



September 30, 2026

To: Tammy Born Huizenga
Senior Advisor, Agency for Healthcare Research and Quality
Department of Health and Human Services

From: Roger Klein ROGER D. KLEIN Digitally signed by ROGER D. KLEIN -S
Date: 2026.09.30 21:31:45 -04'00'
Director, Agency for Healthcare Research and Quality
Department of Health and Human Services

Subject: Limited Conflicts of Interest Waiver for Tammy Born Huizenga under Title 18,
Section 208(b)(1) of the United States Code

The purpose of this memorandum is to grant you a limited waiver of the conflicts of interest law, 18 U.S.C. § 208(a).¹ The need for a waiver is discussed in detail below and is based on full disclosure of your financial interests and the nature and circumstances of matters in which you may be involved as Senior Advisor for Nutrition and Women's Health in the Agency for Healthcare Research and Quality (AHRQ) at the Department of Health and Human Services (HHS or the Department). Without a waiver, you will be prohibited from fully engaging in a significant portion of the work in support of the initiatives you have been brought to HHS to do. The Ethics Division of the Office of the General Counsel has advised you on your recusal obligations.

As an Executive Branch employee, you are subject to the conflicts of interest statute, 18 U.S.C. § 208(a). This statute prohibits an employee from participating personally and substantially in an official capacity in any particular matter in which the employee has a personal or imputed financial interest if the particular matter will have a direct and predictable effect on that interest. The financial interests of an employee's spouse are imputed to the employee. Accordingly, in addition to being prohibited from personally and substantially participating in any particular matter that will have a direct and predictable effect on your personal financial interests, you also are prohibited from personally and substantially participating in any particular matter that will have a direct and predictable effect on the financial interests of your spouse. Pursuant to the authority of 18 U.S.C. 208(b)(1), which has been delegated by the Secretary to me as the AHRQ Director, I may grant a waiver of the statutory prohibition of your involvement in particular matters that may affect those interests upon a determination that the disqualifying financial

¹ A waiver was previously issued to you by the HHS Assistant Secretary for Health in connection with your service as a Senior Advisor in the Office of the Assistant Secretary for Health (OASH), based on the duties and responsibilities associated with that position. Since that waiver was issued, you have transitioned to serving as an AHRQ Senior Advisor, with duties and responsibilities that differ from those considered in the prior waiver. Accordingly, this waiver is being issued by the AHRQ Director based on your current AHRQ duties and responsibilities and supersedes and replaces the waiver previously issued in connection with your OASH service.

interest in a particular matter or matters is not so substantial as to be deemed likely to affect the integrity of your services to the Government.

Your Spouse's Conflicting Interests

Your spouse has a financial interest in Oak Investors Group, LLC, (Oak Investors) which is a fund of funds that contains a variety of underlying interests including, relevantly, interests in pharmaceutical preparation manufacturing, surgical and medical instrument manufacturing, general line grocery merchant wholesalers, and insurance agencies and brokerages. The value of this interest exceeds \$5 million. Oak Investors is an investment pooling vehicle through which capital is invested in third-party-sponsored private equity and venture capital funds. Investment decisions with respect to the underlying funds are made by unaffiliated third-party sponsors, and your spouse does not participate in or control those decisions. The underlying interests are minority, passive investments that are generally illiquid, and transfers are subject to restrictions under the applicable governing documents, which would make divestiture difficult, time-consuming, and potentially costly to accomplish.

Your spouse also holds a financial interest in Praxis Group Holdings, LLC (Praxis) estimated to be around \$13.5 million as well as an estimated \$10 million in Unette Seller HoldCo LLC. Praxis owns Unette Corporation (Unette), and Unette Seller HoldCo LLC has equity interest in Unette Corporation as well. Your spouse does not individually control the company's investment or operating decisions and only retains a minority, non-controlling equity interest in Praxis following the sale of the operating business to an unaffiliated private equity sponsor. The acquiring sponsor controls five of the company's seven board seats, including the CEO seat, and your spouse does not hold a board seat or have any other management role with Praxis. The retained interest is also relatively illiquid and subject to transfer restrictions and other rights of the majority owner that materially constrain your spouse's ability to independently divest the interest.

