

Feedback on STARS 0.4

Introduction

STARS 0.4 was made available for comment from the Strategic and Technical Advisory Committees for a 3 week period between September 26 and October 15, 2007. The comment period was later extended through November 15, 2007, to allow for additional comments. We received comments from 59 individuals in total. This document contains all feedback received, with the feedback received after October 15 in [blue](#), so as to help users of a previous version of this document identify the new feedback. The feedback is presented as it was submitted, with minor formatting changes and typographical editing for clarity.

Participants in the Review Process

Feedback on STARS 0.4 was received from the following individuals:

Strategic Advisory Committee Members

- Sarah Banas - Program Associate, American Association for the Advancement of Science
- Elizabeth Beltramini - Director of Communications, Association of College Unions International (ACUI)
- Mary Jensen - Coordinator of Campus Sustainability, Keene State College (representing the College and University Recycling Council)
- Julian Keniry - Senior Director, Campus & Community Leadership, National Wildlife Federation
- Paula Martin - Assistant Provost, Juniata College (representing the National Council for Science and the Environment)
- Cameron Schauf - Director, Dining Services & Auxiliary Operations, University of Rochester (representing National Association of College & University Food Services)
- Richard A. Skinner - Senior Vice President, Programs & Research, Association of Governing Boards
- Jeanne S. Steffes - Associate Vice President for Student Affairs, Syracuse University (representing ACPA - College Student Educators International)

Technical Advisory Committee Members

- Peter Ashbrook - Director, Environmental Health & Safety, University of Missouri-Columbia
- Tom Balf - Director, Campus Consortium for Environmental Excellence (C2E2)
- Ed Becker - Executive Director, Environmental Health & Safety, University of Southern California
- Matthew Biette - Director, Dining Services, Middlebury College
- Enid Cardinal - Sustainability Coordinator, Illinois State University
- Jeff Darling - Purchasing Agent, University of Colorado at Boulder
- Mark Darling - Program Coordinator, Recycling Resource Management, Ithaca College
- Jack DeBell - Recycling Program Development Director, University of Colorado at Boulder
- Jonathan Fink - Director and Chief Sustainability Officer, Global Institute of Sustainability, Arizona State University
- Debby Freed - Alternative Transportation Manager, Office of Transportation, Virginia Tech

- Melissa Gallagher-Rogers - Manager, LEED Government & Higher Education Sectors, U.S. Green Building Council
- Stephen Gnadl - Associate Director, Stamp Student Union, University of Maryland
- Lauren Heising - Coordinator of Sales & Nutrition, Housing & Dining Services, University of Colorado at Boulder
- Winston Huff - Sustainability Coordinator/Project Manager, Smith Seckman Reid Engineers
- Tom Kelly - Chief Sustainability Officer, University of New Hampshire
- Steve Kreidler - Executive Vice President, University of Central Oklahoma
- Dominique LaRoche - Director, Space Management, Arizona State University
- Nancy Levandowski - Director of ISU Dining, Iowa State University
- Terry Link - Director, Office of Campus Sustainability, Michigan State University
- Larry Litten - Retired; previously Director of Institutional Research at Carleton and Dartmouth Colleges as well as the Director of Research at the Consortium on Financing Higher Education (COFHE)
- Jean MacGregor - Senior Scholar and Director, "Curriculum for the Bioregion" Initiative, Washington Center for Improving the Quality of Undergraduate Education, The Evergreen State College
- Matt Malten - Assistant Vice Chancellor for Campus Sustainability, Washington University in St. Louis
- Jerry Mann - Director, Student Support Services/Business Analysis, UCLA
- Johnette McKown - Executive Vice President, McLennan Community College
- Kevin Nelson - Office of Policy, Economics and Innovation, U.S. EPA
- Jacob Park - Assistant Professor, Business Strategy & Sustainability Business, Green Mountain College
- Jim Pittman - Associate Faculty, Sustainability Science & Practice, Prescott College
- Debra Rowe - Coordinator, Disciplinary Associations Network for Sustainability (DANS)
- Morgan Simon - Executive Director, Responsible Endowments Coalition
- Walter Simpson - Energy Officer, University at Buffalo
- Brad Smith - Dean, Huxley College of the Environment, Western Washington University
- Jeff Stebar - Principal, Perkins + Will
- Anne Stephenson - Consultant, University of Chicago
- Tuesday A. Strong - Director of Facilities Services, Rose-Hulman Institute of Technology
- Edward R. Terceiro Jr. - Executive Vice President, Mt. Wachusett Community College
- Brian Yeoman - City Director, Houston, Clinton Climate Initiative
- Michael Youdelman - Manager, Department of Recycling/Resource Management, Stony Brook University

Others

- Dave Ashley - Director of Environmental Design, Ashley McGraw Architects

- Niles Barnes - Press Relations and Administrative Assistant, AASHE
- Jonathan Bortles - Environmentally Responsible Purchasing Coordinator, CU Environmental Center, University of Colorado at Boulder
- Vivien Choi - General Manager, Dining Services, UC Riverside
- Sara M. Cleaves - Associate Director, University Office of Sustainability, University of New Hampshire
- Peter Crownfield - Alliance for Sustainable Communities
- Carlos Davidson - Director and Associate Professor of Environmental Studies, San Francisco State University
- Jeanette Henderson - Director of Real Estate, University of Washington
- William C. Johnson - Vice President of Business Development, Haley & Aldrich Inc.
- Patty Karapinar - Senior Project Architect, ANOVA Architects, Inc.
- Marilyn Pollack - Director of Dining Services, Washington University in St. Louis
- Peter Roper - Program Manager, CU Environmental Center Transportation Program, University of Colorado at Boulder
- Amy Lee Telligman - University of Colorado at Boulder
- Grant Walker - Associate Professor of Sociology, Sacred Heart University

Front Matter Comments

General

Reviewer 1

Overall, this is a very fine document and I couldn't find much to comment on.

Reviewer 2

Thank you for the opportunity to review and comment on the STARS indicators program AASHE is developing. I've reviewed it and think it is just terrific. I've scanned both for specific management system components and performance indicators and found both. In particular, I was eager to see a performance-based approach to energy, transportation and food issues as well as review of incentives in place for faculty professional development. It was also encouraging to see the several social and economic benchmarks, such as financing positions and projects and fair labor practices.

The current draft echoes some of the best elements as well of several of the better community indicators and assessment I've seen (e.g. Austin and Seattle-- have you seen those?). I wonder, would it be going too far to assess aspects such as support of the arts, childcare and possibly even a few more of the tenets of smart growth such as transit oriented development? Occidental College runs a very innovative program of community outreach and sustainable development that could inform an indicator or two in that area. At the same time, you have to mind the length of this assessment and, currently, the length seems just about right.

I took the LEED-EB certification course last spring and was somewhat disappointed at its lack (at the moment) of harder performance-based benchmarks for the rating system. For example, it seemed it would be possible to get a high LEED rating and still use quite a bit of energy. The STARS assessment addresses the omissions of the LEED system and I think will be more effective as a "whole-campus-community" assessment. This program would lend itself to a lot of the training and certifications that LEED offers. For example, AASHE could certify sustainability practitioners on campuses, signifying proficiency in the ability to use the STARS process to evaluate campus performance.

The document I reviewed was: www.aashe.org/stars (just want to ensure I reviewed the correct document). Please continue to remind me of the next steps in the process (and especially any requests of me) as I'd like to try to be helpful to you.

Reviewer 3

Overall, this is a great start. The approach makes sense and the checklist is quite thorough.

Reviewer 4

Are the incentives for institutions of higher institutions to participate in the proposed STARS rating system clear?

One thing that nags me about the proposed STARS rating system is one of necessity, that is, what are the **incentives** (e.g. organizational, financial, and so on, etc.) or **the push or the pull factors** for colleges and universities to rate themselves using this system?

Like many organizations, colleges and universities are already bombarded with many governmental and non-governmental reporting requirements (including some I am sure that are sustainability reporting-related). Given the time and resource that undoubtedly that will be required to complete the necessary self-reporting framework, it is not abundantly clear nor

obvious to me why colleges and universities would want to rate themselves using this new AASHE rating system (particularly for the first time)?

However controversial the US News ranking system might be in higher education, I have no doubt that if very few people would care very much about the rankings if they did not have a measurable impact on admissions and institutional prestige factor.

Assuming that the proposed AASHE rating system is not going to have a similar layered impact (I can be persuaded otherwise), again, what are the incentives (e.g. organizational, financial, and so on, etc.) or the push or the pull factors for colleges and universities to rate themselves using this system?

Does the indicator enable reasonably fair comparisons across campuses?

I am a bit concerned that the proposed STARS rating system will only reinforce the institutional bias that already exists toward wealthier, better funded institutions of higher learning (large research universities over small liberal arts colleges, and wealthier small liberal arts colleges over more their admission/tuition driven peer institutions) that have the resources (staff/manpower and organizational resources) to design and develop a STARS rating system reporting framework.

Are there existing standards by which to measure achievement of this indicator?

Other than the LEED system, some higher education institutions have devised campus sustainability action plans based on the Global Reporting Initiative (GRI)'s guidelines. GRI is currently devising a new protocol/reporting framework for its non-profit sector, which will probably include higher education institutions.

Is the necessary data available at most campuses, or can it be made available? If not, what do you suggest?

My guess is that some of the most difficult data availability challenges will come from the operations and the purchasing side as campus sustainability and purchasing/operations efforts tend to be institutionalized by different people and institutions.

My suggestion would be to give at least 1 point for any campus reporting framework that includes people from purchasing/operations on its campus sustainability committee and then an extra point or two for showing evidence that the integration of purchasing/operations into campus sustainability has yielded some concrete results of some sort.

Reviewer 5

Overall I am concerned about the problem of converting a scoring system with a corporate feel for universities. The education and research sections are particularly weak. I will be gathering a large group here on campus in the next month or two to review this comprehensively and will look forward to providing better input at that time. In the interim, I would find it very useful to share comments among all members of the technical advisory committee and wonder if you can forward or otherwise create a mechanism for doing that? If not, I am happy to request others' thoughts but would appreciate an email list if you have one. Two principle benefits for this:

1. we form a kind of learning community that benefits from the full range of ideas
2. it increases the transparency of the process which I think is VERY important.

Reviewer 6

Just finished reading the document. While it looked through, I got to wonder about those with already developed programs. It seems that those who are jumping on the band wagon have the opportunity to get more points as perhaps a trend may seem small if you are reaching a smaller

tweak to a program. Perhaps there could be a "years of commitment" column to a trend if the steps have slowed???

...

Overall, looks quite comprehensive.

Reviewer 7

Here are my comments on what is overall a fantastic start for the STARS assessment:

Are you planning to have links to the other assessment/resource tools mentioned in the criteria (e.g., Responsible Purchasing Network, Best Workplaces for Commuters, etc.) in case folks are not familiar with these?

Reviewer 8

After careful review and consideration of the Draft Document for the STARS system of evaluation, it's my opinion that the overall intent of the project holds great promise and value. However, when figuring the details on assessing a rating/value to various categories, herein is my concern. For example, some universities across the country are able to incorporate a full-fledge food waste composting program within the context of their recycling program(s). Universities such as ours, want very much to do the same, but unfortunately are unable to due to a lack of outlets (i.e. commercial "permitted" composters, farms within reasonable distance, etc). Hence, this segment of the waste stream still ends up being disposed of and consequently, the end results --> waste minimization figures are impacted.

In light of this scenario, and there are others, somehow the STARS system needs to take (if it's doable) a more fair representation of how to assess points and values to the overall merit of any respective University program.

...

The document looks very good and is very broad based. Not just "environmental sustainability" but "sustainability" in the most general sense.

What is the incentive for Universities to voluntarily submit a comprehensive report like this? Will your organization adopt a similar approach as "RecycleMania" does? Whereby there is extensive reporting on this, marketing, and Awards given based on various highlights/categories?

When asking for reporting information on the University in question, it should be clearly stated what the "footprint" of the school is. For example, within the context of the RecycleMania competition....some schools opt not to include certain segments of their footprint (i.e. University Hospital/Medical Center; Residences, Campus Dining Area, etc). Reporting requirements need to clearly specify what is deemed a Footprint of an institution. It's going to be difficult enough gaining an "apples to apples" comparison in the context of sustainability, let alone just for recycling.

Will there be guidance documents supplied to aid in reporting and gaining a foothold on measuring? Not simply a guidance on explaining a particular category, but getting into the nuances of measurements and reporting....

Reviewer 9

Thank you for the opportunity to review the STARS system. At this point, I do not have that many comments on the initial content. USGBC is willing to help in the writing of the sections of the User's Guide that reference LEED.

...

This may be more appropriate for the User's Guide, but a campus can choose to use LEED as a tool to reduce their energy and water use. The LEED rating system covers topics such as GHG reduction, stormwater management, potable water use reduction and energy use reduction.

Reviewer 10

Everything else looks very comprehensive from my perspective.

Reviewer 11

Nice work. This seems like a fairly comprehensive document, especially for a first draft. ... It wasn't too long, the format was easily comprehensible. I would recommend the use of a serif type. The sans-serif typefaces are too difficult to read, especially in paragraph form.

...

There is no mention of Alumni, other than in endowment form. It seems important to somehow capture them in this process.

Reviewer 12

I think the document looks very promising and am very glad for this opportunity to provide feedback regarding alternative transportation/commuter options.

Reviewer 13

Excellent work. I think I'm going to try to fine tune this as a toll for unit certification here as we develop an internal 'green certification' project.

...

New Credit(s) – perhaps this can be one or it can be two, but I would like to see something that measures employee travel other than by fleet vehicles – mainly air travel, but one should get kudos if they take trains where possible or if they show an increase in teleconferencing activities. This also leads to where might carbon offset programs fit and should they receive any credit.

Hope these few thoughts aid the cause. Impressive work thus far.

Reviewer 14

In general, [my organization] is very cautious about endorsing as “best practice” rating activities that

- 1) are impressionistic or “reputational” in terms of how an individual institution is ranked,
- 2) presume there to be a single model applicable to all types of higher education institutions, and
- 3) are so prescriptive as to deny or diminish the authority and autonomy of boards of trustees to fashion criteria by which to assess institutional performance.

While the analogy may be somewhat strained, we celebrate and endorse the “diversity” of institutional types and missions represented by the 4,000-odd colleges and universities, preferring to see in that diversity many of the healthy aspects associated with biodiversity.

Similarly, we value the autonomy with which boards act since that autonomy serves as a foundation for such profoundly important and distinctive elements of the academy as academic freedom. Standards, by definition, impose some degree of sameness, if not necessarily uniformity, and may therefore reduce the variation that is the hallmark of American higher education.

Definitions bedevil all efforts at systematic assessment and, as noted in the STARS document, are “inherently imperfect.” It may be the case that the STARS framework will indeed facilitate sufficient discussion to hone further a clear definition of “sustainability.” Alternatively, a deliberately circumscribed framework that has a broad measure of “face validity,” particularly with lay persons who are, after all, the very people who govern most colleges and universities, might attract more institutions interested in the operational and environmental (more narrowly-speaking) aspects of sustainability. With more institutions using the framework, STARS would be more and better “road-tested” for the scope of exactly what is meant by “sustainability.” As the term is used in STARS, I anticipate some and perhaps many boards resisting its use because the term, as used in STARS, is so expansive.

As will be apparent in the comments that follow, I am more comfortable advocating on behalf of the institution undertaking to develop a sustainability framework that reflects its mission but is nevertheless subject to assessment, albeit, one that is less-expansive than the framework represented in the STARS document. Specifically,

*I suggest that this consideration [i.e., **ER Prerequisite 1: Sustainability Definition**] precede all other indicators and thereby allow institutions to resolve for themselves what they see sustainability to encompass, including the number and spectrum of dimensions they see as pertinent.*

Reviewer 15

I've attached my comments on this first round. While I looked through the whole thing (all indicators and guidance on indicators) I'll be honest in that I really focused on the first 5 pages, assuming that there will be an opportunity in the future to comment on indicators. If not, let me know and I can go through the indicators on Monday.

Good job so far. I hope that my comments aren't too far out in left field!

Reviewer 16

As you know I'm not working full-time as a sustainability coordinator so I'm not equipped to comment on most of the indicators. For the most part they seem great to me!!

Reviewer 17

I appreciate the openness that AASHE has had in this very important project. If done well, the STARS will give a boost to sustainability programs throughout higher education. Unfortunately, Version 0.4 does not meet the desired objectives and will set sustainability efforts back unless substantial changes are made to the document. I will split my remarks into three areas: strategic comments, general comments, and technical comments.

Strategic Comments

It was my understanding that this was to be a technical document. It is not; rather it is a political document and there are way too many controversial positions taken in the document that will lose support for sustainability rather than garner support. If this document is supposed to be a political document, then I misunderstood its purpose and I would submit my resignation from the Technical Advisory Committee because I am not interested in pursuing the political aspects of sustainability.

Overall Comments

Assuming STARS is a technical effort, I would observe that upon first reading, there was an overweighting of controversial social issues before one even reached the environmental issues. As someone involved with environmental issues for over 30 years, it is a tremendous disappointment to feel that social activists are trying to use environmental issues to garner support for their social issues. As STARS is currently written, environmental issues count for less than half (48 of 113) the possible points. I thought sustainability was primarily an environmental movement. Building on that thought, the environmental operational criteria should be the second category (after Institutional Commitment) to emphasize its importance. In its current place in the STARS, it almost appears as an afterthought.

On my campus, our sustainability efforts have focused on collecting statistical data that are factual. Once that data is collected, we can have sound data to develop campus policies around which consensus can be obtained so that sustainability is something that the entire campus community can support. Many of the issues, especially the social issues, in this version of STARS will cause divisiveness and cause way too many people to classify persons pushing sustainability as “do-gooders,” “tree huggers,” or some other derogatory term. These issues are too important to drive people away.

Reviewer 18

Really impressive first draft. Thank you for the opportunity to review this important document as we try to integrate sustainability education and practices into our campuses/lives.

...

very good and easy to understand write ups of the indicators

...

GREAT first draft

Reviewer 19

I think its a really exciting effort and always hard (though important) to bring lots of voices in.

Reviewer 20

First, I would like to commend AASHE for developing the document. It reflects thoughtful commitment to the sustainability of our planet, and I am appreciative of the leadership.

My overall comment for constructive improvement would be to ascertain that the indicators are closely tied to sustainability goals. I would be more comfortable by rewording the “must” statements to suggest that the college receives points for positive action rather than a required action. An example of this would be on GF Credit 4—Institution is a signatory in good standing While I strongly personally support the included areas that are on the fringe of sustainability, I believe the rating system should focus on those elements that tie directly. They are excellent strategies but are covered in other types of reviews. With this in mind, I would offer the following suggestions:

Reviewer 21

Thank you for providing me with the opportunity to review the draft of AASHE Sustainability Tracking, Assessment & Rating System (STARS). I applaud your efforts on this task.

Reviewer 22

The number of points in each section are out of balance. In education and research, there should be more points available and big items like graduation requirement should be worth more points.

...

Be careful on the wording of the credits so they don't sound too value laden.

What about institutions that already have great progress and so your indicators are not realistic given their baseline. Do they get credit for the baseline?

There needs to be a comment at the beginning that this rating system is not meant to be prescriptive and instead provides a menu of options for how an institution can express their commitment to sustainability. Also a paragraph about how these criteria match efforts in the business sector to be more sustainable in policies and practices. This will help move it away from the conservative/liberal problem.

Reviewer 23

As a first draft the document has a lot of great content. It should perhaps be renamed STAG (no less silly than STARS unfortunately) "Sustainability Tracking Assessment Guide". This document reads much more like a "guide" than a rating system. Since it's called STARS (reminiscent of a grade school incentive program with stickers), the visual image of giving one's self STARS is not likely to be attractive to prospective students choosing a school or prospective funders.

...

1. _____ Is the indicator "valid"? (Does it measure what it is supposed to?)

Language such as "indicator", "intensity", and "trends" are less rigorous than the language contained within the Green Guide for Health Care (a very similar document). The GGHC raps each credit around what it "does" (i.e. how it contributes to health and healing). These indicators do not seem to have this sort of necessary focus.

The education category (19 points) (i.e. what the campus is really there to DO) has less weight than operations (48 points), and social responsibility / community outreach (31 points). As a campus rating system, it should be focused on what students are really learning.

Indicators for each of the prerequisites and credits should be measurable with accepted reference standards so that universities across North America can establish a common benchmark for performance. Since this system is self-reporting, it will be important that each university complies with the same standards or guidelines in order for claims to be comparable and to have any value. For example, universities may want to measure total energy consumption by kWh/sf and/or by building type or per capita and measure total water consumption by gallons of water per student or per capita.

2. _____ Does the indicator enable reasonably fair comparisons across campuses?

Comparisons will only be made if the guide outlines a common set of standards and protocols for tracking performance.

3. _____ Is the necessary data available at most campuses, or can it be made available? If not, what do you suggest?

My understanding is that every campus tracks things differently (UBC has an entire department that is funded through operational savings, whereas SFU does not have as detailed a metric). The guide would help those campuses that are not as organized in these categories begin to track the

necessary data. Having most campuses even think about collecting the data is a step in the right direction.

4. _____ What “outcome” is the indicator focused on achieving, and is there a better indicator for achieving the same outcome?

It’s difficult to identify “outcomes” for each of the credits (let alone an overall outcome from the system). Each credit would benefit from an intent or goal that might be achieved. The introduction has 5 goals that the guide might be able to cover superficially but the credits lack rigor and deliverables. A simple letter from the Dean saying that they have a “sustainability implementation plan” would not be sufficient for measuring performance of the plan. Creation of the plan should be fleshed out. (What must the plan include?)

...

6. _____ What are the terms for fulfilling this indicator? What guidance is needed?

There needs to be more prerequisites. The credits are far too easy, far too broad, with too much room for interpretation. The guide need not be as prescriptive as LEED, but it should provide enough information for campuses that are starting with no programs on the horizon. More emphasis should be placed on the progress of campuses.

7. _____ What resources are available for further information on this topic?

