



# California Carpet Stewardship Program

An initiative of CARE: Carpet America Recovery Effort

**CARE Contingency Plan (2023-2027)**

## **AB 2398 Operations Training Guide and Management Methodology**

**(Attachment A)**

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## **Purpose**

The purpose of this training manual is to guide and provide implementation support for a newly awarded Carpet Stewardship Organization (CSO), to effectively operate the California Carpet Stewardship Program (The Program) under its current design as of April 21, 2023 and as required under statutory law (California Assembly Bill 729) should CARE be delisted as the active CSO. This guide is a supplement to the Contingency Plan 2.0 Framework which outlines how articles will be transferred to a new CSO. Readers are recommended to have fully read CARE's approved Plan (<https://www2.calrecycle.ca.gov/Docs/Web/123366>), CARE's originally submitted Contingency Plan (<https://www2.calrecycle.ca.gov/PublicNotices/Details/4022>), AND the Contingency Plan 2.0 Framework document prior to using this training guide.

CARE also encourages the reader to become familiar with California Assembly Bills 1158, 729, and 2398 (Carpet Law) and relevant Public Resources Code (PRC), Division 30, Part 3, Chapter 20. Additionally, any new CSO management will want to be familiar with Assembly Bill 901 (sets forth RDRS reporting requirements), as the Program must report its public Drop Off Site volumes (DOS) under this requirement.

Carpet America Recovery Effort (CARE) has been the Carpet Stewardship Organization (CSO) since the California Carpet Stewardship Program's (The Program) inception beginning in 2011. The Program is a complex program that has evolved over 12 plus years. CARE has worked to learn, evolve, and adapt to a very dynamic marketplace with shifting economics. The Program has been shaped by a multitude of factors, including a global pandemic which brought intense financial pressures to ensure survival of the program via its recyclers.

This document attempts to capture the fundamental activities that underpin the growth and success of the Program. That said, it is impossible to ensure every minute detail has been documented. Further, how one interprets and implements this information will vary considerably. If further guidance after CARE's termination as CSO is needed, CARE can be available under a separate, paid consulting contract.

This document is intended for Internal Use Only and for the sole purpose of training CalRecycle Staff or its designee(s). Due to certain sensitivities and the potential for disclosure of Confidential Business Information, this document is not designated for public access.

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## **Introduction**

This training manual is organized into areas of effort that fully integrate the functions necessary to comply with all Carpet Stewardship Laws and Regulations and enable execution of the day-to-day finance, operational, logistics, market development, Marketing, Education, and Outreach (MEO), and grant programs) necessary to operate the program. It does not provide policy, procedure, or technical support for conceptual or individual business development approaches, as CARE recognizes that these elements may change depending on the stylistic preferences of a replacement organization.

## **Program Branding**

The CARE brand and its logo are used throughout the Program and are the property of Carpet America Recovery Effort. Use of the CARE logo and proprietary business solutions are not permitted without express, written permission from CARE.

The California Carpet Stewardship Program logo is a derivative of the CARE national logo. CalRecycle or its designee will develop its own logo, with a separate look and feel, within a reasonable amount of time, not to exceed 12 months after CARE's termination date. Any approved use of the branding by CalRecycle or its designee will be managed in accordance with CARE's branding stylization guides and requirements and in accordance with any trademark or copywrite laws.

## **Third-party Software Licensing**

CARE uses third-party database software, website or digital forms, spreadsheets, and SharePoint document repositories to conduct business on a day-to-day basis. Some of these tools may not be transferred to a new CSO. Readers of this guide are encouraged to implement the best business practices and tools without written instructions or access to such tools.

Third-party business solutions purchased on behalf of the program, using program direct funds, will be transferred where noted in the AB 2398 2.0 Contingency Plan Framework document (Contingency Plan) or transition inventory listing. However, third-party business solutions' training and user guides are not included in this document, and it is the responsibility of the new CSO to secure such documents should they decide to continue using them.

## **Document Version Control**

To accommodate changes in legislation, business operations, technical advancement, and other areas of concern that may impact how CARE conducts business under the program, this document will continue to be developed and will be modified on an

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ongoing basis through the life of CARE's current plan (2023-2027). Thus, this document will be deemed a living document until either 1) all identifiable program processes and workflows have been formally documented, and no further content is required, or 2) CARE is delisted as CSO of the program.

CARE will continue to manage version control to ensure that only the most current training information is available to the reader. CARE will update this Training Guide on an as-needed basis, but at least once every 18 months and will provide CalRecycle with an updated version for its records.

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## **1. Financial**

### **1.1. Assessment Change Protocol**

CalRecycle will not pre-approve assessment increases in place of a CSO approaching CalRecycle for any assessment increase as a Plan amendment after an initial Plan approval. CARE suggests that the CSO's Plan inclusion of an estimated schedule of anticipated assessment increases will help ensure fair notice to the industry and CalRecycle. Accordingly, a CSO should preview such a schedule within their submitted Plan. If/when an assessment increase is necessary, CSO shall submit a Plan amendment subject to Advisory Committee review and CalRecycle approval. The assessment schedule in a Plan does not predetermine the form of or any changes to the system of differential assessments per the approach approved by CalRecycle.

If a change in the assessment is required, a CSO will make every effort to follow the typical 90-day notification cycle. However, in the event of unusual circumstances, the CSO may choose to implement an approved assessment change during a condensed time frame, such as 30 to 60 days.

The CSO works with an MEO subcontractor to put in place a multi-touch approach for notifications when a change to the assessment is required. There are ten pathways of communication to ensure a comprehensive notification system. Those pathways are as follows:

- 1) E-newsletter to all subscribers
- 2) Social media posts
- 3) Email directly to mills
- 4) Postcards sent via USPS to retailers.
- 5) Distribution of notice via mills to their retailers
- 6) Notification(s) posted to the CalRecycle list-serve.
- 7) Selective phone calls
- 8) Direct outreach to Networks (StarNet, Fuse Alliance, CCA Global)
- 9) Direct outreach to big boxes (Home Depot, Lowes, Empire Today)
- 10) Trade press (e.g., Floor Daily, Floor Covering Weekly)

### **1.2. Accounts Receivable - Mill Assessment Payment Process**

#### **Funds Reconciliation Process**

As Mills submit their remittance payments for the reporting period and a general ledger (GL) is prepared and maintained to track the remittances received. Remittance payments received are used to pay monthly subsidies to Recyclers, as well as program and administrative expenses, and sweep activity is processed through an Escrow Account.