Praxis provides contract packaging and related services for a range of FDA-regulated products, including prescription and over-the-counter pharmaceuticals, medical devices, animal-health products, nutritional products, and personal-care products. Unette specializes in contract filling and packaging services for liquids, creams, and pastes used in similarly regulated product categories, including cosmetics, personal-care products, food and household products, pharmaceuticals, dietary supplements, beverages, and medical devices.

Additionally, you and your spouse hold financial interests in companies that develop and sell computer hardware, software and related internet technologies², and your spouse owns a limited partnership interest in Sovereign's Capital Venture IV, LP (Sovereign), which invests principally in technology companies operating in the U.S. and Southeast Asia. Investment authority for Sovereign is vested exclusively in its unaffiliated General Partner,

² These interests are Adobe Inc., Cisco Systems, Inc., International Business Machines Corporation, Dell Technologies Inc., Meta Platforms, Inc., Palo Alto Networks, Inc., Salesforce, Inc., Workday, Inc., Ferox Consulting, LLC, HG Security Services, LLC – Series S, and Palantir Technologies, Inc.

and your spouse has no authority to participate in or direct the fund's investment decisions. The interest cannot be withdrawn unilaterally, and any transfer requires the General Partner's prior written consent, materially limiting your spouse's ability to divest and making divestiture unduly burdensome. The aggregate estimated value of these latter interests exceeds \$500,000.

Together, all of the described holdings represent substantially less than 10% of the non-residential real estate assets you and your spouse hold, individually and jointly. In light of these circumstances, you are requesting that the waiver apply to your spouse's financial interest in Oak Investors, Praxis, Unette, and Sovereign, as well as to your and your spouse's financial interests in companies that develop and sell computer hardware, software and related internet technologies.

Nature and Importance of Your Role and the Sensitivity of the Matters

AHRQ's mission is to enhance the quality, appropriateness, and effectiveness of health services and access to such services, through scientific research and the promotion of improvements in clinical and health system practices, including the prevention of diseases and other health conditions. The Senior Advisor for Nutrition and Women's Health provides strategic leadership and expert guidance to advance the Secretary's priorities under the Making America Healthy Again (MAHA) initiative. The Senior Advisor serves as a technical and scientific authority and provides expert guidance and internal consultation to AHRQ leadership and staff on nutrition, women's health, and whole-person health initiatives; helps strengthen the Agency's research capacity in nutrition and women's health and ensure that research, policy, and program activities reflect current scientific standards and emerging issues; and supports the development of high-quality evidence to inform the health services research community, key stakeholders, and other users of AHRQ-supported research. Areas of focus include developing and interpreting nutritional guidelines, public health interventions, research on alternative and integrative health modalities, physical activity and wellness, the implications of environmental exposure policies and standards, ingredients used in processed foods, coordinated care that addresses health and well-being needs, nutritional and consumer product labeling practices, emerging wearable health technologies, and strategic public-private partnerships designed to promote patient engagement and informed lifestyle choices.

The Senior Advisor also provides authoritative and strategic counsel to the AHRQ Director, senior staff, and key Agency officials on nutrition and women's health activities that shape Agency-wide policy, programs, projects, and long-range initiatives; leads complex and sensitive assignments that address multifaceted issues central to AHRQ's mission and operations; and anticipates emerging issues and evaluates risks requiring leadership attention. The Senior Advisor builds and maintains effective liaison relationships with federal agencies, academic institutions, private-sector organizations, and nonprofit entities; serves on advisory and technical panels supporting research, evidence synthesis, and dissemination activities and represents AHRQ on committees, workgroups, and task forces to promote Administration-wide goals and priorities; and contributes to the development of strategic plans and program priorities that advance the MAHA agenda, with particular emphasis on nutrition and women's health. In addition, the Senior Advisor oversees the development of materials, including analyses, briefings, and recommendations for the Director's decision-making, and reviews such materials

for completeness, accuracy, analytical soundness, and strategic coherence; and translates the Director's objectives into clear, actionable guidance for Center Directors and other key officials across the Agency to promote organizational alignment and coherent implementation of Agency priorities. In performing these functions, you serve as one of a number of individuals who provide information, analysis, and recommendations to senior leadership, and you do not exercise final decision-making authority with respect to these matters.