The Green Guide for Health Care (January 2007) – Good example of a guide that has purpose and traction. (The guide is informing the LEED for Health Care application guide)

Sustainlane. A measuring guide for green cities (which may be applicable to larger campuses that have the population of small cities).

Reviewer 24

I applaud everyone at AASHE for their efforts in getting this project off the ground. As a Sustainability Coordinator in a newly created position, I am hoping to use STARS as a jumping off point to get [my campus] moving in the right direction (a little quicker).

Reviewer 25

Attached are some comments on the STARS criteria that in my opinion would make the tool less prescriptive and help gain greater acceptance. My main concern is that if the tool is perceived to be based on an established model, many institutions will shy away from participating. Universities take pride in innovating new solutions to global concerns, so you may gain more acceptance by building on this.

...

Thanks for allowing me to preview and comment on the STARS benchmarking tool from a campus sustainability administration point of view. In general it is a good idea, but a few points should be considered for it to gain wide acceptance.

...

In general, the “Tier I” criteria pre-specify the solutions that must be implemented and fail to state the purpose or true goals of the criteria.

- Pre-specified solutions like “revolving loan funds” and “incorporating sustainability criteria in hiring and promotion of faculty” limit the appeal of STARS process. It seems to me that the goal is not to have a loan fund that matches that used at another institution, or to promote only faculty working on sustainable projects, so the STARS criteria should not be so prescriptive regarding the solutions that need to be in place. Unique and innovative solutions should be encouraged.
- STARS materials, especially the checklist, may go too far in endorsing specific organizations and standards and dissuade use of others. For example, credit is given for participation in ACUPCC but not in other agreements (Tallories, Regional Agreements, etc.). Another example may be the use of LEED standards or application of LEED criteria in institutional specific standards, while failing to state the true goal of incorporating green thinking in the design, construction, and operation of buildings (of which LEED is perhaps the most widely accepted set of criteria, but not the only useful criteria).

Reviewer 26

The armature is great and you have come a long way.

Reviewer 27

It is an honor to review this and I get a sense of hope for the future.

Reviewer 28

My first thought is potentially the only challenging thought I'll submit, the others are primarily tweaks or minor suggestions. I believe that this concept is too large and contains two dominating emphases that I think are best split into separate assessments. It seems that there is a campus sustainability issue relative to the environment and another issue relative to social justice and community engagement. From my perspective joining in this conversation late in the game I see these are modestly entwined and separable into two stronger assessments/rating systems. Both of these are, in my personal opinion, relevant and important to encourage. Professionally I think they stand better as two than as one.

Reviewer 29

My perspective comes from the land use side of sustainability -- namely the smart growth perspective so my comments will relate specifically how the campus operates in its growth and development.

...

Getting to the End Result: Outcomes versus Outputs -- Prior to the scoresheet, there is a discussion about performance measures, which really makes sense to me, but I do not think that it is carried out well enough through the scoresheet. So many of the factors relate to whether something exists, and not about what that thing is intended to accomplish. For example, most of the Governance and Finance criteria are set up to score a point based on if the school can say yes to something, without much consideration as to what is the end result of the factor. ... There are sections that do focus on outputs, like the greenhouse gas reductions, but not many. There needs to be a stronger emphasis on these factors in order to get schools to realize that these factors go into making a difference on campus. On the opposite end of the spectrum, some outcomes cannot be measured accurately. For instance, OP Credit 26: Stormwater Management is written as an outcome, but does not provide enough guidance to be useful. This section should include something that can be measured like relating their efforts to Best Management Practices.

Audience -- This issue came up at the AASHE meeting in Phoenix. I am not sure if this scorecard is meant for the high level schools that are already successful in sustainability or if this is for schools lower down the ladder. In any event, I think this should be explicitly stated somewhere in terms of the target audience. Since schools will use this to claim success and get a leg up on their peers, it makes sense to spell out who the benchmarks are intended.

Measurements Using 3-year trends -- I can appreciate the rationale for basing points off of 3-yr changes, but I think one can argue that a school can measure positive change in one year that far exceeds the outcomes over a three year timeframe. Who then is more successful, the incremental change or the short-term but larger effort?

Meaning of "demonstrating" factors -- This is another term that needs to convey something more than it does. As read, the school can just acknowledge to itself that some benchmark has been achieved, potentially, without really indicating how or what was completed. Again, another factor related to the lack of outcomes to be measured.

The Land Use Angle -- From a smart growth perspective, sustainability is truly about how land is developed in a way to result in positive (or at the very least, minimal negative) impacts upon the environment. To this extent, credits should address not only to what extent the campus has developed compact building orientation, mixed-land uses as well as protected open space, enhanced circulation flow, but also provided transportation options enabled students to live on campus in greater numbers. Each of these criteria will improve air and water quality, reduce vehicle miles traveled, and provide for more walkable, livable communities that provide active living on and off campus. Each of these factors can be devised with specific metrics to clearly indicate the outcome of smart growth development. For instance, credit can be given to the planning and construction of a mixed-use building that houses students and classrooms and can be shown to reduce the amount of car trips to campus because students are already living on site.

Weighting of credits -- It is good to weight the energy credits because of their direct impact upon (environmental) sustainability, but I think some of the other sections (Operations) should be weighed more than others.

Reviewer 30

This is excellent and outstanding work, you have done a great job since the last time I saw the draft documents! Nice job.

The questions for this round of review are quite extensive. I have tried to stay within those bounds, but found myself wandering off into other thoughts than focus on the 7 core questions-- though I tried my best. Since you have specifically not asked about point distributions, I will not comment on those but we may want to revisit that topic in the future.

I would suggest including the point values in the prereq/indicator guidance descriptions for ease of viewing.

Reviewer 31

It's really hard to find the right "balance." I applaud your efforts and believe fervently that this effort will achieve great things -- but that there will be lots of bruises and broken bones along the way.

...

I'm going to try to write comments that are as helpful as possible, but I know that it's easier to describe problems with a document/indicator than it is to suggest a solution (at least for this intellect)

Second, let me applaud you on this effort. I know how much effort and thinking and time went into it. The more I look at this, the more complex it becomes...

Breadth - I think you have covered most all key topics. I'm not keen on bumping up many of the possible Tier Two indicators to Tier One.

My perspective – I looked at this based on my experience with the development of CERES Principles/Report, my familiarity with GRI and my work with colleges/universities (compliance and sustainability work) and experience in auditing.

One of my unique experiences (and challenges looking at this) is to put on an auditor's hat and say how would a university appropriately demonstrate to me that they had such a program or deserved a point(s) for a certain indicator. For many indicators I would not be comfortable conducting an independent, objective third-party audit unless they developed concrete plans, definitions, policies, data collection and assessment methods to that I could develop appropriate auditing protocols. I'll give examples later when I get to those indicators.

What was my visceral reaction? (1) I think GRI did a better job at the beginning in capturing core information without feeling like there's an "agenda" that is being pushed. I guess it comes down to "rating" versus a universal standard for CSR transparency. Many of the Social Responsibility and Community Engagement indicators made me feel uncomfortable. Sort of like someone saying that this is what a really fine piece of art looks like and then realizing that Picasso may not fit the mold because cubism approaches art in a completely different manner. (2) I didn't like the 3-year trend lines. I understand, but it feels, well, unsustainable and it rewards recalcitrants (which I don't think is a huge issue). Might it be moot in 10 years when a great performing school can no longer get points? I know you address this later on page 3 of the intro, but I still don't have a positive reaction to giving points to trends. I would be more comfortable with simply giving points – at this juncture -- to an institution that publicly discloses this data and at a future time AASHE sets the "thresholds" for performance

...

I guess as I finish writing down my comments, I'm not sure that I wouldn't be more comfortable with a Assessment scheme that simply rewards folks for having the programs and showing some level of performance, and leave off the points for upward or downward trends until thresholds of appropriate performance can be determined. Other bodies can mine the data and compare and rate schools independently and you can

...

AS I ruminated on this document overnight, I thought about the extraordinary time and effort it took for folks trying to fill out the Higher Education Sector Performance Checklist. As we all know, getting the data -- especially past years -- was and is a huge effort. One of the questions the pilot should answer, perhaps, is whether positive or negative trend data should determine points because I think it will take 2-3 years before most colleges and universities have the trend data to fill out (or be willing to fill out and look acceptable) . By that time, you/we may have a pretty good handle, based on pilot data, on threshold performance levels and avoid giving points for trending.

Reviewer 32

I read the document over the weekend. I was impressed. I can see by the scope of the tool that a significant amount of time went into its preparation. I found no glaring areas missing. The only concern I would have is the amount of time that it would take to complete. Giving the growing demands for time perhaps some might feel that they do not have time to fill it out.

Reviewer 33

I was initially very, very interested in participating on the STARS TAC committee. Now I have reservations because of what I see as a definite political emphasis in the draft that overshadows the environmental aspects of sustainability.

I wonder if there are ways that STARS can encourage community college participation. I am concerned that community colleges, a huge sector where we haven't seen a lot of growth in sustainability, may be reluctant to participate because of funding staff positions required by STARS, and because they are more tied politically to their local community than University campuses and thus might be reluctant to take on the political aspects of the draft. I would hate to have them turned off to STARS by the inclusion of political requirements that they or their community may not support. That would be very detrimental to the environmental sustainability movement.

Reviewer 34

I am really impressed and excited to see the serious commitment to social justice issues in the STARS. Social justice is often left out. I think this aspect will be interesting on our campus where social justice is our number one value and sustainability is just now coming more into focus.

Reviewer 35

STARS will be a terrific advance on the sustainability front. The discussion of the basic issues of measurement and certification in the introduction is very good. The star rating system is certainly the way to go.

I'm making my comments "fresh," prior to reading the comments of others. In general, I have the following concerns:

A. Reliance on trend data to the exclusion of snapshot data will certainly undesirably penalize many of the real leaders in sustainability. A couple of approaches might be considered: 1) allow institutions the option to demonstrate trends for a longer period, say 5-years or 10-years and do the rating based on percentage change; 2) collect snapshot data from the pilot institutions (and successively from all participating institutions) and give institutions a point if there are in the best 25% on any measure.

B. The weightings that give up to 5 more points from some areas than most of the measures are quite arbitrary and in some cases extreme (e.g., equating SC 3 and OP 17 in importance is implausible). One solution would be to give more points for some of the unscaled measures (e.g. OP 9 & 10). Another would be to give only partial points for each scaled step so that the highest level gets a "1." I'd vote for equal scales for all the scaled measures (either 4 OR 5 steps).

C. Section weightings (points) will necessarily be arbitrary, whether sections are weighted differently or equally. However, the present greatly unequal weightings of the major sections are too far out of line, especially the lesser value given to economic sustainability. One solution would be to standardize the ratings of each section (as US News does with its unequal measures), assign stars to each section, and report an overall star count based on the sum of section stars. I believe that the stars given each section should be reported as well, since it identifies leaders and laggards in each related, but somewhat independent, area of sustainability. Separate ratings of the sections will provide intrinsically useful information (as do the individual grades of the Sustainable Endowments Institute).

D. One way for any institution to reduce its ecological footprint is to go out of business. On the other hand, assuming that sustainability implied continued existence, economic sustainability is not well developed in STARS and excludes many of the traditional (and legitimate) indicators of "institutional sustainability" such as income/expenditure ratios, debt/income ratios, demand for product/services (e.g., applications, research funding). An institution that is not economically viable surely isn't sustainable as an institution (although if it has been an egregious villain on the

environmental or social front, its demise may be a blessing-apart from the disruption that it introduces into the lives of employees). Can some credit be given for an institution incorporating economic sustainability externalities into its budgeting and financial planning (a la Pittman and Wilhelm)?

E. The evaluation of trend data will be a challenge. Which of the following data represent a "3-year upward trend?"

94%, 98%, 95%

94%, 92%, 96%

94%, 86%, 95%

94%, 95%, 95%

I'd vote for a 4-year percentage increase (4th over 1st year), with points given to specified intervals (as in OP 16).

This is great stuff. Carry on. I look forward to the next round.

Reviewer 36

The Stars rating system is a great document and I would like to thank everyone that has taken part in its development. We applaud your efforts.

Reviewer 37

Overall I think the document is about ready to go. It is a living document so modifications will always happen. I agreed with most of the comments that were made in regards to making sure the smaller institutions have an equal chance at success.

Categories can and should be expanded as more institutions show leadership in new areas. Example: I am working on a program with Grainger to exchange all sorts of products, i.e. motors, v-belts, bearings, etc. We're calling it a Holistic Approach to material purchasing. When a motor wears out we return it to the manufacturer to be repaired, refurbished, or properly disposed of, we would receive a rebate for handing it back and the rebate would be applied to the new purchase price resulting in further cost reductions.

Reviewer 38

Are there any plans to interface, merge this framework for assessing campus sustainability programs with others programs such as: The Sustainable Endowments Institute's College Sustainability Report Card, or the APPA Facilities Performance Indicators, and/or others? The reason for asking this question is out of concern that AASHE and others could be facing pushback from institutions if faced with multiple systems, reports etc. This has been seen in the corporate world as business leaders were faced with dozens of reporting requirements, surveys, rating systems, sustainability frameworks, etc. There may be a real opportunity to figure out how best to integrate existing efforts.

We understand The STARS system will be a self-tracking system in the short term and that verification options (third-party or other) are being considered for the future. As consultants with experience with verification systems, we support the idea of verification but think it is important (and a real opportunity) for AASHE to set an expectation for verification and an explanation of what institutions should be looking to get out of it.

We see two distinct opportunities:

Broadly at the campus program level, the value of an external verification is very limited if the result is simply a "check list" type verification letter, generated by a consultant for the university. Where value is actually created is via the learning that's gained and the gaps identified during the

process of an audit. Verification can be a means for developing a process for continual learning and improvement, but only if the emphasis is on what can be better to lead to better sustainability performance, cost savings and efficient management of sustainability programs. By providing guidance and encouragement for this type of “verification” (of sorts) AASHE has the opportunity to get some universities moving in a truly sustainable direction.

At the individual systems level, certain specific environmental performance data absolutely does merit direct verification of performance (via a simple checklist). As an example, you can get “LEED” points and certification for various renewable energy systems or other building systems, but without verification that they actually meet the objective, some can consume more energy than the not “green” alternative.

AASHE might want to consider embedding links and documents into this document (the Stars Guidance) so it’s easier for institutions and resources and definitions. For example, OP Credit 9, the Green Seal Procurement could be a hyperlink direct to Green Seal website. In our experience, the more customers have to root around finding out the information and resources, the less favorable impression they’ll have filling this out.

There could be opportunity to utilize an “open-source” format for information sharing as well. If it’s a members-only area of the website, members could submit content to help other members. AASHE can still keep an element of competition in this – but the competition should be on sustainability performance – not which institution can find out the information the fastest to fill out the survey. Or if AASHE wants to maintain tighter control, invite their members to submit tips/ideas, etc. and they can compile and provide those tips in the relevant places within the survey.

Minor Issue of Word Choices:

Have you considered eliminating the use of the word or any reference to “checklists” in the document? It is clear you are trying to promote performance-minded and measurable outcomes that are flexible; which is inconsistent with the idea of a checklist. Also, you may want to consider an alternative to the use of the word “must” when describing the indicators? An alternative word choice might promote the spirit of creativity, collaboration, innovation, and learning that leads to more sustainable outcomes. “Must” can seem rigid and inflexible, which is not what this program seems to be about.

A resource you might be interested in:

ASCE is currently leading PERSI (<http://www.persi.us/index.html>), a consortium of infrastructure organizations (ASCE, AIA, ASChE, ASTM, ASME, USGBC, NIST, IEEE, AutoDesk, CSI, etc.) to help its member organizations 1) address sustainability consistently in their practice and standards AND 2) to develop metrics for measuring sustainability. The efforts of this group may be of interest to AASHE, and vice versa.

Reviewer 39

I agree with the comments that there is over-emphasis on social responsibility & community engagement, which seems to reflect an underlying political agenda, and it's not inherently obvious how these relate to environmental sustainability. At the very least, this section should be last and should have fewer categories and a lower score set as compared to the other sections.

The recent Sustainable Endowments report seems to address much of what you're trying to accomplish with STARS. I agree with some of the comments that suggested the self-assessment aspect of STARS may reduce its perceived accuracy, and other comments about who the audience will be. How will STARS differentiate from the Sustainable Endowments report, particularly because the latter is not a self-assessment and is getting good press.

Overall I think it's great that you're tackling this, and a common measurement tool is definitely needed.

...

While I do understand and appreciate that environmental stewardship is one aspect of the broadest definition of sustainability, I still think that the Stars survey is too heavily weighted to the social justice elements. And perhaps it's the limitations of language. For example: The survey asks whether there's a Sustainability Officer. At most universities, this position would likely be someone who is focused on environmental stewardship, not ensuring whether for example the faculty is meeting diversity goals or whether there's compliance with fair labor practices. If Sustainability Office = environmental, then a Sustainability survey implies measuring progress on environmental.

And the AASHE conferences I've been too, like Greening of the Campus, have been oriented towards environmental stewardship, with only a sprinkling on social justice issues. So frankly it was simply a surprise to read through the survey and find more scoring elements on social justice than an environmental.

I just wanted to give you my general reaction, because if I react in this way (and I'm very much oriented towards sustainability in all aspects), then it's an indicator you could get more negative responses from others and a disinclination to participate.

I looked at the survey again after mulling over your explanation, but am finding that I still have the same reaction as I did initially. There are too many social questions, many of them very vague and probably not particularly measurable. Ex: SC 25 Worker Wellbeing. Huh? Or SC 26 Social Mobility -- that one strikes me as something that reflects local/state/american culture and not necessarily directly related to sustainability. I mean, are you suggesting that moving up in social rank is a good thing even though it implies higher levels of spending & consumption? There's all sorts of values imbued in a question like that.

Of course I could be wrong and others will embrace a survey of this breadth, or maybe it's just a matter of time and you're way out in front in including questions that most people would not perceive currently as part of what it means to be sustainable.

All my comments offered in the spirit of friendship and respect for your work and AASHE's contributions toward a sustainable future!

Reviewer 40

In some cases, a trend is useful, but it should not be a primary indicator. (Once an institution has achieved success in a given area, they would lose a point!)

Trend is also a problem for small institutions where they may not have enough (or any) quantifiable changes in a given year.

Measuring absolute changes in relation to a baseline might be more meaningful, as they propose for GHG reductions. But this only works if the scale is fair—not heavily weighted to favor small improvements.

I'm not going to repeat this under every Trend point, but these points equate very minor trend improvements with a significant and continuing improvement and penalizes those who are most successful.

Don't the totals seem a little out of balance? 18 for Education and Research compared to 31 for Social Responsibility and Community Engagement? (And many of the SR & CE points seem quite superficial.)

The copy we have lists no items for Innovation, so how do they get these points?

In many areas, there is a tendency to measure institutional structures, as opposed to real engagement or results. (Including community service in job descriptions is the same one point as actually using it in tenure, promotion, and pay evaluations.)

Reviewer 41

In general there is a problem with the points assigned to various items. Many items are assigned one point while some are a lot more significant than others, e.g. a campus could do well on diversity and labor practices (both important) and score a lot of points but be a basket case on energy conservation, renewable energy, and reducing its carbon footprint and yet get the same overall score as a campus which did miracles on the energy and greenhouse gas reduction side. That does not seem right, given the critical urgency of addressing climate change. Note that climate protection crosses all boundaries, environmental, social justice, economic. Also a campus could be doing excellent in many areas but not trending upward (because they are already excellent) and be out scored by campuses which have done little but are trending in the right direction (in part because they have done almost nothing to date and slight improvements appear big). Also consider research. Research counts for a maximum of four points and is 50% trend scoring driven. One can imagine a school that is doing a tremendous amount research on critical sustainability issues, thus making a huge contribution, yet scores just 2 – 4 points. (It could be just two points if they are not trending upward but how important is that if they are already doing a great deal.) The scoring system produces all kinds of anomalies like this and is very problematic in my opinion.

A. Introduction

Reviewer 18

the introduction goal number 1- include "student life" in the list of components of campus-if the goal is to change the culture of the campus, a phrase including students is more inclusive

consider adding common standard of measurement "and language". need to have similar semantics -apples to apples to assess.

Reviewer 25

Combining the use of a benchmarking/sharing tool with a marketing device creates a scenario where institutions must buy off on both a collaborative tool and a competitive survey. Some clarification about the primary purpose of STARS will go a long way to gaining wide acceptance of STARS as the benchmarking standard.

Reviewer 31

I really like the introduction paragraph with bullets 1-5. Well said.
I would delete the "In addition" paragraph. I don't like the tone or you telling me the impact of a yet-proven tool.

B. Reporting Instructions

Reviewer 38

It might be useful to set a deadline for the completion of the STARS questionnaire to ensure universities send back their responses. There are many examples of voluntary schemes which are not successful due to the lack of deadlines. Thus, having a deadline might increase the value of the system.

Another idea might be for AASHE to consider partnering with US News & World Report, Petersons, Princeton Review, Beyond Gray Pinstripes (or the like), to encourage them to include the STARS ranking as part of their ranking system. If one of the big value drivers for institutions is really attracting students, tying STARS to one of these other “ranking” systems might be a big incentive to encourage schools to complete the rating and work on their progress.

Reporting Frequency

Reviewer 3

May an institution submit a completed checklist more frequently once every three years, if it wishes too?

Reviewer 18

word choice (w/c) continuous vs. continual

Reviewer 27

I was originally concerned that reviewing every 3 years was too long but after getting into the meat of the review it makes more sense. My assumption is that if they make some significant improvements and want to be reviewed earlier that would be acceptable?

Reviewer 31

Under Reporting Frequency, I am assuming you can update more frequently than 3 years, if you wish, or validate findings, etc.

Reviewer 38

The reporting frequency seems appropriate, as it will not overburden institutions with the process of generating multiple reports in succession. However, you might consider providing the “option” of submitting updated data in the interim years on specific indicators which an institution is actively monitoring and tracking with frequency. If there was an easy (web-based?) means of updating this information and them making it available for other interested parties to view it might be another incentive for schools to actively track progress and revisit goals and programs more frequently, without creating the burdens of an annual report.

