1.0 Purpose and Benefits

The Public Integrity Reform Act of 2011 established Project Sunlight, an initiative which authorized the creation of an online database (http://www.projectsunlight.ny.gov/) where the public can access to see the names of individuals and entities interacting with government decision makers, and imposes reporting requirements on certain state employees (“covered employees”). The purpose of this policy is to communicate the mandatory nature of the Project Sunlight training and reporting requirements to covered employees.

2.0 Authority

Section 103(10) of the State Technology Law provides the Office of Information Technology Services (ITS) with the authority to establish statewide technology policies, including technology and security standards. Section 2 of Executive Order No. 117 provides the State Chief Information Officer with the authority to oversee, direct and coordinate the establishment of information technology policies, protocols and standards for State government, including hardware, software, security and business re-engineering. Details regarding this authority can be found in NYS ITS Policy, NYS-P08-002 Authority to Establish State Enterprise Information Technology (IT) Policy, Standards and Guidelines.

3.0 Scope

Project Sunlight applies to every state agency, including ITS. This policy applies to employees of ITS.
ITS General Counsel will designate a list of employees covered by Project Sunlight. Those employees designated as covered employees will be notified of their access to mandatory training in the Statewide Learning Management System (SLMS) by the Division of Legal Affairs (DLA). From time to time, ITS employees may be designated or undesignated as their job responsibilities change. DLA will keep a list of all covered employees and update it at least twice a year.

Employees who believe they are covered by Project Sunlight should consult with DLA if they have not received notice they are covered. In such instances, employees should keep sufficient records of potential reportable contacts until they receive a determination from DLA.

4.0 Information Statement

4.1 This ITS policy is to ensure maximum compliance with all requirements of Project Sunlight. Covered employees may designate a person to assist in entering information relating to covered “appearances” in the Project Sunlight database. Those persons should be reported to the Project Sunlight Team so they may have access to the mandatory SLMS training and the reporting database. It remains the responsibility of the covered person to ensure that the appropriate information is being entered into the database.

4.2 The reporting requirements of Project Sunlight can be found HERE. More detailed guidance is available within SLMS. All appearances should be reported to the Project Sunlight database within 5 business days.

5.0 Compliance

This policy shall take effect upon publication. Compliance with all relevant State requirements is expected. Failure to comply with these requirements may result in disciplinary action.

6.0 Definitions of Key Terms

Except for terms defined in this policy, all terms shall have the meanings found in http://www.its.ny.gov/glossary.
7.0 Contact Information

Submit all inquiries and requests for future enhancements to the policy owner at:

Division of Legal Affairs
Reference: ITS-P13-001
NYS Office of Information Technology Services
State Capitol, PO Box 2062
Albany, NY 12220-0062
Telephone: (518) 473-5115
Email: its.sm.dla@its.ny.gov

Statewide technology policies, standards, and guidelines may be found at the following website: http://www.its.ny.gov/tables/technologypolicyindex

8.0 Revision History

This policy shall be reviewed at least once every two years to ensure relevancy.

<table>
<thead>
<tr>
<th>Date</th>
<th>Description of Change</th>
<th>Reviewer</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/23/2013</td>
<td>Original Policy Release</td>
<td>ITS</td>
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<tr>
<td>09/23/2014</td>
<td>Scheduled Update</td>
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</tr>
<tr>
<td>07/29/2020</td>
<td>Revision</td>
<td>Division of Legal Affairs</td>
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</table>

9.0 Related Documents

The following documents should be used as reference and educational tools by all ITS employees with Project Sunlight responsibilities:

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Project Sunlight Technical Training PowerPoint</td>
<td>Found on SLMS <a href="https://nyslearn.ny.gov/">https://nyslearn.ny.gov/</a></td>
</tr>
<tr>
<td>Project Sunlight Substantive Training PowerPoint</td>
<td>Found on SLMS <a href="https://nyslearn.ny.gov/">https://nyslearn.ny.gov/</a></td>
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