You were selected to serve as AHRQ's Senior Advisor for Nutrition and Women's Health based on your expertise and extensive experience in whole-person and functional approaches to healthcare, particularly preventive healthcare and the identification and treatment of the underlying causes of disease rather than symptoms alone. For more than 30 years, you have engaged in patient-centered, evidence-based healthcare, integrating traditional Western medical practices with integrative approaches to medicine. Most recently, you served as Chief Medical Officer of the Born Preventive Health Care Clinic from 1998 until joining HHS, where your work focused on comprehensive approaches to prevention, wellness, and the treatment of chronic health conditions.

Moreover, you were identified as the individual best suited to undertake the duties you were hired to perform. Your demonstrated record of integrating nontraditional therapies with conventional medicine, together with your willingness to evaluate and challenge established approaches to healthcare, offers unique insights and the depth of experience needed to address significant challenges in the American healthcare system. In your role as Senior Advisor for Nutrition and Women's Health, you are expected to apply your clinical and subject-matter expertise to discrete AHRQ research and evidence-development activities that support MAHA priorities. Rather than serving only in a general advisory capacity, your work will include helping to shape and advance research projects intended to generate practical evidence on nutrition and women's health. For example, you are expected to focus on a project to gather and analyze data from schools and school districts that have implemented healthy school meal programs, with the goal of better understanding the effects of those approaches and informing future research, policy, and programmatic decisions. You also will focus on a menopause-related research project comparing breast MRI and mammography for the detection of early breast cancers. In connection with these and other assignments, you may advise AHRQ leadership on research design, evidence development, interpretation of findings, stakeholder engagement, and the translation of research results into recommendations or other Agency activities. While some agency policies and initiatives on which you may work may be criticized by individuals and entities outside of the Executive Branch, they are not particularly sensitive. Nevertheless, your involvement in the consideration of policies as well as practical tools and initiatives intended to improve nutrition and women's health will be of significance to the matters on which you will work.

Based on your experience and expertise, your work is expected to center on research and evidence-generation activities involving nutrition, preventive health, women's health, and related health technologies. Although many of these assignments will involve broad research questions and matters that do not implicate 18 U.S.C. § 208(a), some projects may involve particular matters of general applicability related to research, policy, program, advisory, or coordination activities concerning discrete classes in which you or your spouse have financial interests,

including pharmaceutical manufacturers; surgical and medical instrument manufacturers; grocery wholesalers; insurance agencies and brokerages; companies involved in the packaging of supplements, prescription and over-the-counter drugs, and other FDA-regulated products; and companies that develop or sell computer hardware, software, internet technologies, and related services. These interests may be implicated by your work on nutrition and healthy school meals, consumer health information and labeling, integrative and preventive health approaches, access to coordinated care, or women's health research involving breast cancer screening technologies, as well as by the collection, analysis, and dissemination of health-related data. Absent a waiver, you would need to remain recused from these particular matters of general applicability, which are a substantial portion of your official duties. Because AHRQ intends to rely on your specialized expertise in developing, evaluating, and interpreting research in these priority areas, issuance of a waiver will ensure that you are available to participate fully in certain particular matters of general applicability within the scope of your assigned responsibilities.

Value of Potential Gain or Loss and Relation to Your Assets

The aggregate value of the disqualifying financial interests addressed by this waiver represents substantially less than 10 percent of the assets that you and your spouse hold, individually and jointly. Although several of the interests are significant in absolute value, they comprise a relatively small portion of your non-residential real estate overall portfolio. Moreover, the interests held through Oak Investors and Sovereign are diversified investment vehicles rather than interests in single operating businesses. Oak Investors is a fund of funds whose underlying interests include businesses engaged in materially different activities, including pharmaceutical preparation manufacturing, surgical and medical instrument manufacturing, general line grocery merchant wholesaling, and insurance agencies and brokerages. Accordingly, although certain particular matters on which you may work could affect one or more of Oak Investors' healthcare-related holdings, a matter affecting one segment—such as pharmaceutical products or medical devices—would not necessarily have a comparable effect on its holdings in other industries. Even among the healthcare-related holdings, the underlying businesses operate in distinct product and commercial segments and therefore would not necessarily be affected similarly by the same particular matter. This diversification reduces the likelihood that any single particular matter would significantly affect the value of Oak Investors as a whole.

