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HSC CODES OF PROFESSIONALISM AND CONDUCT

THE UNIVERSITY OF NEW MEXICO HEALTH SCIENCES CENTER



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INTRODUCTION

The University of New Mexico Health Sciences Center (UNM HSC) Community

These Codes of Professionalism and Conduct outline the requirements and expectations for conducting business on behalf of the UNM Health Sciences Center (HSC). The UNM HSC Executive Compliance Committee has approved these Codes and adopted them as policy across all HSC systems. All HSC Members are held to the standards of these Codes. HSC Members include employees, faculty, students and trainees (e.g., interns, post-doctoral fellows on training grants, etc.), volunteers, and vendors. Violating the HSC Codes of Professionalism and Conduct may result in disciplinary action.

Building a Culture of Professionalism begins with understanding HSC's Vision/ Mission and Values.

The UNM HSC Vision

Transform health and health science education and research to improve health and health equity for New Mexico and beyond.

The UNM HSC Mission

We exist to lead New Mexico toward health equity through our unique integration of care delivery, education, discovery and innovation, and through advocacy and collaborations. We celebrate the diverse cultures and history of our state while creating an inclusive and compassionate community that makes UNM Health and Health Sciences an extraordinary place to study, work and serve.

UNM HSC Core Values

- **Healing:** both within individuals and among our communities that cultivates hope, care and joy
- **Equity:** for all New Mexicans in health, education and economic opportunity
- **Excellence:** in health care, education and research and in building a place where people seek to study, work and serve
- **Innovation:** in all aspects of our mission enabling us to rise to the health, workforce and economic challenges of our time
- **Compassion:** in how we treat our patients, students, each other and ourselves
- **Service:** accountable to our diverse communities across New Mexico

Seven Strategic Priorities

- Prioritize Workforce Development, Recruitment and Retention
- Elevate Behavioral Health: Address Mental Health & Substance Misuse
- Enhance Health Equity, including for Rural, Hispanic, Native American and other Underserved Groups
- Expand Impact through Research
- Enhance Access, Quality and Safety of Clinical Care
- Enrich Student Experience, Educational Innovation and Outcomes
- Advance New Mexico's Economic Development in Biosciences and Health Care Services and Technology

Details regarding each of the Strategic Priorities can be found by clicking the following link:

<https://hsc.unm.edu/leadership/strategic-planning.html>

1. PROFESSIONALISM

As representatives of HSC, we strive to promote the highest standards of behavior and moral conduct by adhering to the following Components of Professional Standards. Regardless of title, every HSC Member promotes and abides by these requirements and expectations, both while accomplishing their duties at the HSC and in any activity where they are a representative of the HSC.

I. Professional Obligations

A. **Respect for Persons.** The HSC succeeds only when we foster an environment of respect. All HSC Members must treat patients, coworkers, third parties, and others with a high degree of dignity and courtesy, both in the direct scope of our work and in personal interactions. Maintaining confidentiality of sensitive information is our moral and legal obligation. Respecting others means refraining from discriminatory or retaliatory behavior. For more information, see (Section 1.1). Many community members interact with the HSC in difficult times, especially for those facing medical concerns. During these times, communication, kindness, and patience are vital, and all HSC Members will consistently exercise these qualities and conduct.

Reference: UAP 2240 Respectful Campus - <https://policy.unm.edu/university-policies/2000/2240.html>

B. **Respect for Patient Confidentiality.** HSC Members will share medical information only when necessary to perform their professional obligations. HSC Members will never discuss sensitive information in places where others may overhear the conversation.

Reference: HIPAA - Use and Disclosure of Protected Health Information Policy
[Use and Disclosure of Protected PHI Policy](#)

C. **Honesty.** HSC Members will be truthful in both verbal and written communications. HSC Members must maintain accurate and honest records of patient care and business activities, following proper procedures to correct and amend records and to make late entries in medical records when necessary.

Reference: RPM Section 4.8 Academic Honesty
<https://policy.unm.edu/regents-policies/section-4/4-8.html>

D. **Integrity.** Integrity means strictly following a code or set of values. Every organization has its own written and unwritten rules, along with the common ways of interacting and conducting business, which determine how work gets done. We are committed to reviewing our processes, identifying strategies for improvement, and constantly evolving and adapting to meet the changes in the health care industry. At the HSC, integrity involves adhering to the specific codes of conduct, such as the American Medical Association's Code of Ethics, as well as following the HSC's implied expectations and norms.

Reference: Regents Policy Manual Section 2.18 Guiding Principles
<https://policy.unm.edu/regents-policies/section-2/2-18.html>

E. **Personal Growth and Awareness of Limitations.** HSC Members must be aware of their personal limitations and deficiencies in knowledge and abilities and know when and with whom to speak to for supervision, assistance, or consultation.

F. **Responsibility for Peer Behavior.** HSC Members will take initiative to ensure their colleagues are able to fulfill the requirements of their roles.

G. **Breaches:** HSC Members will report serious breaches of this Code and other important rules and regulations, such as HIPAA and EMTALA to the Health Sciences Center Compliance Office Department.

Reference: UAP 2200 Reporting Suspected Misconduct and Whistleblower Protection Policy
<https://policy.unm.edu/university-policies/2000/2200.html>

II. Professional Ideals

- A. **Conscientiousness.** HSC Members strive to learn from their experiences and grow from this knowledge. HSC Members dedicate themselves to lifelong learning and continuous professional and personal development.
- B. **Cooperation.** The HSC focuses on teaching and learning. It is important for HSC Members to understand the importance of cooperation, share their knowledge to help others, and generously offer their time when assisting or answering questions from patients, coworkers, or others. HSC Members strive to take responsibility for each other and the institution by adopting a spirit of volunteerism and altruism.
- C. **Responsibility to Community.** HSC Members place the highest value the people and communities they serve. Cultivating a foundation of trust and credibility is paramount to them. HSC Members will maintain this trust through integrity, transparency, and a commitment to the well-being of the communities under their care.

