A Message From the President

As environmental sustainability is indisputably one of the major issues of our time, colleges and universities must collectively take an essential leadership role in the global effort to maintain our planet.

At the University of Baltimore, the collaborative work of students, faculty and staff has resulted in a climate action plan, part of our active engagement with the American College & University Presidents Climate Commitment. The aspirational goals of this document will inform decisions at UB ranging from curriculum development to campus construction. As with any successful plan, it must be dynamic; the steps outlined here will both impact and be impacted by future events. Our ultimate success depends not on any single action but rather on our ability to elevate environmental awareness to every level of campus decision-making.

As always, our most enduring impact as an educational institution will be realized through the knowledge and values we impart to our students. The 18-year-old who begins college in 2010 will reach retirement age in 2057. It is clear that the choices we make today, coupled with the global citizenship that will characterize future generations of our graduates, will shape the quality of life in our city, region and world for this century and beyond.

Robert L. Bogomolny
President, University of Baltimore
# Table of Contents

1.0 UB’s COMMITMENT TO SUSTAINABILITY ................................................. 4  
   1.1 Sustainability Defined ........................................................................ 4  
   1.2 Sustainability and UB’s Strategic Plan ............................................... 4  
   1.3 University System of Maryland (USM) Environmental Sustainability and Climate Change Initiative ................................................................. 5  
   1.4 American College and University Presidents Climate Commitment (ACUPCC) ................................................................. 5  
   1.5 The Sustainability Task Force .............................................................. 6  
   1.6 The Climate Action Plan (CAP) ............................................................. 7  
   1.7 Acknowledgements ........................................................................... 8  

2.0 TIMELINE FOR CLIMATE NEUTRALITY ............................................. 9  
   2.1 Climate Neutrality Defined .................................................................. 9  
   2.2 Carbon Offset Defined ....................................................................... 9  
   2.3 Target Year Goals for Neutrality .......................................................... 9  

3.0 UB’s BASELINE CARBON FOOTPRINT .............................................. 11  

4.0 GHG MITIGATION STRATEGIES AND GOALS .................................. 13  
   4.1 Strategy 1: Instill the principles of sustainability into UB’s culture through policy and educational initiatives. ......................................................... 13  
   4.2 Strategy 2: Reduce energy related emissions by 45% by 2020 .................. 15  
   4.3 Strategy 3: Reduce GHG emissions from student, faculty and staff commuting 2% annually ................................................................. 17  

5.0 FINANCING OPTIONS ....................................................................... 19  

6.0 TRACKING PROGRESS ...................................................................... 20  

7.0 PROGRAM REVIEW AND REVISION ............................................. 21
1.0 UB’s COMMITMENT TO SUSTAINABILITY

1.1 Sustainability Defined

Sustainability is the continuous effort to meet the needs of the present generation without compromising the ability of future generations to meet their needs. This effort includes working towards maintaining a healthy environment, social justice and a strong economy.

1.2 Sustainability and UB’s Strategic Plan

UB’s teaching mission has historically been centered on career-focused education, as stated in the Academic Committee Plan Report of October 2007: “…the education of the student is central to all the activities at UB and the ultimate goal is to provide a supportive learning environment for individuals to advance in their careers and be engaged in their communities.” (pp. 7-8) The University’s Strategic Plan for 2008-2012 highlights the University’s commitment to the concept of sustainability. The fifth Strategic Goal is to “create a welcoming, environmentally sustainable 21st-century urban campus.” Five specific objectives of this goal include:

1. Construct new and renovated classrooms, labs, study areas, offices, academic support facilities, and common spaces necessary to maintain and enhance the learning and teaching environment.
2. Enhance the information technology infrastructure to support learning, teaching, student services, and core business functions.
3. Increase environmentally-conscious practices in energy consumption, recycling, procurement, transportation and building construction and renovation.
4. Enhance campus green space, signage, lighting and other streetscaping elements to create a safe, welcoming and defined urban campus.
5. Provide parking facilities and campus residential options that meet the needs of current and future students, faculty and staff.