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The month following the due date for Mill reporting and remittance, a reconciliation (“The Reconciliation”) of the Escrow Account and remittance activity is performed by reconciling the Mill reporting documentation to the GL account and the Escrow account.

Example: For Mills reporting for the month of July, documentation and remittance are due by August 31<sup>st</sup>, and the reconciliation is performed in September.

The Reconciliation considers the following:

- Sweep activity,
- Dues paid,
- Pending deposits,
- Pending remittance,
- Remittance from other periods,
- Interest earned, and
- Total remittance for the reporting period.

An informal review is conducted monthly for paid vs. unpaid and quarterly findings of The Reconciliation are included in the Quarterly Mill Report.

### **1.3. Accounts Payable Processes**

#### **Subsidies Payment**

Recyclers are required to submit recycling information each month, which is utilized to report recycling activity and to calculate subsidies due to the Recyclers. Email notifications for reporting are sent out the first business day after the reporting period, and documentation is due by the last day of the month subsequent to the reporting period.

Example: For Recycler reporting for the month of July, reporting notifications are emailed to respective Recyclers on the first business day of August. Documentation is due by August 31<sup>st</sup> or by the last business day of the month, whichever comes first.

The three types of Recyclers (Collector/Sorter Entrepreneur, Processor, Manufacturer) each submit monthly activity details including changes in inventory as well as shipping logs. Recyclers submit the following items through the financial and reporting software each month:

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- Collector/Sorter Entrepreneur (CSE)
  - CSE Monthly Attestation Form
  - CSE Monthly Reporting Form
  - CSE Monthly Shipment Detail
- Processor
  - Processor Monthly Attestation Form
  - Processor Monthly Reporting Form
  - Processor Monthly Shipment Detail
- Manufacturer
  - Manufacturer Monthly Attestation Form
  - Manufacturer Monthly Reporting Form
  - Manufacturer Monthly Product Detail
  - Manufacturer Monthly Purchase Detail

The month following the due date for Recycler reporting, documentation submitted by the Recyclers is reviewed for completeness and accuracy. The subsidy calculation is also reviewed and is based on the eligible outputs reported by each Recycler. Once the review has been approved, subsidy payments are approved and processed. CARE's goal is to issue Subsidy payments by the 15<sup>th</sup> of each month but requires payments to be made no later than the last day of the month.

*Example: For Recycler reporting on the month of July, documentation is due by August 31<sup>st</sup>, and the review, approval, and processing of subsidy payments is completed by September 15<sup>th</sup>.*

If information is missing or not reported correctly on any of the forms, a follow-up email will be sent to the respective Recycler for corrections/clarifications.

### Expenses Tracking

#### *Program Expense Tracking*

Program expenses are tracked through CSO's finance and reporting software. Invoices are submitted from program vendors to the accounting staff. Each invoice above \$500 is reviewed and approved by the Executive Director. Invoices below \$500 are reviewed and approved by the Director of Finance. This approval is printed and attached to the invoice. The invoices are coded to the proper account by the Finance Director. The invoices are entered into the accounting software for the weekly accounts payable check/ACH cycle by the accounts payable clerk. All paid invoices are then set aside for review by the independent accounting firm who compiles the monthly/yearly financials.

Each month, prior to the review of subsidies with an independent accounting firm, the program expenses are entered into the finance and reporting software database. The

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reporting software splits the expenses into sub-categories to track via reports reviewed by the CSO's Executive Director and Director of Finance each month. Subsequently, this information is aggregated into the quarterly reports provided to CalRecycle.

### *DoS Operational Expense Tracking*

Operations includes 3<sup>rd</sup> party hauling, Drop-Off site self-hauling reimbursement, Recycler tipping fee payments (Processors/CSEs) and rent for placed bins at designated Public Drop-off sites (categorized as storage fees). Additional operation expenses not associated with the direct collection of PCC at public DoS are also included but tracked separately by the Finance Director.

Drop-Off Site operational expenses are captured via invoice submittals from 3<sup>rd</sup> party haulers, self-haulers, and CARE designated recyclers (Processors/CSEs) in an Excel workbook. On a quarterly basis the aggregated data is then input to the Drop-Off Site template located in the financial and reporting software. The results are synthesized into the program reporting structure and are highlighted using graphs and tables.

All transactions are reconciled to ensure accuracy and validity. Individual DoS expenditures are reviewed weekly by the Operations and Logistics Project Manager and then the Executive director reviews the total accumulated expenses each quarter.

### **Operations Invoice Approval & Payments**

Assigned staff review invoice submittals on a weekly basis. The following outlines CARE's approach to the Invoice Approval and Payment process for operations.

1. Vendor submits invoice in accordance with CSO's invoicing requirements.
2. The Finance Director emails pending invoices to designated staff for review and approval of payment.
3. Designated staff reviews invoices in accordance with CSO's invoicing requirements.
4. Designated staff completes review and response to Finance Director with:
  - a. Full Approval: All presented invoices are approved for payment.
  - b. Partial Approval: Invoices that are rejected are listed with reason for rejection and action to be taken.
    - i. Rejected invoices are added to the tracker: "Held Invoices" for tracking resolution.
    - ii. Once correction is made, rejected invoices are forwarded to the Finance Director for inclusion on the next check run. The tracker is updated, and the invoice line item is marked "Resolved".
  - c. Payment is processed in accordance with CARE's payment processing protocol and via vendor preference (Check, EFT, Credit Card, etc.)

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### **1.4. Audits**

#### **Financial Audits / Performance Audit**

Following the first quarter (Q1) after the fiscal year ends (December), CARE engages an independent certified public accounting firm, chosen through an RFP process for a term of three fiscal years, to conduct financial audits of both CARE's financials as well as the CCSP financials. Additionally, the firm also conducts a Performance Audit based on performance goals and activities as directed by CalRecycle. The Director of Finance acts as a liaison with the audit firm and other parties that provide information to complete the audits.

The audit report on the California Carpet Stewardship Program will explicitly report on the Carpet Mill or stewardship financial statements as they relate to the Program and its compliance with Public Resources Code Section 42970 and Title 14, Article 1, of the California Code of Regulations. The audit report will include the following:

- Total square yardage carpet shipped into California for the reporting period.
- Aggregate assessments collected.
- List of non-compliant Carpet Mills who are registrants with the Plan.
- Results of Agreed Upon Procedures conducted on the Carpet Mills and fund recipients during the reporting period.