Reference: UAP 2100 Sustainability
<https://policy.unm.edu/university-policies/2000/2100.html>

D. **Respect**

Our success depends on how well we work together. By treating all HSC Members with respect, we improve our service to the community. All HSC Members will treat all patients, students, visitors, faculty, and staff with the highest level of respect and dignity.

Reference: UAP 2240 Respect and Diversity Respectful Campus
<https://policy.unm.edu/university-policies/2000/2240.html>

One component of treating people with respect is avoiding discrimination. We live and work in a diverse state and UNM is a diverse institution. We honor, respect, embrace, and value the unique contributions and perspectives of all HSC Members and our local and global communities. Everyone at the HSC, including faculty, staff, visitors, patients, and students will receive equal access and treatment, regardless of race, color, sex, sexual orientation, gender identity, national origin, ancestry, religion, age, spousal affiliation, genetic information, physical or mental disability, or medical condition. We accomplish more together as a team when we include people with diverse backgrounds, talents, and contributions.

Another essential component of treating people with respect is maintaining an environment free from harassment and bullying. The HSC does not tolerate harassment or bullying of any kind. This includes any conduct, whether electronic, physical, nonverbal, verbal, visual, or otherwise, that disrupts another person's work performance or creates an intimidating, offensive, abusive, or hostile work environment.

Reference: Regents Policy Manual- Section 2.3: Equal Opportunity, Affirmative Action, Anti-Harassment and Anti-Retaliation
<https://policy.unm.edu/regents-policies/section-2/2-3.html>

We define harassment as any conduct that negatively impacts an individual's or a group's age, color, disability, gender, gender identity or expression, marital status, military status, national origin, race, religion, sex, sexual orientation, participating in a Civil Rights complaint, use of the federal Family and Medical Leave Act, use of the workers' compensation system or any other status protected by law when:

An individual's submission to or rejection of such conduct is used, either explicitly or implicitly, as a basis for any decision affecting their employment terms, receipt of services, or participation in academic activities; or such conduct unreasonably interferes with an individual's work performance, receipt of services, academic activities, or creates an intimidating, hostile, or offensive environment.

Bullying is defined by the University as sufficiently severe, persistent, or pervasive mistreatment directed at one or more individuals, which a reasonable person would consider to improperly interfere with the individual's (or individuals') work or school performance or participation.

HSC Members must speak up if they see or suspect that anyone is being harassed, bullied, or discriminated against. Supervisors must ensure that employment decisions comply with UNM policy and are based on lawful business reasons.

Reference: <https://policy.unm.edu/university-policies/2000/2240.html>

- E. **Diversity** is fundamental to the HSC's ability to attract and retain top talent, foster innovation and creativity, thrive in a competitive market, maximize our investment in people, and ensure flexibility. Embracing diversity is essential to realize our multifaceted mission and to set an example of integrity, compassion, and leadership in health care, education, research, and community service.

Patients who don't speak English or don't speak it adequately for the purposes of their contact with the HSC, have a right to an interpreter. As healthcare clinicians, we are responsible for making interpreter services available to patients at no cost. Using a hospital interpreter has some significant advantages. For example, some patients may feel uncomfortable discussing sensitive health information in front of a friend or family member. UNMH Interpreter Language Services may be contacted at 505-272-5399.

Reference: UNM Hospital Language Services
[Language Services](#)

- F. **Discrimination.** The HSC complies with Title IX of the Education Amendments of 1972 by prohibiting sex and gender discrimination in education programs, activities, employment, and admissions. We do not tolerate discrimination or harassment on the basis of gender, gender identity, gender expression, or sex, including sexual harassment, sexual misconduct, sexual violence, and retaliation for reporting such concerns. The HSC also prohibits dating violence, domestic violence, sexual assault, and stalking.

Reference UAP 2720 Equal Opportunity and Prohibited Discrimination
<https://policy.unm.edu/university-policies/2000/2720.html>

Reference: UAP 2024 Sex Discrimination Including Sexual Misconduct
<https://policy.unm.edu/university-policies/2000/2740.html>

At the HSC, we are committed to providing a welcoming environment for all members of the community. If someone engages in discriminatory behavior, the first action an HSC Member must do is ask that person to stop, if the situation permits. If the situation does not improve, or the HSC Member does not feel comfortable asking the person to stop, the HSC Member shall speak with their immediate supervisor. If the HSC member is not comfortable speaking to their supervisor, or does not see any improvement, the HSC Member shall contact the Office of Equal Opportunity at 505-277-5251. The Office of Equal Opportunity is located on UNM Main Campus.

1.1. **Doing Business with Others**

Professionalism isn't just about the commitment to do the right thing but the desire to interact with people, vendors, and other third parties or entities who share that commitment.

One way we ensure we interact with good people is through exclusion checks. Exclusion checks help us identify people or entities that have encountered legal issues. Since we want to do business with reputable people and businesses, the UNM HSC conducts exclusion checks before hiring or contracting with any person or vendor, as well as on a monthly basis for the duration of the business relationship.

State and federal governments provide a variety of exclusion lists. The Health Sciences Center Compliance Office checks the exclusion lists from the Office of the Inspector General of the Department of Health and Human Services (OIG) and the General Services Administration (GSA). By checking both lists, we ensure that our faculty, staff, and vendors are not included on any of the exclusion or debarment lists that apply to us.

Reference: HSC Compliance Screening for Individual and Entity Exclusions Policy
[HSC Compliance Screening for Individual and Entity Exclusions](#)

1.2. **Conflict of Interest, Conflict of Commitment, Outside Activities**

As HSC Members, we have certain obligations to the HSC. These obligations help protect the integrity of the organization and its mission.

