Introduction

Organizations around the world are pursuing zero waste and better building practices across their portfolio of assets. Across multiple properties, organizations are minimizing resource consumption, preventing waste, and redesigning material life cycles so that all residual materials are reused - transforming themselves and the future of resource management by applying zero waste and circular strategies at scale. GBCI aims to recognize this transformational leadership by enabling organizations to apply the zero waste framework provided by TRUE across multiple buildings in an efficient and cost-effective manner.

The TRUE portfolio approach is a pathway that offers an alternate, streamlined documentation submittal and verification process by focusing on the similarities between multiple buildings that are striving to recognize their zero waste accomplishments. Leveraging these similarities, participants benefit from economies of scale while also achieving recognition faster. The information outlined below details this alternate approach to submitting documentation as well as how GBCI reviews and provides recognition to multiple buildings that are pursuing TRUE.

This document is a supplement to the Guide to TRUE Certification and should be used in conjunction with that Guide.

Eligibility

The TRUE Portfolio Approach is available to portfolios of individual and/or group projects owned or managed by a single organization (please refer to the Guide to TRUE certification for definitions of group and individual projects). Projects in the portfolio can be different sizes and located in different regions across the world or on one property (such as a campus certifying incrementally as a portfolio). TRUE certification is issued to the individual or group project within the portfolio, the portfolio itself does not receive a combined certification.
To gain from the efficiency offered by the portfolio approach, portfolios that elect to follow this approach must have the following characteristics:

- A minimum of five projects
- All projects owned or managed by one organization
- A designated portfolio manager (and/or a dedicated team) that will complete all certification applications for projects within the portfolio. It is strongly advised that the portfolio manager (or team) has completed the TRUE Advisor certificate program.
- Portfolio-wide standardized processes and policies in place to maximize the number of credits that are the same for all projects within a portfolio (see the “Submit the Portfolio Review” section on the following pages for further detail).

If the organization has multiple types of projects that share distinct sets of credits due to differences in building, operations, waste, ownership, strategies, or application types (for example, events vs. facilities or retail vs. warehouse), it is advised to enroll them as separate portfolios. This ensures the most similarity possible between the projects within a portfolio which allows for an even more streamlined review process for each individual project. To expedite the review process, all portfolios could be submitted for review simultaneously. Buildings on the same site could take this approach as well if desired, grouping like buildings.

The TRUE portfolio approach may not be suitable for portfolios with projects that are very dissimilar and cannot be organized into more homogenous groups. If it is anticipated that the projects will not share many credits in common, utilizing the standard TRUE review process (as outlined in the Guide to TRUE Certification) may be the best approach.

If assistance is needed defining the portfolio(s) and the projects within it, contact us to be put in touch with a TRUE team member.

**Portfolio Approach for TRUE**

Achieving TRUE certification through the portfolio approach involves four main steps:

1. **Enroll** your portfolio and pay the requisite fees.
2. **Submit** for portfolio review and receive a catalog of pre-approved MPRs and credits for use in individual projects.
3. **Register and submit** individual projects for recognition based on your portfolio review.
4. **Maintain certification**

1. **Enroll Portfolio**
   1. Enroll your portfolio(s) by completing the online Portfolio Enrollment Form and paying the one-time enrollment fee(s). Please visit the TRUE website for pricing for portfolio enrollment.
   2. Projects from the portfolio may also be registered at this time or can be registered after completion of the portfolio review. Projects may be registered over time in groups or one at a time (see the “Register and Certify Projects” section for further detail).
3. Attend a portfolio orientation session with GBCI team members to understand how the process works and clarify any questions you may have.
4. Your enrollment includes one or more TRUE Advisor registrations (depending on the size of the portfolio) as well as a full portfolio review where you can document and demonstrate compliance with MPRs and credits that are applicable at a portfolio level.
5. Refer to Appendix A for tips and advice on how to get started with the portfolio process.

