



# Office of Information Technology Services

State Capitol P.O. Box 2062  
Albany, NY 12220-0062  
[www.its.ny.gov](http://www.its.ny.gov)

<b>Office of Information Technology Services Policy</b>	<b>No:</b> ITS-P13-001
<b>ITS Policy:</b> <b>Project Sunlight Policy</b>	<b>Updated:</b> 12/02/2025
	<b>Issued By:</b> NYS Office of Information Technology Services  <b>Owner:</b> Division of Legal Affairs

## 1.0 Purpose and Benefits

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The Public Integrity Reform Act of 2011 established Project Sunlight, an initiative which authorized the creation of a publicly available online database, <https://projectsunlight.ny.gov>, showing the names of individuals and entities interacting with government decision makers. The law also 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

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*Section 1 of Executive Order No. 117*,<sup>1</sup> 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 State Enterprise Information Technology \(IT\) Policy, Standards and Guidelines](#).

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<sup>1</sup> 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.

### 3.0 Scope

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This policy applies to employees of ITS.

### 4.0 Information Statement

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This ITS policy is to ensure compliance with [all Statewide requirements of Project Sunlight](#). The ITS Ethics Officer will designate a list of employees covered by Project Sunlight. From time to time, ITS employees may be designated or undesignated as their job responsibilities change. The ITS Division of Legal Affairs (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 the ITS Ethics Officer 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.

Covered employees may designate another employee to assist in entering information relating to covered “appearances” in the Project Sunlight database. Those employees 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 entered into the database.

The [reporting requirements of Project Sunlight](#) can be found on the Project Sunlight website. More detailed guidance and training is available within SLMS or by contacting the ITS Ethics Officer or Division of Legal Affairs at [projectsunlight@its.ny.gov](mailto:projectsunlight@its.ny.gov). All appearances should be reported to the Project Sunlight database within **5 business days**.

All ITS staff are required to take training about Project Sunlight’s requirements on an annual basis. Employees who have access to the Project Sunlight system will also take a separate training on actual use of the system.

### 5.0 Compliance

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

### 6.0 Definitions of Key Terms

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Except for terms defined in this policy, all terms shall have the meanings found in the [ITS Glossary](#).

## 7.0 Contact Information

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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](mailto:its.sm.dla@its.ny.gov)**

The State of New York Enterprise IT Policies may be found at the following website:  
<https://its.ny.gov/policies>.

## 8.0 Revision History

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This policy should be reviewed consistent with the requirements set forth in [ITS-P24-003 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
01/25/2023	Revision	Division of Legal Affairs
12/02/2025	Revision	Division of Legal Affairs

## 9.0 Related Documents

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

<b>Project Sunlight Frequently Asked Questions</b>	<a href="https://projectsunlight.ny.gov/public/Docs/OGS_SunlightPublicFAQ.pdf">https://projectsunlight.ny.gov/public/Docs/OGS_SunlightPublicFAQ.pdf</a>
<b>Project Sunlight Technical Training PowerPoint</b>	Found on SLMS <a href="https://nyslearn.ny.gov/">https://nyslearn.ny.gov/</a>

<b>Project Sunlight Substantive Training PowerPoint</b>	Found on SLMS <a href="https://nyslearn.ny.gov/">https://nyslearn.ny.gov/</a>
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