Verification/Certification

Reviewer 15

I can understand that without funding for AASHE to verify/certify the ratings, the next best alternative is for self assessment. If the ratings were merely for a campus’ internal benchmarking purposes and those purposes outlined in bullets 1-5 (page 1, section A), I feel like the risk of campuses “cooking the books” to come out ahead is limited and so self-assessment makes a lot of sense. However, knowing how popular rankings are with students who are looking to find the “best possible school”, I’m imagining that colleges will use their STARS scores as marketing tools; in such competitive situations, I feel that it is much more likely that a self-assessment will be manipulated to elevate a school’s image. No matter what language you require when referring to the rating (as on page 2), students (and parents) are going to *assume* that the ranking was overseen by a third party (like US News) and so it is imperative that the system has incredibly clear guides for what warrants a point in any given category, and maximum transparency so that an outsider (not necessarily AASHE, but people who may want to dig into a school’s rating) can easily access on what basis the school awarded itself the point. To achieve this, here are some specific recommendations:

- Schools should be asked to provide back-up information showing evidence that it has achieved each point. This may be nothing more than the link to a webpage for the program, a clipping from the school paper, a page from the annual report/campus census, etc. This would not be verified by AASHE, but would allow anyone interested to look more into the details of the assessment.
- It is imperative that the instructions stress that the existence of a program is not enough to warrant a point in that category, and that this message is carried through in the guidance on indicators. For example, I would strengthen the language for GF #1 “sustainability committee” (meeting “routinely” is too vague) or OP #1 “recycling program” (providing receptacles that are unmarked or not handled properly by custodial staff is not really having a recycling program...)
- While you’ve noted that the completed checklists will be available on AASHE’s website, I would also make the president’s letter also available. This allows someone looking at the scores to see the institution’s focus (facilities, education, etc) and get a briefing of some of the highlights.

Reviewer 18

AASHE will not be overseeing or training certifiers., w/c AASHE will not oversee or train certifiers.

Reviewer 23

Self reporting standards generally become very controversial, as they are far less rigorous than an actual rating system. Also since AASHE is proposing to be a self-reporting system, it is important to keep in mind that the industry may not perceive this to be a rigorous standard as LEED because it does not offer third party verification. We are now operating in a business environment where it is important to make credible claims around building performance and eliminate any perception of green-washing. We have seen this develop with Green Globes, a self reporting system that is attempting to cater to those projects not interested in LEED. It is a less rigorous system and has no third party verification protocol.

Reviewer 31

Especially if you allow for peer review, I think you will need to develop assessment standards to provide credibility to the process. Issues associated with the competency of the team, independence, use of assessment protocols, etc. are critical (see ISO 14001 auditing standards, for example 14010, 14011 and 14012)

I would make clear that equivalent language can be used. Lawyers will get involved in the wording. Trust me.

C. Registration Fee

Reviewer 42

Under C. Registration Fee it mentions paying a small fee to cover “costs”. I suggest the document be a bit more specific on what costs it would cover. It may be implied, but I think it should state to cover administrative cost of collecting the information, publishing the information on the web, producing a searchable data base... what ever the “nominal fee” will cover.

D. Boundaries

Reviewer 16

Letter D. Boundaries could perhaps be a little more specific. In the case of urban schools like the U of Chicago, we have large landholdings that are commercial real estate properties. Although it does say all properties, would it include affiliates which are *sort of* owned by universities... like charter schools for instance?? In our case we have lots of properties and projects that have fishy provenance and financing -- sort of city, or community development corporation, sort of us... Anyway, there's a lot to be said for pinning that kind of information down. This fluid and confused state enabled us to tear many, many buildings down during the urban renewal years. But the description wouldn't give a sustainability coordinator enough traction on our campus to find out who really *does* own the charter school land. Perhaps other schools would not have this kind of problem or question -- this is also partly a Chicago-city problem. Despite access to information at the recorder of deeds, it can be very difficult to pin down land ownership here.

Reviewer 30

What about boundaries for transportation (i.e. is student travel included in the institution's footprint or is that their personal footprint).

Reviewer 31

Tough issue, especially with (at least in the northeast) some C/Us that have extensive land holdings (they may not be strategic; alumni may have given in wills, etc) and satellite campuses are cropping up everywhere. I think the issues of boundaries needs to be further vetted if you really expect folks (e.g., incoming students) to compare one school to another. Perhaps there's a category of C/Us that does a comprehensive campus report and then place others in a separate category(ies)

E. Indicators, Weighting, and Categories

Reviewer 18

Might look at the indicators for Middle States and other accreditation agencies.

Add- Evidence and promotion of co-curricular educational and awareness programs to establish, enhance and support the overall sustainability efforts on campus.

Reviewer 27

Use of the Promulgation I had to look up - my assumption is that most in dining operations will not know either but other educators on the review committee may know

Rationale for Selecting Indicators

Reviewer 3

I agree with the strategy of emphasizing performance over strategy indicators when possible.

Reviewer 15

I applaud your use of performance indicators where possible; I think this is essential. Documentation of these indicators will be trickier, but hopefully is something that the college has already been tracking. I also agree with your use of trend and snapshot indicators. I am less concerned about a lack of snapshot indicators at this time; I think those will come once there is some benchmark for a good school.

Reviewer 17

The current version of STARS has two types of indicators: performance indicators and strategy indicators. I believe performance indicators make sense. Many of the strategy indicators may make sense in some settings, but not in others. Therefore, strategy indicators must be considered very carefully. There are too many strategy indicators: many of these should be dropped and others need to be modified.

Reviewer 18

Good philosophy about indicators/strategy- makes this an action document; trend and snapshot will involve those established in this and those just starting, empowers groups to continue

Reviewer 27

I embrace the ideas of trend-based and snapshot performance indicators and believe both need to be considered.

Reviewer 30

Indicators, weighting and categories - page 3 paragraph 3 starts with "For many important aspects of sustainability....." and in this case it would be very useful to have specific examples. From a system dynamics background, I would contend that performance indicators can be developed for any and all aspects of sustainability in any and all contexts and scales (though in some cases qualitative indicators would be required rather than quantitative).

Reviewer 31

I think I disagree with your description of performance indicator and "strategy" indicators. At least in the example you cite, I would call the "presence of a bus pass program" a "program indicator." To me, the presence of a transportation policy, procedure or plan, which includes goals, targets, roles and responsibilities, etc would be evidence of a strategy indicator. To that point, I think you have missed an opportunity to more fully include "Environmental Management System or EMS" principles – even if you don't use that terminology -- or reward those campuses that effectively practice such management.

Reviewer 37

I agree with the strategy of emphasizing performance over strategy indicators when possible.

Tiers

Reviewer 15

I feel like there is not enough information on Tier 2 and/or scoring laid out for me to make a full assessment. In general, I think that the list of Tier 1 indicators covers quite a bit of ground, and the allowance for innovation points helps to reward something "not on the list". Also, regarding tier 2 indicators, I fear that schools will rely on many less-significant activities to push up their rating. Therefore I would recommend:

- Tier 2 indicators should be used only to gain a single point each of the 4 categories (ie. a school could only gain a maximum of 4 points based on Tier 2 indicators)

Reviewer 16

why are the tier two indicators still listed? Are they open for inclusion still? If not I suggest that you do something like the "Innovation and Design" category for LEED. That is, four or five points where schools can add in their own do-gooding and best practices. No doubt many would suggest composting or the graduation pledge as reasons for ID points, but I think it might be MORE useful to see what people come up with for a catch-all category. It seems like the ID category has been an important way the USGBC has created a dialogue in the field between project teams.

Reviewer 27

I agree that some indicators are tier one and tier two but as we go thru I believe some are in the incorrect area.

Levels of Achievement

Reviewer 7

For the thresholds, it is very important that full-time enrollment is incorporated into the star matrix. Some associate's colleges have thousands of students while some master's colleges have only a few hundred. The number of students certainly is a factor in institution's ability to execute some of the criteria.

Reviewer 15

I agree that thresholds should be altered to allow for different types of institutions. In setting the standards, here are some things to consider:

- I would say that, though there are fewer points in some categories (governance has 12, operations has 48!), in assessing star-levels, each should be given equal weight. At present, campus operations (which have an important immediate impact but are often done without students even knowing about it) far outweigh educating students to know what sustainability actually is.
- Thresholds should be arranged so that a school must be at least proficient (having earned 10-25% of the points) in each of the 4 categories (or those that are applicable based on institution type) in order to receive a 4-star rating. At least for this highest rating, high achievement in one category should not cover you for little/no action in another.
- I might also suggest that the ratings be reported on AASHE's website with their scores in each of the 4 categories. I'm internally divided about whether or not it would be a good idea to have a similar 4-star rating for each of the 4 categories. On the "pro" side of this, it would keep people away from comparing raw numbers in each of the categories so you don't end up with a #1 school (instead you might have 2 or 3 in the 4-star level). It would also lend itself to the composite star rating being an average of the star-ratings in each of the 4 sub-categories, giving equal weight to each of the categories. On the "con" side, it might be too confusing (tiers of indicators, levels of stars, etc).

Reviewer 17

I presume there is some thought being given to placing institutions in several categories. CSHEMA has used the following:

Large Research University
Large Non-research University
Small School

One could also use Community College (2-yr school) and perhaps other categories.

Reviewer 19

not sure about separating out tribal colleges...also then HBCUs and LSIs? Wouldn't want this to get shifted into a racial debate/make these institutions look really bad compared to their peers given that they have very little money to play with!

Reviewer 24

In identifying the number of points necessary to earn stars, an additional breakdown, beyond the Carnegie Classification, of public vs. private may be fairer. Generally speaking, public universities have significantly less financing available to them to implement high cost sustainability measures. Being in the same rating category as large endowment institutions could deter lesser funded, public institutions from participating.

Reviewer 31

I recognize that this is still a work in process. I think it can be easily accomplished by a percentage of available points rather than an absolute, I think that it is inherently easier to score big points here as a small institution than a large institution – and yet the impact (e.g., number of products (graduates) or impacts (e.g., energy usage) or program effectiveness of the big institution may be much more influential or important. Rockefeller University will likely change to a top level sustainability performer very quickly, but Columbia, I suspect, will take many years to achieve the same score – as one example. I know this is one of the goals of the project and it will take the pilot and years of learning to “get it right” but I think this is a real issue right now. Big schools with fantastic programs may not get as high a score as small, more nimble schools.

Reviewer 37

I think the MOST important point I can make is that we strive to ensure that all institutions feel empowered to earn some points in each category, if possible. We should be trying to motivate them, and make sure the threshold scoring is NOT so tough as to make them feel un-empowered.

In identifying the number of points necessary to earn stars, an additional breakdown, beyond the Carnegie Classification, of public vs. private may be fairer. Generally speaking, public universities have significantly less financing available to them to implement high cost sustainability measures. Being in the same rating category as large endowment institutions could deter lesser funded, public institutions from participating.

Reviewer 41

A concern I previously raised is that even the best green campuses are probably light-years away from true sustainability, at least environmental sustainability as applied to campus operations. I remain concerned that campuses will receive three or four stars yet will remain a great distance from genuine sustainability – and hence the rating system will be both misleading and degrading to the meaning of sustainability.

Why four stars and not five? Five would provide more gradation. The rating system needs to be prepared to give even the best campuses, perhaps just three stars out of five.

Categories

Reviewer 15

I'm ok with the categories and that there are prerequisites for some.

- In Category B, in addition to work study community service, I would also provide points for campuses that encourage research projects that work directly with the community (ie. my senior design project was working on solar panel design for an orphanage in Honduras)

Reviewer 17

I don't understand the concept of "prerequisites". Does this mean that if an institution doesn't meet the prerequisite they can't get any of the points in the category (A, B, C, D)? If so, I disagree with that approach. I would suggest if these issues are deemed to be important, that they be given extra weighting (say 5-10 points each).

Reviewer 18

to the Category C Add Curricular and Co-Curricular Education and Research (there are millions of dollars each year spent on student activities, this should be part of the overall rating- lots of opportunity to educate, create change agents)

Reviewer 38

We think the use of only four categories of indicators is appropriate (Gov & Fin, Ops, Edu & Res, SR and CE). These categories are simple and it is easy to understand under which category a certain campus program might fall.

However, an argument could be made that these categories, continue to emphasize the silos which exist on campuses already (academic, administration, operations). For real progress towards "sustainability" might it be useful to create topical headings (water, energy, social, etc) under which all elements of a school could play a role in promoting more sustainable outcomes. Bringing these groups together creates a culture of collaboration and a more "systems" view of the university which is probably fundamental to truly making progress.

One way to encourage collaboration in the short term might be to encourage university participants to gather data (for preparing the report) from areas outside of their own sphere of influence, as a means of promoting cross-functional coordination. So someone from facilities and operations might track down the data for reporting under the "Education and Research" category. This could be an area for innovation initially, but an opportunity for AASHE to encourage with a guidance document.

Reviewer 41

A: Education and research
B: Operations
C: Social responsibility and community engagement
D: governance and finance

Innovation

Reviewer 13

Innovation – seems to suggest a review by AASHE where none of the rest of STARS has it. This would be labor intensive as you suggest. It might be worth struggling for some guidelines they can use themselves to include "innovation". That way the work is on the front end. You could also allow it to be offered without points – kind of in the spirit of "open source". Getting into evaluation is probably something you want to stay out of as much as you can given the spirit you have introduced earlier in the document (pg.1)

Reviewer 3

In what way might the fee be adjusted per innovation point proposal? If the thought is to increase the fee to cover the cost of reviewing the proposals, doesn't that work to discourage innovation?

Reviewer 17

I think provision for up to 4 points is reasonable. I think there needs to be better guidance on what is expected.

Reviewer 18

good to add the innovations bonus score for a best or promising practice

Reviewer 27

Under Innovation I believe the sentence should be "a committee to review and **veto** proposed "

Reviewer 38

We would encourage AASHE to consider the STARS program dynamic. From year to year, various programs which AASHE may not have considered, but which fits under the one of these headings should either be added and/or there needs to be a better mechanism for allowing innovations (i.e. no fee for submitting).

You might consider, not assigning a fee for "innovations", as penalizing university/colleges for promoting new sustainable practices may have some unintended consequences (low participation in STARS?). Universities are centers of innovation and we should therefore encourage universities/colleges to share innovative practices. Additionally, AASHE already encourages both innovation and knowledge sharing via your Resource Center. Rather than assigning a fee, it might be better to leverage any innovations/best practices into that section so others can see what's being done.

The "Living" Campus

Reviewer 13

"Living Campus" not familiar with Living Building Challenge so would be good to have reference/link/summary of the concept.

Reviewer 23

If AASHE is serious about encouraging a living campus then the guideline must become more rigorous overall. For example, the Living Building System only has all prerequisites.

Reviewer 25

A Star rating system that rewards "fully sustainable campuses" with four stars conflicts with the innovative processes at institutions of higher education. While unlikely that any campus, business, or institution can ever claim to be fully sustainable, the STARS system will not be well received if it wasn't designed to continually strive to produce new and innovative approaches to emerging issues.

Reviewer 30

The "living" campus - I would recommend putting the Living Building Challenge in context with the LEED standards, that just as Cascadia Region Green Building Council sought to open up the top tier of the USGBC standards, rather than confront that in the future living campus criteria are integrated into this tool. Along with my suggestions on action learning indicators below it might be good to add an explicit Living Campus indicator.

Reviewer 31

I worry that the "Living Building Challenge" type aspirational score will only be available to the College of the Atlantic and similar type schools. We'll see. That's what pilots are for.

Reviewer 38

With regards to The "Living" Campus, you might consider adding a level (of Living Campus level indicators) to the existing skeleton after they learn more from the first round of rating and the actual range of sustainability activity, rather than setting the Living Campus concept as a separate set of indicators. By incorporating these indicators into the existing framework, a school can strive to achieve the highest rating: a "Living Campus".

Reviewer 41

I don't know what the "Living Campus" means but it appears as though the fourth star will be reserved for "fully sustainable campuses" and rightly will be much harder to achieve. How will "fully sustainable campus" be defined? In terms of points or in terms of actual sustainability – two very different things. It should be the latter so trend scoring does not substitute for absolute achievement. On the operations side, a fully sustainable campus will have to be fully carbon neutral, wasting little, buying only the greenest of products (and as few as possible), having a near 100% recycling rate, etc. As STARS is set up now, a high point score will not guarantee any of this.

F. Definitions of Sustainability

Reviewer 7

We should probably specify the three dimensions of sustainability in the introductory definitions section. It's not explicitly stated there.

Reviewer 18

We hope that ensuing conversations among practitioners (add) "and scholars" will help us all understand ...

Reviewer 21

My immediate observation is that the introduction to this document should clearly define sustainability in its broadest terms. My concern is that sustainability may be viewed in a narrow context as pertaining only to energy and energy related initiatives. In this context respondents may not adequately reflect aspects of social responsibility, community engagement, and diversity.

Reviewer 26

I do not comprehend why the Brundtland Commission definition does not meet the test of commonly accepted? Fully understood is a fair statement. I think this works against us. It is like saying that the science on climate change is unclear. If we can not define it, or won't, then measuring it makes no sense at all.

Reviewer 27

The definition is pretty broad but acceptable

Reviewer 29

Definition of Sustainability -- I, like most people, struggle with the term and what should be included. This rating system seems to include significant points related to non-environmental factors related to sustainability (ie, Social Responsibility and Community Engagement). While these are important, I am not sure they effectively convey what we are striving for with this tool. Topics that my organization finds important such as wastewater management and transportation options barely exist. Specifically, whether a school has a vegan menu or whether there is a student outreach coordinator does not represent the complete environmental essence of sustainability. For example, a school can have a outreach coordinator, but they do not focus on sustainability issues, it does not make any difference.

G. Reporting Elements

Reviewer 18

might look at the language of the President's Climate Commitment as another resource (I think that you already did this)

Reviewer 27

On the chart for Curriculum it should show that the course is a requirement to graduate it is in the definition but I believe it would be better also in the chart.

Checklist Comments

Institutional Profile

Reviewer 14

The age of the institution and that of its physical plant provide useful contextual information that will influence virtually any indicators employed.

Reviewer 3

The title of the campus contact would also be helpful.
What is the definition of a Full Time Campus User?

Reviewer 7

Is the enrollment asking for the full-time equivalent or headcount? We should specify.

Reviewer 42

Under Institutional profile: the population may require the definition of “headcount or FTE” for the sake of consistency – or at least the option for the institution to state which it is reporting.

And for infrastructure – the total campus conditioned building area in SF should state Gross or Net, again for consistency across respondent. Also if we have European respondent, we may want to state “or national metric”. The response to the number of SF may not be as useful unless we also know the geographic area, the type of structures and primary use.

The total energy use per year again will depend on the functions, physical size, and population. Under total enrollment it should specify “headcount or FTE” and perhaps even distinguish between undergrad and graduate students.

Reviewer 26

Infrastructure I would suggest that potable water usage is a critical success factor. I believe you should calculate mmbtu/sq ft not settle for gross numbers. I believe that you should record heating and cooling degree days. I think that you should require disclosure of there electrical source; coal, natural gas, fuel oil, hydro, nuclear, and renewable. Does the institution own and operate electrical generation equipment including CHP. I think that as baseline you should have the number of airline miles traveled, the number of automobile and truck miles traveled by university or college owned vehicles, student trip miles, diesel trail miles, ocean going vessels miles traveled, and personal miles traveled by faculty and staff for which they were reimbursed.

Reviewer 28

Under Institutional Profile, Infrastructure: This should include leased space and all satellite operations. There may be a problem assessing shared spaces, i.e. a university that provides degree programs using another university's facilities, but I believe all should be included, not merely main campus type operations. We could also provide a checklist of all energy using functions to ensure that our participants are including all the available measures to convert into BTU usages

Reviewer 31

Again, serious concerns about boundaries of measured data issues. I'd like this to be as precise as possible. Perhaps a number of menu options/boxes?

What about size (acreage of campus) or percent paved. I'd like to get some sense of space and/or density.

Later indicators are normalized on a "per capita" basis and I was not sure how that related to your population indicators.

Jack DeBell - Recycling Program Development Director, University of Colorado at Boulder

Please make sure schools are reporting at least their disposal and diversion tons in the background/baseline section.

Reviewer 35

Some output measures should be included in order to permit assessment of institutional efficacy (is it doing its job with minimal resource requirements?). I'm particularly taken with the approach to achieving sustainability of the Happy Planet Index—efficiency at producing desired outcomes (I know that sustainability will require more than our best current efficiency levels, but relative efficiencies will help point us in the right direction). I would suggest: 1. Degrees granted by level, 2. Research expenditures (although I believe that expenditures is an inherently inefficient measure of efficiency since expenditures may be for unnecessary levels of resource and facilities usage).

"Energy used" is not infrastructure. I'd suggest an category of "Resource use" that includes three measures--energy and waste (recovered [recycled] and "externalized," separately, in tons).

It would be helpful if sufficient absolute environmental impact data could be reported so that an "ecological footprint" could be calculated.

Reviewer 37

The age of the institution and that of its physical plant provide useful contextual information that will influence virtually any indicators employed.

Reviewer 41

Will need to define how MMBTU per year will be calculated. What conversion factor should be used for electricity? 3413 BTUs/KWH (end use)? Or will campuses be asked to use a primary fuel conversion reflecting the amount of energy that is required to make electricity based either on a national average or for their region? There are pros and cons of doing this various ways but it is an issue which needs to be addressed.

A. Governance and Finance

Reviewer 30

The titles seem strange here as the overall section is "Governance and Finance" and the sections are Institutional Commitment, Funding and Investment. Are there perhaps other aspects to governance than institutional commitment? I would suggest changing that sub-title to governance and integrating inst. commitment into the language of the indicators.

What about adding an indicator for doing regular sustainability assessment using GRI, SAQ, this tool or other tools, such that they would get points after using these tools for three years in a row?

Would it be appropriate to include a governance credit for having a chapter of the American Association of University Professors, which is essentially a union? There may also be a corresponding student union association.

Perhaps we could include a point for institutions that are including valuation of social and environmental impacts in their financial analysis?

