



Office of Risk Management and Compliance

SUNY THE STATE UNIVERSITY OF NEW YORK



Project Sunlight

A component of the
Public Integrity Reform Act of 2011

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**Offers a unique, public-facing look into the daily operations and decision-making processes of New York State government, promoting transparency and setting a national standard for openness.**



## Who does Project Sunlight apply to?

- **Project Sunlight applies to:**
  - *The State University of New York (SUNY)*
    - *Including all constituent units except community colleges of the State University of New York and the independent institutions operating statutory or contract colleges on behalf of the state.*
  - Every executive state agency, department, division, office, and board;
  - Every public benefit corporation, public authority and commission at least one of whose members is appointed by the governor;



## Who is Covered?

## Five (5) Categories of Covered Appearances

*\*\*Review additional information in the [Project Sunlight Policy](#)*

### Who is covered?

- SUNY employees who are decision makers and/or advisors to decision makers who have the power to exercise agency discretion or advise someone who has such discretion over one (1) of the five (5) categories of covered appearances.
- Each campus should maintain a list of the individuals that fit this definition (e.g., President, Vice President(s), Director of Procurement, Deans, etc.).

### Five (5) Categories of Covered Appearances:

1. **Procurement** – Goods, services, construction, real property.
2. **Rate-Making** – Setting rates for public utilities or services.
3. **Regulatory Matters** – Investigations or enforcement actions.
4. **Judicial/Quasi-Judicial** – Adjudicatory agency hearings.
5. **Rulemaking** – Adoption or amendment of regulations.



## Who is Excluded?

### Who is excluded?

- Outside agents of a state agency or authority, such as retained outside counsel.
- State and local government employees and elected officials as well as those of tribal governments and federal government representatives.
- Judges or employees of the judiciary.
- Individual inmates and parolees and their representatives before state entities regarding their supervision and/or conditions of confinement.
- Representatives of the media.
- Persons under the age of 18.



## What counts as an “appearance”?:

## What is NOT Included?:

### What counts as an appearance:

- An interaction that is an in-person meeting or a video conference between covered individuals, related to one of the five (5) covered categories.
  - There can be numerous appearances related to a single matter.

### What is NOT included (not exhaustive list - refer to policy):

- Written communications (email, fax, letters)
- Telephone calls
- Public meetings
- Ministerial or administrative interactions



## Reporting Requirements and Exemptions

*\*\*For more examples – refer to the  
Project Sunlight Policy*

### Reporting Rules:

- All covered appearances (one per meeting) must be logged in Project Sunlight by the campus Designated Project Sunlight Liaison/Reporter - within 5 business days.
- The campus Designated Project Sunlight Liaison/Reporter must report all appearances using their Project Sunlight login credentials.

### Common Exemptions:

- Appearances related to procurements under \$25,000.
- Appearances during restricted periods in procurement.
- Meetings for information-gathering initiated by the agency.
- Participation in widely-attended conferences or visiting booths on a show floor or exhibit hall.
- Matters posing confidentiality or safety risks.



## Compliance, Internal Oversight, and Resources

### Campus Responsibilities:

- Appoint a Project Sunlight Liaison/Reporter
- Provide staff training
  - Track training for compliance reporting
- Maintain internal policies and track/audit compliance
- Adopt a disciplinary policy for those state employees who do not comply with Project Sunlight reporting duties

### Project Sunlight Policy:

- [https://projectsunlight.ny.gov/public/Docs/OGS\\_Sunlight\\_PublicPolicy.pdf](https://projectsunlight.ny.gov/public/Docs/OGS_Sunlight_PublicPolicy.pdf)

### Project Sunlight FAQ's:

- [https://projectsunlight.ny.gov/public/Docs/OGS\\_Sunlight\\_PublicFAQ.pdf](https://projectsunlight.ny.gov/public/Docs/OGS_Sunlight_PublicFAQ.pdf)

### Support & Contact:

- [help@projectsunlight.ny.gov](mailto:help@projectsunlight.ny.gov)
- Public facing portal:  
<https://projectsunlight.ny.gov/public/Home/SearchMeetingImage>



# Project Sunlight

Inquiry Form – Each Campus **Must** Complete

<https://forms.cloud.microsoft/r/QYjRjJsq9i>





# Project Sunlight

This quiz can be distributed to assess knowledge of the reporting requirement. Please contact SUNY Risk and Compliance for campus specific results.

<https://forms.cloud.microsoft/r/fjvEtcbV2N>





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Ensuring compliance and  
effectively managing risk are  
critical responsibilities for SUNY



**Thank you!**