



Lobos,

As we head into the fall semester, we will be sending out a few emails with a range of updates and information that our researchers need to be aware of as we begin the 2026-2027 academic year. In this first email, we are focusing on various compliance updates from several agencies. Note that the Council on Government Relations (COGR) has a monthly newsletter; the [July issue](#) provides summaries of many of these new regulations.

Department of Energy (DOE)

- The DOE has [finalized new regulations](#) regarding Conflicts of Interest (COI), Conflicts of Commitment (COC), and Organizational Conflicts of Interest (OCI), effective **Aug. 17**. The [July COGR newsletter](#) has a thorough summary of the changes going into effect in a couple of weeks (see p. 22). One of the most significant changes for PIs is that the new DOE COI Rule requires review and evaluation for management prior to an application for funding. Thus, all personnel associated with DOE proposals will need to submit their COI disclosures well in advance of proposal submission. We will be communicating more about these changes and how UNM plans to address them in the coming days.

National Science Foundation (NSF)

- The NSF has published a notification to the research community of a forthcoming [policy prohibiting NSF funds](#) from being expended on collaborations with entities on U.S. restricted parties lists. Effective **Oct. 1**, this policy will require Authorized Organizational Representatives (AORs) and senior/key personnel to certify at the time of proposal submission. Further, organizations will be responsible for ensuring that senior/key personnel are aware of and comply with this prohibition and for identifying and addressing prohibited activities before NSF funds are expended.
- NSF intends to implement this prohibition in FY2027 along with the effective date of the new [Draft Guidance on Financial Assistance](#), formerly known as the Proposal & Award Policies & Procedures Guide (PAPPG). We encourage researchers interested in pursuing NSF funding to read this draft guidance as it incorporates changes proposed by the Office of Management and Budget (OMB), including many changes to allowable costs such as [academic publishing costs](#).
- CoGR has recently published this [guide](#) to help researchers navigate some of the changes associated with disclosures and authorship on publications.

National Institutes of Health (NIH)

- A [new NIH notice \(NOT-OD-26-100\) on forms changes](#) describes an updated Data Management and Sharing (DMS) Plan format. All existing awards and applications subject to the DMS policy will transition to the new plan beginning in FY2027. Active awards will need to provide a revised DMS plan in their next RPRR.
- NIH issued a notice that it will be replacing Letters of Support with Letters of Collaboration to reduce administrative burden ([NOT-OD-26-094](#)), with the implementation of Forms J later in FY27. This requirement will align with the format



currently used by NSF, namely letters of collaboration. NIH will provide more guidance prior to the implementation.

Department of Defense (DOD)

- Cybersecurity Maturity Model Certification (CMMC) [Phase 2 implementation](#), set to go in effect this November, has been paused at least temporarily. CMMC requires DOD contractors handling Federal Contract Information (FCI) or Controlled Unclassified Information (CUI) to complete assessment and submit their scores. Again, the [July COGR Newsletter](#) has summarized this pause as well as a link to a Request for Information (see p. 11).

As always, feel free to reach out to your research compliance office as well as your sponsored projects office with any questions you may have. For any questions related to research security, please reach out to Mikell Coleman at industrial.security@unm.edu.

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