Reference: UAP 3720 Employee Code of Conduct and Conflicts of Interest
<https://policy.unm.edu/university-policies/3000/3720.html>

A conflict of interest arises when an HSC Member's financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, their professional judgment in exercising any UNM HSC duty or responsibility.

A conflict of commitment occurs when an HSC Member engages in outside activities, whether paid or unpaid, that interfere with or resemble their primary professional obligations and commitments to UNM HSC.

An outside activity refers to any paid or volunteer work undertaken by any HSC Member outside the scope of their employment at UNM HSC. Outside activities may include consulting, participation in civic or charitable organizations, serving as a technical or professional advisor or practitioner, or holding a part-time job with another employer, regardless of whether the work aligns with their primary occupation or is in a different field.

All HSC Members owe a fiduciary duty of loyalty to the HSC. In other words, HSC Members must safeguard HSC resources and to act in the best interest of the HSC. In practice, this means that HSC Members must **not**:

- Use HSC facilities and equipment, including proprietary intellectual property, for purposes other than valid HSC purposes, unless policy explicitly approves or authorizes such use.
- Create the appearance of a conflict of interest, regardless of whether one is actually present.
- Take advantage of business opportunities that the HSC might pursue.
- Use their position at the HSC or knowledge gained through that position for personal profit or to help others profit at expense of the HSC.
- Use their position to obtain personal profit by engaging in activities that conflict with the interests of the HSC.
- Accept outside or dual employment or compensation that could reasonably impair their judgement in performing their duties at the HSC.

1.3. **Mandatory Training**

All HSC Members are required to complete all assigned mandatory trainings by the end of each calendar year. These trainings are essential to ensure alignment with organizational standards, state and federal regulations, and to support a safe, informed, and effective work environment. All trainings are available in the Learning Central system at the beginning of each calendar year.

Reference: UAP 3290: Professional Development and Training
<https://policy.unm.edu/university-policies/3000/3290.html>

1.4. **Employee Privacy**

As HSC Members, we are responsible for protecting the personal information of our colleagues. That means that those of us with access to employee's personal information must be diligent in safeguarding that information.

Reference UAP 3710: Personnel Information Disclosure Policy
<https://policy.unm.edu/university-policies/3000/3710.html>

All HSC Members will access, use, and disclose HSC information only for legitimate business purposes. HSC Members must not share, sell, or post their colleagues' personal information, including on personal social media, email, or "cloud" storage accounts. If an HSC Member witnesses or suspects unauthorized use or disclosure of this restricted information, they must report it to their supervisor and the UNM Health Sciences Center Privacy Office at 505.272.1493 or HSC-Privacy@salud.unm.edu.

Reference: HIPAA - Use and Disclosure of Protected Health Information Policy
[Use and Disclosure of PHI](#)

Reference: HIPAA - Responding to Breaches of Protected Health Information (PHI) Policy
[Responding to Breaches of PHI](#)

Reference: HIPAA - Right to Access of Protected Health Information by the Patient Policy
[Right to Access of PHI by the Patient](#)

Reference: HIPAA - Right to Request to Amend Designated Record Set Policy
[Right to Request to Amend Designated Record Set](#)

1.5. Patient Privacy

One of the HSC's most valuable assets is information. All HSC Members must follow policies and laws related to confidentiality, including HIPAA. HSC members must remain attentive and safeguard all protected information, including the confidential information of patients and families that is entrusted to the HSC.

HSC members may only access, use, and disclose protected patient information while fulfilling their responsibilities within the scope of their employment with the HSC. When accessing, maintaining, sharing, storing, or transmitting electronic data, HSC Members must always use encrypted HSC-owned or –approved systems and storage devices, as well as HSC or HSC-approved email systems. HSC members will avoid discussing restricted patient information in public areas.

For any questions about the Privacy Rule in the Health Insurance Portability and Accountability Act (HIPAA), please contact the Privacy Office at 505-272-1493. To ask anonymous questions or report a HIPAA Privacy concern anonymously, call the Compliance Hotline at 1-888-899-6092.

Reference: HSC Information Security Program Plan
[HSC Information Security Program Plan](#)

1.6. Social Media

At the HSC, we understand that social media provides people with many opportunities to connect with friends, family, and colleagues. However, the use of social media also presents risks and carries with it certain responsibilities.

Ultimately, HSC Members are solely responsible for what they post online. Before creating online content, consider some of the risks involved. Although social media is personal in nature, it is not private. That means that personal communications, such as posts or tweets, might be seen by people who were not necessarily intended to have seen them.

As HSC Members, we have the responsibility to be professional at work and online. Here are some tips:

- Think before posting. If the content would not be appropriate for supervisors or family members to see, it shall not be posted.
- Maintain privacy. Many social media sites give users some control over who can see posts. Take advantage of such filters when appropriate
- Be honest about identity. Assure your online identity is yours, not someone else's.
- Include a disclaimer. Unless an HSC Member is posting about the HSC as part of their job, they shall make sure readers know that they are not representing UNM or the HSC.

- Protect patient privacy. In order to protect the privacy of our patients, HSC Members must never post information about patients on social networking sites.

Social Media can change quickly. Always keep in mind that all HSC Members are representatives of the HSC, and that conduct outside the workplace can affect perceptions of the University. Any conduct that adversely affects work or school performance, or otherwise adversely affects others or HSC's legitimate business interests, may result in disciplinary action up to and including termination or expulsion.

A common question raised in the context of the HSC's work is whether a clinician's relationship with patients should be reflected over social media. Often, patients search clinicians on social media platforms like Facebook and send a friend request. While this gesture is a testament to their appreciation of the clinician's interactions with the patient, the relationship is of a professional nature. A clinician's relationship with patients shall be businesslike, and "friending" on Facebook may compromise the clinician's ability to conduct themselves professionally. In order to maintain a proper clinician-patient relationship, HSC clinicians shall only make social media connections with patients when the clinician knows the patient in another context.