The strategic plan also lists specific strategies for achieving the objectives. These include:

- Constructing the UB’s Capital Improvement Program (CIP) projects within the established timelines (law building and learning center).
- Developing and implementing a Facilities Use Plan with the input of all stakeholders that supports the core academic mission.
- Upgrading faculty and staff office space.
- Creating an inventory of adaptable, flexible academic space that can accommodate new learning and teaching styles.
• Actively promoting and increasing community use of public transportation.
• Creating a one-stop shop for student transactional services.
• Implementing an energy performance contract to upgrade campus energy efficiency.
• Strengthening the campus recycling program.
• Managing facility usage to reduce unnecessary energy consumption.
• Maintaining an equipment life cycle program.

Metrics used to document progress towards achieving the goal and meeting objectives include:

• Square footage of new and renovated classroom and instructional-related space
• Number of students, faculty and staff using public transportation
• Reduction of energy consumption; progress towards campus climate-neutrality
• Campus safety indices
• Leadership in Energy and Environmental Design (LEED) certification obtained for new construction and major renovation projects
• Tracking waste by measuring the amount of recycling versus garbage.
• Tracking the number of faculty, staff, and students who live near campus.

1.3 University System of Maryland (USM) Environmental Sustainability and Climate Change Initiative

In April 2008, the University System of Maryland (USM) launched the Environmental Sustainability and Climate Change Initiative designed to promote environmental stewardship and sustainable practices across Maryland universities, research institutions and regional higher education centers. The goal of the initiative is to position the university system as a national leader in institutional responses to the challenges of global climate change through its policies, practices and programs. As an institution within this system, UB fully supports this initiative.

1.4 American College and University Presidents Climate Commitment (ACUPCC)

In December 2007, President Robert Bogomolny signed the American College and University Presidents Climate Commitment (ACUPCC) on behalf of the University of Baltimore. Recognizing that colleges and universities provide leadership in their communities, this initiative establishes sustainability as a norm in order to minimize greenhouse gas (GHG) emissions while providing students with the knowledge and skills to address these critical challenges and develop solutions to these developing challenges. As of the fall of 2009, over 650 higher education institutions have signed onto the initiative.
As a signatory, UB agreed to calculate the campus’s carbon footprint, immediately adopt two or more tangible actions to reduce GHG emissions, and to develop a comprehensive plan to achieve climate neutrality as soon as practicable. UB’s baseline carbon footprint for the 2007-08 fiscal year was calculated in April 2009. Tangible actions immediately adopted included the formation of a Sustainability Task Force (STF), adoption of the requirement for LEED Standards for Buildings, a purchasing policy requiring the purchase of Energy Star certified products in all areas for which such ratings exists, and encouraging the use of and providing access to public transportation for staff, faculty, students and visitors by the free campus shuttle that connects to area inter-modal transit stations and parking facilities.

1.5 The Sustainability Task Force

The UB Sustainability Task Force (STF) was formed in response to the President’s commitment from University Council sponsorship with the support of advocates from all sectors of the university. Two meetings were held in March and April 2008. Subcommittees were established including the following: Air, Light and Water Quality, Curriculum, Energy Consumption, Green Building, Streetscaping and Landscaping, Mass Transit, Procurement, and Recycling. An Executive Committee has been formed and the above organizational model is under revision.

On October 24, 2008, the University Council voted unanimously to affirm the STF statement of purpose:

_The Sustainability Task Force will work with the University of Baltimore administration and community to develop and implement an institution action plan to achieve the goals of the President’s Climate Commitment and to promote education about sustainable business and environmental practices through co-curricular and other learning activities._

UB and the STF have undertaken a number of sustainability initiatives. A campus-wide energy performance contract was executed to achieve energy reductions. In accordance with the State’s goal for all publicly funded buildings to achieve LEED silver certification, UB has used LEED design principles in the design and construction of its new John and Frances Angelos Law Center to be completed in 2012.

UB has also implemented a single stream recycling system which allows the collection of paper, cardboard, aluminum cans, glass and plastic bottles in one container. The benefits of this approach include a 10-30% increase in participation rate and a reduction in transportation and operations costs.