The Program will share confidential information on sales and assessments with the accounting firm on a quarterly basis and in aggregate form to protect the confidentiality of individual Carpet Mills. The Certified Public Accounting firm will do the following:

- Perform certain Agreed Upon Procedures (AUPs) on Carpet Mills, recipients of the carpet assessment funding, and grant recipients to ensure compliance with the guidelines in Carpet Stewardship Law.
- Conduct regular audits for Collector/Sorters according to AUPs. These audits will include inspection of material flows to support convenient collection as well as Reuse AUPs.
- Conduct audits in accordance with Generally Accepted Accounting Principles (GAAP) and Generally Accepted Government Audit Standards (GAGAS).

The audits are reviewed by the Executive Director, the Director of Finance, and the Executive Committee of the Board of Directors of the CSO along with the independent audit firm representatives. Following the review and any additional notes, explanations, and adjustments the audit is finalized with the signatures of the Executive Director and the Treasurer on a Management Representation Letter provided by the independent certified public accounting firm.

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### **Bi-Annual CalRecycle Audit**

On a bi-annual basis, CalRecycle initiates an audit of the CSO in accordance with 14 CCR 18946 that generally includes the two most recent prior years as a review period. The audit will include, but not be limited to, tests of compliance and a full review of the independent financial audits. This audit is prompted by an Audit Engagement Letter issued by the Director of CalRecycle to the Executive Director of the CSO.

The engagement letter provides a list of due dates, records, and documents to be provided by the CSO to the auditor-in-charge, named in the letter. The following is a general list of the initial requests:

- CPA's original data, working papers, reports, and agreed upon procedures (AUP) for financial audits performed and completed during the audit period.
- CPA's original data, working papers, reports, and AUPs for compliance audits performed and completed during the audit period.
- Payroll journals, payroll registers, employee timesheets, and fringe benefit rate calculations for CARE's personnel who provided services charged to the stewardship program.
- Organization chart identifying personnel working on the stewardship program.
- Written manuals of accounting and internal control procedures
- Allocation methodology relating to indirect and/or overhead costs.
- All contracts CARE holds in relation to the stewardship program.
- Any deliverables generated by those contracts during the audit period.
- All financial data from CARE and Apria between January 2022 and December 2022
- General ledger, cash receipts, and disbursement journals

Additional documentation may be requested once fieldwork begins. At the conclusion of the audit fieldwork, an exit conference will be held to discuss any items identified during the audit. A written report containing the audit results of CSO's compliance with the PRC and CCR will be issued. Furthermore, the CSO will have an opportunity to respond to a draft report. The final report will incorporate CSO's response and may be modified based on additional documentation provided.

The Director of Finance acts as a liaison with the audit firm and other parties that provide information to complete the audits. The exit conference is attended by the Executive Director, the Director of Finance, and the appropriate staff from CalRecycle. Once completed the results are shared with the SPC and the CSO takes any action that might be needed.

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## 2. Administrative

### 2.1. Annual Report Process

#### Annual Report Overview

Carpet Stewardship Law requires the CSO to submit an annual report describing its activities to CalRecycle by September 1 of each year. The California Code of Regulations (CCR), Title 14, Section 18944 describes the content that the annual report must contain, including the following sections:

1. Contact Information
2. Executive Summary
3. Scope
4. Program Outline
5. Description of Goals and Activities Based on the Stewardship Plan
6. Market Development
7. Financing Mechanism
8. Outreach/Education
9. Audits

In May 2023, CalRecycle provided a *California Carpet Stewardship Annual Report Review Checklist* that it uses to review the annual report. This document is available from CalRecycle directly. To meet the submission deadline, the annual report development process should begin early in the calendar year, once the previous year has concluded and final annual data becomes available.

#### Annual Report Data Collection

The following data is collected by Program staff members or subcontractors as noted:

- Carpet sales in California (from carpet mills, reported to independent auditor/Aprio).
- Assessment payments (independent auditor/Aprio).
- Program costs, including subsidies paid (Program finance staff and independent auditor/Aprio).
- Recycling rate and status of other Program performance goals (independent auditor/Aprio).
- Quantities (pounds) of carpet collected, reused, converted to Recycled Output, by type, and other forms of disposition (independent auditor/Aprio).
- Collection sites operated and other collection activities (Program collections staff).
- Source reduction activities (Program staff collects from carpet mills).
- Data from annual survey of Carpet Mills (independent auditor/Aprio).

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- Grants and market development activities (Program staff).
- Description and examples of education and outreach efforts (Program staff and/or marketing, education, and outreach consultant).
- Audited financial reports (independent financial auditor).

Data on carpet sales, collections, and costs are used to generate multiple tables and graphs in the Annual Report. The CSO's independent accountant has historically provided the majority of the data, tables, and graphs.

The CSO should designate a report lead, either a staff member or subcontractor, to guide this process. The report lead works with the Program's implementation team to generate and edit descriptive text to accompany the tables and figures. The report lead also coordinates regular status meetings with the reporting team to evaluate and address a variety of elements related to the development of the report. The report lead ensures the report's thoroughness in addressing each of the required sections to help ensure the report is delivered on time and as scheduled.

### Annual Report Development Workflow (Process)

A schematic of the Annual Report process appears below. The section below the graphic describes the step-by-step process for developing and finalizing the Program's annual report, with recommended timeframes.

**Figure 1: Overview of the Annual Report Production Process and Timing**



- 1) The report lead convenes Annual Report production team, ideally in January. The team should include the California Program Manager and team members who can provide information regarding collection programs, sites, and pounds collected; carpet sales, active participants, subsidies paid, and other Program finances; and other Program activities such as grants, marketing, and outreach. Responsibilities should be identified for each chapter or major section of the report.