Reviewer 35

Institutions should get points for sustainability transparency through public reporting: say one point for publishing performance data on the Web for the measures in STARS, two points for publishing trend data for at least 5 years.

...

I'd suggest two credits additional:

1. Sustainability coordinator participates at highest level of institutional planning and budget setting?
2. Institutional planning and budgeting formally includes consideration of the sustainability implications of decisions and attempts to incorporate the full-cost of natural resource use and disposal, including externalities (costs absorbed elsewhere or by future generations).

GF Prerequisite 1: Sustainability Committee

Reviewer 14

This is not a committee of the board of trustees, I trust.

To whom or what would this committee report? As noted in my general comments above, I would focus the work of the committee on operational and environmental sustainability.

Reviewer 5

Don't prescribe a "committee" and its makeup. An institution should have a mechanism in place that is comprehensive and participatory but it does not have to be limited to a committee. Also, stop using modified versions of the term sustainability: there is no such thing as "environmental sustainability." Sustainability is the integration of all three (in ASHEE's system of social, economic and environmental) you get all three in an integrated manner or you don't get sustainability, period.

Reviewer 7

If a committee does not exist or doesn't meet the STARS definition, should the institution continue completing the document?

Reviewer 17

As noted above, I would give multiple points to this rather than making it a prerequisite. Also, I would take out the term "social" in the reference to sustainability.

Reviewer 30

I am not clear on the intentions and differences behind prerequisites as opposed to credits, but it seems that sustainability committee could be a credit instead. It also seems that given the extensive distinctions in this indicator that perhaps it could be split into 2-- one being institution level guiding documents and the other stand-alone policies or plans (the implication in the extensive discussion is that policies/plans are more common, yet at [my institution] we have it in our mission but it has not been operationalized in our policies/procedures).

Reviewer 36

Should we also include a representative from Administration, Operations, community and Purchasing on this committee?

INSTITUTIONAL COMMITMENT

Reviewer 4

- Can a college/university check off “yes” to sustainability implementation plan and/or sustainability officer if there are strategic plans and/or individuals who work on sustainability issues but are not labeled with the prefix ‘sustainability’ (e.g. service learning, community outreach, etc.)?

GF Credit 1: Guiding Documents

Reviewer 14

Institutional mission statements are the province of boards of trustees and are typically not altered routinely. A “statement of principle on sustainability” focused per my earlier remarks and recommended by a president to the board of trustees who, in turn, adopt the statement as a matter of institutional policy, should suffice for earning this credit.

Reviewer 30

It seems to me that guiding documents could also be seen as a prerequisite.

Reviewer 35

GF1: If half or more of the schools, departments, et cetera have sustainability plans, I’d give the institution 1 point; institutional level plans should get 2 points.

GF Credit 2: Sustainability Implementation Plan

Reviewer 43

This should require dates/time-based goals.

Reviewer 27

I believe GF Credit 2 should be stronger stating that they are to have 10 year goals with updating at a minimum of every 2 years.

Reviewer 30

It seems to me that the plan could also be seen as a prerequisite. It should be specified that this needs to have clear indicators with benchmarks for performance improvement.

Reviewer 5

This could potentially cut both ways: By forcing “formal adoption” in an institution where shared governance, faculty senates, unions etc...(asked for in GF 5) you may force a watering down of sustainability in order to achieve “formal adoption.” This is not necessarily the best approach. Ask how implementation and accountability are addressed and do not presuppose the mechanism.

Reviewer 17

This seems pretty vague to me. I suggest that it be dropped. I think performance indicators are much more significant in demonstrating an institution's sustainability commitment than to have a plan. (I'm not saying a plan is not important or useful; however, I am interested in results, not plans.)

Reviewer 14

Following from my recommendation above, the institution's annual budget and annual report – documents acted on by governing boards – should stipulate acknowledgement of the “statement of principle on sustainability” and report how each of the major institutional domains of activity/responsibility have or will address the principle of sustainability.

GF Credit 3: Sustainability Officer

Reviewer 14

If sustainability is to become both a guiding principle and an operational parameter, staffing responsibility to a single individual actually may dilute the impact of the principle by “orphaning” the activities to an office or an individual.

Reviewer 5

Here you use the term “campus wide” but not function wide: academics, research and engagement as well as operations should be addressed otherwise you could have a II that is only dealing with operations.

Reviewer 17

I don't have problems with this category. I would note that larger institutions, especially those with larger budgets, will have an advantage over their smaller counterparts.

Reviewer 31

I think may need to have a broader definition/approach here. I think this should be more about function and reporting structure than “we have a sustainability professional.” For example, I see – from an environmental side – the future moving toward an energy manager” fulfilling this function and I don't think a campus should be penalized because they have multiple people fulfilling various functions of a sustainability officer. Moreover, reporting structure is huge. Many campuses are hiring to “catch up with the Jones” – I don't think we want to be a party to that

Reviewer 40

Unclear: Are they saying that they get 1 point for a I, 2 points for a II, and 3 points for both? Having these two positions would be ‘overkill’ at a small college and would itself contribute to unsustainability.

Reviewer 41

The appropriate number sustainability coordinators for a given campus is a function of campus size. This credit does not take that into account. A small community college with a single full-time sustainability coordinator might be doing pretty well. To be equally well staffed, a large four year school might need a team of five sustainability coordinators. This credit ignores this reality.

GF Credit 4: American College & University Presidents Climate Commitment

Reviewer 43

Would schools that have made a commitment to a(n) verifiable greenhouse gas reduction strategy not receive credit?

Reviewer 4

Since AASHE is also the institutional coordinator of the Climate Commitment, is it possibly a conflict of interest for AASHE to assigning a point for colleges and universities for signing onto the Climate Commitment? I suppose one might avoid this problem by including something on Climate Commitment or a policy equivalent.

Reviewer 17

This criterion should be dropped. Climate change is an important issue; however, it is the issue of the day. Other issues or related initiatives could rise in importance in the next few years and this could become a dated question. I also think this should be dropped because it is simply signing a statement and there is no guarantee of performance. Performance can and should be measured in the Operations section and that would meet this issue.

Reviewer 24

Relative to the number of institutions of higher education in the US, the number of colleges and universities with a specific commitment to address climate change is very small. And the number of signatories to the Presidents Climate Commitment is only a small portion of those. Given the level of commitment required this is understandable and definitely merits credit recognition. However, even a commitment to Kyoto targets (reduction to 1990 levels or below) is more than most institutions are doing. To address this, this credit could be structured like GF 3: 2 points for being a signatory to the Presidents Climate Commitment and 1 point for a commitment to reduce to 1990 levels or below.

Reviewer 26

Not a valid indicator as written. Signing is one thing. Producing the plan another. Progressing against the plan a third reframe. Or deduct 1 point if a non signing. Similar to the LEED bike racks and no smoking policy. If this has to stay move to a prerequisite.

Reviewer 30

What if they are a signatory and not in good standing? Are there specific criteria and third-party verification systems set up for this?

Reviewer 31

I think "equivalent" has to be added here. This represents a clear conflict of interest to me

Reviewer 40

An institutional commitment to sustainability and an implementation plan are critical, but if they are going to give points for the Presidents Climate Commitment, they should also include the Talloires Declaration. While it doesn't have a formula for accountability, it is a more comprehensive approach to sustainability.

Reviewer 41

this should count for way more than one point. Why has it been so devalued?

GF Credit 5: Shared Governance

Reviewer 43

How do we define "meaningful"? Transparency?

Reviewer 7

What are we really hoping campuses will have, or is this a “gimmee” for most folks?

Reviewer 17

I don't have a problem with shared governance and my campus does a good job on this issue. However, I don't believe it belongs in STARS.

Reviewer 20

I believe this should be directly tied to the opportunity for input into sustainability.

Reviewer 27

GF Credit 5 should state- regular solicitation of their opinion on an annual basis as a minimum

Reviewer 29

Shared Governance is an example of some benchmark that scorecard aims to achieve, but there is no discussion related to what the school should get out of the Shared Governance. An outcome might be that the government would support campus policies to promote sustainability in campus practices or something like that.

Reviewer 30

It is not clear what this means, how it is to be assessed. It may be useful to break this down into more specific indicators. Also, there are potential issues of comparison such that some may not perceive it as necessary to have shared governance to achieve sustainability. The AAUP will have some standards for this from the faculty perspective. With regard to your questions on the terms of fulfilling this indicator, it is a bit ambiguous--what about direct representation of these constituencies on committees and institution-wide bodies?

Reviewer 40

This is desirable, but the presence of those bodies—or even solicitation of their opinions— does not mean that anyone is paying any attention. How does the checklist assess whether participation is real?

FUNDING

Reviewer 43

What types of projects must be included? What is the outcome; just to ensure funding? Shouldn't this be a part of budget management?

Reviewer 41

On funding, size matters. More funding (in proportion to size of campus or number of students) is better and should score better. Otherwise trivial funding programs could score as well as substantial ones.

GF Credit 6: Reinvestment Mechanism

Reviewer 14

One cautionary observation: Foundations of public institutions are typically legally independent organizations, hence, the terms of endowments and other foundation funds may restrict their use, albeit, the STARS document references “the savings from sustainability projects.”

In addition, the working definition subsumed by STARS is so inclusive that it might be difficult to determine exactly what further sustainability projects might address.

Reviewer 5

Why prescribe a reinvestment mechanism? Isn't the key ongoing investments? If a university can demonstrate consistent investments regardless of whether it takes the form of a revolving loan fund it should not matter. Moreover, this has a heavy operations bias and does not address investments in curriculum, research or engagement

Reviewer 17

It is unclear to me whether this mechanism applies to ALL sustainability efforts or an institution can get the point if there is just one point. For example, can these funds be used to fund the Sustainability Officer? One of the objectives of any campus administration is to find efficiencies to reduce overhead; if we say that NONE of these savings can be used for other campus purposes, I think we run the risk of lack of support for sustainability. If we say that SOME of the savings should be reinvested, then there is a chance of support. Whatever is decided about reinvestment, I would note that it is not always easy to identify what the savings are of a sustainability activity.

Reviewer 23

Smaller campuses may have a more difficult time with reinvestment

Reviewer 30

this may be unclear to some and it could be an opportunity to highlight the Harvard case study or other examples, or just provide links for resources on how to set it up.

Reviewer 35

GF 6: Some institutions readily fund operational sustainability initiatives from the facilities budget if the project has a reasonable payback period (it can even be longer than the required rate of return for financial investments). How would this kind of a mechanism, which can be quite effective, fare in this formulation?

GF Credit 7: Dedicated Sustainability Funding

Reviewer 14

See above, under GF 6.

Reviewer 5

say “in addition to faculty research” rather than “not including”

Reviewer 17

I think this definition needs to be better defined. For example, if an institution has dedicated funds for energy conservation, would that qualify for the point? I would suggest that the definition be modified to say something like, “Institution must have dedicated funding on a regular basis whose use is to fund sustainability projects that would not normally be funded by campus operations.”

Reviewer 30

It is unclear whether this means a restricted fund within the budget or a specific funding source that is so dedicated. I recommend clarifying this or making two different indicators.

Reviewer 31

I would broaden language. Rather than a project by project approach, I would like to see funding for the implementation of the sustainability plan or tie it to the sustainability committee (since that is a prerequisite)

Reviewer 35

GF 7: Wouldn't any institution that has funded a sustainability officer automatically qualify for this point? I believe that diffusing sustainability sensibilities and initiatives throughout the institution is as important as funding specific projects, and would submit that Tier 2 #6 is as important as dedicated funding

INVESTMENT

Reviewer 11

What about retirement plans? Should all packages include access to SRI?

Reviewer 19

One question is whether you want an aspirational standard or one where lots of schools already have it. Also can you have a sliding scale on a question?

Could have one more credit on shareholder advocacy—to earn these points you must take an active stance in reforming practices of corporations in regards to sustainability. 1 point if you do proxy voting, 2 if you have also written a letter, co-filed or filed a shareholder resolution in the past 3 years. Maybe these could be phased in somewhere else...but definitely need to be there!

Reviewer 20

This does not relate to community colleges. Do we just lose these points?

Reviewer 25

Public and private universities have different use for endowments and varying utility for large investment portfolios. They also count on different rules for transparency and public disclosure which poses different challenges for individual institutions. While a simple checklist is useful in

encouraging certain practices, it may limit the usefulness of ranking institutions based on the brief STARS checklist.

Reviewer 28

Define as to whether this means (for public universities) University investables and/or Foundation investables. In our state, we do not have control of our university funds, they remain at the State Treasury.

Reviewer 30

This and several of these other indicators may pose a challenge to smaller institutions without an endowment. While the lack of an endowment speaks to issues of financial/economic sustainability, I wonder if we want to handicap them with points that they cannot receive.

Reviewer 31

maybe I'm wrong, but I think it will be pretty easy to get points at GF10 and 11.

Reviewer 13

While I understand the hesitation to “rely” on an explicit “investment policy” I think it should be useful. For example it clearly could be credited under Credit 1 as a guiding document. Again, I would urge consideration of the use of an international guideline like the PRI. If institutions have a policy that includes the majority/all of the 6 principles they get a point. I believe if an institution crafts such a specific policy it is on the way to seeing it implemented. Such a policy bridges changes in leadership within institutions that otherwise may be driven by personalities.

I agree that a policy is not “proof” of sustainability. Yet it offers a framework for those inside the organization to call the question when/if they find the policy being ignored. Signing a president's commitment doesn't necessarily mean that people will cut greenhouse gases either as we learned from signatories of the Talloires Declaration, but it is useful as A tool, not THE tool.

GF Credit 8: Endowment Transparency

Reviewer 17

I don't believe this issue should be included as part of STARS. This is not a sustainability issue by any definition.

Reviewer 19

lots of schools as I'll explain below disclose on public equity but not other asset classes. So if you just have it be any type of transparency, a handful of schools will have it. If its all asset classes, only public universities are legally required to disclose and no one else does

Who is the “campus community”? be specific here---students, alumni, faculty, staff...and does that include people in the local community area or not? Also a number of schools provide transparency on direct holdings of public equities, but not private equity, real estate, hedge funds...all the other asset classes. Would be good to specify “transparent across asset classes and in regards to money manager selection” Public equities are often only 20-30% of the portfolio.

If the campus community includes alumni then in-person visits is unfair as an exclusive distribution mechanism. Also how far back do you want to allow on the timelag? 3 months? If its not till the next year that's not really best practice

GF Credit 9: Committee on Shareholder Responsibility

Reviewer 14

See above, under GF 6. By specifying the composition of the committee, this standard presumes upon board prerogatives.

Reviewer 5

again, don't prescribe a "committee" the university needs to point to a mechanism or means of accomplishing this.

Reviewer 13

I would suggest Committee "MUST" have students not "SHOULD" as from the little work I've seen there is a tendency to keep faculty and staff away from this process at many, if not most, schools.

Reviewer 17

I don't believe this issue should be included as part of STARS. This is not a sustainability issue by any definition.

Reviewer 19

Replace "on proxy voting and investment screening" with "Regarding the alignment of the schools' mission and values with its investment portfolio." We need this to be broad as its not just public equities here—yale students got a hedge fund out of the private prison system, community investments might be bonds, etc.

Add "The body should include students, administration and trustees at a minimum and may also involve alumni and faculty."

Alumni and faculty can slow a committee down if a. faculty are not super-inspired and committed and b. alumni live far away so are hard to move into the mix. Admin staff (like the VP of finance) and trustees on the school's investment committee are essential, however as they assure that things actually get done---they can gauge the temperature on the recommendations the best!

Change name to Investor Responsibility, not Shareholder Responsibility

Reviewer 30

this seems to me more of a governance indicator, though the content of the decisions of that committee are investment related.

GF Credit 10: Proactive Sustainability Investments

Reviewer 14

See above, under GF 6.

Reviewer 5

do you want to add "that are performing within an acceptable rate of return"? I think the key is balancing performance of investment that results in payout to purpose and SRI vehicles. This

should not be a problem as I believe that SRI performs well, but adding some phrase that conveys recognition of payout performance will be important for CFOs etc.

Reviewer 17

I suppose this is okay, but it doesn't excite me.

Reviewer 19

Broaden this so its not just about funds---that its sustainability investments which could be in a number of vehicles---venture capital for sustainable ventures, debt financing for low incoming housing, CDFI or community bank bonds, etc etc etc. Also I really think a minimum makes sense...at least 1%? I'm not super-impressed if a school has a 25k social choice fund, as cool as it is conceptually... I'd like there to be a threshold for schools to get a point. Maybe I'm too tough, but I would hate for schools to say "we got a perfect score on endowments" with just window dressing commitments. If under 1% could also have a minimum speed for it to grow per year...or something. But I think 1% is still quite lenient.

I would say:

"Institution must invest at least 1% of its endowment in a sustainability-focused investment vehicle, in any asset class. This may include a renewable energy investment fund, sustainable venture capital, debt financing for low-income housing, or an investment in a community development financial institution, etc. Investment in a socially responsible mutual fund with "positive screens" is sufficient to earn this point. Investment in a socially responsible mutual fund with "negative screens" is not sufficient, nor are donations to local community efforts." (schools tell us all the time about the playgrounds they built...not the same).

Reviewer 30

There is a great deal of similarity in 10 and 11 since both discuss screens--need to make more distinct. also, the title of 10 is specific to sustainability and the title of 11 is not though they both deal with sustainability content. The both talk about screens, yet 10 seems to focus on positive and 11 on negative though the titles don't match the content. I wonder if there are positive examples to include (renewable resource screens, social responsibility screens, etc.).

GF Credit 11: Investment Screening

Reviewer 14

See above, under GF 6.

Reviewer 17

I don't believe this issue should be included as part of STARS. This is not a sustainability issue by any definition. The reference to apartheid in South Africa makes this tool look like a dated document.

Reviewer 24

The criteria is fine, but the example is dated. A current example would be more fitting (Israeli Apartheid or Darfur for example). Or perhaps more general: "companies operating in a specific country with known human rights violations".

Reviewer 38

GF Credit 11: Does this merit Tier I indicator status? At this point it seems that almost all endowments will be able to say they use screens. Unfortunately, it will be very difficult for AASHE to distinguish between those screens which use methodologies which really contribute to sustainability goals, and those that simply screen out the really bad apples. We feel that you have better captured the intent in GR 10 and GR 11 may be unnecessary.

Reviewer 40

According to this, if a college had a social-responsibility screen two years ago and then dropped it, they would get this point—Why?

B. Social Responsibility and Community Engagement

Reviewer 5

I think that this section is going to need some serious thought about “engaged scholarship.” The model you have here is very corporate and does not necessarily transfer to the university in an effective manner. There is good work going on in “engaged scholarship” that can be referred to in order to refine this.

Reviewer 17

I think these are important issues. However, I disagree that these are sustainability issues that should be rated. I don’t see a single criterion I would include in STARS. Further, many of these criteria are divisive; many do not have a clear target on what is appropriate.

Reviewer 20

This is an area that I believe is not critical to my definition of a college’s sustainability efforts.

...

Again, my college is committed to a sustainable environment. Our definition of sustainability is more environmental, and we would be less interested in evaluating the entire social realm of the campus and more to enhance our goals of protecting the environment and acting responsibly in protecting our resources for the future. We address other categories that are not directly related to environmental sustainability in other ways.

Reviewer 22

In the Social Responsibility piece, should be labeled Social/Environmental Responsibility, internally and externally. Also there should be points for working with the local/state/national government, local businesses, K-12, to reduce human suffering, improve quality of life for the surrounding communities (including the poor, wording to be addressed.)

Perhaps collapse some of the Social Responsibility items together.

Reviewer 24

In general the Social Responsibility and Community Service section is focused on student and individual service. There is no credit or tier two indicators listed that address broader partnerships within the community. An example: assisting the local municipality with its sustainability efforts (either through infrastructure or human capital). Is this something that would be for an innovation credit?

Reviewer 25

While it is important that individuals are not subjected to conditions that systematically undermine their capacity to meet their needs, the tiered criteria appear to be too prescriptive on how that is to be achieved. I can easily see where an institution could fair poorly on the STARS social responsibility indicators while actually being a leader in the consideration of social concerns affecting their operations and the planet. In turn, I can also predict that most institutions will score highly in sections B and C with minimal additional effort.

There isn't a quick fix for this section, in that it attempts to simplify complex social issues into a condensed checklist. Maybe the survey should focus on ecological issues, while defining social initiatives more broadly than those presented in this initial draft. Details of security, safety, health, wellness, etc. could easily be incorporated in the survey if the boundaries aren't better defined.

Reviewer 26

Suggested Prerequisite: Higher Education goes on and on about its three part or four part mission. Service is always a component but note in this section only students have that accountability. I think that there should be a minimum hour requirement per faculty member and per staff member for this section to have any credibility.

Additional points:

Service SC 1X----Number of free community presentations given without charge to assist the city, county, and state adapt to the societal implications of climate change.

SC 2X Child Care Facility and Program A recurrent problem for everybody on campus regardless; s,f,or staff.

Reviewer 28

As outlined above, this category and similar social justice/engagement issues should be contained as a separate assessment/rating system.

Reviewer 35

I find this section a bit overdone. I would vote for combining 6 & 7 (a committee with funding and staff support) and 22 & 23 (employees, including GRAs and TAs) and placing SC 4, 14, 16, 18 or 19 in the Second Tier list.

Reviewer 40

Why not require a formal policy commitment, a broad recognition of social responsibility?

This section seems to have a lot of points but never does much to really evaluate Social Responsibility or Community Engagement or relate them to sustainability. Superficial indicators may be worse than none.

SERVICE

Reviewer 1

My one comment relates to Section B, Social Responsibility and Community Engagement (SC), under Service. This section accounts for community service on campus. One other component of Community Service engagement that suggests institutionalization is the existence of a community service office within the campus student government. For example, [at my institution] the

undergraduates have an elected officer in charge of a dedicated community service office with nearly 22 projects reporting to it and an overall budget of over \$300,000. The graduate government has an appointed officer who oversees a smaller budget. So, you might want to expand the description of the SC Credit 1 to indicate it can be a student government officer or something along those lines.

Reviewer 30

how about a service learning indicator? Prescott College, Sterling College and a few others are focused on that and if I am correct service learning was a big priority in the recommendations of the President's Council on Sustainable Development.