Reference: <https://hsc.unm.edu/about/marketing-communications/social-media.html>

1.7. Gifts and Entertainment

Offering or accepting personal gifts or entertainment can influence our decisions or the decisions of others. Accepting either may create a conflict of interest and, in some cases, may violate federal or state laws. The appropriateness of offering or accepting gifts and entertainment depends on the specific circumstances and the individuals involved. Please refer to the linked matrix below for specific information regarding gifts and entertainment:

Reference: UAP 1030 Gifts to the University Policy

<https://policy.unm.edu/university-policies/1000/1030.html>

1.8. Political Activities

The HSC recognizes the important role that political involvement plays for many of our HSC Members as they participate in the broader community. The HSC supports the right of HSC Members to engage in civic and community activities. It is also vital to clearly distinguish between personal political activities and those undertaken on behalf of the HSC. The following policies outline the responsibilities of UNM employees and faculty regarding political activities:

University Administrative Policy 2060 – Political Activity

<https://policy.unm.edu/university-policies/2000/2060.html>

Regents' Policy Manual Section 6.5 – Political Activity by Employees

<https://policy.unm.edu/regents-policies/section-6/6-5.html>

Faculty Handbook Section C150 – Political Activities of UNM Faculty

<https://handbook.unm.edu/c150/>

Reference: Health Sciences Participating in Peaceful Protests

[Participating in Peaceful Protests](#)

1.9. Media Relations

The Office of Public Affairs serves as the spokesperson for the University and responds to media inquiries and interview request. If an HSC Member is contacted by a media representative, they must refer the inquiry to the Office of Public Affairs for assistance. After hours, the UNM Hospital switchboard can page the Public Affairs on call representative.

Reference: Media Relations Policy

[HSC Media Relations Policy](#)

1.10. Reporting Concerns

One can address and report compliance concerns in several ways:

- In most cases, your supervisor should be your first point of contact. They are likely in the best position to understand your concern or question and take appropriate action. If this isn't practical - your supervisor cannot answer your question, if you have already shared a concern and believe it has not been addressed, or if you prefer to share the information with someone else – you may report your observations to an administrator, senior leader, UNM Health Sciences Center Compliance Office, or the Compliance Hotline.
- Call the UNM Health Sciences Center Compliance Office at (505) 272-7371.
- Email your questions or concerns to HSC-compliance@salud.unm.edu or HSC-privacy@salud.unm.edu. Call the Compliance Hotline at 1-888-899-6092, 24/7, or access the portal online. The Compliance Hotline also known as Ethics Point, is operated by an outside vendor and allows for anonymous complaints and questions. HSC Members should be aware that anonymous reports can take longer to investigate. To ensure a quick investigation, callers should provide as much information as possible in their reports.

Reference: <https://secure.ethicspoint.com/domain/media/en/gui/42682/index.html>

Reference: UAP 2200 Reporting Suspected Misconduct and Whistleblower Protection from Retaliation
<https://policy.unm.edu/university-policies/2000/2200.html>

Reference: UAP 3220 Ombuds Services
<https://policy.unm.edu/university-policies/3000/3220.html>

1.11. Non-Retaliation

The HSC is committed to providing a work environment that encourages open communication. Regardless of the type of alleged or actual wrongdoing reported, the HSC will not tolerate retaliation against anyone who reports a concern in good faith. Good faith means reporting a concern with honest and sincere intention. All HSC Members who raise concerns or ask questions in good faith are protected from retaliation under Policy 2200, as well as by state and federal law.

Reference: University Administrative Policy 2200: Reporting Suspected Misconduct and Whistleblower Protection from Retaliation
<https://policy.unm.edu/university-policies/2000/2200.html>

NMSA Chapter 28 – Human Rights

<https://law.justia.com/codes/new-mexico/chapter-10/article-16c/>

If an HSC Member is concerned about retaliatory behavior, they shall contact the Health Sciences Center Compliance Office, the Compliance Hotline at 1-888-899-6092, 24/7, or the UNM Ethics Point web portal. The HSC Member does not need to be certain that retaliation has actually occurred to make a report.

1.12. Maintaining Health and Safety

The HSC is committed to providing a healthy and safe workplace. We must remain alert to health and safety risks as we perform our jobs and speak up whenever we see a potential hazard. The UNM Environmental Health and Safety website, <https://ehs.unm.edu/index.html>, offers detailed information and resources for preserving health and safety and for reporting concerns.

Reference: UAP 6110 Environmental Health and Safety
<https://policy.unm.edu/university-policies/6000/6110.html>

If an HSC Member witnesses illegal or suspicious activity occurring at any Health Sciences building, location, or campus, they must notify UNM PD. If they witness a crime being committed that involves anyone being physically assaulted, especially a child, they must call UNM PD immediately and notify their supervisor.

2. PATIENT CARE

2.1. Treating Patients with Respect

Our patients come from many different backgrounds, and the HSC must ensure patient receives respectful treatment. We will not deny treatment to any patient based on race, national origin, religion, gender or gender identity, sexual orientation, marital status, age, disability, or source of payment.

Under the federal Emergency Medical Treatment and Active Labor Act (EMTALA), our clinicians must provide necessary emergency medical services to everyone, regardless of their ability to pay. We prioritize the order in which we treat patients depending on the severity of their condition, never on their ability to pay for medical services. A patient's ability to pay will not be a factor in deciding whether they are seen.

Reference: UNM Hospital Emergency Medical Treatment & Labor Act Policy
[Emergency Medical Treatment & Labor Act \(EMTALA\)](#)

2.2. Patients Have a Right to Make Decisions about their Care

One of our duties to our patients is to ensure that, if they are capable, they participate in making decisions about their own care. At the HSC, we involve our patients in decision-making and given adequate information to make those decisions.