Your and your spouse's direct financial interests in the identified technology companies also warrant consideration because certain aspects of your anticipated duties may involve matters concerning emerging health technologies, the collection, analysis, and dissemination of health-related data, consumer and patient communications, and public-private partnerships. Those responsibilities create a sufficient nexus to include the interests in the waiver because a particular matter of general applicability within one of those areas could have a direct and predictable effect on a company whose products or services fall within the affected class. At the same time, the particular matters on which you are expected to work are unlikely, in most instances, to have a significant effect on the overall business of any individual technology company. The identified companies generally operate across broad and diversified commercial markets, and their health-related products or services, where applicable, represent only one aspect of substantially larger businesses involving software,

hardware, cloud computing, data analytics, cybersecurity, digital communications, enterprise services, or related technologies. Your anticipated work generally will concern research priorities, evidence-generation, health information, and policy or programmatic questions rather than procurement decisions, company-specific regulatory actions, or other governmental matters directed specifically at these companies. Accordingly, although particular matters within your portfolio could affect the commercial environment for certain health-related technologies or services, any resulting financial effect on an individual company generally would be limited in relation to the company's overall business and would arise through a broader research, policy, or programmatic matter rather than through governmental action focused on that company.

Your spouse's interest in Sovereign presents somewhat different considerations. For purposes of 18 U.S.C. § 208, your spouse's limited partnership interest gives rise to a financial interest in particular matters that directly and predictably affect Sovereign or its underlying portfolio investments. Sovereign, however, invests in multiple technology companies operating in the United States and Southeast Asia rather than in a single operating business. Although its investments are concentrated generally in the technology sector, they are spread among multiple portfolio companies with differing products, services, business models, and markets. Accordingly, a particular matter within the scope of your duties could affect one portfolio company or a discrete segment of the technology sector without having a comparable effect on Sovereign's other investments or on the value of your spouse's interest in the fund as a whole. The breadth of Sovereign's portfolio, together with the generally research, evidence-generation, policy, and advisory nature of your anticipated duties, therefore limits the relative significance of the potential financial effect of such matters on your spouse's overall interest in Sovereign.

The particular matters on which you may work are expected to have only a limited effect on the overall businesses of Praxis and its subsidiary Unette. Both companies provide contract packaging, filling, and related services for a broad range of FDA-regulated and other products, including prescription and over-the-counter pharmaceuticals, medical devices, animal-health products, nutritional products, dietary supplements, cosmetics, personal-care products, food and household products, and beverages. Neither company generally develops or markets the products that are the subject of the research and evidence-generation activities in which you are expected to participate. Although some matters on which you may work, including matters concerning dietary supplements or other FDA-regulated products, could affect the commercial environment in which certain Praxis or Unette customers operate, your work generally will concern discrete research and evidence-generation activities rather than the companies' packaging operations, customer contracts, or ability to provide services. Accordingly, any financial effect on Praxis or Unette generally would be indirect, arising through the effect of a broader research or policy matter on particular customers or product categories rather than from governmental action directed specifically at either company. Moreover, because the companies serve customers across numerous product categories, a matter relevant to one category would not necessarily have a comparable effect on their other lines of business. These considerations limit the relative significance of the potential effect of the particular matters on Praxis and Unette when compared with their overall businesses.

Taken together, the relatively small proportion of your and your spouse's overall assets represented by the disqualifying interests, the diversification within Oak Investors and Sovereign, and the limited and generally indirect relationship between the particular matters on which you are expected to work and the overall businesses of Praxis and Unette, I conclude that the disqualifying financial interests that are the subject of this waiver are not so substantial as to be likely to affect the integrity of your services.