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- 2) The report lead prepares an outline based on previous year's Annual Report, addressing any relevant feedback, or requested changes, particularly from CalRecycle, and circulates the outline to Annual Report production team members for input (January).
- 3) The report lead revises the report outline as needed based on team feedback (January/February).
- 4) The report lead prepares and circulates template draft chapters based on prior content, with placeholders for areas to be updated (including appendices), to report team members in February.
- 5) Chapter leads prepare their sections and return the updated drafts to the report lead in March for integration. The independent auditor of Carpet Mill and collection data (Aprio as of 2023) prepares a summary workbook of figures and tables for inclusion, also in March.
- 6) Team members review the auditor workbook and identify any needed corrections for the auditor to update (the auditor is the "keeper" of final data). The report lead compiles these questions and edits and provides them to the auditor to address and incorporate into an updated workbook as needed (April).
- 7) The report lead compiles the draft chapters and appendices as well as incorporates tables and figures from the updated auditor workbook to prepare the first draft for internal review (April). Some items, such as the analysis of greenhouse gas emissions savings using the U.S. Environmental Protection Agency's Waste Reduction Model (WARM), are calculated separately based on final data from the workbook. The report team uses CalRecycle's *Report Review Checklist* to help ensure that the report covers all statutory and regulatory requirements.
- 8) The report team reviews the draft and provides feedback. The report lead addresses the feedback and provides an updated draft for CSO leadership review in May. (In CARE's current process, the Executive Director of the CSO and the Stewardship Planning Committee review the draft.)
- 9) The report lead responds to feedback and makes revisions in June. The financial audit reports, which are addressed in the "Audits" chapter and included in an appendix, have historically become available around late June. They should be inserted into the document (without modification except for Accessibility requirements) when available.
- 10) When the draft report is complete and ready for external review, the report lead prepares a compiled PDF including any appendices that need to be inserted

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separately (e.g., list of participating mills, audit reports, examples of educational and outreach materials) for distribution to the Advisory Committee (early July), in advance of its meeting.

- 11) The Advisory Committee typically meets around mid-July to review the draft Annual Report and provide written recommendations. (More details on the Advisory Committee review and submission to CalRecycle are noted in the section below.)
- 12) The report team and the CSO leadership meet, in late July or early August, to address the Advisory Committee's recommendations, revising the report as needed and preparing a response document for inclusion in an appendix (including noting rationale for any recommendations that are not incorporated).
- 13) The report lead incorporates final revisions, reviews, and formats the document, and prepares a final PDF, including all appendices (August).
- 14) The lead works with a designer to ensure that all Accessibility requirements are addressed to meet Americans with Disabilities Act (ADA) and California accessibility standards (August).

### **Advisory Committee Review and Submission to CalRecycle**

By September 1 of each year, the CSO must submit an annual report to CalRecycle, and the CSO must provide a copy of the annual report to the California Carpet Advisory Committee at least 30 days prior to the CalRecycle submission. The CSO is required to respond to the Advisory Committee's recommendations and incorporate them "to the extent feasible" (Public Resource Code 42972.1(b) and (c). Per PRC 429.72.1(c), "If the carpet stewardship organization or manufacturer is unable to incorporate the recommendations, it shall provide a written explanation to the department and the advisory committee. The explanation shall detail whether the carpet stewardship organization or manufacturer plans to incorporate the recommendations into a subsequent carpet stewardship plan, subsequent amendments to the plan, or a subsequent annual report."

To meet the required schedule for report submission, the CSO typically provides the draft annual report to the Advisory Committee in early to mid-July, in time for an Advisory Committee around the third week of July. This schedule enables the Advisory Committee to provide feedback and recommendations in early August, in time for the CSO to address them in the Annual Report and submit the final document to CalRecycle on or before September 1.

The process is designed to produce a thorough report that meets all statutory and regulatory requirements and is ready for CalRecycle's approval. If the report is not approved, the project lead will reconvene the project team to address any deficiencies

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and prepare a response letter and updated document, if needed, for resubmittal to CalRecycle.

### **2.2. Assessment Change Notification Process**

See section VI. Marketing, Education & Outreach (MEO) under subsection: California Differential Assessment Notification Process

### **2.3. Annual Mill Survey Process**

Subsequent to final year-end reporting (Q4) by the Mills, an annual survey is emailed to all Mills. The survey is generated using an online survey tool and carried forward from previous years. Once the survey is rolled over and updated, a bulk email (BCC) is sent to the Mills instructing them to complete the survey. Follow-up requests are made periodically until the due date of the survey. Participation in this survey, and all data inquiries, is a required provision of the signed contracts by all Program participants.

CARE works to ensure confidentiality of all proprietary data and information. Only aggregate results are used for public reporting.

After the Mills survey is completed, the information is incorporated into the annual report.

- A. Weight per Square Yard
- B. Setting of Discards Formula Parameters - relevant data is updated on an annual basis as a result of the Mill survey and Market Insights reports.
- C. Backstamping -current information is updated via a Mill survey.

### **2.4. Contract Management**

#### **Service Provider (Labor) Contract Process**

CARE utilizes external resources in areas where CSO Staff may not possess the necessary expertise or skillset, or resources may be limited or overburdened. This may include individual subcontractors, small business organizations or professional staffing solutions. Contracts are generally developed for services performed within a given period, typically on a 12-Month basis and may be renewable or be based on a limited project term. CARE uses generally accepted business practices for initiating contracts and may include Request for Quotes (RFQ), Request for Proposal (RFP) and/or direct purchase methods . CARE recognizes that CalRecycle or any newly appointed CSO may have their own method for issuing and managing labor contracts and the reader is encouraged to check with their business management for guidance.

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### **Drop-Off Site Contract Process**

A contract is not necessarily required for a CSO-sponsored public drop-off site to be established. When the drop-off site itself requires a contract, the below development process occurs. Contracts with drop-off sites are between the CSO, the drop-off site, and the selected hauler.

1. Determine whether the existing PCC Diversion Agreement template can be used as a starting point or if the drop-off site requires use of their own template agreement.
2. If the PCC Diversion Agreement template can be used, send the document to the drop-off site for review and comment. Include any special considerations if already discussed. Send the document in Microsoft Word with Tracked Changes enabled.
3. If the drop-off site requires their own contract template, request a review copy, and share with legal counsel as needed to ensure the CSO is sufficiently protected, and the basic drop-off site process is accurately described (refer to “PCC Diversion Agreement – Template” document).
  - a. Contract negotiation: review changes with legal counsel. Negotiations can sometimes require several contract iterations and correspondence between the CSO/legal counsel and the drop-off site.
  - b. Coordinate with selected hauler to ensure all parties are comfortable with the language and that any insurance requirements are met.
  - c. Review changes, if any, with legal counsel. Track changes for all edits and comments.
  - d. Each contract and associated negotiations are unique. Particular care should be taken with legal counsel to ensure all parties are comfortable with included language and that the CSO is sufficiently protected.
  - e. Once all language is agreed upon, send contract to all parties for signature. The number of copies, wet or electronic signatures, etc., are determined on a case-by-case basis.
  - f. Collect all required signatures and file fully executed copy in the designated document repository folder.