Reviewer 40

I think institutional policy is a superficial way to look at community service. If students are independently involved in community service/engagement, it certainly can contribute to institutional and community sustainability, and may indicate a stronger commitment than routine placements by the institution. Institutional commitment may show up in areas such as policies, scheduling, or transportation—or just encouragement.

If a college is located in a sparsely-populated area, community service may be very different, especially if a high percentage is required. What types of service would work in these areas—without creating an increase in transportation?

Reviewer 35

Rename this section "Service and Outreach"

SC Credit 1: Community Service Coordinator

Reviewer 14

The concerns expressed above re a Sustainability Officer also pertain here.

Reviewer 7

Does the position have to be campus-wide?

Reviewer 30

is it realistic to apply so many position criteria in here, as this poses a specific handicap to smaller institutions who cannot reasonably expect to have all of these specific positions given limits of funding at smaller institutional scales. perhaps it would be useful to add in more explicit descriptions of a way that this can be fulfilled if it is part of a job role.

Reviewer 40

This wouldn't be very important in a school of 250 students, nor would one coordinator be very important in a school of 30,000 students.
This approach seems to make large institutions look more sustainable than they really are, while making small schools look worse?

SC Credit 2: Student Community Service

Reviewer 14

This area may not be viewed by all or even most persons on a university or college campus as directly pertinent to “sustainability.”

While important, I do not think the total points assigned to this indicator is commensurate with the importance of student community service *per se*. I suggest a single point be awarded for a threshold of, say, 50%.

Reviewer 13

not all service is equal, so I suggest a little more detail in the indicator that gets at an FTE type number – perhaps something like #hours/student/semester

Reviewer 24

This credit does not allow for distinction between varying levels of student service. Is a 1 hour community service project equivalent to a masters degree program that requires peace corp/american corps service as a graduation requirement? Perhaps this could be remedied by adding a second credit (that pertains to only Master and Doctorate degree granting institutions) that looks specifically at graduate student service.

Reviewer 30

100% should stand alone, not with a ">" symbol since it is not possible to exceed 100%.

Reviewer 31

Typo with >100% student community service. I’m not sure I agree that a school should get 5 points for this and 1 point for a Sustainability Implementation Plan, as one example. Moreover, I am concerned that the higher scores are most available to privileged schools. At commuter schools or schools with a high proportion of students that work, I am not sure it is fair or appropriate to say you must do community service for free. I’d break into 3 categories and give no more than 3 points

Reviewer 40

Much community service work is not terribly significant, so is rating community service only in terms of the percentage who participate the best approach? Involvement in after-school programs, for instance, is very common, but it may be limited to helping school children with meaningless homework or it could be very creative and inspiring. I’d rather see 20% engaged in creative involvement than 100% in less important ways.

SC Credit 3: Community Service in Job Descriptions

Reviewer 14

This area may not be viewed by all or even most persons on a university or college campus as directly pertinent to “sustainability.” Given the diversity of institutional types in the US, the relevance of this particular attribute to the full spectrum of institutions may be highly variable.

Reviewer 31

I’ll leave this to others more knowledgeable than I, but I know of a lot of faculty unions in mass that may not agree to this.

Reviewer 40

Having it in Job Descriptions may be desirable, but incorporating it in performance and tenure evaluations is what counts.

SC Credit 4: Work Study and Community Service

Reviewer 14

This area may not be viewed by all or even most persons on a university or college campus as directly pertinent to “sustainability.” Given the diversity of institutional types in the US, the relevance of this particular attribute to the full spectrum of institutions may be highly variable.

Reviewer 43

How was the percentage reached? Isn't this affected by size of workforce?

Reviewer 20

SC credit 4: Work Study and Community Service would discourage participation in the program because we have so many disadvantaged students who benefit from on-campus jobs that we would not seek a 25% goal.

Reviewer 27

I have concerns that the federal work study funds for community service allow the work to support the community of the campus. So I believe it is a valid measure but I do not know the government definition and I am concerned that campus internal community may be impacted.

Reviewer 40

Shouldn't this be based on a scale of percentages, rather than an arbitrary 25%?

SC Credit 5: Work Study and Community Service – Trend

Reviewer 14

This area may not be viewed by all or even most persons on a university or college campus as directly pertinent to “sustainability.” Given the diversity of institutional types in the US, the relevance of this particular attribute to the full spectrum of institutions may be highly variable.

DIVERSITY

Reviewer 4

It strikes me that the series of questions regarding diversity under this section would be much more relevant for larger research universities or larger bachelor's degree granting institutions.

Reviewer 7

When we talk about underrepresented populations here, are we referring to traditionally, locally, or nationally underrepresented? For example, would a primarily Hispanic administration in Texas receive credit for diversity?

Reviewer 26

SC 6 and SC 7 are not and should not generate points they are foundational prerequisite items.

Reviewer 27

I do have concerns that campus that are already diverse will struggle and be jeopardized so a number should be stated and if they are already there they get the points I do not know the number but trust you can come up with an acceptable one.

Reviewer 40

Again, many of these make sense at large schools, but not necessarily in a small school. They assume that everyone agrees on what 'Diversity' means, but that is not our experience.

SC Credit 6: Diversity committee

Reviewer 5

again, mechanism rather than prescribing committee

Reviewer 27

I believe that meets routinely is too loose and should say monthly or at a minimum quarterly.

Reviewer 38

SC Credit 6: Consider requiring the diversity committee to have a representative number of ethnic minorities and women.

SC Credit 7: Diversity officer

Reviewer 30

as with the community service coordinator, but even moreso given the language here, it is a bit much to expect all of these positions to be included and this tends to impose more of a burden/handicap on smaller institutions.

Reviewer 40

A full-time diversity officer doesn't make sense in a small school—so they lose a point?

SC Credit 8: Admissions Diversity

SC Credit 9: URG Graduation Rate - Trend

Reviewer 43

Shouldn't graduation rate and admissions be clearly linked? Is it the efforts that count, or actual admissions?

Reviewer 30

it is not clear from this description what URG is. I presume this is "under-represented racial and ethnic groups" but if it is such a universally accepted phrase that an acronym is used, then are there clear standards on what this means? is it groups that are underrepresented at the institutional scale, the national scale, the global scale? also with these trend indicators, the representation will

shift so once there is a balance in URG representation how we design these indicators to "turn off" if you will so that it does not drive performance beyond a balanced threshold.

Reviewer 35

SC 9: This is the first of many trend data that work against institutions with very high rates. Some mechanism needs to be established to assign points to institutions that already operate at the high performance end of the spectrum, where improvements are either unduly expensive or unlikely to occur.

SC Credit 10: Faculty Racial and Ethnic Diversity - Trend

Reviewer 30

this is vague. as with the prior one, we must define what URGs are in terms of specific typologies that can be used for data collection and quantitative analysis. also, we need to deal with the reality that ethnic and racial information is often not required but rather optional on forms and disclosures. how can we make data collection easy for the institutions? does this run into issues with regard to the court rulings on affirmative action? furthermore, why does this standard not apply to staff?

SC Credit 11: Faculty Gender Diversity - Trend

Reviewer 30

again, what happens when there is a balance in gender diversity? what does it mean for there to be a 3 year upward trend in a proportion? furthermore, why does this standard not apply to staff? should we perhaps make these universal to all employees rather than specify administration and faculty, leaving staff out?

Reviewer 35

SC 11-13. High achievement, in addition to positive trends, needs to given points in these measures. Diversity is a highly problematic measure because deviation in either direction can occur in either direction—too few from a group or too many. If the desired standard is representation equal to a groups presence in a population, points would be given for increases up to that level, but would have to be subtracted for increases beyond that level. Likewise, if equal representation is the goal, points would have to be given for movement toward equal representation, but subtracted from movement away from equal representation. The rules need to be applicable to all contingencies. Simple increases in numbers of specified groups are the easiest to measure, but the least defensible measure in the long run (which is the timeframe for sustainability).

SC Credit 12: Administrator Racial and Ethnic Diversity - Trend

SC Credit 13: Administrator Gender Diversity - Trend

Reviewer 7

Should we include transgender?

Reviewer 31

As noted previously, quite uncomfortable with the implicit (or explicit) judgments here and the requirement for 3-year trend. What does Wellesley College do on SC 13 if it already is the leader

nationally in this area? I would rather that you simply get a point for showing trend data and that this data is available for review.

SC Credit 14: Departmental Diversity Plans

SC Credit 15: Non-Discrimination Statement

Reviewer 7

Are points awarded if the statement does not include all these audiences? Why are we specifying “cancer-related” to explain the medical condition? I would assume, we’d not find it acceptable to discriminate because of obesity, skin conditions, etc., which might not be cancer-related or genetic.

Reviewer 24

This should be a prerequisite for the “Social Responsibility and Community Engagement”. Although “sexual orientation” may not always be included in diversity statement in other organizations, it should be considered a necessity in higher education. If tolerance is not established from the beginning, the other efforts (credits in this case) will have only limited success.

Reviewer 30

In terms of these aforementioned diversity indicators, SC 15 refers to many other areas and types of discrimination that are not individually included as their own indicators. are we saying that racial and gender diversity are more important than age, religion, sexual orientation, etc.? shouldn't we spell out what we mean by diversity before getting into these individual types, rather than doing so after?

SC Credit 16: Benefits for Domestic Partners

FAIR LABOR PRACTICES

Reviewer 25

A good system needs to be in place, but not exactly as prescribed in STARS.

SC Credit 17: Fair Labor Code of Conduct

SC Credit 18: Independent Monitoring of Logo Apparel

Reviewer 30

why do we single out apparel? if there is third-party designated compliance in the supplier's program overall, is there a need for monitoring in apparel?

Reviewer 38

Might this generate a fair amount of push back? If I am proactive already a member of FLA and have been for years, I would question why AASHE has determined that Fair Labor Association membership is not considered sufficient. FLA has established membership, recognition, and already has a huge list of institutions as members. Monitoring factories abroad is already wrought

with high costs and problems of accuracy. FLA has made a lot of headway by partnering with both colleges AND the apparel companies that produce the clothes. They have made great progress towards developing a greater understanding between stakeholders with regards to what each party wants.

AASHE might consider providing some guidance or incentives for encouraging C&Us to find ways to improve the existing FLA program through dialogue, rather than force universities to find another independent monitoring body.

Reviewer 40

What about Fair Trade? Fair Trade is based on the same principles as sweat-free, so why isn't it handled in the same way?

Points should be awarded if the dining services sell and use only Fair Trade coffee, tea, chocolate, rice, bananas, and so on—if there is a Fair Trade certification for a product, selling the non-Fair Trade product is just as irresponsible as selling sweatshop apparel.

This means that Fair Trade is not just an offering to silence complaints, it is about eliminating products based on UNfair trade.

SC Credit 19: Designated Suppliers Program

Reviewer 40

If all their products are WRC monitored, why do they get another point for belonging to the designated suppliers program?

SC Credit 20: Living Wage - Staff

Reviewer 30

we use the word "staff" here and this generally does not refer to faculty and administrative employees. also we may want to just merge the two to apply to all faculty, staff, adjuncts, contractors, etc.

SC Credit 21: Living Wage - Contractors

Reviewer 31

I'm not sure that out-source cleaning or dining employees would be covered here. They would be considered employees of the contractor, not subcontractors. This would be a really hard "auditable" function; you may be better off limiting this to certain worker types/activities as noted above. It's difficult to know all the workers on campus at any given time.

SC Credit 22: Healthcare Benefits

Reviewer 26

SC 22 Healthcare benefits simplified or expanded. e.g. An annual eight hour allocation to preventative healthcare. I am very concerned this is not a valid indicator. Campuses are notorious for half time or part time help who get no benefits whatsoever and this institutionalizes that bad habit. They would not fit in at all. I am not sure how fair comparisons from union versus non union versus privates versus state mandated can get close. We know that on compensation it does not work. What is the real goal? Provided or not or paid in full or not?

Reviewer 30

this is very bold and well beyond industry standards. is it fair? is it realistic? again, does it impose a unfair handicap to smaller institutions? I would recommend at least making this a two part indicator or a tiered indicator with difference levels, including some language making it clear that this is beyond regulatory compliance.

Reviewer 40

Employer-based health care is not a sustainable system, although this may be desirable on a transitional basis.

SC Credit 23: Graduate Student Employee Benefits

Reviewer 7

Could this be extended to FMLA protection? So if a graduate student needed medical treatment for a child they would be protected? As an aside, the maternity benefits for grad students is mentioned in the Tier 2 list, and should probably be removed from that if it's included in Tier 1.

Reviewer 40

In general, benefits for all employees should be calculated in ways that reflect %FTE, which will result in a half-time worker getting the same number of weeks of vacation as full-time employees. What about schools that don't have graduate programs and TAs? This point favors those with graduate programs.

SC Credit 24: URG Pay Equity

Reviewer 42

I would love to hear from Human Resources professionals regarding SC credit 24 and 25. Our institution has policies and even a department of wellbeing, and of course the policies address pay equity and all sorts of other diversity and equity issues. However I am seeing a big push toward "service professional" positions instead of what used to be classified staff. Within the service professional positions, it seems the edges are a bit blurred on the equity, under the guise of the functions being different, thus it is more difficult to determine if equity is there or not. I only mention that as whether the question should be asked of the ratio of classified staff to service professional as a measure of policies protecting the workers.

Reviewer 24

The second sentence "That it, the institution..." "it" should be changed to "is"

Reviewer 30

again, spell out URG so it is clear what that exactly means, what falls in and out of that designation and if it is a third-party designation.

also, what of pay equity from top to bottom of the institution? in the age high CEO salaries and after Ben and Jerry's had their policy of a max. 5:1 ratio of compensation from the top to bottom of the corporation, pay equity has come to mean quite a bit beyond the diversity ramifications. as well, in this indicator we are including gender in the URG discussion and yet in the diversity indicators URGs seemed to no include gender. there may be a title/content mismatch in language here somewhere.

last thought, these all require a great deal of extra data analysis and in many cases again the disclosure is option for some groups of individuals in some roles.

SC Credit 25: Workforce Well-being

Reviewer 42

I would love to hear from Human Resources professionals regarding SC credit 24 and 25. Our institution has policies and even a department of wellbeing, and of course the policies address pay equity and all sorts of other diversity and equity issues. However I am seeing a big push toward “service professional” positions instead of what used to be classified staff. Within the service professional positions, it seems the edges are a bit blurred on the equity, under the guise of the functions being different, thus it is more difficult to determine if equity is there or not. I only mention that as whether the question should be asked of the ratio of classified staff to service professional as a measure of policies protecting the workers.

Reviewer 40

What does this mean—needs to be defined in the checklist.

AFFORDABILITY AND SOCIAL MOBILITY

Reviewer 14

This area may “stretch” the definition of sustainability beyond the point where trustees may be prepared to accept it.

Reviewer 38

AASHE might consider awarding more points for institutions offering funding or scholarships to students from “low income” families wishing to pursue an education focused on the issues of sustainability.

SC Credit 26: Social Mobility – Trend

Reviewer 30

I feel strongly that this indicator is unrealistic. it requires a very high level of student disclosure and institutional data collection that will be extremely difficult to accomplish.

Reviewer 27

SC Credit 26 second sentence can confuse using the word alternatively is it one or the other or both?

Reviewer 35

SC 26: community colleges that operate in economically disadvantaged areas will be hard put to get a point from an upward trend, and they do deserve one for their present performance levels.

Reviewer 40

Does not seem relevant.

SC Credit 27: Affordability – Trend

Reviewer 17

How can the ratio of financial aid in relation to tuition grow if all these social issues are to be addressed? Each one costs money and if the money doesn't come from tuition, where will it come from?

Reviewer 30

I feel strongly that this indicator is unrealistic. it requires a 0 net growth in net revenue if there is more growth in financial aid than in tuition. the metric for this indicator needs to be revised or not included, which is what I would advise. how about saying that the rise in tuition in 3 years must not exceed the rise in inflation as measured by the consumer price index? then you could make another indicator for points if the financial aid increase has exceeded the consumer price index.

Reviewer 35

SC 27: institutions that already meet the full need of students by federal guidelines should get a point here.

Reviewer 40

This implies that increasing loans is equivalent to increasing grants/scholarships! Schools should get points for reducing costs, not deferring it as student debt.
Wouldn't need-blind admissions would be a more meaningful indicator?

C. Education & Research

Reviewer 5

A few specifics below, but this entire section is oversimplified and problematic. Definitional problems abound.

Reviewer 17

One needs to tread carefully here. There are many interest groups that have opinions about what students should be taught. These interest groups are just as passionate about their issues as we are about sustainability. The problem is that campus curricula are already packed very tight. This doesn't mean that progress cannot be made in this area, but I can tell you that the academic staff do not react well to suggestions for additional academic requirements.

Reviewer 20

Again, I would ensure that all indicators are tied to sustainability.

Reviewer 26

Add at least 4 new categories in ER e.g. Faculty lifetime learning; Faculty outreach' Staff lifetime learning and Staff outreach.

Reviewer 27

Believe that across campus marketing of the information is a MUST and there is not mention of this as an education

Reviewer 28

For the many two year and four year non-research universities can we contain language regarding undergraduate research to help offset the fellowships and funded research award issues that are more prevalent on comprehensive research campuses?

Reviewer 30

we should add an indicator here for project-based learning in the institution, or participatory action research. if the students are working directly in the institution in helping it to become more sustainability this is often the most valuable and transferable learning as students prepare to do this work in the "real" world.

Reviewer 31

Curriculum and research seems very squishy to me and I can see lots of easy points being accrued based on some new commitments but a lot of repackaging and reformatting of curriculum.

Reviewer 35

ER 2, 3, 17, 18: more areas where high current levels of achievement and/or longer upward trends need to be given points.

Reviewer 38

ER Pre-Req and Credits 1-4: We were very pleased to see this Pre-Requisite and the intent of each of these credits!

In the guidance document, AASHE may consider revising the language to make it clear what the goal is, rather than encouraging labeling courses as "sustainability focused". As we see it, the goal of the ER category is for integration of this type of thinking broadly across campus. The real goal of a good definition (pre-req) would be for all courses to be sustainability focused/incorporate sustainability concepts. All subjects provide opportunity for "sustainability" education. Perhaps, integrating sustainability into the core class should be more heavily weighted than having a large number of electives?

The risk of not clearly spelling out the goal, providing guidance, and the right incentives is that we could create more incentives than already exist to separate "sustainability" into its own academic category. The silo effect can be exacerbated by having only sustainability-focused courses if the core content is never touched.

Reviewer 40

How many students go on to promote sustainability after they graduate?

Reviewer 44

I were to use this as it stands, my institution would not measure up because it was no grad requirements, few courses (75% or more of all instruction is delivered in coordinated studies programs), no tenure or promotion, no undergraduate degrees in designated majors. We could only show progress in a couple of places. Maybe there should be an open-ended ER Credit where the institution itself defines a criterion or benchmark of its own and reports it.

Reviewer 45

Proposed ER Credit XX: The institution must offer credit bearing experiential learning opportunities related to sustainability for their students. These can include, but not be limited to, service learning, internships, research experiences for undergraduates, or international exchange programs.

...

Something that isn't addressed is the difference between graduate and undergraduate curriculum. Maybe we don't need to differentiate, but I'd be interested in hearing how the group as a whole thought about the issue.

ER Prerequisite 1: Sustainability Definition

Reviewer 14

I suggest that this consideration precede all other indicators and thereby allow institutions to resolve for themselves what they see sustainability to encompass, including the number and spectrum of dimensions they see as pertinent.

Reviewer 4

I assume "sustainability definition" is in here because AASHE is already aware of number of colleges and universities have a working definition of sustainability which has been operationalized into teaching and research. This just strikes me as a very high bar to cross that seems to be more aspirational than operational. Does AASHE have a working definition of sustainability (more than a vision statement) which is operationalized into its program strategies?

Reviewer 5

pushing for a "formally adopted" definition cuts both ways and can undermine integrative and comprehensive efforts. Not even ASHEE has a formally adopted definition! As that each institution include its working definition.

Reviewer 17

I would make this a credit item and give it 2 points. I don't value it as more important because it is just a definition and by itself does not result in any positive actions.

Reviewer 26

I thought you said "There is no commonly accepted and fully understood definition? So how can there be one now and how valid can it be and how likely is it comparable within reason?"

Reviewer 30

this seems quite late in the process to be discussing a sustainability definition. I think the prerequisites should all be presented earlier before the indicators since presumably an institution cannot even get to the point of worrying about indicator assessment if they do not have all the prerequisites.

Reviewer 31

ER Prerequisite – I find it interesting that you require someone to define, but you won't. Just being a pain... I would prefer an Education and Research Plan that more fully defines strategy, goals, definitions, (EMS – Plan, Do, Check, Act) and then hold the institution accountable for effectively implementing the plan.

Reviewer 40

This does not seem as important as a policy that courses should relate the subject matter to sustainability.

CURRICULUM

ER Credit 1: Graduation Requirement

Reviewer 4

Under graduation requirement, it might be helpful to give an example that qualifies (or does not qualify as) as a “sustainability-focused distribution requirement.”

Reviewer 5

This does not necessarily accomplish anything as repackaging of existing areas such as environmental science could accomplish this without it actually reflecting actual sustainability. Instead ask how each institution is ensuring that courses required of all students address sustainability.

Reviewer 13

This deserves more points at least 2 if not 3.

Reviewer 17

The requirement that all students take another course will not fly. What might have a chance is to recommend that each student be required to take a course that addresses sustainability. The university should prepared a list of courses that would meet this requirement. Some of these courses could be used to meet other graduation requirements.

Reviewer 20

This is too restrictive. As I indicated earlier, there could be points to recognize efforts, but a “must” seems overly prescriptive.

Reviewer 27

Love the graduation requirement!!!!

Reviewer 44

I would add to this “sustainability as a formal learning outcome for students.” A growing number of campuses involved in assessment work have learning outcomes in addition to course requirements, e.g. thinking critically, communicating orally and in writing, etc. Several campuses in WA have already added sustainability as a learning outcome, but not a course requirement. Others have re-written their science requirement, add sustainability.