2. Submit for Portfolio Review

Portfolio Review Documentation

The portfolio review step essentially comprises of the submission, review, and pre-approval of a “catalog” of MPRs and credits that can be used by projects in the portfolio. The narratives and documentation can address both precertification and certification requirements to enable some future projects to do precertification and others to do certification. There are two types of documentation that may be submitted at this stage: (A) portfolio master documents and (B) prototype documents. Based on applicability and the strategies utilized, the project team will determine which MPRs and credits will be submitted as portfolio master or prototype. The following outlines each documentation type in detail:

A. Portfolio Master Documents

These are narratives and documents that may be applicable at an organizational level and will be the same for all or most projects in the portfolio. Examples of documents include (but are not limited to): organizational forms, templates, reports, guides, policies, agreements, screenshots, procedure/SOP documents, training documents, and other documents that satisfy MPR or credit requirements for multiple projects.

While these may vary depending on what strategies an organization may use at portfolio level versus individual project level, the following are a few common examples of MPRs and credits where a single portfolio master document may be shared by all projects or one action may satisfy the credit requirement for all projects: organizational zero waste goal (Leadership Credit 1), commitment to continuous improvement (Innovation Credit 2), zero waste policy (MPR 1), EPP policy (Purchasing Credit 1), online training platform (Training Credit 8), portfolio case study (MPR 7). Note these are only examples and not a comprehensive list, the portfolio may choose to add any applicable credits at the portfolio level depending on their operations.

Note: the case study for MPR 7 should be submitted during the portfolio review as a Portfolio Master document instead of after certification. The case study will follow the standard TRUE case study guidelines, outlining overarching practices across all projects in the portfolio. As the case study is submitted at the portfolio review, individual projects in the portfolio need not submit a case study post-certification.

B. Prototype Documents

These are narratives and documents indicating standard practices, actions, strategies or guidance that will be followed by projects, but the implementation or performance is project specific. It is recommended that prototype narratives and documentation be provided for all credits which may be attempted by projects in the portfolio and for which portfolio master documentation is not applicable.
The following are some common examples of MPRs and credits where prototype documents showing standard portfolio procedures may be submitted: waste audit procedures and forms (Zero Waste Analysis Credit 1), landscaping (Reduce Credit 7), documenting pallet reuse (Reuse Credit 1), contamination reduction procedures (MPR 5). Note these are only examples and not a comprehensive list, the portfolio may choose to add any applicable credits as prototype documents depending on their operations.

In addition, for MPRs and credits where prototype narratives and/or documentation are being provided, complete data and/or documentation that meets all requirements and shows implementation at the individual project level must also be provided for that MPR or credit during the portfolio review. These documentation examples (“audit documents”) may be from an actual project or may be a complete sample document and/or narrative meeting all credit requirements. If actual documentation is used and practices are the same across the portfolio, an example from at least one project is required. However, if there are variances or unique examples across the portfolio, all variations should be submitted so that GBCI has a complete understanding of how the credit is applied across all projects in the portfolio. Documentation examples must be complete and meet all requirements as outlined in the TRUE rating system.

While data and performance is project-specific and is required to be submitted at the individual project level, the following must always be prototyped with data and documentation examples provided with the portfolio submission: all MPRs, Zero Waste Reporting Credit 1, and Diversion Credits 1-5. If a common system or procedures are in place within the portfolio for collecting and tracking data, a narrative and/or documentation explaining the system may be submitted only once during the portfolio review stage.

**Portfolio Review Process**

The portfolio review involves the following steps:

1. **Submit documentation:** To begin the portfolio review, submit the following:
   a. The **TRUE portfolio submission form** indicating which credits will be included in the portfolio submission. Include in the form all required narratives that explain how the action and documentation applies to, or is implemented by, the projects in the portfolio. Clearly indicate which credits are portfolio master credits and which are prototype credits. If submitting for both precertification and certification, clearly indicate which narratives and documents are for each.
   b. **Portfolio master and prototype documents** for each credit being attempted and all MPRs.
   c. **Audit documents** showing implementation examples for credits/MPRs with prototype documents (these audit documents would be based on required submittal documents outlined in the TRUE rating system).
      - Documentation and narratives should be submitted for all credits that may be attempted by projects in the portfolio. At a minimum, documentation must be submitted for all MPRs and at least sufficient credits to achieve the minimum TRUE certification status of 31 points. For precertification, all required MPRs and credits must be submitted in the portfolio review.
      - If the portfolio anticipates targeting higher levels of TRUE certification for their individual project, then it is encouraged the portfolio submits all portfolio and prototype credits that may be used by projects in the portfolio. Maximizing the credits submitted during portfolio review will facilitate streamlining the individual project reviews.
There are no requirements for how frequently a credit must be used by the individual projects in the portfolio. Even if the credit will be used minimally, it should be submitted during the portfolio review.

2. **Preliminary Portfolio Review** (20 business days/4 weeks):

After you’ve submitted your documentation, GBCI will review your portfolio submission for completeness and compliance with the TRUE rating system and attempted credits and MPRs. GBCI will respond with its preliminary review report within 20 business days (4 weeks), indicating which credits are awarded and which are pending, with a request for more information for pending credits.

Prepare new or revised documentation in response to the preliminary review comments, and/or attempt additional credits before submitting for final review. GBCI suggests that you submit all updated documentation within 20 business days (4 weeks).

3. **Final Portfolio Review** (15 business days/3 weeks):

After any updated documentation is provided, GBCI will review revised or newly submitted credits. If new credits are added to the final review, they will only receive one round of review with no opportunity for comments from GBCI or submittal of additional information in response. The project team will have to submit for additional supplemental round of review (additional fees apply) to submit any clarifications. Once all credits are reviewed, GBCI will prepare a final review report with the following award categories:

- **Awarded**: MPRs and credits where portfolio level documents and/or narratives are provided will be approved portfolio-wide and may be used by future projects. The MPRs and credits that can be awarded portfolio-wide will vary based on the MPR or credit, type of portfolio and the strategies used.
- **Anticipated**: MPRs and credits where prototype narratives and/or documentation is used by all projects, but the implementation or performance is project specific, will be marked as ‘anticipated’, indicating the audit documents/proof of implementation (such as photographs, etc.) that will be required at project level. The MPRs and credits that will require further documentation will vary based on the MPR or credit, type of portfolio and the strategies used.
- **Not Awarded**: MPRs and credits where the intent has not been met or the applicant cannot substantiate meeting the requirements.

Note that no recognition is issued following the completion of the portfolio credit review, it is simply a catalog of MPRs and credits already reviewed for the portfolio.

**Important Considerations:**

- Portfolio credit sets and subsequent individual projects are held to all TRUE requirements that are in place when the portfolio is enrolled.
- Once reviewed, if any updates are needed to the portfolio MPRs or credits, the portfolio manager may submit those to GBCI at any time, separate from any individual project review. However, note that the initial portfolio enrollment fee includes up to one update a year. After that, additional fees will apply for adding or updating credits. Portfolio credits may be added, updated, or removed. There is no limit to the number of changes per submission. An updated portfolio submission form along with the documentation required by the MPRs or credits being attempted must be submitted. To begin an update, reply to the portfolio review results email or email true@gbci.org. For more
information regarding maintenance of portfolio credits, see the “Post-Certification” section below.

- At any point preceding or following the portfolio review, the portfolio manager may request to hold one or more meetings with TRUE staff to ask questions and review the process, requirements, and next steps for earning recognition for projects in the portfolio.
- If there are multiple portfolios from the organization, additional portfolios submitting for review after the first portfolio can use any applicable awarded or pre-approved MPRs or credits from the first portfolio to streamline the portfolio submission and review process.
- Portfolio MPRs and credits will expire every 3 years and must be renewed. See the “Post-Certification” section for more details.

3. Register and Certify Projects

Once the portfolio review process is complete, you are ready to register and submit as many projects as you’d like for precertification or certification based on the portfolio results.

