



## 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](#), 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.