

# Feedback on Sustainability Officer-Related Credits

## Comments on STARS 0.4

### 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

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## **Responses To Survey**

### **Governance and Finance**

1. GF-Prereq1: Is having some sort of formal body devoted to sustainability such an important first step that it should be a required to achieve a STARS rating? Should we be more flexible about the exact form such a body takes, or should we be more specific about the composition of the body, how frequently it should meet, and who it reports to?

*Respondent A*

Yes, with maximum flexibility.

*Respondent B*

Please don't get prescriptive about this. It will discourage participation. Each college has its' own culture and different structures work that fit the culture. As long as work is being accomplished, why do we care how an institution gets it done? This is a process outcome – how things are done We should focus on results.

*Respondent C*

I'd add a requirement that the "body" include or report directly to a senior officer.

*Respondent K*

Yes, for if there is no such organization then most likely no buy-in by an organization. You should be more specific, for without order one ends up with no clear plan of action or measurable results.

*Respondent G*

There should be a formal body registered with this organization; however the composition of that body should be flexible due to the diversity of the institutions. I would think that a requirement should be that students are involved and that there is one person who is the primary person leading the body. The rest of the group can be decided upon by the institution according to their needs/goals.

*Respondent I*

More flexible, some schools are just learning the language and the culture of this may still be driven by students with a secondary buy in by administration or faculty or vice versa

2. [Should we create a credit for having a sustainability awards or other sustainability public recognition program? If so, how should we define the credit to ensure that such programs are meaningful and significant?](#)

*Respondent A*

Yes. The fact of the program is meaningful and significant no matter how defined.

*Respondent B*

I don't feel strongly about this either way.

*Respondent C*

Annual awards announced to both the campus and the general public through news releases and Web site postings.

*Respondent K*

Absolutely, without recognition, there are no participants. I will leave the exact definition to greater minds!

*Respondent I*

If not give credit for awards- give examples of how some campuses have provided visible symbols of campus work in this area.

## **INSTITUTIONAL COMMITMENT**

1. [GF2: Should formal adoption of the sustainability implementation plan be required? Given the potential risk that formal adoption may lead to a "weakened, compromise version" of the plan, is it more effective for the plan not to be formally adopted? \(Which is likely to have the most impact?\)](#)

*Respondent A*

Yes. The official version will be weakened and compromised, but it is also open to improvement with time.

*Respondent B*

Again, this is process outcome that I don't think we should focus on. We should be looking for tangible results – the "what" not the "how." Each institution will do what is necessary and fits their method of governance. Further, there are some areas of the country where it isn't politically acceptable to be working on this. Presidents may be engaged in "stealth" initiatives! Let them get on with it. If you force this kind of thing they may do nothing.

*Respondent C*

Yes. If formal adoption weakens the plan, the consequent negative effects will be reflected in the other data in the STARS report. Without formal adoption, the plan is less likely to carry weight.

*Respondent K*

Either an organization is on board or not.

*Respondent I*

No-just like I don't have the funds on my campus to build all LEED Platinum, I am still going to shoot for LEED silver. Don't put people back into a corner .

2. GF3: How should we define "sustainability officer"? There is wide diversity in the functions and reporting structures of existing sustainability officers. Which structures and functions demonstrate greater commitment to sustainability? How should we use the point structure to encourage the structures and functions that represent greater commitment?

*Respondent A*

You shouldn't.

*Respondent B*

Another prescriptive process outcome. Jobs will be created depending on the work that needs to be done –this is well covered in other parts of STARS. Don't start telling institutions how they need to organize. For some colleges, the work may be distributed; for others contained in one job.

*Respondent C*

How about changing the referent to “an office” and having the measure reflect sustainability FTEs per 1000 employees (or some other denominator), with points given for relatively higher levels of staffing. I say this, recognizing that any measure where “more is better” is an invitation to inefficiency. This can partly be mitigated, however, by the inclusion of the many performance measures in the STARS system so that a bloated sustainability bureaucracy would have relative poor results elsewhere.

*Respondent K*

Higher the level up-the firmer the commitment. I'll leave the point structure to you guys!

