Conflict of Interest

Electronic Document Quick Reference Guide

The following quick reference provides guidance for using the Electronic Conflict of Interest (COI) system for the Conflict of Interest (COI) form submission. Information provided includes:

Section 1: Accessing the COI system
Section 2: Completing the form as an Employee
Section 3: Completing the form as a Supervisor (Approver)
  A. First Level Supervisor Approval Process
  B. Second Level Supervisor Approval Process
Section 4: Returning a Document
Section 5: Email notifications

The Electronic COI system can be accessed at coi.nmsu.edu and on the HR Services homepage at hr.nmsu.edu/ when the annual HR requirement is in effect.

If you have questions or need assistance in submitting the COI form, please contact the Employee and Labor Relations office at elr@nmsu.edu.
Section 1: Accessing the Electronic COI system

Use your ‘my NMSU’ username and password to login at coi.nmsu.edu.

Once logged on to the system, you will see a menu on the left side of the web page. To begin a new form you will click on “+ New COI Document”. If you need to access your previous COI forms you will need to click “Historical Documents” and you will be redirected to the EDS system (in a new tab) to log in and access previous completed forms.

When accessing the COI form, you will be prompted to complete the online Conflict of Interest Training Module. While the COI training is not required to complete the COI form, it is highly recommended that you complete the training to better understand university’s COI rules and procedures. If you elect to complete the training, you will be redirected to the COI form upon completion of the training. If you do not want to complete the COI training, you will click “Continue to Form” and the system will open the COI form.
Section 2: Completing the Form as an Employee

Every regular employee of the university is required to annually complete a Conflict of Interest document at least once a year when requested to by the office of Human Resource Services. Note: For information and guidance regarding conflicts of interest/commitment or perceived conflicts, please refer to NMSU Administrative Rules and Procedures 3.19 and 3.20.

1. Employees must answer all questions in the document. Second level routing is only required if conflicts of interest are reported.

   Example of question:
   1. Are you engaged in any other employment or consulting (including self-employment) outside of the university?
      - [ ] No
      - [ ] Yes

2. The electronic COI system is designed to discover errors or omissions. Employees who answered incorrectly by leaving information out or forgetting to select a radio button will see an error message at the top of his/her screen in pink. The system will highlight the section where the information is missing and allow the employee to correct the error.

   Please see the example below.
3. Once an employee has completed all questions, s/he must acknowledge that s/he has read and agrees to comply with the NMSU Business Ethics Handbook by clicking on the checkbox.

Acknowledgement of Receipt and Review of NMSU Business Ethics Handbook

To ensure that integrity and ethics are characteristics associated with New Mexico State University, each NMSU official, employee, and representative is expected to comply with the Principles of Ethical Conduct expressed in Administrative Rules and Procedures of NMSU 3.19.20. In addition, NMSU officials, employees, and representatives are expected to comply with all other applicable policies, procedures, laws, union contracts, and regulations which address ethical conduct and standards of business conduct for specific situations.

Please view the NMSU Business Ethics Handbook.

☐ I acknowledge that I have read and agree to comply with the NMSU Business Ethics Handbook.

4. When the document is complete, the employee must “Sign” his/her document by clicking on the button to route the document for approval. Clicking the “Delete” button will require that you restart your form.

5. The employee will be presented with a screen which automatically will display the name of his/her supervisor in accordance with the “Reports To” field in Banner. If the supervisor’s name that appears is correct, the employee must click the radio button next to the name.

☐ If the name is not correct, the employee can conduct a search for his/her immediate supervisor by typing the name into the search fields and clicking the search button as shown below.
6. Finally, the employee must click on the “Sign & Forward” button to complete the document submission.

7. At this point, the system will ask for confirmation and the submission is completed by clicking “Sign & Forward”.

8. The system will route the employee to the “My Conflict of Interest Documents” which will indicate the Document # and the Status of the COI form.

Section 3: Completing the Form as a Supervisor (Approver)
Please note that disclosure forms submitted containing no conflicts require only one level of review and approval. Disclosure forms submitted containing one or more (real or perceived) conflicts of interest require two levels of review and approval.
A. **First Level Supervisor Approval Process**

1. When an employee has completed a COI document and routed it to his/her supervisor, the supervisor will receive an informational email regarding the action that occurred. The supervisor may access the employee’s document by clicking on the link inside of the email message. The supervisor will be directed to the login screen as seen in Section 1 – Accessing the Electronic Conflict of Interest (COI) system, and therefore must log in.

2. The supervisor must click on the “Documents Where I’m The Supervisor” link in the menu bar to view the documents that are “Pending Signature”.

3. To review the employee’s document, click on the “Review” button that corresponds to the employee’s name and the document will open on the screen.