### **DoS Contract Management & Tracking Process**

Drop-off site contract elements are typically self-sustained and do not require extensive management or tracking by the CSO. Most activities/responsibilities associated with drop-off site contracts involve the day-to-day management of the drop-

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off site itself and overseeing the hauler's commitment to servicing an assigned drop-off site.

The Term of each contract should be carefully tracked to ensure no agreements expire. The length of extension is determined on a case-by-case basis.

1. Approximately 6 months before the Term of a contract is scheduled to expire, coordinate with the drop-off site, associated hauler, and legal counsel to draft an Addendum for contract extension.
  - a. Once language is agreed upon, send contract to all parties for signature. The number of copies, wet or electronic signatures, etc., are determined on a case-by-case basis.
  - b. Collect all required signatures and file fully executed copy in the designated document repository folder.

### **Delivery Agreements (Recyclers)**

Delivery Agreements are issued to Collector, Sorter, Entrepreneurs (CSE) who agree to take in public drop-off site loads and charge the program a fee known as a “recycling fee”. This fee covers the recyclers’ operating costs to accept such loads as they can contain non carpet debris and/or may contain contamination that leads to increased solid waste disposal costs. A delivery agreement does not displace the responsibilities of a CSE under the program but instead identifies what is expected of the recycler with regards to material delivered to them from a public drop-off site including invoicing requirements, diversion efforts, and payable rate negotiation.

These fees are not in lieu of, nor do they replace subsidies the recycler may be eligible for. The following is the general approach to Delivery Agreements.

1. Recycler provides a quoted rate per pound or ton for loads received through the CA program’s public drop-off sites.
2. CSO staff prefills Delivery Agreement and sends to recycler for signature and adoption.
  - a. If the recycler is a CSE member, a signed copy of the agreement is saved in the CSE file.
  - b. If the recycler is not a program member, a copy of the agreement is saved in the vendor’s account file.

### **Grant Contracts**

Grantees are informed of their award or are declined via a notice that is emailed to each applicant. If the grantee accepts its award, it begins the contract process via Adobe Sign. The contract process is modeled after the CalRecycle process and includes:

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- A Cover Sheet signed by the grantee, CSO Grants Manager, CSO Chief Financial Officer and CSO Executive Director.
- A Recycling/Collections Target Sheet committing the grantee to deliver a certain number of tons of recycled or collected PCC as a result of the grant.
- Terms and Conditions.
- Procedures and Requirements for reporting and payment.
- A Security Agreement, which enables CSO to take punitive action if performance goals are not met at the 50 percent level or above. This Agreement applies only to capital improvements grantees.
  - Grant-funded public DoS are required to remain a public DoS for two years after being awarded funds. Failure to meet this requirement may result in CSO requesting the return of equipment or funds. This is stated under within the Micro Grants for Collection/Reuse Terms and Conditions document.

Once the contract is fully executed, the Grants Manager issues a Notice to Proceed via email to the grantee. Grant-related expenses may now be incurred. All awardees are announced in the monthly e-news during the month that the award was made or the following month.

For reference: CARE's contract templates can be found on CARE's grants webpage at: <https://carpetrecovery.org/california/ca-grants/>.

### **Other Contracts [RFP/Independent Subcontractor]**

1. The CSO identifies scope of work or effort needed or posts solicitations and/or RFP.
2. The CSO interviews potential awardee(s)
3. The CSO initiates contract negotiations with the awardee and legal department(s).
4. The CSO awards contract.
5. The CSO sends letter(s) of declination.
6. Work commences.

## **3. AB 2398 Program Participation Processes**

### **3.1. CSO AB 2398 Membership Enrollment**

The following process describes enrolling a new member to Carpet America Recovery Effort and the California Program. The established CARE protocol requires that all entities receiving AB 2398 subsidiary funds or participating in the program as a Mill must be a paid member of CARE. This membership is not transferrable to a new CSO. CARE recommends any new CSO establish their own protocols for managing AB 2398

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membership. Any CARE AB 2398 designated membership will expire upon CARE's delisting date and CARE will no longer manage AB 2398 membership benefits and/or requirements.

### **3.2. Initial AB 2398 Membership Enrollment**

1. Potential participant fills out an online registration form located on CSO's website and pays initial membership dues (varies by registration type).
2. The finance department confirms receipt of membership dues and notifies Executive Director and CSO staff assigned to membership management.
3. Assigned staff contacts the potential participant for introductory conversation and to determine if a site visit is necessary prior to acceptance.
  - a. If no site visit is necessary, proceed to step 4.
  - b. If a site visit is necessary:
    - i. Perform site visit within 30 days of registration, or
    - ii. If an immediate visit is not feasible due to business location or staff availability, the visit must take place within 1-2 quarters but no later than 180 days from registration.
  - c. Staff completes site visit form and submits findings to membership management staff member.
4. Executive Director announces new member to all CSO staff and Accounting/Reporting Firm with approval to proceed.
5. Using electronic signature services (Adobe Sign), CSO membership management staff sends membership agreement form(s) to participant and Executive Director for signatures.
6. Once both parties have signed, file Fully Executed copy in designated document repository file folder (SharePoint).
7. CSO membership management staff notifies Accounting/Reporting firm to proceed with onboarding and report training.
8. CSO membership management staff notifies CalRecycle of any new additions to the Registered Manufacturers (Mills, Importer on Record) list.

### **Membership Designation Process**

As of January 2023, CARE had four designated AB 2398 Membership Categories: Mill/Importer on Record, Processor, CSE (Collector/Sorter Entrepreneur) and Tier 2 Manufacturer. Due to changes in the market and availability of new recyclers and member interest, additional membership categories may be added at CARE's discretion.