We give ongoing explanations to patients about their condition and treatments. We provide discharge instructions when patients depart. Many conditions come with educational material that we can be print out and give to patients at discharge. Hospital units and most clinics have staff that can assist with decisions regarding transitions of care. Patients can also request a copy of their medical records by contacting the Health Information Management Department (HIM) at 505-272-2111, or view them electronically through the Patient Portal.

Reference: UNM Hospitals HR 345 Staff Requests on Patient Care Conflicts
[Staff Requests on Patient Care Conflicts Policy](#)

2.3. Patient Advocacy

Being a patient can be confusing and scary. Patient Advocates help patients access the services they need to navigate their healthcare. At the HSC, we commit to assisting our patients throughout the process of receiving care from us.

At UNM Hospitals, a patient advocate can be reached either by requesting to speak with an advocate, by going to the administration reception area on the first floor, or by calling (505) 272-2121.

2.4. Discharge Planning

At the HSC, we understand that what happens to a patient after they leave our care in the hospital is as important as what happens while under our care. Therefore, our Care Management team starts developing the safest transition plan for the patient upon admission.

If patients have concerns about their discharge, they can ask their nurse or doctor to notify the unit's case manager. A nurse or social worker will come to the room and speak with the patient and/or family.

Reference: UNM Hospital Discharge Planning
[Discharge Planning](#)

2.5. Care Management Services

The Care Management department helps patients with discharge planning, community resources and referrals, financial assistance resources, and ensuring that payer sources have all the necessary information to authorize care or medical equipment.

Case managers are available at UNM Hospital and in all the primary care clinics, screening patients in these locations for potential needs. Indications may include advanced age, unsatisfactory living situations, complicated or life altering diseases or injuries, or other stresses faced by the patient or family. Physicians, nurses, or other healthcare workers may refer patients to a case manager, and patients or families may also request one.

Case managers facilitate transfers to other facilities, such as skilled nursing or rehabilitation centers, and guide patients to appropriate assistance programs. If a patient is interested in contacting a case manager, clinicians should reach out to the UNM Hospitals patient advocate coordinator at (505) 272-2121.

Reference: UNM Hospital Care Management and applying for Institutional Medicaid [Care Management and Medicaid](#)

2.6. Special Considerations Regarding Children

The HSC is committed to protecting children. When an HSC Member encounters a child whom they suspect is abused or neglected, including medical neglect, they have a legal and ethical duty to report their suspicion to the police or the Children, Youth, and Families Department (CYFD). HSC Members must also ensure that any potentially abused, neglected, or potentially mistreated child receives an evaluation from either the Child Abuse Response Team (C.A.R.T.) or Para los Niños in cases of suspected sexual abuse to ensure a proper assessment and medical diagnosis.

All HSC Members have an absolute legal and ethical duty to protect the child when they reasonably suspect abuse or neglect. Clinicians must call CYFD Statewide Central Intake at #SAFE from a cell phone or (505) 841-6100 to report their suspicions, fill out a Child Abuse Documentation form in the electronic medical record, and submit an ad hoc consult request to C.A.R.T. via Powerchart.

HSC Members who see a child being hurt on our campus must call UNM PD immediately at 505-277-2241 (or 911 from a Campus phone) and report the incident and notify their supervisor.

Reference: UAP 2205 Minors on Campus <https://policy.unm.edu/university-policies/2000/2205.html>

Reference: UNM Medical Group, Mandatory Reporting of Child Abuse and Neglect [Mandatory Reporting of Child Abuse](#)

Reference: UNM Hospital :Child Abuse Neglect and Exploitation Mandatory Reporting [Child Abuse and Exploitation Mandatory Reporting](#)

Medical neglect is a form of child abuse and neglect, and the law requires HSC Members to report their suspicions. HSC Members should call CYFD Statewide Central Intake at #SAFE from a cell phone or (505) 841-6100 to report any suspicion. Additionally, HSC Members must fill out a Child Abuse Documentation form in the EMR and complete an ad hoc request for C.A.R.T. via Powerchart. CYFD can often provide services to families struggling with a sick child and the socioeconomic pressures that can arise from such an illness.

3. MEDICAL DOCUMENTATION AND BILLING

Healthcare professionals are entering one of the most dramatic and rapidly changing eras in history. More health care outcomes and quality measures will be demonstrated through coded data derived from medical record documentation. Coding staff must abide by professional values, ethical principles, regulatory standards, and official coding conventions, rules, and guidelines when involved in diagnostic and procedural coding or other health record data abstraction. They must apply consistent coding practices to produce high-quality healthcare data as reflected in the medical record documentation for each encounter or visit.

Changes in the Prospective Payment Systems and quality outcome measures rely on improved documentation, data integrity, and consistent medical coding to accurately reflect the complexity of care and severity of illness of our patients. The documentation principles of accuracy, completeness, and timeliness are crucial to demonstrating to our patients and all third-party entities that UNM HSC provides high-quality and efficient patient care. Coding serves multiple purposes beyond financial and billing needs, including administrative uses, population health, public data reporting, research, and quality and patient safety measurement.

The Health Information Management (HIM) Department at UNM HSC hospitals ensures documentation compliance with regulatory standards, including Medicare Conditions of Participation, Joint Commission Standards for accreditation, Medical Staff Bylaws, Rules and Regulations, and various New Mexico State documentation requirements. Accurate, timely and complete documentation for each patient encounter not only meets compliance standards but also serves the best interests of our patients.

In accordance with the Cures Act, patients have the right to electronically access their health information. They can exercise their patient rights by accessing their personal medical records through the Patient Portal within our Electronic Medical Record (EMR).