I think I have a problem in general with “sustainability focused course.” This implies an entirely new course, or a course re-titled with the word sustainability. In fact, we want sustainability ideas and content and practices integrated throughout the disciplines. It is challenging therefore, to assess quantitatively the degree to which this is happening. Furthermore sustainability includes social/environmental justice. Justice is a huge theme in classes at my institution, it is infused throughout. So how do we quantify that?

ER Credit 2: Course Offering – Trend

Reviewer 5

Again you are going to confront a definitional problem here. Is it limited to courses with “sustainability” in the title? Given sustainability’s inclusive nature, vast numbers of courses can be included? We have a large general education course in Global Environmental Change that is fundamental to sustainability, will it count under this heading? I think that you are really oversimplifying here.

Reviewer 7

This is confusing. What if different courses are offered each year? Also, what counts? Science courses? Foreign politics?

Reviewer 17

This is a meaningless statistic. I can’t think of anything that can be measured usefully, so I suggest dropping this criterion.

Reviewer 30

we need to define what we mean by sustainability-focused courses. is there a certain % of the content that must be sustainability-related. is it their definition of sustainability, in which case presumably all the curriculum is related, or a standard definition? is mentioning the word or some remote aspect just once in the course going to suffice?

Reviewer 40

[What does this mean?](#)

ER Credit 3: Student Exposure to Sustainability – Trend

Reviewer 43

Aren't other involvements (outside of courses) equally valid as learning opportunities?

Reviewer 17

This should somehow be juxtaposed with ER Credit 1. If an institution can get the point for ER Credit 1, then it should automatically get this point.

Reviewer 30

is this an example of double-counting? we are awarding credit to the number of courses, so shouldn't we just measure courses or students? a larger class would presumably get more points, but a smaller class might provide a more effective means for changing behavior and attitudes towards inspiring student action on sustainability.

Reviewer 40

[Labeling courses as sustainability-focused seems artificial. There are better ways to expose students, such as including it in courses, mentioning it at special events, and so on.](#)

ER Credit 4: Course Development Incentives

Reviewer 17

This is too vague a criterion. I can't think of a way to develop a worthwhile way to measure it, so I recommend dropping it.

Reviewer 38

Course Development Incentives (ER Credit 4) are very important to integrating sustainability on campus. AASHE might consider being even more specific and provide helpful guidance here. Sustainability does not have to be a focus of a course, if faculty simply integrated sustainability into CORE courses such as economics, accounting, law, science, political science, etc. there would be higher penetration of sustainability content on the campus.

Reviewer 44

I'd add "make sustainability a focus of their courses, or substantially integrate sustainability content and practices into their courses." People have to walk before they start sprinting. Add some sustainability content to a class is big progress. Let's provide a way to recognize and encourage that.

ER Credit 5: Course Designation

Reviewer 43

What is the purpose?

Reviewer 3

Compared to most of the other categories, this one seems a bit arbitrary, and not necessarily worthy of a point.

Reviewer 17

This seems reasonable, given some of the other criteria in this category. I recommend that it come first in the ER group.

Reviewer 40

Meaningless

ER Credit 6: Academic Program or Department

Reviewer 43

What is the purpose?

Reviewer 13

This deserves more points. I'd make it a 2.

Reviewer 17

This seems a little silly to me. Having "sustainability" in the name doesn't mean a thing—the coursework is the key. I recommend dropping the criteria.

Reviewer 30

do they get multiple points if there are several? what if is is sustainability related or focused as in ER Credit 2 but the word is not used, such as ecological economics?

Reviewer 40

What does having 'sustainable' in the name of a program mean? Suppose they have 5 interdisciplinary programs that are related in some ways to sustainability—must they all have sustainability in the name? Like the course labels, this is superficial.

ER Credit 7: Tenure, Promotion, and Hiring

Reviewer 4

I wonder if any institution of higher education in the U.S. has or in the near future will factor in sustainability issues as part of a faculty member's "tenure" review process, unless these issues were part of a faculty member's core research and scholarship. I know, for instance, that experience with community-based research/service learning courses is starting to impact faculty hiring and/or promotion decisions (very early stages though).

Reviewer 17

Okay as is.

Reviewer 20

Again, this is too prescriptive.

Reviewer 30

haven't all of these indicators been in reference to the definition in ER Credit 1? if so, is there a need to specify that here? if not, what definition is being applied?

Reviewer 40

The way we read this, an institution where a single department bases tenure, promotion, and hiring decisions on work related to sustainability will get the same point as one where every department does this!

RESEARCH CONTENT

Reviewer 20

This does not apply to community colleges.

Reviewer 46

One quick observation about the research criteria below—I think that there should be some inclusion of the absolute magnitude of the first and second indicators as well as the trends. It does not seem appropriate that a university that has very large but flat or decreasing totals for extramural and internal grants should receive less credit than one with much smaller but increasing amounts. The decreases could result from the vagaries of timing of when large grants were received or renewed.

Reviewer 30

ER Credit 8-10 - these are certainly a handicap to smaller insituttions, and may not even be applicable to non-research-based institutions. how can we make these more applicable, and possibly even make room to include participatory action research?

Reviewer 40

All of these points favor large research universities over small colleges, although the former are, in many ways, often less sustainable.

ER Credit 8: Funded Research – Trend

Reviewer 43

How is this defined/equally judged?

Reviewer 13

This is a nightmare trying to sift out what is relevant and what is not. Medical research, community and economic development work could all apply. How about plant genetics, biotech, and the other emerging technologies that COULD be beneficial, but might also be nightmares about to be unleashed? Not at all sure how to deal with this at a place the size and breadth of MSU. I'm open to approached

Reviewer 17

I don't know how one would measure this. Many institutions do not have much in the way of research, and one or two grants can really skew data even over a 3-year period. I recommend dropping it.

Reviewer 31

I don't even mind giving credits at this point to an institution tracking "sustainability" research let alone showing a 3-year trend.

ER Credit 9: Internal Research Grant – Trend

Reviewer 43

How is this defined/equally judged?

Reviewer 17

This is too vague in my opinion. Different people will define sustainability-focused research differently—the definition is not a trivial issue. Further, what percentage is enough? 100%?? If so, do we really believe that ALL research should be sustainability focused? One could argue that 100% of research is sustainability-focused already. I suggest dropping this criterion.

Reviewer 40

Penalizes small colleges with little or no research.

ER Credit 10: Research Center

Reviewer 17

This is fine for big research institutions, but may not make sense for small and non-research institutions.

Reviewer 40

Penalizes small colleges with little or no research.

ER Credit 11: Research Incentives

Reviewer 17

It seems to me that if an institution has a dedicated sustainability fund (GF 7), it is meeting this criterion. Because it duplicates a previous criterion, I would drop this one.

Reviewer 38

Perhaps credits could be awarded to institutions actively recruiting professors in a “sustainability” field or who express a commitment to integrating the idea of sustainability into their teaching (be it literature, history, science, etc). There would need to be a way to demonstrate this via hiring policies.

Reviewer 40

Doesn't this ignore the fact that many research universities have research programs that actively contribute to an unsustainable world? (weapons research, for example) As it is, a university could do enormous damage and then get a point because it has a program with sustainability in its name!

INFORMAL EDUCATION

Reviewer 17

These are fine, but don't represent an institutional commitment. Student organizations are dependent on student volunteers. I don't have a problem with retaining these criteria.

Reviewer 18

change "INFORMAL EDUCATION" to Co-Curricular Education, or Student Life Education and Awareness.

I'd also like to see others comments on this section- will look to add one or two indicators to this section, as I mentioned, millions of dollars spent in this area each year, probably needs to be enhanced a bit

Reviewer 47

After reading through STARS 0.4 it got me thinking that perhaps a section/point could be added if a campus did or did not have an active and institutionalized outdoors program. For example, UNC-CH has WAFFYS (wilderness adventures for first year students- <http://campusrec.unc.edu/OEC/waffys.htm>) that is open to freshman and is a 7 day backpacking trip usually with students who have never been camping or spent more than a night outdoors.

This came up when I was having lunch with a friend who had spent all Summer working for the forest forest service in D.C. She told her boss she was experiencing nature deficit disorder working out of her cubicle all day (half jokingly) and ended up working in the courtyard half the

time. There is continuing to be evidence that "nature-deficit disorder" is real and scientists are moving beyond anecdotal evidence of it.

I think this could fit somewhere, perhaps in the Student Life/Campus Culture section.

Reviewer 45

Should there be some additional credit for the institution actively supporting sustainability groups? For example, we host a meeting of all the campus sustainability groups at least once a semester. We give them lunch and a space to meet. We also have set up listservs for them, given them some support for creating websites, etc.

ER Credit 12: Student Organization

Reviewer 14

Students have the prerogative of seeking to organize recognized organizations and it seems somewhat coercive to imply that such an organization must be in existence to reflect a concern for sustainability.

Reviewer 43

Can't this be addressed by multiple student organizations that address various issues of sustainability?

Reviewer 5

Not meaningful: how many students? Much more important to ask more generally how the structure and interaction of student organizations respond to sustainability

Reviewer 7

Almost always, students create and maintain their own organizations as a grassroots system. If an administration has no control/ability to start a student sustainability organization or to maintain it, is this a fair criterion?

Reviewer 13

Scale matters here. We have a number of groups that mix up the environmental and social/economic stuff. I also wouldn't want to leave out all the students involved in chunks of sustainability – diversity, social/economic justice, environmental, so perhaps we could allow credit for student involvement in organizations that address some portion of the whole.

Reviewer 26

Informal Education ER 12 again it is always the case that we can require it of the students but we rarely if ever require it of the faculty and the staff. Sustainability is an issue on campus not because the kids do not get it. Its because the faculty and the staff do not get it and they are fighting it tooth and nail in a lot of instances.

Reviewer 30

the reference to ad hoc efforts is way too vague and needs to be spelled out more clearly. if two students get together and pick up garbage on campus one day, does that count as an ad hoc club?

Reviewer 40

Does this work like community service, where actively engaged students don't count as much as one 'official' organization that may do little or nothing? Suppose there are two or three separate clubs that complement each other, which would probably be a stronger and more sustainable model?

ER Credit 13: Student Sustainability Outreach Program

Reviewer 14

Students have the prerogative of seeking to organize recognized organizations and it seems somewhat coercive to imply that such an organization must be in existence to reflect a concern for sustainability.

Reviewer 3

What is "the Eco-Reps program?"

Reviewer 5

This runs the risk of perpetuating sustainability as just another "interest" group or theme dorm. This is very superficial. No mention of dorm-based, dining hall-based, other non-formal programming including university-wide dialogues etc...

Reviewer 13

Need a better definition of what this includes and doesn't include

Reviewer 11

Many of the programs I am familiar with are not student run, with the exception of one of the CSU Schools (Chico I believe). As you are probably aware, it is difficult for programs run by students to be maintained over time without faculty or staff support. Our program has two tiers of students, Eco-Reps I and Eco-reps II. The II students are responsible for mentoring the new students and evaluating the program to keep it current and interesting.

Reviewer 40

There are many ways for a campus to promote engagement; giving a credit for one type and not others may stimulate institutions to create similar programs that may not be appropriate for that institution.

LITERACY

Reviewer 14

As noted earlier re sustainability definition, each institution should be encouraged to develop its own meaning and operational implications of "sustainability" and have that definition also inform the type and degree of "literacy" to be sought by campus stakeholders.

Reviewer 5

Don't go there: you are joining the culture wars. Literacy is very tempting but is a slippery slope that can be extremely divisive.

Reviewer 17

ER Credits 14-16: I think these are good and should be retained pretty much as is.

ER Credits 17-18: I think these give more credit to sustainability literacy than is warranted. The thresholds and trend raise some difficult issues for good performers. (It is kind of hard to raise the threshold or trend if you already have a high degree of achievement here.)

Reviewer 20

Again, I would look at the “must” statements

Reviewer 30

I would recommend making this one tiered indicator with different levels of literacy on a % metric. in addition, we need to specify what is meant by "literacy" or provide some criteria by which a standards can be applied to different definitions. also, what if the institution does not have any cohort-based programs?

Reviewer 31

My uncomfortableness (is that a word) aside with this section, I like the Literacy Section (ER 14 – 18) and believe that this is very auditable.

Reviewer 45

ER Credits 15 and 16: We might want some flexibility here--I'm not sure that years 1 and 4 is relevant to all schools (e.g., Community Colleges are two year programs). [My institution] has-- and I'll bet a number of other universities have-- surveys for entering freshmen and graduating seniors (may of whom have been here 6 years). I wonder if we might offer some sort of option of adding questions to existing surveys that Institutional Research offices are already doing that may be at different intervals?

ER Credit 17 and 18: I'm worried about ceiling effects on the courses trend and on the literacy trend data. We have students learning about sustainability in a freshman seminar and we have an increasing number of sustainability-related classes. Students are also coming in with more knowledge – how much of an improvement will required? Improvement is a lot harder when you start at a higher level.

ER Credit 14: Sustainability Learning Goal

Reviewer 26

Literacy ER14 the intended subject here is clearly the students. I worry more about faculty and staff. We turn over a lot of people in higher education . What is the sustainability of a plan that does not inculcate continuously?

Reviewer 40

If there is an institution-wide commitment, why a separate commitment here?

ER Credit 15: Sustainability Literacy Survey – Baseline

Reviewer 38

How comprehensive will this survey be? Will a quantitative score be provided? AASHE might consider provide resources or help develop the survey? To really be a comparative tool, it is

something that should be standardized and offered to campuses. AASHE could provide value by providing a standard template.

Reviewer 40

The goal of environmental literacy is good, but I don't think it can be measured in a survey. Most surveys are designed to produce the desired results, and making something that is subject to such variations in measurement worth 4 points does not seem appropriate.

ER Credit 16: Sustainability Literacy Survey – Phased

ER Credit 17: Sustainability Literacy Survey – Threshold

ER Credit 18: Sustainability Literacy Survey – Trend

D. Operations

Reviewer 14

The variables and indicators subsumed by this area are appropriate and reasonable considerations for boards and institutions and would meet the general test of “face validity” for a definition, policy, and culture promoting sustainability.

Reviewer 43

Can we develop a metric for biodiversity, as another measure of landscape health?

Reviewer 18

Probably in Operations section of indicator want to include something about a section on the bookstore- key and very visible service and educational component if done well.

Reviewer 30

OP Prerequisite - doesn't this same situation apply to all prerequisites? it should really be included earlier at the start with all the prerequisites or at least a pre-indicator discussion of how they all fit together. my assumption is that if an institution does not have all the prerequisites then the cannot participate.

...

if we are awarding points for LEED application, should we not also consider some points for GRI, ISO 14000, LCA, carbon footprinting and other such things?

Reviewer 36

I suggest you add an additional credit on Airborne Releases that would be worded as follows: "Institution must meet the Biosafety Level 3 (BSL-3) effluent treatment requirements of the NIH-CDC Guidelines for Airborne Effluent from Laboratories that Handle Biohazards or Meet all standards of California South Coast Air Quality Management District for all products of combustion."

GHG is very important however; some institutions with ongoing research have a greater need to address this problem.

Reviewer 48

Some where consider adding a credit for a Sustainable Campus Operating Manual with instructions on recycling, operating class rooms to use natural light, and tons of other things that no one knows about unless they are told on how to operate a sustainable campus. The document could be on-line but some specific parts could be posted in appropriate places in each building.

Reviewer 38

AASHE might consider building a credit or bonus or indicator around the subject of Facility Utilization rates. (vs. new buildings/plans on campus where existing utilization is low).

OP Prerequisite 1: Recycling program

Reviewer 49

Absolutely necessary for a sustainable campus!

1. Is the indicator "valid"? (Does it measure what it is supposed to?)

Yes. It is specific enough to indicate what materials need to be recycled and broad enough that the recycling or diversion of material not recycled can be measured.

2. Does the indicator enable reasonably fair comparisons across campuses?)

Yes.

3. Is the necessary data available at most campuses, or can it be made available? If not, what do you suggest?

It is available if the institution invests in collecting it.

Good reason to start a recycling program and to look at how an institution's wastes are being disposed of. Notify the Administration that this information is critical to the financial health of the institution.

4. What "outcome" is the indicator focused on achieving, and is there a better indicator for achieving the same outcome?

Diversion of solid waste from disposal through land filling or incineration is the outcome. Best indicator.

5. Are there existing standards by which to measure achievement of this indicator?

Yes, USEPA standards as used by Recyclemania.

6. What are the terms for fulfilling this indicator? What guidance is needed?

Guidance is available from the National Recycling Coalition's College and University Recycling Council.

7. What resources are available for further information on this topic?

See the answer to number 7.

Reviewer 11

This should read “recycling receptacles must be dedicated to each building, or building cluster.” Many facilities use outdoor bins, placed adjacent to dumpsters due to indoor space or fire code constraints.

Reviewer 17

I think the definition needs some refinement. What does it mean to “provide facilities”? Does an institution need to have its own recycling or solid waste management center. What does the term “all materials” mean? One could interpret it to mean that 100% of solid waste needs to be recycled to meet the prerequisite. I suggest that rather than making it a prerequisite specific points be given for various types of recycling. For example,

- Able to calculate overall campus recycling rate: 1 point
- Significant program for recycling containers: 1 point
- Significant program for recycling paper: 1 point
- Significant program for recycling cardboard: 1 point

Reviewer 27

Local jurisdiction is a dangerous setting as in Ames they use incinerator and burn everything!! I believe point should be given for the more items they recycle.

Reviewer 38

Simply for transparency and to promote continuous improvement, perhaps AASHE should either award a number of points according to the number of different materials being recycled (e.g. glass, plastic, paper, cardboard, etc) or perhaps simply list the different product options and campuses must check off which ones they recycle. Otherwise, a school with a comprehensive program and one recycling only paper on equally footing. Simply reporting it might be enough to move the laggards along.

You might consider awarding additional points for locally recycled products (vs. those shipped off a long distance).

Reviewer 40

The standard of recycling only those items mandated in the local jurisdiction is very weak. A private university in a rural township might have no recycling requirement at all!

OP Prerequisite 2: Environmental, Health and Safety Regulatory Compliance

Reviewer 17

As an EHS Director, I don't understand what it means to be in compliance with regulations. For example, if we receive 3 Notices of Violations (NOVs) during a RCRA inspection, are we out of compliance, and if so, for how long? Keep in mind that many regulatory inspectors are directed to find NOVs or their job is in jeopardy. I suggest that the criterion be given 5 points and be reworded to ask whether the institution has dedicated EHS staff appropriate to the institution's size with programs to ensure environmental compliance. If you must push the concept of regulatory compliance, please list all the regulatory agencies that you consider important.

Reviewer 20

These regulations should be defined.

Reviewer 27

OP Prereq 2 and they should need to reapply to be rated again

Reviewer 31

I would restate this. First, any school that says there in compliance with “all” requirements is either ignorant or lying. Something, somewhere isn’t quite right. Secondly, a slap on the hand for a violation or misstep should not kick you out of STARS until you come back into compliance. Moreover, what do you do if you self-discover that you are out of compliance? Tell AASHE but don’t self-disclose to the EPA? Large schools that have the best programs with the most competent staff are at a severe disadvantage because they have a huge number of compliance issues on their plate and enforcement agencies that look at them all the time. I think that language regarding a dedicated EH&S Office or function(s); programs to identify and comply with applicable EH&S standard and a procedure or mechanism to conduct audits or inspections to assess compliance on a regular basis should be sufficient. In addition, I think that a campus should get a point if they have a formal Environmental Management System. (If you accept any of this, I can help you with language)

Reviewer 38

We were pleased to see compliance with all EHS regulations as a prerequisite. Have you considered awarding points for institutions implementing an Environmental Management System (EMS)? An EMS is a proven system to control and reduce environmental impacts and make sure one is always in compliance. This type of system can be an indicator of an institutions commitment to improving its performance. One idea might be to make it be a Tier II indicator if a school has an EMS and award more points if they are including sustainability goals and measure in the EMS.

Reviewer 40

Delegating a sustainability rating to a system administered by others does not seem appropriate. It is not difficult to imagine cases where an institution could be technically out of compliance because of a paperwork error, even an error by the regulatory body.

Reviewer 50

This is too broad and too vague a statement. Regulatory compliance is not necessarily black or white. An institution may be informed of a problem and may be working to fix the problem; however, does this mean that they are not in compliance.

PLANNING AND DEVELOPMENT

Reviewer 23

Unfortunately, the building and operations section does not measure real LEED buildings (just LEED equivalent) which has little value in terms of measuring achievement since nothing is really “achieved”. It is not advisable to recommend LEED-equivalent compliance as this may be perceived as green washing.

Reviewer 38

My comment is within the Operations section. You might consider on a later rendition including "Strategic Planning" as a to-do for college campuses. If they are doing Campus Master Planning prior to solidifying a strategic plan they could miss agreed upon goals and objectives from the board, students, administration and others. There are actually some architectural firms out there that are expert with campus master planning who won't do one unless the institution has gone through an aggressive strategic planning process and arrived at a mission statement with global goals and objectives to guide the whole process.

Reviewer 40

These trends don't make sense in a small school that does little or no building. How about points for NOT building!?

Reviewer 35

Should separate credits be given for new and renovated building compliance with LEED? Could we give points for various levels of recycling of demolition materials?

OP Credit 1: Campus Master Plan

Reviewer 17

This is fine; however, I would delete the reference to landscape master plan since that is a separate issue.

Reviewer 42

Under Master plans: since some institutions may have plans that were completed before the sustainability push, and they are quite expensive to commission, could STARS accept a "sustainability addendum to the master plan"?

Reviewer 26

I would relocate the requirement that the plan formally endorse LEED NC for all New Construction the likelihood that the validity and fairness tests will hold up on principle, values and equivalents is not clear this is.

Reviewer 30

would a strategic plan apply if it has specific goals/objectives on long-term campus planning?

OP Credit 2: Campus Design Specifications

Reviewer 43

Why not explicitly require certification by a third-party? Otherwise, how do we know all items that would be verified through commissioning, etc., were delivered in the project?