I have considered whether this case presents an insurmountable concern about the appearance of impropriety and have concluded it does not, given the circumstances outlined above. Where an employee complies with the terms of a section 208 waiver, the granting of a waiver will be deemed to constitute "a determination that the interest of the Government in the employee's participation outweighs the concern that a reasonable person may question the integrity of agency programs and operations." 5 C.F.R. § 2635.501(b)(3).

Matters Covered and Limitations

Subject to the limitations identified below, I am granting this limited waiver to allow you to participate in particular matters of general applicability³ in which you would have an otherwise disqualifying financial interest because of one or more of the financial interests described above.

No Authorization to Participate in Particular Matters Involving Specific Parties for Which You Have a Disqualifying Financial Interest. This limited waiver does not permit you to participate in particular matters involving specific parties⁴ that will affect the financial interests of Oak Investors, Praxis, Unette, and Sovereign or the listed communications media and technology financial interests.

No Authorization to Participate in Particular Matters that Would Have a Special or Distinct Effect on Oak Investors, Praxis, Unette, Sovereign, or the listed technology financial interests. This limited waiver also does not permit you to participate in any particular matters, including particular matters of general applicability, that would have a special or distinct effect upon the financial interests described above other than as part of a class. This includes particular matters of general applicability where Praxis, Unette, the listed communications media and technology financial interests, or entities in which Oak Investors or Sovereign is invested are among the very few known to operate in a particular area.

No Authorization to Participate in Particular Matters Beyond Duties Listed. This limited waiver does not permit you to personally and substantially participate in any particular matters of general applicability in other HHS program areas beyond those listed above. In the event you asked to participate in matters other than the programs and initiatives related to nutrition and

³ A "particular matter of general applicability" means a "particular matter that is focused on the interests of a discrete and identifiable class of persons but does not involve specific parties." 5 C.F.R. § 2640.102(m).

⁴ A particular matter that involves specific parties includes "any judicial or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, arrest or other particular matter involving a specific party or parties." 5 C.F.R. § 2640. 102(l). A particular matter involving specific parties "typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties." *Id.*

women's health described above, further consideration of your potential for conflict of interest will be required.

No Authorization to Participate in Any Other Particular Matters in Which You Have a Disqualifying Financial Interest. This limited waiver does not permit you to participate in any particular matters of general applicability that may affect any of your or your spouse's financial interests other than those described in this waiver.

Limitations on Disqualifying Financial Interests. This limited waiver will no longer apply should the value of your disqualifying financial interests (described above) rise to more than 10% of your and your spouse's overall investment portfolio.

Particular matters in which you may not participate should be disposed of in accordance with the terms of your Ethics Agreement. Specifically, appropriate personnel will assist in screening matters that may implicate your disqualification obligations, and any matter from which you are disqualified will be referred to the designated official or another appropriate staff member for handling, without your knowledge or involvement. If you have any questions about whether you are permitted to participate in any particular matter under this waiver, including particular matters of general applicability, you are advised to consult with the Ethics Division of the Office of the General Counsel. This waiver is effective for the duration of your appointment and so long as your duties do not change; if your duties change at any time, you are advised to consult with the Ethics Division of the Office of the General Counsel as this waiver will need to be re-evaluated.

Conclusion

For the specific reasons detailed above, I grant you a limited waiver under 18 U.S.C. § 208(b)(1) to permit you to participate as Senior Advisor for Nutrition and Women's Health in the Agency for Healthcare Research and Quality in particular matters of general applicability that might affect your personal and imputed financial interests described in this waiver, subject to the limitations above.

The Office of Government Ethics has been consulted concerning the issuance of this waiver, as specified in 5 C.F.R. § 2640.303. A signed, final copy of this waiver will be forwarded to the OGE, as specified in 5 C.F.R. § 2640.303, and upon request, a copy will be made available to the public in accordance with the procedures described in 5 C.F.R. § 2640.304. That office also will list your name as a recipient of this waiver on its website in accordance with the procedures described in OGE/GOVT-1, System of Records Notice (2024).