Project Sunlight Campus Compliance Plan

Campus Compliance Requirements
The Office of Procurement & Travel Services is responsible for the administration of this program at the SUNY Canton campus. Compliance requirements include the following:

- **Communication**
  Project Sunlight background, requirements, and other information, including FAQs, are available at the link below.
  - Memorandum from SUNY dated December 21, 2012 explains the legislation.
  - Project Sunlight webpage, managed by SUNY System Administration, provides comprehensive information about Project Sunlight requirements.

- **Identification of Decision Makers and Advisors**
  Based on job titles and responsibilities, certain individuals are designated as potential Decision Makers and Advisors with influence in procurements of $25,000 or more. These individuals are notified of Project Sunlight requirements by the Compliance Training Coordinator via email.

- **Training**
  Individuals who are identified as potential campus Decision Makers or Advisors are required to take the mandatory training bi-annually at WeComply Sign in.

- **Certification of Training**
  The College will automatically receive confirmation that you have completed the module.

- **Designation of Contact Person**
  For questions on how Project Sunlight might apply to you or your staff contact Beth Martin, Purchasing Manager, x7555.

- **Reporting of Qualified Appearances**
  Campus Decision Makers, Advisors, or others in an influential role are required to report qualified “appearances” with vendors or their representatives that could result in the purchase of $25,000 or more in goods or services (this applies to a single procurement or a multi-year contract). If several campus employees participate jointly in an appearance, all participants can be reported on one form. Multiple appearances involving a single procurement must be reported separately. Appearances are to be reported to the Office of Procurement & Travel Services, using the Project Sunlight Reporting Form within three (3) days of the appearance.
The Office of Procurement & Travel Services, using data from the Reporting Form, will post appearance information to the Office of General Services website within five (5) days of the appearance.

- **Annual Campus Certification**
  - Campuses must provide yearly certification that all qualified “appearances” have been reported and that appropriate campus employees have been properly trained on their obligations under the law.
  - SUNY will follow-up with individual campuses when the Project Sunlight website reflects a lower than expected level of actual Project Sunlight appearances.

Further information about Project Sunlight is available on the [SUNY Project Sunlight website](https://www.sunysunlight.org), including informative FAQs. Additional questions that might arise after review of the training materials may be directed to Beth Martin at [martinb@canton.edu](mailto:martinb@canton.edu) or ext. 7555.