Participants may qualify for more than one membership type but must sign a separate agreement for each type they wish to receive subsidies under. Only one paid membership dues fee will be required even if a participant qualifies under multiple

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types. Membership Designations are assigned during the initial introductory phase and are typically assigned by the Executive Director. A participant's business operations and type stipulate eligibility. The participant is expected to perform in accordance with *each* agreement regardless of if they are drawing subsidies or not.

### **3.3. Member Onboarding & Training**

#### *Mills*

Once a new Mill has signed a contract, they are put into the system to complete reporting procedures. The Mill is now required to complete the reporting procedures.

An email is sent to the Mill to schedule a training session. During the training session, the Mill is informed on the following:

- Procedures for filling out required documents,
- What data is need for the required documents,
- How assessment is calculated,
- How to process the required remittance,
- Timing of reporting and due dates,
- All requirements for reporting and AUP procedures,
- Penalties for non-compliance

The Mill is required to report at the end of the current reporting period, even if no activity was involved.

#### *Recyclers*

Once a new Recycler has signed a contract, they will have an account set-up to enable reporting within the financial and reporting software. The Recycler is then required to complete reporting procedures.

An email is sent to the Recycler to schedule a training session. During the training session, the Recycler is informed on the following:

- Procedures for filling out required documents,
- What data is need for the required documents,
- How the subsidy is calculated,
- Timing of reporting and due dates,
- All requirements for reporting and AUP procedures,
- Penalties for non-compliance

The Recycler is required to report at the end of the current reporting period, even if no recycling activity occurred.

### **3.4. Member Reporting Protocols**

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### **Quarterly Review and Roll Up Process (Mills, Recyclers, CSEs)**

#### *Mills – AB 2398 Report*

Monthly Mill information collected (refer to I.A – Account Receivable and I.A – Funds Reconciliation Process) is compiled on a quarterly basis for reporting and review. The Mill Listing, the Remittance Log, and The Reconciliation are used to provide information for the quarterly report slide deck (“AB 2398 Report”).

The following is reported as of the quarter end from the respective reports:

- The Mill Listing
  - Registered Mills
  - Changes in Mills
  - Reporting documentation status
- Remittance Log
  - Remittance Amounts
  - Remittance breakdown
  - Mills in Violation
- The Reconciliation
  - Final reconciliation
  - Reconciliation notes

Subsequent to the update of the AB 2398 Report, it will undergo a formal review and approval process. Discussion and necessary updates will be made until the AB 2398 Report is approved. Once the AB 2398 Report is approved by CARE for all participants, it is shared and presented to interested parties in aggregate form to protect confidential business information (CBI).

#### *Recyclers – CARE Sustainable Funding Oversight Committee*

Monthly Recycler information collected is compiled on a quarterly basis for reporting and review. The information collected and processed through the financial and reporting software is used to provide information for the quarterly report slide deck prepared for the Sustainable Funding Oversight Committee (“SFOC”).

Information submitted by the Recyclers and Mills is processed in the financial and reporting software and reports are generated which contain data that is used to populate an Excel workbook (“SFOC Workbook”). The SFOC Workbook is rolled over from previous quarters and the current quarterly data is added to the historic data. The data is used to update graphs and tables to include the data for the current quarter.

After the SFOC Workbook has been updated, images of the graphs and tables are placed on PowerPoint slides. Each slide in the report represents a single graph or table. The remaining report is updated with an agenda, explanation and summary of the quarterly activity and comparative information.

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Subsequent to the update of the SFOC Workbook, it will undergo a review and approval process by the SPC. Discussion and necessary updates will be made until the SFOC Workbook is approved. Once the SFOC Workbook is approved by CARE, it is shared and presented to interested parties. The SFOC Workbook is also posted to the CARE website.

### **Member in Good Standing**

CARE includes Member in Good Standing Criteria in its membership packages. These criteria outline CARE's expectations and membership requirements. Topics include the following and ensure that members and program share the same goals and priorities.

- The company must complete all required CARE reporting of activities in accordance with the timeframe required by the Carpet Stewardship Plan or VPS Plan and consistent with relevant contracts.
- The company must be compliant with all federal, state, and local OSHA, DOT, Fire Department, EPA, Water Authorities, and all other regulatory agencies requirements.
- The funds being requested will be compliant with CARE's relevant contract(s) and Agreed Upon Procedures and be able to be verified through sales bills, and/or documented certified scale tickets.
- The signature of an officer of the company verifies the company is operating in good standing.
- CARE dues are current and must be paid by January 31<sup>st</sup> of each calendar year.
- Company must be a viable, operational, and on-going business enterprise contributing to the continued growth of PCC reclamation.
- A company must follow ethical business practices and comply with all federal and state employment laws.



### *Membership Reinstatement Process*

Suspended member must submit all pending data and/or documents for any reporting periods for which the member was not otherwise considered in good standing. In addition, the following items apply:

- Membership dues are current and up to date and paid in full at the time of reinstatement.
- Non-Compliant Member must remit a minimum nonrefundable reinstatement service fee of \$2,500 to be charged prior to processing of any new materials.
- additional fees charged at an hourly rate of \$150/hour may apply at the sole discretion of CARE for reinstatement processing requiring excessive levels of staff support.

Upon reinstatement, the reinstated member will remain on probation for a period not less than one calendar year where all data and/or documents must be filed on time as noted by CSO's membership reporting schedules.

If the member is a Mill, CSO notifies CalRecycle of the reinstatement.

#### **AB 2398 Participating Carpet Mill (Manufacturer)**

##### *Delinquent & Delisting Reporting Protocol*

Carpet Mills (Manufacturer) wholesalers, distributors, and importers subject to the

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Carpet Stewardship Law and those choosing to participate under a Carpet Stewardship Organization (CSO) must register with CSO and maintain affiliation with CSO as a member.

The Delinquent & Delisting Reporting Protocol is included in all Mill Membership Agreements. Mills are the only members who are required to be registered with CalRecycle under the law.

### *Delisting Membership*

After a Recycler or Mill has left the program, either due to non-compliance or voluntary withdrawal, they are delisted from the Accounting/Reporting firm's reporting processes.

### **Mills**

A Mill is removed from a list of active users and documented as inactive. The historical records are maintained. Active Registered Manufacturers list is updated and provided to CalRecycle for public access.

CSO notifies CalRecycle that a Mill is no longer active.

### **Recycler**

A recycler's reporting account is deactivated, but not removed. All historical information is maintained.

