

## **University at Buffalo Internal Compliance Plan for Reporting**

### **What is Project Sunlight?**

Project Sunlight is a New York State initiative established under the Public Integrity Reform Act of 2011 and Omnibus Ethics Legislation (Ch. 399, Part A §4, L. 2011). The purpose of this legislation is to promote transparency and accountability in state government by allowing the public to view interactions between private individuals or entities and New York State employees in five specific categories of activity:

1. Procurement of real property, goods and services
2. Rate-making
3. Regulatory matters
4. Agency-based judicial or quasi-judicial proceedings
5. Rule-making under the State Administrative Procedures Act

All state agencies are required to use the Project Sunlight online database to report “appearances”—instances when individuals, firms or vendors meet with SUNY decision-makers or their advisors regarding any of these five areas.

**At the University at Buffalo (UB), Project Sunlight primarily affects activities related to procurement of goods and services.**

---

### **Campus Compliance Requirements**

The Director of Policy, Compliance, and Internal Controls oversees the implementation of Project Sunlight at UB. Compliance involves the following components:

#### **Communication**

Information about Project Sunlight — including the Project Sunlight Policy, user manual for public access, background requirements, and FAQs — is available through:

- [New York State Project Sunlight official website](#)
- [New York State Project Sunlight Resources](#)

#### **Identification of Decision-Makers and Advisors**

Certain UB employees are designated as decision-makers or advisors to decision-makers based on their job responsibilities in relation to one or more of the five Project Sunlight

categories. These individuals are notified of relevant information and updates via email and through the UB Project Sunlight website.

## **Training**

Designated decision-makers and advisors are required to complete the SUNY Project Sunlight Training.

## **Certification of Training**

Upon completion of the training, participants must take and pass a quiz. SUNY maintains a record of all UB employees who have successfully completed both the training and the quiz.

---

## **Designated Contacts**

- UB Project Sunlight Liaison:  
[Amy Beers](#), Director of Policy, Compliance, and Internal Controls
- UB Project Sunlight Reporter:  
[Linda Ferry](#), Office Assistant 3, Purchasing and Contract Services

---

## **Reporting Qualified Appearances**

UB decision-makers and advisors must report any qualified appearances involving external individuals, firms, or vendor representatives when the meeting concerns one of the five Project Sunlight categories.

Generally, within SUNY, these reports relate to procurements of \$25,000 or more for goods or services (whether a single transaction or a multi-year contract).

- If multiple UB employees attend the same appearance, they may be listed together on one report.
- Separate reports are required for multiple appearances concerning the same procurement.
- Reports must be submitted via the Project Sunlight Reporting Form within three (3) days of the appearance.

The Project Sunlight Reporter will then post the appearance information to the Office of General Services website within five (5) days of the appearance.

---

## **Annual Campus Certification**

Each year, UB must certify that all qualifying appearances have been reported and that relevant employees have completed required training.

SUNY reviews appearance data and may follow up with campuses if reported activity levels appear lower than expected.

---

## **Additional Information**

More information, including FAQs, is available on the [NYS Project Sunlight Resources website](#) and on the SUNY Project Sunlight website.

Questions after completing the training materials may be directed to:

Amy Beers

Director of Policy, Compliance, and Internal Controls

[amybeers@buffalo.edu](mailto:amybeers@buffalo.edu)