**Project Registration**

Register one or more projects in your portfolio using the [online TRUE registration form](#). Discounts on standard registration and certification fees are available based on the volume of projects. Visit the [TRUE website](#) for more details or [contact us](#) for a quote.

While it is recommended to register all projects in the portfolio at once, projects may be registered over time in groups or one at a time. Projects may be registered during the portfolio enrollment process or after the portfolio review is complete. There are no deadlines by which the first project or the entire portfolio must certify.

**Project Review**

Submit individual projects for certification using portfolio MPRs and credits. Projects can be submitted as they are ready for certification (no deadlines or specific volume thresholds are required). However, the first three project reviews must be completed before subsequent projects may be submitted for review.

The review process for this phase is slightly different than the review process outlined in the TRUE Guide to Certification, since it relies on audits to streamline the review of larger volumes of projects and for quality control. Project reviews occur in two parts: the preliminary review and a final review. The full documentation is reviewed for the first three projects and those thereafter randomly selected for full reviews during an audit. The audit process ensures that the portfolio projects are in compliance with TRUE standards and verify that your quality control processes are working effectively.

**Review Process for First Three Projects:**

The review process and timelines for the first three projects will be the same as outlined in the TRUE Guide to Certification and include two rounds of review (preliminary and final review). If the portfolio is pursuing both precertification and certification for its projects, the first three projects targeting certification and the first three projects targeting precertification will be reviewed in full.
As a set of MPRs and credits have already been awarded or pre-approved during the portfolio review, the individual projects in the portfolio will submit a reduced amount of documentation. The following documentation must be submitted for the first three projects:

a. **The TRUE certification application form** indicating all credits being attempted by the project. Indicate credits that were awarded or anticipated at the portfolio review, as well as any project specific credits if applicable. Provide any required narratives not already provided, such as for credits attempted at the project level only.

b. **Audit Documentation and/or narratives** confirming implementation of any prototype MPRs and credits that were pre-approved/anticipated during the portfolio review, but not awarded. In many cases, the documentation is as simple as a photograph or narrative demonstrating how portfolio level guidance, policies, or procedures are implemented by the project. The final review report from the portfolio review will indicate for each MPR and credit whether each project will need to provide proof of implementation. Narratives and documents already submitted during the portfolio credit review do not need to be resubmitted.

c. **Diversion performance data and weight documentation** must be submitted by each project pursuing recognition, and the data must meet the required credit or performance thresholds for the recognition being pursued.

d. **All required documentation for any individual credits** that are only applicable at the individual project level and have not been addressed in the portfolio review. If used, these unique credits should represent a small portion of the overall credits submitted. It is expected that there will be minimal to no new individual credits at the project level and all credits have previously been reviewed at portfolio review as master or prototype credits.

**Review Process for Subsequent Projects**

Once the first three projects have been submitted and reviewed, the portfolio organization may start submitting additional projects for review via an even further streamlined process. The process and timelines for these projects will be as follows:

**Preliminary Review (5 business days/1 week):**

- **Submit the TRUE portfolio project scorecard** indicating all credits being attempted by the project. The form will contain options or markers with which you can indicate credits that were awarded or anticipated at the portfolio review, as well as any project specific credits if applicable. Provide any required narratives not already provided, such as for credits attempted at the project level only.
- **Submit diversion performance data** for the MPRs and credits that require it.
- Your scorecard and documentation will be checked for completeness and compliance.
- GBCI will respond within 5 business days with either review results and an offer of certification, or with a notification of audit. The documentation required during audit will be the same as identified for the first three projects in the section above.
- The project team is required to **accept the results within 10 business days**.
- The audit sampling rate will be based on the total volume of projects in the portfolio, the type of portfolio, and the quality of the submissions. The sampling rate typically ranges from 5-25%. Large portfolios (100+ projects) may have a further reduced sampling rate. Smaller portfolios (5-10 projects) may not be eligible for audit reviews or have a higher sampling rate, depending on the actual number of projects, the type of portfolio, and the quality of submissions.
Final Review