Patients can view key documents and test results, and are encouraged to ask questions regarding the accuracy, timeliness, and completeness of the data from each encounter or visit.

3.1. Accurate Medical Documentation

Clinicians and medical staff have a professional and legal duty to document all patient encounters completely, accurately, and in a timely manner. Complete and accurate documentation is not only integral to the practice of medicine but is also a key factor in delivering better health care.

Reference: Documentation of Clinical Activities by UNM Hospitals Medical Staff and House Staff
[Documentation of Clinical Activities Policy](#)

Here are some benefits of thorough and accurate documentation:

- Supports diagnosis and justifies treatment
- Improves continuity of care by providing essential information to other healthcare professionals
- Ensures high-quality care and assists in organizational quality initiatives
- Protects clinicians and the organization from medical malpractice liability
- Facilitates appropriate payment for services rendered

Accurate and complete medical documentation helps prevent violations of the False Claims Act. Billing the government for services not provided constitutes a violation of the False Claims Act, leading to serious financial penalties. These penalties can include damages up to three times the amount paid, along with fines. All employees must comply with CMS regulations. For any questions about proper documentation, please contact the Compliance Trainer in the Health Sciences Center Compliance Office at (505) 272-0035.

Timely completion of documentation is crucial. First, timely documentation is more likely to be accurate, making it more useful for patient care and quality initiatives. Second, delays in completing a record may result in the inability to bill for the services provided. Incomplete records can impact accreditation, state licensure, violate medical staff rules, or negatively affect medical legal actions.

In short, documentation that is complete, accurate, and submitted on time benefits HSC Members, patients, and all HSC entities.

3.2. Referrals

When we refer patients to other clinicians, we must base our decisions on medical judgment, not on business or family relationships. It is essential we pay careful attention to the referrals we make. Some referrals, such as those involving close family members or certain business arrangements, can pose risks to our patients.

Reference: UNM Hospital Standardization of Referrals: Skilled Nursing, Rehabilitation, and Long-Term Care Facilities Guideline
[Standardization of Referrals](#)

Referring patients to close family members may violate federal law. The Stark Laws prohibit “self- referrals” which are referrals to healthcare clinicians where the HSC Member or a close family member has a significant financial interest. These laws also prohibit payments of any kind in exchange for referrals. For example, providing a discount on office space in exchange for referrals would likely violate the statute.

A Note about Exceptions and Safe Harbors:

The Stark Law and Anti-Kickback Statute can be confusing because of the large number of exceptions or safe harbors associated with them. This area of law is highly technical and requires careful attention to detail. Please contact the Health Sciences Center Compliance Office at (505) 272-7371, or HSC-compliance@salud.unm.edu.

Reference: UNM Hospital Safe Harbor for Nurses Policy
[Safe Harbor for Nurses](#)

3.3. Medical Necessity

The HSC is committed to billing only for services that are medically necessary. However, the term “medical necessity” often means different things to different professionals, making communication about it challenging.

Reference: UNM Hospitals Utilization Management Policy
[Utilization Management Policy](#)

“Medical necessity” is not determined on a case-by-case basis and is not the same as “medical judgment.” Instead, it refers to what a payer, such as Medicare or a private insurer, will pay for.

Payers define “medical necessity” based on what benefits populations of patients, not what benefits individual patients. As a result, a treatment that may benefit an individual patient is not always considered “medically necessary.”

To provide context for government payers, the Center for Medicare and Medicaid Services (CMS) states: “No payment shall be made for items or services that are not reasonable and necessary for diagnosis or treatment of illness or injury.” CMS determines whether an item or service meets the definition of “medically necessary.”

If you have questions about whether a treatment is considered “medically necessary” for billing and payment, please contact the Compliance Trainer in the Health Sciences Center Compliance Office at 505-272-0035.

3.4. Financial Assistance

As part of our responsibility to our community, the HSC provides financial assistance to patients who demonstrate an inability to pay, in accordance with policy.

We are committed to ensuring patients receive the care they need, regardless of their ability to pay. Clinicians should refer patients with financial assistance questions to Patient Financial Services at (505) 272-2521, who will determine eligibility for assistance.

Having a close, personal relationship with a patient does not change a clinician's legal and financial obligations. Even if a patient is a close friend, clinicians must still document each patient encounter completely and accurately and bill accordingly.

Reference: UNM Hospital Financial Assistance Program
[Financial Assistance Program](#)

4. RESEARCH

The University of New Mexico HSC conducts a broad range of biomedical research aimed at reducing disease burdens and improving quality of life. Our research focuses on developing new treatments, devices, and cures that often require very detailed studies to ensure safety and effectiveness. To maintain public trust and accountability, we adhere to the highest ethical standards and compliance in all research activities, while prioritizing the safety and security of our students, researchers, faculty and staff, and the broader community. Modern biomedical research often involves various resources, including animals, human subjects, and potentially hazardous materials.

Our research compliance units within the Office of Research provide detailed training and continuous oversight of these resources to ensure responsible research practices. For studies involving human participants, we focus on ethical study designs, confidentiality of personal health information, and strict adherence to informed consent.

The Office of Research actively oversees adherence to all guidelines set forth by government entities. We also take additional, proactive measures to safeguard our research integrity, the environment, and our people. We encourage continuous quality improvement and maintain secure measures are in place to protect those who, in an effort to assist us in upholding the highest standards in our research, report potentially unethical or irresponsible behaviors. We believe that the lasting impact of our research on healthcare depends on our dedication to the responsible conduct of research and the trust and support of the citizens we serve.

For more information, please read the detailed descriptions below or visit our website:
<https://hsc.unm.edu/research/>.

4.1. Protection of Human Subjects in Research

Thanks to research on human subjects, we now have treatments or cures for diseases and conditions that were untreatable. At the HSC, we conduct valuable research that advances the health sciences. Occasionally, our scientists need to recruit human subjects for studies to conduct this valuable research related to a disease or condition.

