



Office of Information Technology Services

State Capitol P.O. Box 2062
Albany, NY 12220-0062
www.its.ny.gov

Office of Information Technology Services Policy	No: ITS-P13-001
ITS Policy: Project Sunlight Policy	Updated: 11/02/2022
	Issued By: NYS Office of Information Technology Services Owner: Division of Legal Affairs

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/>) that 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 1 of Executive Order No. 1171, issued January 2002, charges the State Chief Information Officer with overseeing and supervising the management and operations of the Office of Information Technology Services (ITS). Section 102(2) of the State Technology Law gives the Director of ITS responsibility for the administration of ITS. Details regarding this authority can be found in NYS ITS Policy, [NYS-P08-002 Authority to Establish Enterprise Information Technology \(IT\) Policies, Standards and Guidelines.](#)

3.0 Scope

This policy applies to employees of ITS.

¹ All references to Executive Order 117 refer to that which was originally issued by Governor George E. Pataki on January 28, 2002 and continued by Executive Order 5 issued by Governor Eliot Spitzer on January 1, 2007, Executive Order 9 issued by Governor David A. Patterson on June 18, 2008, Executive Order 2 issued by Governor Andrew M. Cuomo on January 1, 2011 and Executive Order 6 issued by Governor Kathy Hochul on October 8, 2021.

The ITS Chief 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 DLA 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 at <https://projectsunlight.ny.gov/Resources.aspx>. More detailed guidance and training is available within SLMS or by contacting the Chief General Counsel or Division of Legal Affairs at projectsunlight@its.ny.gov. 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 is required with all ITS policies and standards. ITS may amend its policies and standards at any time; compliance with amended policies and standards is required.

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: <https://its.ny.gov/policies>

8.0 Revision History

This policy should be reviewed consistent with the requirements set forth in [NYS-P09-003 Process for Establishing Information Technology Polices, Standards and Guidelines](#).

Date	Description of Change	Reviewer
09/23/2013	Original Policy Release	ITS
09/23/2014	Scheduled Update	ITS
07/29/2020	Revision	Division of Legal Affairs
11/02/2022	Updated policy	Division of Legal Affairs

9.0 Related Documents

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

Project Sunlight Frequently Asked Questions	http://www.projectsunlight.ny.gov/FAQ.pdf
Project Sunlight Technical Training PowerPoint	Found on SLMS https://nyslearn.ny.gov/
Project Sunlight Substantive Training PowerPoint	Found on SLMS https://nyslearn.ny.gov/