



## Project Sunlight Campus Compliance Plan

### What is Project Sunlight?

Project Sunlight is a statewide initiative based on the Public Integrity Reform Act of 2011 and omnibus ethics legislation Ch. 399, Part A §4, L. 2011. This legislation is meant to increase government transparency and accountability by allowing the public to see who interacts with New York State employees with respect to five categories of activity:

- (1) *procurement of goods and services,*
- (2) *rate-making,*
- (3) *regulatory matters,*
- (4) *judicial or quasi-judicial proceedings, or*
- (5) *rule-making per the State Administrative Procedures Act.*

State agencies are required to utilize the Project Sunlight online database to report "appearances" by individuals and firms who appear before SUNY decision-makers or persons who advise decision-makers (known as advisors.) **Given the nature of SUNY activities, we are most likely to be impacted in the area of (1) *procurement of goods and services.***

### Campus Compliance Requirements

The Finance and Administration office is responsible for the administration of this program at the SUNY Oneonta campus. Compliance requirements include the following:

➤ **Communication**

Project Sunlight background, requirements, and other information, including FAQs, are available at the links below.

- [Memorandum](#) from SUNY dated December 21, 2012 explains the legislation.
- [Project Sunlight webpage](#), managed by SUNY System Administration, provides comprehensive information about Project Sunlight requirements.

➤ **Identification of Decision Makers and Advisors**

Based on job titles and responsibilities, certain individuals are designated as potential Decision Makers and Advisors with influence in procurements of \$25,000 or more. These individuals are notified of Project Sunlight requirements by the Finance and Administration Office via email.

➤ **Training**

Individuals who are identified as potential campus Decision Makers or Advisors are required to view the following training tool: [SUNY Project Sunlight PowerPoint Presentation](#).

- **Certification of Training**  
All Decision Makers and Advisors must certify that they have reviewed training materials by submitting the [Project Sunlight Training Certification Form](#) to the Finance and Administration Office.
- **Designation of Contact person**  
For questions on how Project Sunlight might apply to you or your staff contact [Betty Tirado](#), Director, Business Services, x2583
- **Reporting of Qualified Appearances**  
Campus Decision Makers, Advisors, or others in an influential role are required to report qualified “appearances” with vendors or their representatives that could result in the purchase of \$25,000 or more in goods or services (this applies to a single procurement or a multi-year contract). If several campus employees participate jointly in an appearance, all participants can be reported on one form. Multiple appearances involving a single procurement must be reported separately. **Appearances are to be reported to the Finance and Administration Office, using the, [Project Sunlight Reporting Form](#) within three (3) days of the appearance.**

The Finance and Administration Office, using data from the Reporting Form, will post appearance information to the Office of General Services website within five (5) days of the appearance.

- **Annual Campus Certification**
  - Campuses must provide yearly certification that all qualified “appearances” have been reported and that appropriate campus employees have been properly trained on their obligations under the law.
  - SUNY will follow-up with individual campuses when the Project Sunlight website reflects a lower than expected level of actual Project Sunlight appearances.

Further information about Project Sunlight is available on the [SUNY Project Sunlight](#) website, including informative FAQs. Additional questions that might arise after review of the training materials may be directed to Betty Tirado, [Elizabeth.tirado@oneonta.edu](mailto:Elizabeth.tirado@oneonta.edu) or ext. 2583.