The HSC prioritizes the well-being of our research participants and their families. We engage all human research participants and/or their appropriate representatives in a meaningful informed consent process.

Our human subjects do us a great service. We offer them the highest standards of ethical and safe care while they participate in studies at the HSC. The Human Research Protections Office (HRPO) promotes the safety and protection of individuals involved in human research by providing support, guidance, and education to facilitate ethical and scientifically sound research. The HRPO offers free consultations to all researchers considering the use of human subjects or identifiable private data. You can reach the HRPO at (505) 272-1129, or at HRPO@salud.unm.edu.

The Human Research Review Committee (HRRC) serves as an Institutional Review Board that reviews human subject research projects for compliance with federal regulations. Biomedical and behavioral research involving human subjects to be conducted at or sponsored by UNM, or those conducted by or under the direction of a UNM faculty, staff, or student, or that use any confidential patient information, cannot commence until it has been reviewed and approved by the HRRC.

The HRRC Submission Guide is available at <https://hsc.unm.edu/research/hrpo/common/pdf/hrrcsubguide.pdf>.

Reference: Human Subject Research
<https://hsc.unm.edu/research/compliance/hrpo/>

4.2. Use of Animals in Research

At the HSC, we recognize that using animals in research is a privilege that must be taken seriously. Unlike human subjects, animal subjects cannot consent for themselves. Because of that, we put protections in place to ensure the animals involved in research at the HSC are given the care and respect they deserve.

The Office of Animal Care Compliance (OACC) is tasked with administering the mandated procedural protections to ensure that animals used in research experience the least pain and undue stress.

All UNM-affiliated personnel must have an approved animal care and use protocol to conduct research (including field observations) using live, vertebrate animals (amphibians, birds, fish, mammals, or reptiles) or vertebrate animal tissue (including blood). The OACC provides assistance with protocol submission and using the electronic database management system.

The Institutional Animal Care and Use Committee (IACUC) is a Committee comprises at least five members, including a veterinarian with laboratory experience and program responsibilities, a scientist experienced in laboratory animal research, a non-scientist, and a community member. This Committee is responsible for overseeing the animal care and use program and reviews and approves or disproves research proposals involving animals.

The HSC has its own IACUC. Anyone who has concerns about the treatment or use of animals or who witnesses improper or unapproved animal care or use procedures must report their concerns to the anonymous Compliance Hotline or the Vice Chancellor for Research Health Sciences Center, at (505) 272-6950.

Reference: Office of Animal Care Compliance
<https://hsc.unm.edu/research/compliance/oacc.html>

4.3. Conflicts of Interest in Research

The Conflicts of Interest (COI) Office assists investigators at the HSC maintain integrity by ensuring they meet their ethical and legal obligations to disclose financial interests with proposals and protocols submitted for funding and/or compliance review. A conflict of interest arises when there is a risk that one's actions or decisions about a primary responsibility such as patient care, teaching, or research could be influenced by potential personal financial gain or considerations that favor the interests or family, friends, or colleagues to the disadvantage of others.

Research has the capacity to impact many people, and entities like pharmaceutical companies or medical device manufacturers may profit significantly depending on the outcome of the research. When an HSC researcher has financial relationships that could influence the outcome, there is a risk that the research may be compromised. The Conflicts of Interest Office implements that ensure the quality of the research is not affected by financial relationships.

The HSC Conflicts of Interest Committee evaluates whether an investigator's interests could significantly affect or bias the design, conduct, or reporting of UNM research. If the Committee identifies a potential conflict of interest, it works to develop a management strategy.

Any individual responsible for the design, conduct, or reporting of HSC research must complete a disclosure form. This requirement applies to faculty, staff, students, and non-UNM collaborators (e.g., consultants, contractors, or subaward recipients). The form is included in submissions to the PreAward, Human Research Protections, and Research Allocation Committee offices, and to the Office of Animal Care Compliance, if not previously submitted to the PreAward office for the same protocol.

The HSC Conflicts of Interest Office can be reached at (505) 272-6433. A guidance document regarding conflicts of interests at the HSC is available at <https://hsc.unm.edu/research/coi/>.

Reference: HSC Conflicts of Interests and Commitment Office
<https://hsc.unm.edu/research/compliance/coi/>

4.4. Foreign Influence and International Activities

The HSC actively fosters international collaborations through our research initiatives and the contributions of our global students and faculty scholars. These partnerships enrich our culture and are essential components to providing the highest quality education, research, and patient care.

Concerns about foreign influence and international activities in federally funded research has been an evolving topic, with increasing attention from the U.S. Government (e.g., National Institutes of Health). These concerns include:

- Diversion of intellectual property to foreign entities;
- Disclosure of confidential grant application information by NIH peer reviewers to third parties;
- Failure of researchers to disclose research resources and support provided by other organizations, including foreign entities.

Given the increased national focus on these areas, we want to remind researchers and their staff of their obligations to report on international research and scholarly activities.

While most international collaborations are typically not problematic and are encouraged, researchers must be transparent and disclose their involvement in their activities. Disclosures should include current and pending support, resources, and all academic, professional, scientific, or institutional appointments, employment, research oversight, teaching, or student advisory activities, whether foreign or domestic.

Researchers must disclose foreign components proposals, progress reports, and final technical reports. NIH's Grants Policy Statement defines a foreign component as "any significant scientific element or segment of a project outside of the United States" regardless of whether NIH grant funds are used. This can involve a researcher or recipient in a foreign location or a researcher employed or paid by a foreign organization. For more information, refer to NIH issued guidance: [NOT-OD-19-114](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html) (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html>) for additional details.

Researchers are responsible for ensuring all reporting requirements are complete and accurate. Principal Investigators (PIs) must review all pending federal proposals and active awards to verify that all necessary disclosures have been made.