*Respondent J*

Just having one represents commitment, but it certainly represents something different at each campus. The higher up you report, the better.

*Respondent I*

Full time vs. part time commitment, other staff and resources, staff or line position and reporting structure; student government connection, university senate committee

3. GF5: What are the best practices for shared governance? What specific criteria would you require for earning this credit?

*Respondent B*

There are a number of answers to that question and certainly the definition of shared governance is not universally agreed upon. Many institutions operate in a labor environment which puts shared governance in a different light. We have a very robust governance system but it was designed to fit our college and may not work somewhere else. You can't “one size fits all” shared governance.

*Respondent I*

University Senate sub committee with resources to lead and guide academic, co-curricular programs and activities including community service and community involvement

4. Should we add a new credit based on the “percentage of staff that have sustainability functions written into their job descriptions”? Do you have suggestions for defining "sustainability functions"? Who would you include as “staff”? What percentage of staff should have sustainability functions in their job descriptions in order to earn a point?

*Respondent A*

This is not appropriate in this round of the system. It provides grounds for future improvement.

*Respondent C*

Yes. Same breaks as other percentage-based measures. On the topic of scales: all scaled credits should have either 4 OR 5 levels and the intervals should be equal. In some current scalings, the top percentage band is larger than the lowest band; while this recognizes the value of just “getting started,” the highest level (approaching 100%) is the most difficult to achieve.

I'd also introduce a credit for employee (faculty and staff) sustainability training. I'd like to say something like: “sustainability training for all employees—lectures, literature, and workshops--equivalent to the level of diversity training” but I don't believe that would be politic. The credit could be scaled for the percentage who participate in such programs. Perhaps it should be two separate measures for faculty and staff because the former may be more difficult to engage.

*Respondent K*

YES. Sustainability has a broad definition but it does define continuity. EH&S, Interns & clerical workers should count as staff. Percentage should not matter as long there is one for it will grow if given the proper liftoff.

*Respondent J*

No. It would be better to rate on the accomplishments of the campus, than the number of people involved. Certainly more people can mean more gets done, but why should a small school get penalized for fewer people if they accomplish as many outcomes?

*Respondent I*

We are struggling with this a bit ourselves

## FUNDING

1. **GF6: Is a reinvestment mechanism only valuable for the funding it provides or are there other important benefits of having such a mechanism in place? What are the other benefits?**

*Respondent B*

It's an incentive to do work differently to free up dollars for reinvestment. It provides an option to do things without having to repurpose funds from some other place. Most of us are working in a zero sum environment so it provides a mechanism to move forward.

*Respondent K*

Sustainability

*Respondent F*

It should be possible to leave it up to the institution how they will fund, but should not be on the backs of the lower income staff and students at the school (ie such as raising tuition or cutting salaries, benefits).

*Respondent J*

It illustrates a commitment to the process and projects and is a reminder that this is important enough to continue investing in. It can also help develop programs more quickly and encourage new ideas

*Respondent I*

Social screens (KLD and Social Screening service) suggest a larger and deeper commitment than just operational funding. Other benefits-long term investments based on social justice

2. **GF7: What are the distinct types of "dedicated sustainability funding" that an institution can provide? Are some types more important than others (e.g., more secure source; higher growth potential; bigger impact)? Should we only give a credit to a particular type of dedicated funding, or should we offer additional credit opportunities for each type of funding?**

*Respondent B*

Not sure what you mean by this.

*Respondent C*

I'd propose a measure that requires a formal policy encouraging or requiring investing in sustainability and captures sustainability funding as a percentage of the operating budget rather than “dedicated funding.” Others could supply appropriate percentage breaks for the latter better than I.

*Respondent K*

Foundation funding by givers selection.

*Respondent J*

Offer a credit wherever such funding exists. If it's only for energy projects or only for research it's still \$\$\$ that isn't being used to put new carpeting in all the residence halls.

*Respondent I*

Opportunities for each funding- could be grants that can be tapped into at college or unit level

3. Are there any other credits related to sustainability funding that should be considered for inclusion in STARS?  
Please be as specific as possible – write out the criteria if you can.