### **3.5. AUP Process**

Mills, Recyclers, and certain Grant recipients are required to participate in periodic Agreed Upon Procedures (AUP) processes. Because the process and methods of AUPs are considered CARE confidential business information, exact methodology will not be fully disclosed in this guide. It is recommended that CalRecycle or their representative establish their own methods for Acceptable Use Policy (AUP) prior to taking on the program. This will ensure that all policies and guidelines are aligned with their organizational values and goals. A clear and effective AUP promotes responsible and efficient usage of resources. CARE and its Finance/Reporting firm will provide transitional training or support to the new CSO and/or CalRecycle as outlined in the CARE Contingency Plan 2.0 Framework document.

An AUP Status Summary is kept of all Mills, Grantees and Recyclers, which tracks AUP status and prior AUPs conducted on the Mill or Recycler. Any Mill or Recycler which has not had an AUP for 8 quarters is typically considered for AUP selection, however CARE reserves the right to select any Mill or Recycler at a more frequent interval should circumstances warrant additional AUP procedures. From the list of potential entities, a selection is made for an AUP to be conducted for a specific reporting period, typically the most recent reporting quarter.

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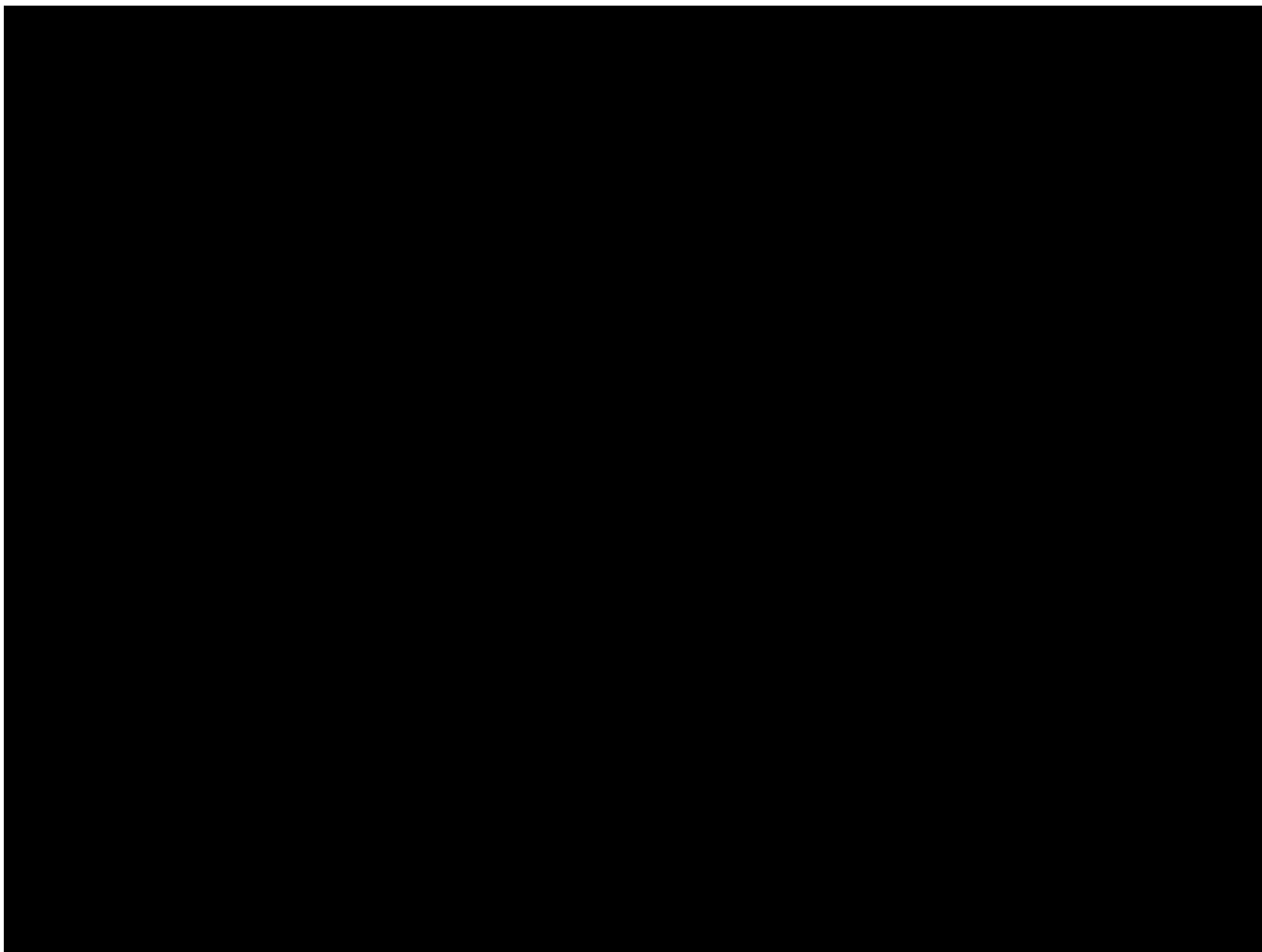
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Once selections have been made, the Recyclers and Mills are contacted via email on the first business day following the reporting due date for the quarter.

*Example: For Recycler/Mill reporting on the month of June (end of Q2), reporting documentation is due by July 31<sup>st</sup>, and email notification for AUP testing of Q2 reporting information is sent on the first business day of August.*

Emails are sent out separately to the respective entities notifying them that they have been selected for AUP procedures.

Per guidance by CalRecycle auditors, AUPs are targeted for completion in the quarter they are initiated. However, this is not always possible for a variety of reasons, such as: required personnel are on leave/vacation, ill, left company, incongruities require more time to resolve, company is slow to response, it is a small entity with limited resources, etc. In such cases, Aprio works to resolve the matter in a timely manner while keeping CARE informed of the issue.



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## 4. Grants Program

### 4.1. Grant Award & Management Process

The California Carpet Stewardship Program (Program) runs several distinct types of annual grant cycles:

- Annual Capital Improvement Grants for collection, processing/manufacturing (\$500k max).
- Annual Product Testing Grants for new or existing products to include post-consumer carpet (PCC) (\$50k max).
- Evergreen Micro Grants for Collection/Reuse for California-based entities only (\$15k max).
- Pilot Cycles:
  - Small Volume Collections (\$50k max).
  - Innovation and Design<sup>1</sup> (\$100k max).