Other actions include the promotion of student discount passes for mass transit, the design and installation of a green landscape plan for the urban streets surrounding the campus, and the installation of water conservation measures in campus fixtures. The STF has also reached out to students through their presence at events such as freshman orientation and the Student Expo.
1.6 The Climate Action Plan (CAP)

This document fulfills the APUPCC’s requirement for a Climate Action Plan (CAP) and provides the framework that will guide UB to climate neutrality by the year 2040. The CAP is a list of strategies, goals and actions that will reduce GHG emissions and build on the foundations laid by UB’s Strategic Plan, the USM Environmental Sustainability and Climate Change Initiative, the goals of the ACUPCC, and the sustainability initiatives currently underway at UB.

The Plan is composed of:

- The Baseline Carbon Footprint
- GHG Emissions Mitigation Strategies
- Financing Mechanisms
- Tracking Progress

The success of the CAP depends not only on the efforts of the institution but also on the individual commitment by UB’s faculty, staff, administration and students. Individual behaviors are fundamental to reducing UB’s carbon footprint.

In implementing the CAP, high priority projects will be those meeting one or more of the following criteria:

- Significant GHG emissions reduction
- Significant environmental benefits
- Significant educational potential
- Significant social benefit
- Low implementation cost
- High opportunity for cost savings
- Partnership opportunities
- Ease of implementation
1.7 Acknowledgements

We would like to extend grateful thanks to the following listed people, who contributed to the development of the Climate Action Plan. We are indebted to your good judgment, fair evaluations, and green conscience.

Robert Bogomolny
Harry Schuckel
Steven Cassard
Joanne Dugan
Carol A. Vaeth
John Gamber
Nebeye Sertsu
Ken Turner
George LaNoue
Faye Bell
Karen Galindo-White
David Bell
Jeffrey Hutson
Stan Kemp
2.0 TIMELINE FOR CLIMATE NEUTRALITY

2.1 Climate Neutrality Defined
Climate neutrality is defined as achieving a state where the operation has zero-net emissions of greenhouse gases. The key word here is “net.” Since most forms of energy, many material, and wastes all contribute to GHG emissions, it is highly unlikely that an organization will be able to achieve zero absolute emissions of GHG without the purchase of offsets.

2.2 Carbon Offset Defined
The offset is a quantified GHG reduction purchased and used to negate or cancel out an equivalent emission from the operation. Carbon is used in this context interchangeably with greenhouse gases (GHG). This is done because although there are numerous types of GHG, the differential effect of each is converted into a common term of carbon dioxide-equivalents (CO\textsubscript{2}e) based upon their relative effectiveness at producing heat once released to the atmosphere. In turn, carbon dioxide can be related to the carbon portion of the compound using molecular weight ratios. In other words, because carbon dioxide is the most common GHG, it is the unit of measurement of all GHGs. A different GHG – methane, for example – is 23 times more harmful than CO\textsubscript{2}; a single unit of methane is counted as 23 units of carbon dioxide equivalent. Therefore, the term carbon offset refers to a reduction in emissions of any GHG.

2.3 Target Year Goals for Neutrality
The International Panel on Climate Change (IPCC) has recommended reductions of 25%-40% below 1990 levels by 2020 and reductions of 85%-95% below 1990 levels by 2050. The State of Maryland, in its Climate Change Commission’s 2008 Climate Action Plan, established a target of 25-50% reduction in GHG by 2020, and a 90% reduction by 2050 (based on 2006 levels). These goals closely reflect the recommendations of the IPCC.

The STF proposes that UB work collaboratively to achieve climate neutrality by the year 2040 with interim goals outlined in Table 1 below.
Table 1: Timeline for Neutrality Compared to the State of Maryland Target Dates

<table>
<thead>
<tr>
<th>Percent Reduction</th>
<th>Targeted Year</th>
<th>Percent Reduction</th>
<th>Targeted Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>2010</td>
<td>10</td>
<td>2012</td>
</tr>
<tr>
<td>30</td>
<td>2015</td>
<td>15</td>
<td>2015</td>
</tr>
<tr>
<td>45</td>
<td>2020</td>
<td>25</td>
<td>2020</td>
</tr>
<tr>
<td>60</td>
<td>2025</td>
<td>90</td>
<td>2050</td>
</tr>
<tr>
<td>75</td>
<td>2030</td>
<td></td>
<td></td>
</tr>
<tr>
<td>90</td>
<td>2035</td>
<td></td>
<td></td>
</tr>
<tr>
<td>100</td>
<td>2040</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The purchase of carbon offsets is not feasible until sufficient, dedicated funding sources are identified. When feasible, UB plans to purchase offsets from sources generated in close proximity to the Baltimore area in support of the local community.