<table>
<thead>
<tr>
<th>Document #</th>
<th>Name</th>
<th>Version</th>
<th>Status</th>
<th>Created On</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>56</td>
<td>Patricia Leyba</td>
<td>3.0</td>
<td>Pending Supervisor Approval</td>
<td>September 08, 2017</td>
<td>Review</td>
</tr>
</tbody>
</table>

4. Review the employee’s comments, if any, depending on if conflicts were reported and type in supervisor comments. If supervisor comments are not entered where required, then an error message will appear requiring that comments be entered.

5. At the bottom of the employee’s form, the supervisor must answer if a conflict of interest or commitment exists and if the employee is involved in sponsored activities.
6. When the supervisor has reviewed the document, he/she can do the following:

   - **Sign Form:** This allows the supervisor to advance to accept the document and sign it.
   - **Return for Correction:** If the form requires changes by the employee, the supervisor can return it to the employee with notes requesting him/her to make changes. The employee will receive an email notice indicating that the form has been returned for correction.
   - **Transfer without Signing:** This should be selected only if the supervisor who received the form is NOT the supervisor who should be signing the form. Please note that anytime a document is forwarded, all signature levels are still required by the system.

7. If all looks correct, the supervisor should sign and upon signature will be presented this option:

   - **Confirm your action**
     - Click **Sign** to complete document. Otherwise, click **Cancel** to return to the previous screen.
8. This concludes the process for the first level supervisor. 

Note: If no conflicts were reported by the employee, then the document is complete. If conflicts were reported, the first level supervisor will see the following option and should select the “Sign and Forward” button.

B. Second Level Supervisor Approval Process
The second level approval process is similar to the routing and options available in the first level supervisor approval process. Second level routing is only required if an employee has answered “yes” indicating that a conflict or perceived conflict exists. This includes an employee answering “yes” indicating involvement in Sponsored Activities (#8); this question drives specific reporting for the VP for Research office of Integrity and Ethics per federal regulation requirements.

1. The second level supervisor will receive an email notification that a document has been routed for his/her signature when the first level supervisor has signed the document.

2. The second level supervisor should click the link provided in the email to be directed to the login screen as seen in Section 1 - Accessing the Electronic Conflict of Interest (COI) system, and therefore must log in.

3. The second level supervisor must click on the “Documents Where I’m The Next-Level Approver” link in the menu bar to view the documents that are “Pending Approval”.

4. To review the employee’s document, click on the document number next to the employee’s name and the document will open on the screen.
5. Review the employee’s conflict comments and the first level supervisor’s comments.

6. Comments are not required by the second level supervisor unless the document will be returned for correction (In this case, the second level supervisor will be provided with a comment box at the end of the process to communicate any changes that are required). If the document is acceptable, the second level supervisor should click on the “Sign” button and confirm the action on the next prompt.

7. Confirming the action concludes the process for the second level supervisor.
Please note that the second level supervisor has the capabilities to “Return for Correction” and “Transfer without Signing”.

a. **Return for Correction:** If the form requires changes by the employee or the first level supervisor, the second level supervisor can select to “Return for Correction”. It will route backwards to the first level supervisor who can make changes if necessary at his/her stage or depending on the direction of the second level supervisor, the first level supervisor can also select to “Return for Correction” if the changes need to be made by the employee.

b. **Transfer without Signing:** This should be selected only if the supervisor who received the form is NOT the supervisor who should be signing the form.

### Section 4: Returning a Document

When returning a document, it will always route backwards so that it moves back to the person who last submitted it. Therefore, if the document is being returned by the First Level Supervisor, it will be routed directly back to the employee who submitted it. If the form is returned by the Second Level Supervisor, it is routed directly back to the First Level Supervisor. The reason for this is so that the First Level Supervisor stays involved in the process and also so that the First Level Supervisor can make corrections to his/her comments if necessary per the direction of the Second Level Supervisor.

1. To return a document that has been submitted, click the “Return for Correction” button.

2. The following comment box will appear. This is to be used to communicate the changes that are expected by the employee or first level supervisor.

3. **RECIPIENT OF RETURNED DOCUMENT VIEW:** When the employee/first level supervisor receives a document that has been returned for correction, he/she will see the return comments in a light orange box at the top of the document. These are for instructional/communication use only.
These are not recorded onto the document itself and are not displayed in the PDF. However, these comments are recorded in the application’s database therefore they must be relevant and appropriate.

<table>
<thead>
<tr>
<th>Reason Returned:</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;example of return for correction comment&quot;</td>
</tr>
</tbody>
</table>

**Section 5: Email Notifications**

As documents are routed for review and signature, the person who needs is pending the action will be individual notified via email. Messages will be received from nmsueds-donotreply@nmsu.edu (see example below).

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Dear Ralph Lucero,

This is to inform you that Conflict of Interest Form #60 for Patricia Leyba is awaiting your approval.

Click here to review and sign this document.

Thank you,
NMSU HR Services

THIS IS AN AUTOMATED RESPONSE GENERATED BY THE SYSTEM. DO NOT REPLY TO THIS EMAIL.
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