- **For projects that are selected for audit, provide the full documentation** (as noted in the section above) within 40 business days/8 weeks.
- GBCI will respond with its audit review results or requests for clarifications within 15 business days.
- Your team will either submit responses to the clarification requests or if final results are received you will **accept the review as final**, if you are satisfied, or **choose to appeal** the results of the review. If GBCI has found that you have failed certain credits or MPRs by submitting incorrect information or not fully satisfying all requirements, we ask that you do not submit any additional portfolio projects until the audit review results are accepted. Note: if GBCI continues to find that you have failed certain credits or MPRs across multiple projects, the auditing rate may be increased and you may be subject to an additional fee.
- When a portfolio project is in the audit review process, subsequent newly submitted portfolio projects will remain in a queue. The review will commence when the audit reviews for all preceding portfolio projects are finalized, including any appeals, additional credit reviews, etc.
- At its discretion, GBCI may request for additional documentation, conference calls and/or site visits (virtual or in-person) to ask for clarifications or verify the accuracy of information provided for audited projects. If this is done, sufficient notice will be provided to the project team.

Post-Certification

As each project completes the review process, it will earn and celebrate the recognition from GBCI that it has attempted (precertification or certification). While post-review activities and requirements are similar to that of a standard project, there are some key differences for portfolios:

- Only one case study is submitted for all projects in the portfolio. The case study is submitted during portfolio credit suite review instead of after the review process is complete (see the “Submit for Portfolio Review” section above for more details).
- One online **profile** will be completed for all projects in the portfolio.
- Recognitions earned for multiple projects do not combine into one portfolio level recognition. A portfolio may promote achievement of TRUE certification for the total number/percentage of buildings in its portfolio. For instance, a portfolio organization may indicate “a certain percentage of projects in their portfolio are TRUE certified.” Similarly, a campus pursuing the Portfolio approach where TRUE certification is achieved for all buildings on the campus over a period of time may indicate that “all buildings on the campus are TRUE certified.”

Certification Maintenance and Recertification

Certified projects will follow the standard **maintenance and recertification guidance** to maintain their certification or recertify to a higher level. Precertified projects are not subject to any maintenance requirements. The following is unique to portfolios:
• Annual data for all projects will be due on the same day each year, despite the date those projects certify. This date will be given by GBCI once the first individual project in the portfolio certifies. A custom date identified by the project team that better aligns with internal reporting or calendars may be established, per request. Because projects will certify at different times of the year, some projects will submit less than 12 months of data for their first data submission. If a project has certified less than 3 months before the annual maintenance date, the data will not be due until the following year. Each year, GBCI will provide a reminder 30 days before the data is due.
• The certification validity term will end on the annual maintenance date that is closest to 3 years from the date of certification. GBCI will provide the certification expiration date of that project upon certification of the project and will provide a reminder before it is set to expire.
• Portfolio MPRs and credits will expire every 3 years and must be renewed by confirming continued compliance with all requirements and/or providing updated information for any changes that have occurred, as applicable. The renewal will occur on the annual maintenance date that is closest to 3 years from the date the portfolio credit review completed. GBCI will provide a reminder that a renewal is needed before the expiration.

Resources

The following are key resources for portfolios that can be found on the TRUE website:

• TRUE Guide to Certification: use in conjunction with this Portfolio Guide
• TRUE Portfolio Enrollment Form: use to enroll your portfolio
• TRUE Certification Application Form: use for audited projects (and first three projects) in portfolio

The following are key resources for portfolios that will be made available once the portfolio enrolls:
• TRUE Portfolio Review Submission Form: use to submit for portfolio review
• TRUE Portfolio Project Scorecard: use for all other projects that are part of portfolio
• TRUE Portfolio Project Tracking Tool: use to estimate point totals, track the progress of projects, and conduct credit gap analyses.
Appendix A: How to get started with TRUE across your portfolio

The following section outlines actions that are not required to engage in the portfolio approach but are helpful for getting started. The portfolio can enroll at any time and does not need to be ready to apply. The steps listed below are organized by how most portfolios prepare to engage with TRUE, but the steps can be done in any order and along any timeline.