The number of students, faculty and staff associated with UB affects the carbon footprint. Growth in enrollment is expected to increase by approximately 2000 students within the next 10 years.
3.0 UB’s BASELINE CARBON FOOTPRINT

The University of Baltimore emissions totaled 16,221 metric tons of carbon dioxide-equivalent (mton CO2e) for fiscal year 2007-2008. This equates to 0.022 mton CO2e per square foot (749,361 total sq. feet) and 2.78 mton CO2e per student (based on the 2008 student population of 5,843).

Emissions related to electricity use contributed the largest percentage of emissions followed by those related to faculty, staff and student commuting to and from the campus.

**Methodology:** The GHG emissions inventory was conducted using the ACUPCC’s Clean Air-Cool Planet (CA-CP) calculation tool, supplemented by the World Resources Institute’s GHG Protocol. The GHG Protocol is the most widely accepted international standard for GHG accounting and is the basis of the CA-CP tool. The inventory of emissions included those arising from electricity consumption, heating and cooling, vehicle fleet operations, business travel (by air, rental vehicle and personal vehicle), waste management practices, wastewater treatment and daily commuting to and from the campus.

The baseline for UB, the 2007-2008 fiscal year, was calculated using the electrical and natural gas consumption totals provided by Energy Systems Group (ESG), UB’s Energy Performance Contractor (EPC), for 2005. Table 2 and Figure 1 provide summaries of emissions from University of Baltimore operations.

<table>
<thead>
<tr>
<th>Emissions Category</th>
<th>mton CO2e</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fleet</td>
<td>111</td>
<td>0.68</td>
</tr>
<tr>
<td>Electricity</td>
<td>*6,744</td>
<td>41.58</td>
</tr>
<tr>
<td>Natural Gas</td>
<td>*1,593</td>
<td>9.82</td>
</tr>
<tr>
<td>Commuting***</td>
<td>6,496</td>
<td>40.05</td>
</tr>
<tr>
<td>Air Travel</td>
<td>314</td>
<td>1.94</td>
</tr>
<tr>
<td>Reimbursed miles</td>
<td>8</td>
<td>0.05</td>
</tr>
<tr>
<td>Study Abroad Air Travel</td>
<td>312</td>
<td>2.28</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>-32</td>
<td>-0.23</td>
</tr>
<tr>
<td>Wastewater</td>
<td>8</td>
<td>0.06</td>
</tr>
<tr>
<td><strong>T&amp;D Losses</strong></td>
<td>667</td>
<td>4.86</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,221</strong></td>
<td></td>
</tr>
</tbody>
</table>

*Electricity and natural gas usage for 2005 base year
** Transmission and Distribution line losses associated with purchased electricity
*** Commuting data was extrapolated from a survey. More accurate data collection methods are being examined.
For the baseline year, emissions from electricity consumption represent 41.58% of total greenhouse gas emissions. Commuting contributed 40.05% (see***, above); combustion of natural gas for building heat, 9.82%; campus fleet, air travel and study abroad air travel, reimbursed mileage, solid waste management, wastewater processing and transmission and distribution line losses make up the remainder of emissions.

Figure 1: 2007-2008 Emissions by Activity at University of Baltimore
4.0 GHG MITIGATION STRATEGIES AND GOALS

4.1 Strategy 1: Instill the principles of sustainability into UB’s culture through policy and educational initiatives.

UB is preparing students to be productive citizens of the world. In that effort, UB recognizes that students must be environmentally literate, understand what their carbon footprint is, how their actions and behaviors contribute to climate change and know how to implement mitigation strategies in their own lives. Likewise, professions related to green industries and sustainability are rapidly emerging. Students need to be trained in those disciplines and technologies in order to compete, excel and succeed in our world today.

- **Strategy 1A: Establish a permanent Office of Sustainability with a program budget and a Sustainability Coordinator (fall of 2010).**

  Permanent leadership and coordination of sustainability efforts on campus are essential to successfully achieving the overall goals of UB’s sustainability program; successful implementation of the CAP hinges on consistent effort and oversight of the Plan’s implementation including the backing of the campus administration. In order to achieve this, STF believes that responsibility should be formally incorporated into a full time staff position.

