



AGENCY TRANSPARENCY PLAN UPDATE: 2024
New York State Department of Financial Services
February 1, 2024

DELIVERABLES ACHIEVED SINCE 2021

1. **Records Retention:**

- a. In its 2021 Transparency Plan, DFS stated that it would embark on an agency-wide effort to update and expand its record retention policy. As of the end of 2021, DFS had already commenced that effort, holding a kickoff meeting with representatives from the then 13 DFS business units to set up a process for the review and updating of each business unit's record retention schedule, and had planned to meet separately with each of those representatives for early 2022 to monitor progress and to assist with resolving any issues that may arise.
- b. **UPDATE:** As of the date of this update, DFS has met with representatives of business units to review and update their record retention schedules to reflect current practices. As a result of these reviews, DFS has made various changes to its record disposition authorizations and is awaiting approval from State Archives. DFS will continue to update and/or develop new record retention schedules.

2. **Project Sunlight:**

- a. In its Transparency Plan, DFS stated that it would (i) explore making the Project Sunlight substantive training material that is currently in the Statewide Learning Management System (SLMS) mandatory training for staff, and (ii) resume requesting quarterly reports from its Project Sunlight Monitors. DFS also stated that it would mandate that all DFS policy makers, monitors, and reporters take Project Sunlight training and would resume requesting quarterly reports.
- b. **UPDATE:** In January 2022, the Project Sunlight Training modules (Substantive and Technical) were placed on the SLMS "My Learning Page" for all DFS employees. In addition, DFS now requires all policy makers to take Project Sunlight Substantive training and requires all Project Sunlight Monitors and Project Sunlight Reporters to take Project Sunlight Substantive and/or Project

Sunlight Technical training. Project Sunlight Monitors have resumed quarterly reporting, which includes reporting on staff compliance with Project Sunlight reporting, and advising on whether staff need training or re-training. Additionally, DFS' Intranet was updated to include Project Sunlight training materials, reporting forms, and guidance and policy documents, for all employees to easily access.

3. **FOIL:**

- a. In 2021, DFS had identified an increase in the volume of complex FOIL requests, necessitating the review of thousands of pages of documents. Without increased staffing, DFS had advised that timely FOIL responses would be in jeopardy.
- b. **UPDATE:** DFS has hired two additional legal staff to improve processing of FOIL requests.

INITIATIVES TO BE IMPLEMENTED IN 2024

1. **Transitioning to Gov QA:** DFS is in the process of transitioning to Gov QA to further improve FOIL request processing.
2. **Record Retention Policy:** In the last two years, many of DFS' business units have evolved to better serve New Yorkers. As part of the updating of DFS' Record Retention Policy, the record retention practices of the remaining business units not previously addressed will be reviewed and updated.