Reviewer 9

Is the intent for the campus to choose either LEED Silver certification or equivalent? The way this paragraph reads right now it is not clear whether or not the campus must have the buildings certified by USGBC if they choose LEED Silver or if they are just required to write the LEED Silver requirements or equivalent requirements into their design specifications. We have shown that the results from buildings that go through LEED certification are significantly better than those

that are only built to LEED specifications but not certified. It is my opinion that whether a campus chooses LEED or another rating system they should go through the entire process.

Reviewer 17

My institution has recently adopted a policy that we aspire to LEED building requirements, but we will not normally arrange for LEED certification. The campus believes that the money spent on verifying LEED certification could be better put into the building. I am guessing that this would not be a sufficient policy to get the point for this category. Perhaps this building design category could be split into 2 points, one of which is to have adopted green building standards and the 2nd to have LEED (or equivalent) certification for at least one building.

OP Credits 3 and 4: I am not familiar with these, but suggest that they be dropped in favor of my suggestion for giving 2 points for OP Credit 2.

Reviewer 26

OP2 is excessive and burdensome. It will drive more people away from LEED.

Reviewer 30

does LEED have a policy on use of the phrase "LEED equivalent" as it seems to be an end run effort to use their criteria without paying the fees, and I am not sure as how it may not violate their copyright/trademark holdings. also, if we can use LEED then this indicator should be tiered to award more points for different levels of LEED certification.

Reviewer 41

I have said this before but I can't seem to get any one's attention on this. LEED Silver is entirely inadequate. LEED Silver buildings can be quite average. The bar should be LEED Gold and Platinum – with maximum energy points -- and the STARS rating system should establish that threshold. I can't say this strongly enough.

OP Credit 3: LEED-EB Trend

Reviewer 3

A 3-year trend won't differentiate between institutions with little or no building and institutions that are building, but not to LEED standards. This might be one area where strategy and policy should count more than performance indicators, especially over a 3 year period.

Reviewer 26

OP3 LEED EB is available to LEED NC buildings after a 5 year term. Some will Make it. LEED EB is the toughest LEED criteria there is there are very few buildings in the US who can make it today. If this category stays it is worth more than one point. There should be a minimum percentage to enter the game otherwise If I have 10 million square feet and I do 25,000 square feet a year for three years and do not build a building I get a point. Meanwhile I still have 9,925,000 square fet of non LEED buildings.

Reviewer 30

OP Credit 3-4 these should be merged together. otherwise, I would encourage merging them and doing the tier system mentioned above.

Reviewer 31

OP Credit 3/4 – I think I'm ok with this, but I would rather see a campus build a green science building (energy hog) than a big LEED certified athletic facility with lots of square footage of air.

Reviewer 36

From an operations standpoint a Commissioning plan brings results and is a system that OP understands and knows how to implement. LEED-EB is intended as a tool to maintain a building that was built to LEED NC standards. Most campuses have older buildings that would not qualify for LEED EB. A retro commissioning plan will help these building operate to their efficient potential. Add:

"Or, Institution must set up a retro commissioning plan for all buildings conducted on a regular basis and not longer that 5 year intervals. Institution must develop an ongoing plan to respond to the retro commission reports."

OP Credit 4: LEED-CI Trend

Reviewer 3

A 3-year trend won't differentiate between institutions with little or no building and institutions that are building, but not to LEED standards. This might be one area where strategy and policy should count more than performance indicators, especially over a 3 year period.

Reviewer 26

This LEED category exists for clients who are located in space which is not owned or controlled by them. This does happen in higher education but it is by far and away an anomaly. And de facto if it is the case that it is not owned it is not operated by the university of college I would suggest if there are any of these that as a percentage of square feet they have to meet a minimum 5% of the campus and that they be submitted as innovation point suggestions.

PURCHASING

Reviewer 8

In procurement, there should be a category on "take back your waste" policies. This is but one measure that can affect waste minimization efforts.

Reviewer 30

I think we should include these all together in a tiered indicator with points for involvement in more programs. otherwise, we will be adding and removing indicators as these many programs change in number and type rather than just changing the language of one big indicator.

Reviewer 35

OP 5 & 6: I don't know the environmentally responsible purchasing standards, but I would hope that local purchases of non-comestible items would also be recognized.

Reviewer 36

Buying local, renewable materials and certified wood are important sustainable practices. Some of this is included in LEED CI. Is it enough to let the LEED CI credit include these credits or should they be separated? Here are some additional credits to consider:

OP Credit ?: Regional Materials

Institution must establish a goal to use materials or products that have been extracted, harvested, or recovered as well as manufactured, within 500 miles of the campus.

OP Credit ?: Rapidly Renewable Materials

Institution must establish a goal to use rapidly renewable materials and identify products and suppliers that can achieve this goal. Consider materials such as bamboo, wool, cotton insulation, agrifiber, linoleum, wheatboard, strawboard and cork.

OP Credit ?: Certified Wood

Institution must establish a goal (when wood products are needed) to use wood-based materials and products, which are certified in accordance with the Forest Stewardship Council's (FSC) Principles and Criteria for wood building products and furniture.

OP Credit 5: Environmentally Preferable Purchasing

Reviewer 51

Being both a blessing and a curse, there happens to be many EPP resources available.

The NAGPI Eco-S.A.T. has a good reputation as far as I can tell, and was one of the first resources I was shown upon starting this work. However even after 4 years of college and 1 year of an EPP job, I personally don't think it is affective. Additionally, the EPA has an extensive EPP archive, but I can see your point- its geared toward Federal agencies.

Last year, my main resource was GreenSeal when I was fact-finding for the taskforce on specific product categories. This is helpful for educational purposes but However, is not necessarily aimed at higher education, and is somewhat of a 'weak' guide to procurement agents (I can see why STARS has designated categories for both Green Seal and EPP).

So in trying to propose solutions (and not just problems), here's what I think:

I am sure you are aware of The New American Dream foundation. In applying for a summer internship, I spoke with the director of their Responsible Purchasing Network. I got the impression that they are in the process of becoming a true leader in Institutional Purchasing guidance. Here is their synopsis:

The Responsible Purchasing Network (RPN) is a national network of procurement-related professionals dedicated to socially responsible and environmentally sustainable purchasing. Officially founded in 2005, RPN is a program staffed and managed by the [Center for a New American Dream](#), and advised by a voluntary [Steering Committee](#) of leading procurement stakeholders from government, industry, educational institutions, standards setting organizations, and related organizations.

I encourage you to click the "Steering Committee" link, there are several big names in today's EPP scene. Moreover, members gain access to purchasing guides on an array of products relevant to hi-ed.

Joining this network could potentially be part of the STARS purchasing requirement, and be listed as a EPP source that is hi-ed friendly.

The website can be accessed through newdream.org or directly at <http://www.responsiblepurchasing.org/>

Additionally, please check out <http://www.greenguardian.com/eppg>. Though I had not seen this site prior to this inquiry, it looks like a **very** valuable source that is comprehensive and easy to

use. This tool was recommended by the Rutgers Solid Waste Policy Group. It may be less nationally recognized than NAGPI, but it seems much more direct and user friendly than many other guides.

I have many more government based resources, but the above would be my recommendation for a hi-ed application at this time.

Reviewer 26

This is a plan only and I don't like plans I like action. This is viable only if there is an agreement on scope and there is a minimum required spend expressed as a percentage of total spend.

I would have thought that Integrated Pest management, non-fossil fueled cleaning chemicals, water treating chemicals, herbicides, fertilizers would have generated categories which would have been far easier to measure and monitor.

Vending machines and their offerings would be a good start also. 20 ounce drinks of sugar should be a negative point and candy bars and chips a negative versus fruit drinks, plastic versus aluminum.

OP Credit 6: Environmentally Preferable Purchasing – Trend

Reviewer 17

I don't see how this information can easily be measured. Further, I think the intent can be subverted by persons who do not go through the central purchasing system because they see green purchasing as more expensive. In this case, the trend of environmentally preferable purchases through central purchasing could be going up, while at the same time, environmentally preferable purchases campus wide may be going down. I recommend that this category be dropped.

Reviewer 31

The caveat that this is limited to "centralized" purchasing can exclude a lot. I'd prefer performance against plan rather than 3-year upward trend.

OP Credit 7: Sustainable Food Purchasing

Reviewer 52

is this is volume or \$ (I would assume \$)? does the institution define local? (To me, it depends on where you are in the country – we define it as 1 day's drive) Who defines environmentally/socially preferable and with what criteria?

Reviewer 4

It is unlikely that there are any institutions of higher education that have achieved anything higher than 10% of its food purchasing to be local/sustainable. Instead of the current point system, I recommend 1 point for initiating a campus plan for local/sustainable food purchase; 2 points for 10% or less, 3 points for 25% or less, and 4 points for 50% or higher.

Reviewer 6

On the dining programs, I think some of your purchasing matrices are aggressive. I know that we purchase 25 % (+/-) of our food dollars towards local purchases. Were we to increase that

amount, we would be lessening our varieties of menu offerings - something our students may very well look at.

...

The further up the scale you go, the more difficult it is. A simple one point increase seems less of a reward. It should almost be exponential or double what is there. 1,4,6,8.

Reviewer 17

I think the terms “local” and “organic” must be better defined. I think “environmentally and socially preferable food products” is a term that is not well defined. I suggest that if this category is kept that credit be given to food purchases within a 250 mile radius (a different number might be more appropriate). Even this number might be hard to get. Assuming you follow my recommendation, I suggest 3 points be given as follows:

- >10% 1 point
- >15% another 1 point
- >20% another 1 point

Reviewer 53

1. Can we define all the terms (e.g. 'local') finely enough?

Local: might have problems establishing a standard for local.

There are many definitions and discussions around what LOCAL means these days. September is actually the EAT LOCAL CHALLENGE month (www.eatlocalchallenge.com). Within this challenge there is no consistent definition of local, rather the sponsors encourage participants to define local as whatever works for them, be it a 100-mile radius from their home, only food grown within the state or within the region or from within the local foodshed. There is a lot of interest around the 100- Mile diet currently.

Wisconsin Eat Local Challenge surveys participants over a 10 day period about how much local food they eat. No definition of local was provided in the survey materials, rather they queried types of locations where food was obtained, such as farmers' markets, CSA's, grown in a garden, food co-op, etc.

Local Food Plus (a nonprofit out of Canada – see below) defines local as 150 km (93 miles) radius between farm and purchaser.

Organic: - Yes, can be defined precisely enough.

As defined by the USDA:

- 100% Organic- means that every ingredient in the product was raised and harvested in an organic environment as approved and certified by the USDA.
- Organic- means that 70 to 95 percent of all the ingredients have been raised in a USDA approved manner
- Any product containing ingredients with less than a 70 percent organic content can separately list each ingredient that falls into the USDA organic category, but the product may not display a label claiming the product as organic.

2. Are they significant contributors towards sustainability? ABSOLUTELY

3. Are there organizations with definitions, best management practices, code of conduct related to sustainable food upon which we can draw guidance?

Local Food Plus – a nonprofit organization based out of Ontario Canada which certifies farmers and food processors as sustainable and local based on criteria they have developed. They also

work to link the farmers and processors with them with local purchasers. Their certification process is based on standards they have devised for both farmers and processors. The process awards points based on several categories including the following:

- sustainable production systems reducing or eliminating pesticides & fertilizers & conserving soil & water
- providing healthy and humane care for livestock
- providing safe and fair working conditions for on-farm labor
- protecting and enhancing wildlife habitat and biodiversity
- reducing on-farm energy consumption

More information can be found at their website: www.localflavourplus.ca

Reviewer 54

Since the likelihood of dining services having 100% of their food expenditure on socially preferable food products is low, may we amend d) to >80 or >90%?

I believe some percentages indicators are important, but it is as important to give credit to those who find the right balance in incorporating local, organic, and seasonal foods that would allow them to deliver a sustainable foodservice that is viable as well as socially responsible.

The following are some of my thoughts, some may be too trivial to be counted as Credit, but may be as possible tier two indicators. I usually like to follow the flow of activities in dining services to identify the indicators, starting from management and ending with food waste. I wish I have more time to think about this, but this is a start:

MANAGEMENT –

Have a strategic plan to integrate sustainable practices into all aspects of dining services.

Sustainable practices are incorporated in all policies and procedures, including personnel training manual, food purchasing, food production and delivery, marketing and advertising, sanitation and maintenance. I have included some examples here.

Have policies and plans to promote the use of locally produced foods through on-site garden, farmers market or local farming community.

Example: Presence of a culinary garden with its produce being offered to diners on campus and the presence of a farm-to-college or equivalent program.

Have policies and plans to promote use of minimally processed foods.

Example: - Offer a variety of food choices made from scratch

Have policies and plan to promote consumption of protein from plant sources.

Example: Presence of vegetarian and vegan options in menu

Have policies and plan to promote economic and sustainable food purchasing.

Example: Presence of a program to purchase produce from local farmers.

Have policies and plan to promote energy and water-saving food production strategies.

Example: Presence of program to use only Energy Star and water-conserving equipment or even daily water saving guidelines in operation, minor procedures like defrosting in refrigerator rather than under running water.

Have standards and measuring mechanism to monitor performance and improvements of the sustainable food practices.

Have “Green” guidelines for renovating or building new dining facilities.

EDUCATION –

Presence of education and marketing program on reducing food waste in dining facilities. (Example – posters to share with students the daily food waste volume and remind students to take only what they can eat)
Dining services involved in interdisciplinary curriculum/course/research on sustainable food system.

Presence of a collaborative program with academics on the advancement of sustainability practices, For example – student internship, independent study, research on any aspects of the sustainable food system. Another example may be a research project on alternatives materials for the containers and take-out bags used widely in grab-and-go services.

MENU PLANNING

Presence of a system to maximize the use of seasonal and local and organic produce on the menu.

FOOD PURCHASING

This area is already well covered by the current STARS draft under purchasing.

FOOD SAFETY AND SANITATION

Have a dish washing program with low environmental impact.
Have a “green chemicals” program for all cleaning activities.

FOOD DELIVERY AND STORAGE

Have a power-saving program in cold storage.

FOOD PRODUCTION –

Have a power-saving program for all kitchen equipment and appliances.

FOOD DISTRIBUTION AND SERVING

Adoption of bulk packaging instead of individual container (for example. snack, beverage dispenser)

Donate leftover food to charity.

Have a program to evaluate the environmental impact of disposable wares and napkins.
Promote use of regular wares rather than disposables whenever feasible.

COLLECTION AND DISPOSING OF FOOD WASTE –

Have a composting program
Have a program to audit and monitor solid waste and food waste.
Have recycling containers in all food production and dining areas
Have a waste oil/grease recycling program.

INNOVATIVE INITIATIVES:

For Example, a student centered sustainability dining club that involve the gathering of foodservice providers and local farmers and students to develop rapport and create a community.

To encourage smaller universities to start, any merit of introducing a Credit category for institutions that made impressive jump within a short time period or those who came up with innovative initiatives to deliver a sustainable foodservice?

Reviewer 38

Should a distinction be made between the three options (local, organic, health) and/or heavier weighting be placed on the local option? There is something inherently less sustainable about organic peaches flown over a long distance, than potatoes grown locally or even on campus.

Reviewer 40

Considering local, organic, Fair Trade, and Food Alliance as equivalent and interchangeable doesn't make sense. They have different standards and apply to different products; they should be rated separately.

They aren't dealing with the fact that food may be sustainably raised, without chemicals, but not certified as such—in part because the costs of certification are very high, thus favoring large agribusiness. Is certification more important than what they do?

Also, why isn't this issue raised under social responsibility?

The point values are really skewed! How about <30%=0 points?

Reviewer 55

Stepping back to the big picture, I think one of the reasons we were having difficulty in defining categories for dining sustainability is because we were trying to put disparate activities into one bucket that are all related to food, but not part of "food." I think dining needs to respond to several categories within the document, separately.

Obviously, there's the food, that I think should be separated as a category and expanded as we discussed.

Fair Trade and humane treatment should go into the large category of social justice.

Composting and recycling of food should be rated for inclusion into the category of waste management.

Transportation should include a category for food service commissary, deliveries, etc.

What I'm feeling is that the total of food sustainability belongs in many categories, and it is nearly impossible to fit all of these categories into a single category for food.

OP Credit 8: Non-meat Dining Options

Reviewer 4

Also, perhaps I am missing something, but is there a reason for separating out nonmeat dining options from sustainable food purchasing?

Reviewer 7

Should it say vegan OR vegetarian? That would make more sense.

Reviewer 10

Credits for campuses that offer full vegan and natural/organic retail food operations? Why just in dining halls? Dining halls only serve residential students while retail operations serve the entire campus population.

Reviewer 20

What does this have to do with sustainability?

Reviewer 27

Non- meat is a standard on college campus so it is really a freebee and I believe a valid judgment of sustainability a nice feature but all campuses do this.

...

As stated earlier this is a given and should be tier two or not considered sustainability

Reviewer 54

This is great; more and more universities are doing this now, but good to see it being recognized as an indicator.

Reviewer 40

Give increasing points by percentage served?

Reviewer 6

This almost should be a negative number if you don't! Everyone should be offering vegetarian and vegan items by now.

OP Credit 9: Green Seal Procurement

Reviewer 52

does this need to be broken out more – Green Seal Certification (or equivalent) is difficult for some kitchen cleaning chemicals. I see two different areas as defined below: (1) continual research and implementation of less harmful chemicals for staff and environment; (2) adequate training & personal protective equipment for chemicals

Reviewer 17

I am not familiar with this program, so cannot comment on whether it is doable.

Reviewer 56

Our Custodial Services Unit has implemented a Green Cleaning Program. My concern with the OP Credit 9: Green Seal Procurement is that it does not capture all of the various aspects of a Green Cleaning Program, i.e., waste reduction, recycling, and purchasing. I'm uncertain which, if any, category would be most appropriate for a Green Cleaning Program Credit. Sorry, I've not been more helpful but I believe this is important. If a Green Cleaning Program is not listed for a Credit perhaps an Innovation Credit?

Pulling from the resources I have been using I would have to say the following are important elements of a green cleaning program:

- The use of microfiber should be a must. Microfiber cloths reduce paper usage as well as waste sent to the landfill. The savings incurred through paper reduction will pay for the implementation costs. Dust mops, dust wands, and wet mops should all be included as well due to the reduction in cleaning chemical usage as compared to traditional mops and dust wands.
- Janitorial equipment should meet LEED & Green Seal standards. This includes, vacuums, carpet extractors, burnishers, and floor scrubbers.
- There should be an entrance matting system in place. There should be an exterior scraper mat (preferably made from recycled tires/rubber), grates or WaterHog carpet tiles in the vestibules, and carpet runners inside the entrance.
- Documented monthly staff training helps ensure the individuals who have the most influence on your cleaning program are knowledgeable, not just about the products and techniques, but the reasons why. This also helps in the communication process with your customers.
- Of course the use of products certified by Green Seal and Green Guard are a must. Green Guard is great for ensuring your products have minimal impact on IAQ.

Green Seal's GS-42 is an excellent resource for a green cleaning program. Even if you don't follow all of the recommendations, it is a very good start. There is so much more but these bullet points are a start.

Reviewer 24

Although the purchase of certified products is an easy metric, basing credits on that is extremely biased in favor of private institutions as they are often more costly. Public institutions have to adhere to state procurement regulations in addition to their own; and those in less forward thinking states, may not legally be able to give preference to higher cost, green-certified products. They instead maybe putting forth a lot of time and effort to identify and evaluate green, though non-certified products.

To capture this, "or evidence of a green product evaluation or management system" could be added to the credit requirement.

Reviewer 26

GreenSeal is an industry equivalent to the UL electrical label. All it says is we had enough money to pay for the testing. This is not wise. Why not Greenguard? Or EBN products?

Reviewer 31

OP Credit 9 and 10: I'm concerned about "all" product categories. Again, very difficult to audit. I'd be comfortable giving one point to 1-5 categories; 2 points to 6 – 12 categories, or something like that. We also have the issue of outsourced contractors who would seem to not be covered by the language "the institution must purchase". I would propose "Institution or its vendor.."

OP Credit 10: ENERGYSTAR Procurement

Reviewer 17

I don't know how such a policy could be enforced, since most institutions allow departments to bypass central purchasing. Also, how does Procurement know that they have adopted ENERGYSTAR (OR EQUIVALENT) policies for ALL categories that exist? I suggest this be modified to say that the campus has adopted ENERGY STAFF purchasing policies for computers.

Reviewer 36

EPA now has a water efficiency equivalent to Energy Star called WaterSense. These products will use less water than standard products. They also have a list of plumbing fixtures and irrigation systems that meets this certification.

Reviewer 40

The explanation implies that this applies only to electronics.

OP Credit 11: EPEAT Procurement

OP Credit 12: Environmentally Preferable Paper

Reviewer 8

In the area of utilizing "recycled content" copy paper... It's my understanding that in general more Universities procure 35% minimum recycled content. Perhaps this would be given a value of "1". Those Universities that utilize 100% "post-consumer recycled content" should receive a "5". Additionally, those Universities that utilize alternative sources of content (other than post consumer recycled content) such as kenaf, etc. with non-bleaching, should be given a higher weighted value.

Reviewer 17

I don't know whether the 50% recycled content level for fine paper is an achievable goal, so cannot comment. I presume 100% recycled content for bathroom products is an achievable goal, but do not have first hand knowledge about that either.

Reviewer 26

Environmentally Preferable Paper? Why paper?. Why not a million other commodities too faddish and too narrow. Gasoline purchases? E85 purchases? Diesel purchases? Fuel oil? Propane? Natural gas?

Reviewer 27

There is a controversy presently over environmentally preferred paper, cornstarch, cane and recyclable foil. I believe this needs more work and expansion of acceptable choices

Reviewer 40

Office paper for copiers and general use computer printers should be 100% PCW recycled. (Maybe give points based on percentage.) This can be a big cost issue for some schools, because 100% PCW recycled is very expensive right now.)

Reviewer 41

STARS should only provide credit for 100% post consumer recycled paper which is process chlorine free or equivalent tree-free paper. This 100% PCW paper is now readily available, cost competitive and of high quality. Let's not provide excuses for campuses which are not using this paper. Nothing less should count.