  The Sustainability Coordinator may have the following responsibilities:

  - Coordinate sustainability efforts among campus offices and interests
  - Implement the strategies outlined in the CAP and other STF recommendations
  - Oversee recycling and waste reduction efforts on campus
  - Coordinate outreach efforts for students, faculty and staff including marketing efforts and commuting alternatives education
  - Cultivate and develop community partnerships
  - Measure, monitor and report performance annually
  - Develop campus-wide policies and facilitate the incorporation of sustainability concepts into individual departmental policies
  - Research and apply for funding for sustainability projects. Oversee grant monies delegated to sustainability programs.
Strategy 1B: Develop an undergraduate major in Human Ecology and Sustainability in the College of Liberal Arts: Create a minor by the fall of 2010 and a major (fall of 2011).

Currently, it is possible for a graduate student in the School of Business to earn a Certificate in Sustainability; undergraduate specialties are also being considered.

- By fall 2010, offer a major/minor in Environmental Sustainability and Human Ecology.
- Program components will include coursework, internships with non-profits and for profit–related organizations and businesses, and independent study.

Strategy 1C: Provide faculty training opportunities and new course development incentives related to sustainability. Encourage and aim to incentivize faculty to participate. (Fall 2012)

Provide faculty training focused on the incorporation of themes, practices, and principles of sustainability for inclusion in courses across disciplines including the use of sustainability issues as the subject for topical writing projects and training to promote and support independent student research on sustainability issues.

Strategy 1D: Launch a comprehensive education campaign by implementing 2 new educational strategies every school year beginning in the fall of 2010.

Programs may include the following:

- Formally incorporate sustainability education in new student, faculty and staff orientation programs.
- Develop a workshop on alternative transportation for student orientation/back-to-school events.
- Consistently incorporate sustainability educational tidbits into school publications and at staff meetings.
- Improve and expand Website: online “green” suggestion box
- Hold contests/competitions.
- Hold a hands-on workshop focused on the energy consumed by the use of electronics (portable Watt meters).
- Develop and implement a policy that encourages campus procurement to purchase only 100% recycled copy paper, TP and paper towels. Use signage to advertise this fact.
- Develop and implement a procurement policy related to green cleaning products.
• Develop an annual award program, administered by the STR or the Office of Sustainability, to recognize student, faculty and staff efforts to promote and advance UB sustainability goals.

• Develop and implement a policy that all campus events will be “Zero Waste” events. Provide education on the practicalities of organization of these events.

• Produce a film, perhaps through the School of Communications Design, that chronicles the efforts of several committed students, faculty, staff and administrators as they change behavior to live more sustainably. Show the film at several well-publicized events.

• Purchase sustainable commencement caps and gowns, made from 100 percent post-consumer recycled plastic bottles and advertise this (2011).

• Develop a marketing/education campaign for a Live near your work/school program w/ incentives.

  o **Strategy 1E: Promote sustainability across campus by requiring each administrative department to develop an annual Departmental Sustainability Action Plan. (Fall 2010)**

    • Provide a Sustainability Checklist as an educational aide for achieving departmental goals to reduce energy consumption and promote energy efficiency, to reduce waste generated and promote reuse and recycling, and to provide guidance on telecommuting, virtual meetings and zero waste events.

    • Incentivize through the office review process.

  o **Strategy 1F: Review and streamline the management of solid waste and recyclables on campus designed to reduce waste disposed and increase recycling, reuse and reduction. Strategies may include the implementation of a resource management approach, contract renegotiation, and in house processing (2013).**

4.2 **Strategy 2: Reduce energy related emissions by 45% by 2020.**

Energy use was the largest contributor to UB’s carbon footprint. Energy efficiency improvements, the use of renewable energy sources, and the implementation of energy conservation methods will be employed to reduce energy-related emissions 45%.
Strategy 2A: Reduce energy related emissions by 30% through energy efficiency improvements (2010).

In 2007, UB contracted with Energy Systems Group to analyze campus energy consumption levels and utility systems. ESG proposed a series of upgrades and changes designed to cut energy consumption by 30% and to save an estimated $11 million over the next 15 years. The projected savings from these changes will finance the cost of the initiatives.