Reference: Reporting of Foreign Components and Other Support

<https://hsc.unm.edu/research/compliance/rofc.html>

4.5. Research Involving Biohazardous Materials and Recombinant or Synthetic Nucleic Acid Molecules

Scientists at the HSC engage in research aimed at finding new treatments, therapies, and cures for human diseases. This requires they use biohazardous materials to conduct research, at times. Biohazard Compliance (BHC) ensures the safety of the HSC community and the public by ensuring all biohazardous materials are secured in laboratories and handled properly to prevent accidental exposures and enforcing appropriate methods of disposal.

Before HSC Scientists conduct experiments with microorganisms, biological toxins and recombinant or synthetic nucleic acid molecules, investigators must conduct a risk assessment. When any proposed experimental assessment has disease-causing risk potential or is subject to the NIH Guidelines, the Principle Investigator (PI) must obtain approval from the Institutional Biosafety Committee (IBC) before initiating experiments.

The safety of UNM faculty, staff, students, and members of the surrounding community is a top priority. Ensuring research involving the use of these materials is safe is just one of the many ways in which UNM serves the community. BHC implements processes and controls to guarantee these materials are handled safely and according to best practices.

UNM's IBC is registered with the NIH Office of Science Policy (OSP) and supports both the HSC and Central Campus. The scope of this committee includes the use of Risk Group 2 & 3 biological agents, select agents, toxins, and experiments subject to the NIH Guidelines. IBC membership includes the University Biosafety Officer, who serves as the UNM biosafety containment specialist, and over a dozen UNM scientists with expertise in areas of medical research such as infectious disease, animal research, infection control, molecular biology, and other areas. Community members unaffiliated with UNM also serve on the committee. IBC members meet quarterly to critically review and discuss each PI's proposal, determining if enough safety barriers are built into the experimental plans before the research can proceed.

The Biohazard Compliance Office can be reached at (505) 272-8001 or (505) 272-5993.

<https://hsc.unm.edu/research/compliance/biosafety/>

Reference: Biosafety (Biohazard Compliance)

<https://hsc.unm.edu/research/compliance/biosafety/>

4.6. Ethical Business Practices in Research

When an HSC Member accepts grant money to conduct research, they agree to use those funds according to specific rules. It is crucial to understand and follow these rules. If the HSC Member does not follow the rules, there can be serious consequences for the HSC Member, their research, and the HSC.

The HSC will comply with all applicable laws and regulations governing the receipt and disbursement of sponsored funds and will adhere to all grant and contract obligations of the University, including true, accurate, and allowable costs.

Costs charged to grants must be allowable. For many grants, expenses like office supplies and administrative support are not allowable, even though they might be used to perform work associated with the grant.

Reference: Research Integrity Oversight

<https://hsc.unm.edu/research/compliance/rio.html>

5. ACADEMIC

Established in 1994, the University of New Mexico HSC is the largest academic health complex in the state. The UNM HSC trains more than 1500 students each year in twenty-one different fields.

5.1. Code of Student Conduct

All students are required to abide by the UNM Student Code of Conduct, which applies to both full-time and part-time students pursuing undergraduate, graduate, or professional studies.

The policy can be found at: <https://pathfinder.unm.edu/code-of-conduct.html>.

Each of us represents the HSC to students, patients, and our community. They place their trust with our continued commitment to integrity, quality care, and our commitment to excellence.

Remember that we are a team and the resources mentioned throughout this Code are available to help. If you have any questions about a specific topic or issue, please submit your questions to the Health Sciences Center Compliance Office email at HSC-Compliance@salud.unm.edu or contact us at (505) 272-7331.

APPENDIX

POLICIES

HSC Policies: <http://hsc.unm.edu/policyoffice/>

The purpose of this site is to provide easy, online access to all policies that fall under HSC. Policies posted under the HSC Policies tab are policies that apply to all HSC Members, regardless of department, unit, clinic, college, or facility affiliation.


Regents' Policy Manual: <https://policy.unm.edu/regents-policies/index.html>

Exercising powers granted under state law, the Board of Regents of the University of New Mexico adopted a body of policies for the governance of the University. The policies, which are published as the Regents' Policy Manual, provide the framework and authority for the University's administrative policies.

University Administrative Policies and Procedures Manual: <https://policy.unm.edu/university-policies/index.html>

The University Administrative Policies and Procedures Manual policies align operations across the University, define roles and responsibilities, and implement the policies in the Regents' Policy Manual. The policies include any institutional procedures necessary for a comprehensive understanding of the policies' intent and application. Before new and amended policies are issued, they must be approved in writing by the University President.

DOCUMENT INFORMATION

APPROVAL and Information			
Item	Contact Information	Date	Approved/ Reviewed
Document Owner	Angela Vigil, MBA, CHC, Compliance Officer – UNM Health Sciences Center Compliance Office angmvigil@salud.unm.edu		
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09/23/2020 Document Creation	New	HSC Institutional Compliance Program Codes of Professionalism and Conduct	Original	Executive Compliance Committee
09/23/2022	New	HSC Institutional Compliance Program Codes of Professionalism and Conduct	Minor edits only. Effective date of 09/23/2020 remains unchanged.	
Reviewed 11/13/2024 Effective date 09/23/2024 remains unchanged.	New	HSC Codes of Professionalism and Conduct	Updated many of the sections, by adding relevant documents links throughout. Effective date of 09/23/2024 remains unchanged.	
Review complete in May 2025. New Effective Date: 08/27/2025	Revision 1	HSC Codes of Professionalism and Conduct	Document changes and updates finalized. Created active links to all referenced documents and websites. Added one new requirement: 1.3 Mandatory Training. Effective date updated to reflect Revision 1.	Michael Richards, MD, Executive Vice President, UNM Health Sciences and CEO UNM Health System