Also on paper, please be sure 100% PCW is available for bathroom paper products. We have only been able to obtain 95% PCW for those products.

ENERGY AND CLIMATE

Reviewer 17

An energy credit should be added for those institutions that derive their energy from a combined heat and power system.

Reviewer 48

Under ENERGY AND CLIMATE, consider adding a 5 point OP Credit for signing the 2030 Challenge which is an agreement to immediately reduce your non renewable energy use to 50% of the EPA Target Finder amount for that building type and then an additional 10% reduction every 5 years until 2030 when you are using zero non renewable energy. This applies to both reconstruction and new construction but basically by the year 2030 you are committing to not using any non renewable energy. Go to www.Architecture2030.com for more information. Our firm has signed this challenge and we are starting to execute it now. Building owners can sign it as well.

OP Credit 13: Energy Intensity – Trend

Reviewer 17

The concept is fine, but the suggested measurements are not. I spoke with our Director of Energy Management who suggested the following:

Institution must demonstrate a consistent downward trend in total BTU (electricity plus temperature control) per conditioned square foot.

1. >0% reduction/yr (1 point)
2. >1% over the last year (2 pts)
3. > 1%/yr over the last 2 years (> 2% total decrease) (3 pts)
4. > 1%/yr over the past 3 years (> 3% total decrease) (4 pts)
5. > 1%/yr over the last 5 years (> 5% total decrease) (5 pts)

Reviewer 26

Points 0-3 should be moved to a prerequisite.

Reviewer 35

OP 13: Are BTUs divided by both square footage and enrollment+employee numbers? I strongly favor standardizing only by the latter because some campuses are way overbuilt for their real needs and for sustainable operations. This is another area where very good present performance level and/or longer period improvements need to recognize the achievements of leaders.

Reviewer 36

This is a very important point that needs to be defined better by an AASHE committee set up to discuss the issues. Energy is a key component in sustainability. BTU per capita may work but it is not always a good measuring tool. Schools with heavy research will use large amounts of energy. And it is not fair to compare them with a school that will use less energy heating and cooling classrooms. The EPA target finder will rate energy usage for different types of buildings in different areas of the country. As a result it is easier to compare the energy used in a dorm at Dartmouth to a dorm at Berkeley.

I suggest the following: "For all buildings, create an estimate of whole building energy consumption and determine the Energy Performance Rating for your facility design using EPA's Target Finder rating tool.

Reviewer 40

Measuring in BTU could lead to basing points on output of their heating plant as opposed to energy inputs, thus rewarding an inefficient plant. They may need to define use 'per square foot per capita'—as written, this could be interpreted in more than one way.

OP Credit 14: Renewable Electricity Consumption

Reviewer 43

Can we specify a certain percentage that must come from base generation and RECs, and avoid compliance just through RECs (esp. since the REC market is under increasing scrutiny for truly delivering the capacity it markets).

Reviewer 17

Rename "Electricity" to "Energy". My Director of Energy Management suggested the following:

Institution must derive a specified percentage of its total energy supply from renewable energy sources (not including large-scale hydro and nuclear):

1. 3% (1 pt)
2. 5% (2 pts)
3. 7% (3 pts)
4. 10% (4 pts)
5. 20% (5 pts)

Reviewer 25

It should be noted that some institutions have greater leeway in the purchase of renewable energy based on regulatory climate and general space in which they are located. A simple percentage of renewable electricity consumed is not a practical indicator on which to rank colleges. The issue is more complex than that.

Reviewer 26

OP14 the scale is not a straight line progression. 60 -100 should be tripled in value.

Reviewer 30

renewable energy should be defined more clearly, if possible using a third-party definition given that there may be some controversy on which things are in or out (e.g. hydro, biomass, nuclear, etc.). also, I would suggest that the REC language should be expanded to include offsets and other carbon financial instruments--there are some states, if I understand correctly, for which there are not portfolio standards to support a REC market.

Reviewer 31

I would prefer to limit the ability to get all 5 points by buying RECs

Reviewer 36

This is a very good credit and should be included. However; using percentages is difficult for this credit. The reason for this is because a solar system the size of a football field will use a small percentage of the power for a research building. In comparison, the system would supply all the power for a classroom building. The answer maybe to include this for certain types of buildings or, to base it on a square foot basis. There are also questions about other methods, for example - generators that use biofuel that should be addressed.

Reviewer 40

If they are in an area that is already served by large hydro, making them buy RECs doesn't make sense.

Reviewer 41

OP credits 14 and 15: Note that it is infinitely more difficult to provide all heating and cooling needs from renewable energy (OP Credit 15) than to buy 100% green power (OP Credit 14). Points should not be the same. I would keep OP Credit 14 1-5 points and make OP Credit 15 maybe 1- 10 points. Also, we will probably have to provide some definitions so that biomass is sustainable and not from clearcuts.

OP Credit 15: Renewable Energy Consumption

Reviewer 17

Eliminate because this is combined with the previous question.

Reviewer 26

OP 15 Obvious error duplication of 14's philosophy of straight line. Since this was intended as biomass and thermals the above point is made again only the points should be quadrupled.

Reviewer 30

what about solar photovoltaic, tidal, wave? what exactly is renewably-derived hydrogen? are hydrogen fuel cells renewable in teh first place given source constraints limiting the essential component of platinum in all fuel cells?

Reviewer 38

Maybe adjust the wording to include "or similar renewable options" at the end, otherwise it begs the question: "what about wind, or tidal energy, or.....?"

Reviewer 40

List should include wind.

Reviewer 41

OP credits 14 and 15: Note that it is infinitely more difficult to provide all heating and cooling needs from renewable energy (OP Credit 15) than to buy 100% green power (OP Credit 14). Points should not be the same. I would keep OP Credit 14 1-5 points and make OP Credit 15 maybe 1- 10 points. Also, we will probably have to provide some definitions so that biomass is sustainable and not from clearcuts.

OP Credit 16: GHG Emission Reductions

Reviewer 43

Who verifies the carbon offsets?

Reviewer 17

I personally disagree that carbon offset purchases should be allowed for any purpose in STARS. Carbon offset purchases merely allow the rich to ease their consciences by paying money. Therefore, I recommend that carbon offsets should be specifically excluded as allowable under this category. Also, I think it should be clarified as to whether this is for GHG emissions from all campus activities or just energy production (which I would recommend) activities. Last, I recommend that the points be allocated as follows:

1. > 2% (1 pt)
2. > 4% (2 pts)
3. > 6% (3 pts)
4. > 8% (4 pts)
5. > 10% (5 pts)

Reviewer 26

If someone were to achieve 100% reductions we should give them 100 points they would be the winners and we should all study how they got there quickly. This is not a straight line it is a hockey stick and the degree of difficulty is immense and we should reward it if it does happen. If however the attainment occurs through the purchase of offsets the points should be reduced by 60%. The point in doing is worth more to me than buying your way out.

Reviewer 30

is this gross or net? if an institution has significant land holdings, can they subtract their sequestration rates? perhaps the title should be "Carbon Footprint Reduction"

Reviewer 31

I would prefer to limit the ability to get all 5 points by buying offsets

what does 3-year downward trend mean? Could I get a point if I increase in year 2 but then in year 3 I go below year 1 baseline?

Reviewer 38

Will points be awarded for institutions producing GHG inventories, submitting GHG inventory reports and/or receiving third party GHG verification?

It might be a good idea to consider limiting the use of carbon offsets or setting a baseline threshold (e.g. credit will be given for offsets" once x% absolute reduction in GHG has been achieved through other measures). The concern is not to encourage the use of offsets to "get this point", rather than making real operational and/or behavior changes on campus.

This may be an example of where the "checklist" style verification we mentioned early is important to verify actual performance.

Reviewer 40

Point scale is extremely skewed to favor small improvements. Purchasing carbon offsets probably should count towards this point only as a transitional tool—no more than n years. Also, many other points also give credit for direct or indirect GHG reductions. While it is critical right now, GHG-reduction is only one part of sustainability.

Reviewer 41

No campus should do well on a sustainability rating unless it has a substantial GHG reduction program. This should be a prerequisite or scored appropriately.

MATERIALS AND RECYCLING

Reviewer 8

During the past two years, our University has recycled and reused a significant amount of asphalt, brick, and concrete (A,B,C material). In fact, we recycled well over 36,000 tons of materials last year alone. And this year, we have exceeded this figure during the past year. Our efforts overall are quite significant... do we gain the benefit of this material stream as part of STARS? The figures are accepted as part of our annual reporting requirement to the Governor's Office as part of compliance with Executive Order #142.

Reviewer 10

Credits for composting of all dining services organic matter?

Reviewer 11

This doesn't capture diversion programs like computers that are refurbished and put out into the community, office furniture that is sold or given to the local community, etc..... Is there are way to reward these diversion programs that also are good citizenship behaviors, since they typically benefit lower income families/individuals or not-for-profit organizations.

Reviewer 27

I feel the effect to solids in the water needs to be considered in this section as pulpvers verses garbage disposals have different impacts and those doing composting should be a tier one not a tier two as this is an expense proposition and if they reuse the product as a fertilizer for the campus it completes the cycle

As well the review of use of left over's into food banks (more ops than community service in my opinion)

Reviewer 30

OP credit 17-18 these should be normalized on a per student basis. an institution may reduce their per capita trash but increase their study body size and thus not get this point.

Reviewer 57

Having recycling containers in the buildings is a critical step. It took a five year struggle here to get the University to take that step. We have had the containers in the hallways for about four years now. But a visible, reliable system for monitoring what people put into those containers and for collecting the contents of those containers is another thing altogether. We do not have that, and that is critical. I think that should be part of the rating system. We would report that we have the containers, but that would not mean that we were effectively recycling.

Reviewer 35

OP 17-19: Areas where high performance needs to be recognized in addition to positive trends. Also, levels of improvement (as in 13-16) should be differentiated.

Reviewer 41

OP Credits 17, 18, and 19: This is the same problem with all the trending credits – they measure progress (which could be trivial) vs. absolute accomplishment (which is arguably more important). The way this credit is structured, a campus with a 5% recycling rate which is slowly improving could score a point while a top school recycling 60 – 70% might score nothing. Again, a huge problem with STARS – with similar problems due to trending scoring throughout the document.

OP Credit 17: Waste Minimization – Trend

Reviewer 17

The definition should be modified from “per capita” to “per capita FTE’s of faculty, staff and students.”

OP Credit 18: Waste Diversion Rate – Trend

Reviewer 13

I’d like to suggest a % Recovered. We have a huge Surplus operation that focuses on REUSE, which is a higher order waste reduction effort and I think needs measured and encouraged. Recovered material could be recycling + reuse

Reviewer 17

I think this penalizes schools with good performance. Perhaps the following points could be given:

1. >20% 1 point
2. >30% 2 points
3. >40% 3 points

Reviewer 42

Under Recycling: all materials: does this mean only what is being thrown away in receptacles around campus and in rooms, or also the unusable furniture, electronics, motors, metals etc... should we have tiered points on this one?

OP Credit 19: Paper Consumption – Trend

Reviewer 17

Same comment as OP Credit 17.

Reviewer 27

I believe in Credit 19 the white paper recycling should be a credit to this area as well.

TRANSPORTATION

Reviewer 6

I also question the transportation piece. If there are community bussing options but they do not run to your local, should you be stopping at a central hub/ride share lot? [At my institution], many live where the busses do not run or the schedule is very sporadic. I know I am rambling at this point but, I am trying to get my arms around the concept with rural schools.

Reviewer 17

New Transportation Credit: A point should be given if a campus has a published bicycle plan.

Reviewer 25

Taking great expense to reduce the number of commuters to campus is probably more useful to the environment than a count of participants in a vanpool or bus. For example, providing on campus housing for all students would result in greater ecological benefits than having the same students carpool. Calculating true reductions in greenhouse emissions is more complex than is represented in the survey tool.

Reviewer 48

Under TRANSPORTATION, consider adding a Credit from ASHRAE 189 standard which is in the First Review stage for a 10.3.6 Transportation Management Plan. I have included a PDF of the document for your information or you can Google it for any updates.

OP Credit 20: Fleet GHG Emissions – Trend

Reviewer 7

Should this start with institutions tracking their campus fleet emissions?

Reviewer 10

May need more definition to include specific language regarding the use of alternative energy sources for campus fleet vehicles to include, but not limited to motor pool vehicles, physical plant vehicles, charter/shuttle bus systems, etc. Use of bio-diesel, electric/hybrid, natural gas, and/or other non-petroleum based products.

In addition, I see no mention of credits given for campuses that recycle/convert all cooking oil based products into alternative bio-diesel fuel.

Reviewer 17

Is this absolute or per vehicle? (If absolute, could penalize growing campuses).

Reviewer 58

This is not my field, but this is quantifiable by gasoline consumption? Why is no benchmark (5% per year) specified?

Reviewer 30

is this normalized on a per vehicle basis? the same possibility applies as in the one above.

Reviewer 59

it would be useful if the description provided suggestions for measurement

OP Credit 21: Alternative Transportation

Reviewer 3

The size, type and location of an institution is going to have a significant impact on this category. How is this measured?

Reviewer 8

When you mention that Universities need to provide a percentage (%) of those who walk, bike etc... How does one provide a realistic figure to meet your request? It's one thing to suggest those that have tickets on buses... it's another to deal w/ walking and biking. Furthermore, it's my understanding that there are many users of the University Bus system that do not pay as they are a working member of the University etc.

Reviewer 12

How will the rate of alternative transportation use be determined? Will universities be required to do a campus survey every X number of years? You could look at the number of employees and students and the number of parking permits sold and use the difference between the two, assuming that you have to have a parking permit to park your car on campus. Also, I believe that option d. – 100% is unattainable, and therefore shouldn't be listed. Perhaps 90 – 100%, at least there is a small chance that a university could achieve goal.

Reviewer 17

This category will favor urban campuses and penalize those campuses in locations without a developed mass transit system. This percentage is not easy to measure. If this category is kept, I would question whether any institution could achieve 100% not using motorized vehicles except at an Amish institution.

Reviewer 26

Again it is a lot more difficult to do this and the reward has to be greater for doing it. The bean counters will play the game on the cost per point and then develop strategy to go after the points that are the most cost beneficial. Since we have the cost structure all messed up the behavior we are trying to encourage gets punished every time in every score sheet. Let's not do that too ourselves.

Reviewer 27

Need to consider weather and urban verse rural access to public transportation.

Reviewer 58

Unfortunately "alternative" transportation is no longer "alternative" (most universities report SOV mode-splits of less than 50%. However, you use VERY positive language in the description, asserting that walk, bike and bus are PRIMARY. Note: make sure that carpool doesn't slip up ahead of public transportation.

It is also very effective that you do not over-specify each mode; geography alone created vast swings between walk, bike and bus (UC Santa Barbara vs. U Washington). These percentages are not aggressive, but are mostly accurate. For example, CU has generally had about 35% SOV rates among students, and 60% among faculty/staff.

Reviewer 40

It looks like an institution that is successful in having walking (or bicycling) as the primary mode could never get these points! Does it make sense to use a single standard to measure very different situations (a large university in an urban or highly-developed area and a small college in a small community)?

Reviewer 41

Only four points for a campus served entirely by alternative transportation?! This seems nowhere enough for such a huge accomplishment.

OP Credit 22: Commuter Options

Reviewer 3

I'm not sure what this one means.

Reviewer 7

Should there be alternative points for rural campuses or campuses with few commuters?

Reviewer 12

Regarding Commuter Options, it's very important that this be tied to the Best Workplaces for Commuters (BWC) designation – they do a very good job, and there's no reason to reinvent the wheel. Recently, the EPA gave the BWC program to the Center for Urban Transportation Research (CUTR), for them to administer. For the time being, CUTR will be using the guidelines established by EPA to continue the program, but I believe they are looking at ways to advance the program. This is an excellent method for AASHE to rate university transportation systems for employees. There are different levels of achievement for BWCs, and it would be good to increase the number of "points" based on the university level of achievement recognized by BWC. I am hoping that BWC, on campuses, will be broadened to include student transportation, not just employee. If this happens, it would be worthwhile reevaluating/increasing the "points" for this designation as well.

Reviewer 17

I am not familiar with what is required to be designated as a "Best Workplaces for Commuters (or equivalent)". I am skeptical that this is a reasonable criterion.

Reviewer 58

BWC may not be as aggressive as you'd like for this document. If you're making stratified ratings ("Platinum", "Gold", etc.) then I would make this a minimum requirement, but not a best-case. Depending upon AASHE staff time, I would substantiate this. There are some given **standards** in commuter options: telework, flex schedule, universal access transit pass (ECO Pass)/guaranteed ride home, vanpool. This is what BWC quantifies/qualifies. More **progressive goals** might be subsidized proximate housing, on-campus fac/staff housing, parking restriction, market-rate permit pricing, innovative cash incentives, campus fleet service ("zip car").

Reviewer 30

what is this? would it make sense to have a more basic commuter option point for having designated commuter parking spaces?

Reviewer 40

??

WATER AND LANDSCAPE MANAGEMENT

Reviewer 30

what about rainwater catchment, greywater use, effluent treatment and use, living machines and the like? I see greywater in the trend, but do they get points if they are already using these methods when they first complete the assessment--this would not be revealed in a trend indicator.

Reviewer 41

In Tier One there should be points for sustainable landscaping practices especially for green space/habitat protection and no pesticide spraying on campus grounds. IPM (shown in Tier Two) is an inadequate standard.

OP Credit 23: Potable Water Consumption Trend

Reviewer 17

I don't object to this criterion, but would note that it penalizes growing schools and those that have already taken significant water conservation steps.

Reviewer 27

It seems that there is going to be a trend in dining to try to not use as much bottled water and to begin filtering water this may have an impact and I am not seeing the relationship to percapita in the trending and it should be considered as campus do have time of growth.

Reviewer 36

This is an important sustainable issue, should this credit have more point opportunities, like the energy credits?

Reviewer 38

Please consider putting a mechanism in place to ensure that a downward trend in potable water use does not correlate with an upward trend in bottle water consumption at the campus. One solution may be for AASHE to spell out some of the collected indicators (other than just total potable water use) which they would look for in meeting this credit (graywater reuse for flushing, bottle water sales on campus, %age of high efficiency showerheads/faucets etc.)

OP Credit 24: Irrigation Water Consumption Trend

Reviewer 17

I don't object to this criterion, provided the definition is changed to say downward trend in POTABLE water use. I would note that the criterion penalizes campuses that acquire additional property.

Reviewer 36

I suggest you add the following: "Institution should set up a policy to install new irrigation systems or suppliers that meet the EPA WaterSense criteria."

OP Credit 25: Organic Campus

Reviewer 17

I have not heard of OMRI and so cannot comment about whether this is a reasonable criterion.

OP Credit 26: Stormwater Management

Reviewer 17

I am responsible for storm water compliance, but do not know what is meant by the “Institution must mitigate at least 50% of the annual storm water falling on campus.” Perhaps the questions could be changed to say that the institution has a Phase I or II storm water management permit or a written storm water management plan.

Reviewer 30

this is vague. what is mitigation? do traditional engineered methods for stormwater management feeding into a sewage system apply? I presume not. we should get more specific in terms of referencing sustainable urban drainage systems, constructed wetlands and other natural mangement/treatment systems.

Reviewer 59

I find OP 26 to be vague; it would be useful if the description provided suggestions for measurement

Reviewer 40

They might be able to mitigate the runoff, but how would they mitigate the stormwater?!

TIER TWO:

Reviewer 43

Peer partnerships included?

Reviewer 7

SL&CC 23 – This should probably be generalized to student-run sustainable food service.

SL&CC 30 – This should not be a factor. Administrations do not run the student newspaper and it's very specific when we haven't talked about dedicated space in general. Dedicated programs might be a better indicator.

L&CC – I would add an indicator regarding whether campuses have assessment tools to ensure diverse perspectives and programs are offered.

Reviewer 11

Tailloires declaration is listed twice

Why not a series of events versus major events. We find it very effective to have fair trade coffee days, mug giveaway days, green bike repair days, etc. It reaches more students and allows for ongoing education.

Reviewer 18

I would suggest that the tier-two items in Student Life and Campus Culture be put in Tier One (very good list, others in ACUI (campus activities), ACHUO-I (Housing), NIRSA (recreation

sports) SCUP and Dining folks are spending lots of money on what we used to call amenities but now are crucial components of the campus culture- "latent" professors in all of these areas influencing consumer behaviors, campus culture and social movements - lots of efforts to put sustainability in a central focus with students and other internal and external stakeholders.

I have given some more thought on why I think that Student Life should be considered a tier one status as an indicator on this project. At [my institution] we have just renovated a space for a new fitness facility, have just broken ground for a new residence hall, and are looking at a significant feasibility study to upgrade our student union. When I look at the the higher education enterprise I can not think of a single university that is not trying to accomplish one of the three things listed above (all 12 aspirational peers including USC, Wash U., Northwestern, Duke, and NYU have done, or are doing one of the things listed). We are spending lots of money/resources to "green" these buildings in one way or another as part of the campus plan. What students used to call amenities and support services have become a central selling/buying point for families. Just some thoughts for your consideration.

Reviewer 24

#8 and #20 are the same
59 is already listed as SC Credit 23

Reviewer 27

Use of safe to the environment cleaning supplies should be considered in Social responsibilities

Reviewer 58

Perhaps more of a "transportation planning board" and then more of a "mobility coordinator". I might just be more sensitive to "alternative" than necessary.

Reviewer 38

There could be a risk in offering so many Tier 2 alternatives? Might an institutions pick a lot of Tier 2 simple because they cannot/do not meet enough Tier I indicators. There score might be higher than it should. One alternative could be to limit the number of Tier 2 indicators that an institution can include? That way the focus can remain on measured performance.

Other Possible Tier Two Indicators

- Should the promotion of fair trade products be elevated to the level of a Tier I indicator due to its environmental, social and economical benefits?
- AASHE might consider including a sustainability webpage as a Tier One indicator (i.e. school that have one devoted to this). This paperless tool is an environmentally friendly way of communicating sustainability efforts on and off campus.
- Planting native species for landscaping purposes (as an indicator of efforts to reduce water use)