These initiatives include:

- The conversion to more efficient light sources and the installation of occupancy sensors.
- Building envelope upgrades including weather-stripping and insulation.
- Water use reduction through the installation of low-flow aerators on sinks and low-flow flush valves on toilets and urinals.
- The installation of skylights on the gym roof which reduces the need for lighting fixtures and allows the capture of sunlight by photovoltaic solar panels which convert daylight into electrical energy.
- The installation of a green roof on the John and Frances Angelos Law Center roof. Green roofs reflect sunlight and heat, reduce energy use for cooling, and reduce storm water runoff.
- The retrofitting/replacement of inefficient chillers/boilers and other mechanical equipment.

Strategy 2B: Reduce energy related emissions by 10% through conservation initiatives (2015).

These initiatives may include:

- An evaluation of the use of space on campus geared to implementing changes designed to maximize space utilization to avoid or minimize new construction.
- Implement a policy to enhance the performance of existing buildings through deferred maintenance planning and retro commissioning.
- Evaluate the effectiveness of submetering as a means of identifying where energy is being consumed in excess of expected norms or for the purposes of shadow billing by department to facilitate conservation.
Strategy 2C: Implement a plan to purchase 5% of campus energy from renewable sources by 2015.

- Solar: The State of Maryland and the University System of Maryland have contracted to purchase energy from wind and solar farms being developed by Constellation Energy by 2014.
- Wind
- Hydroelectric
- Geothermal
- Cogeneration

4.3 Strategy 3: Reduce GHG emissions from student, faculty and staff commuting 2% annually.

Faculty, staff and student commuting comprises 40% of the greenhouse gas emissions for UB. (see *** under baseline. This figure is under review) This is the second largest category of emissions. The challenge for UB is that it is primarily a commuter school. The following strategies may be employed to reduce commuting-related emissions.

- Strategy 3A: Develop and implement a system for tracking commuter miles for faculty, staff and students (fall 2011).
  
  Formalize the collection of commuting data to better quantify and benchmark commuter miles.

- Strategy 3B: Implement a series of price incentives for using public transit, biking and/or walking to and from campus (2011).
  
  Pricing incentives may include differential parking fees, parking discounts for car pools and fuel efficient vehicles, or payroll deductions for commuters using public transportation. Advertise and encourage the Live Near Your Work Program to incentivize UB staff and faculty to purchase or rent homes near campus.

- Strategy 3C: Develop and implement a bike share program: Advertise local bicycle shops and bicycle cooperatives. Set up an area on campus where bikes can be stored and repaired (2012).

- Strategy 3D: Reduce single occupancy vehicles commuting to campus by at least 5% from 2008 levels by 2012.
- **Strategy 3E:** Analyze the viability of promoting staff telecommuting 2 days per month (2012).

- **Strategy 3F:** Develop and adopt a policy to hold virtual meetings where possible (2012).

- **Strategy 3G:** Increase percentage of students/staff/faculty living near campus by 100% by 2012.
  - Engage the community and business leaders to improve rental options around campus.
  - Incentivize students to rent near campus.
  - Offer UB controlled land for private development of student oriented housing.
5.0 FINANCING OPTIONS

1. Sustainability fee
2. Project Self-financing
3. Performance contracts
4. Incentives
5. Include costs savings associated with potential energy conservation projects to avoided costs of carbon offsets that would otherwise have to be purchased to achieve climate neutrality
6. Alumni offset purchase campaign
7. Grants for program development and implementation.
6.0 TRACKING PROGRESS

The carbon footprint will be used as the metric for tracking the effectiveness of GHG emission reductions by student, by square foot and by emissions category. The STF (or new sustainability director) will oversee the updating of the carbon footprint every year or every two years as required by the ACUPCC.

- Ensure systems, processes, and staffing are in place to accurately record and monitor sustainability efforts.
- Report progress to the community in a sustainability report every two years.
- Establish student commuter information gathering at time of registration. Update faculty and staff commuter information each fall. Analyze and compare each fall semester.
- Report progress to the community in a sustainability report every two years.
7.0 PROGRAM REVIEW AND REVISION

While this is a long term Program plan, progress on Program implementation will be reviewed every two years by the STF and Sustainability Coordinator. Formal review will begin in January with revisions developed, if deemed necessary, by the beginning of the school year.