1. **Determine project team members:** begin by determining the member of the team that will manage the portfolio as it goes through the TRUE review process, who will be designated as the “portfolio manager.” The portfolio manager acts the primary point of contact with GBCI and will coordinate the completion of portfolio and certification applications for the portfolio. Multiple team members may act as portfolio managers to manage individual projects or groupings of projects within the portfolio, if applicable. For the greatest success, it is advised that the portfolio manager complete all applications for projects within the portfolio with the assistance of on-site personnel at each project. However, the portfolio manager may also select an individual at each project to complete the application. In that case, GBCI recommends the portfolio manager reviews the completed applications before submittal to GBCI.

2. **Learn more about TRUE:** get familiar with the minimum program and credit requirements to achieve TRUE certification and/or precertification. Download and review the TRUE Rating System, Guide to Certification and other materials available on the Resources webpage of the TRUE website. It is strongly advised that the portfolio manager(s) completes the TRUE Advisor certificate program for the best understanding of the program and the rating system.

3. **Analyze zero waste activities & performance:** conducting an analysis of portfolio and individual project zero waste activities using the TRUE Rating System can provide a comprehensive picture of the similarities and differences between projects and where they are on their journey to receiving recognition from TRUE. For each MPR and credit, determine whether the requirements can be addressed using common portfolio-wide practices and documents or whether it will be unique to each project. In addition, gathering or estimating the diversion rate at each project will be key to determining how and when those projects will apply for recognition from TRUE.

You can also conduct a gap analysis at this stage by reviewing the credits to understand which you could earn now and which you could earn by implementing new policies and practices. Particularly focus on standardized ones that will apply to all or most projects and will further streamline the TRUE portfolio application process. The gap analysis can also be conducted later while preparing the individual TRUE certification application. Use the following questions as a guide in conducting your gap analysis:

- What standardized processes and policies are in place portfolio wide that earn TRUE credits? What could be put in place?
- What analyses need to be completed to understand your waste streams, current diversion performance and next steps?
- Are there any programs or diversion activities in place that you may not know about?
- What opportunities do you have to further improve? Can you accomplish those improvements before applying for recognition from TRUE?

4. **Define the portfolio:** utilizing the information gathered on similarities and differences between the projects in the portfolio, define the portfolio (or portfolios) the organization
may have, the projects that it will contain, and whether any group certifications are desired (see the “Definitions” section earlier in this document for further details). A portfolio must include at least five projects. Some of the projects that you own or manage may not be suitable for your portfolio. These one-off projects may lack the uniformity needed to meet the project’s criteria. In such cases, these projects are best suited for the standard one-off TRUE review process.

5. **Make a plan & set goals:** After getting a clear picture of the portfolio and the projects within it, discuss the next steps and desired outcomes. Here are some key questions to discuss at this planning stage:
   - What recognitions are desired (precertification? certification?) and by which projects?
   - Is there a particular certification level or point score to aim for on one or more projects?
   - When will the portfolio and individual projects submit for review and how (all at once? one at a time? in groups at a time)? Once the portfolio review is complete, which projects will submit for review first?
   - Is there a goal date in mind to earn the recognitions by? May there be staggered goal dates by which to complete projects by incrementally over time?

6. **Prepare the portfolio submission:** Determine whether each MPR or credit will be portfolio master (one document or action that satisfies requirements for all projects) or prototype (shared or varied strategies, with implementation being project specific). Next, conduct analyses, collect data and documentation, and implement portfolio-wide policies and standardized processes that may be needed to minimize the number of credits that will be unique to each project. As you proceed, save documents for your portfolio review submittal (and if applicable individual project submittals) and start drafting any required narratives.

GBCI’s TRUE customer service team is available throughout the process and can be reached at true@gbci.org. Prior to submitting your portfolio or individual project certification applications, you also can hold one or more calls with a GBCI staff member to clear up any outstanding questions you have on credits and requirements. For more recommendations and guidance, utilize the resources listed above.