### 4.2. Grant Application Process

The first step in launching a new grant cycle is to develop a solicitation. The Program has traditionally modeled its solicitations after CalRecycle grant solicitations. Examples of these solicitations can be found on [CARE's grants webpage](#). Each solicitation does the following:

- Identifies the cycle's purpose and project requirements as well as preferred projects based on current Program needs.
- Identifies eligible applicants and expenses.
- Creates scoring criteria and a timeline for grant application deadlines and approvals.
- Outlines proposal guidelines and grant terms.

Once the solicitation is released, the Program opens a question and comment period for two weeks. Answers to questions are typically posted to the Program's website one week after the close of the question and comment period.

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<sup>1</sup> Innovation and Design funds projects that focus on more recyclable/sustainable carpet designs and PCC-content products.

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Pilot cycle proposals and proposals follow guidelines within the solicitation and proposals are submitted via PDF. A Budget and Work-Plan template is provided. The applicant is required to fill in the fields and submit along with the narrative. Applicants may also submit supporting documentation such as letters of support and equipment quotes.

Online forms are used for capital improvements, product testing and micro grant cycles. The budget form must be filled out separately and uploaded into the online form. The online form also prompts applicants to upload any supporting documentation. All application forms can be found on CARE's grants webpage at: <https://carpetrecovery.org/california/ca-grants/>.

### **4.3. Grant Review and Award Process**

A mix of Program staff and independent reviewers with appropriate technical expertise use score sheets based on weighted solicitation criteria to score each application. The reviewers also provide comments and questions for each applicant. The CARE grants manager calculates an average score for each applicant and consolidates all comments and questions for each applicant. The CARE grants manager then convenes a call, during which the reviewers discuss each application and the cumulative results of the scoring process. Questions are delivered to each applicant, and applicant responses are shared with reviewers. The reviewers attend a final call to make award decisions. The CARE grants manager then drafts a recommendation for the CARE director and board to review and approve.

Reviewer conflicts of interests are considered, and each reviewer must sign a document committing him or her to ethical practices during the review process.

Grantees are selected after a one-to three-month review and approval period. Micro grantees are chosen on the shorter timeline.

### **4.4. Contracts**

See Contract Management: [Grant Contracts](#)

### **4.5. Grant Recipient Reporting**

Grantees must submit quarterly reporting on grant-funded activities during the length of the grant term. The CARE grants manager sends a link to this online reporting form to each active grantee approximately three weeks before the due date. Grantees can request a fillable PDF version of the form. Grantees are also asked to submit project photos. The CARE grants manager conducts regular site visits, typically annual, to each grant-funded project during the grant term and thereafter to assess progress and offer technical assistance. The CARE grants manager also requests a qualitative and

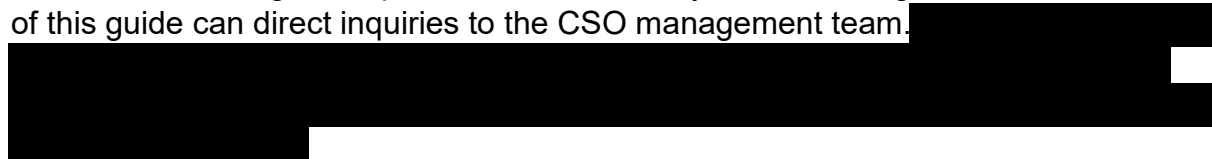
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quantitative update on each grant-funded project on an annual basis following the end of the grant term.

### **4.6. Grant AUP Process**

The CARE grants program conducts four AUPs per year across all grant cycles. Grantee selection is dependent upon the grantee's performance, size of its award, timing of the last AUP conducted, and other factors. CARE has constructed an AUP protocol for each grantee type in partnership with an independent finance and reporting firm subcontractor which conducts the AUP process. This AUP process is proprietary to CARE and is deemed Confidential Business Information (CBI). CARE does not include details on its AUP procedure in this document as this may allow grantees enough information to evade scrutiny. CARE will, however, provide confidential training on its procedures to CalRecycle or its designated CSO. Readers of this guide can direct inquiries to the CSO management team.



### **4.7. Grant Expense Reimbursement**

Any CARE grantee may submit an invoice at any point during the grant term by using CARE's online reimbursement link or by requesting a fillable PDF version of the form. The reimbursement form prompts the grantee to upload invoices and a proof of payment (canceled check, electronic funds transfer or receipt) associated with all expenditures. Pieces of equipment purchased with capital improvement grant funds also require proof of three bids or a sole source justification as well as a photo of each piece of equipment. Submission of the reimbursement form prompts the CARE grants manager to generate an Adobe Sign package which includes the payment request Cover Sheet, the reimbursement form listing expenditures, and any supporting documentation. The Cover Sheet is signed by the grantee, the CARE grants manager, the CARE chief financial officer and the CARE executive director.

Each month, the CARE grants manager works with CARE's contracted marketing, education, and outreach firm to send decals to any grantee reimbursed for equipment during that month. One decal, stating "grant-funded by the California Carpet Stewardship Program" is affixed to each piece of equipment. Larger decals, stating "Recycle Carpet with CARE" must be placed on either side of any grant-funded collection containers and are sent out on the same schedule described above. Grantees must email a photo of each piece of equipment with its proper decal(s) to the CARE grants manager.

CARE holds a 10 percent retention of funds on all grant reimbursement requests,

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except for micro grants, until the grant term ends, and performance requirements are met. Grantees may request ending the grant term early if all performance requirements have been met.

All reporting and reimbursement links can be found on CARE's grants webpage at: <https://carpetrecovery.org/california/ca-grants/>.

CARE has developed excellent, proprietary internal controls to minimize and detect irregular activities. Any new CSO is encouraged to do the same.

### **4.8. Grant Case Study Process**

CARE's contracted marketing, education and outreach firm works in conjunction with the CARE grants manager to identify between two and four grantees to profile annually across all grant cycles. These case studies may be in video or printed formats. CARE strives to feature grantees who are completing a novel project or one that CARE hopes other entities will replicate within the Program. Examples of CARE print and video case studies can be found on CARE's grants webpage at:

<https://carpetrecovery.org/california/ca-grants/>.

### **4.9. MEO Market Development Support: CARE Grantees**

MEO Subcontractor works with CSO staff to support several aspects of the grant process.

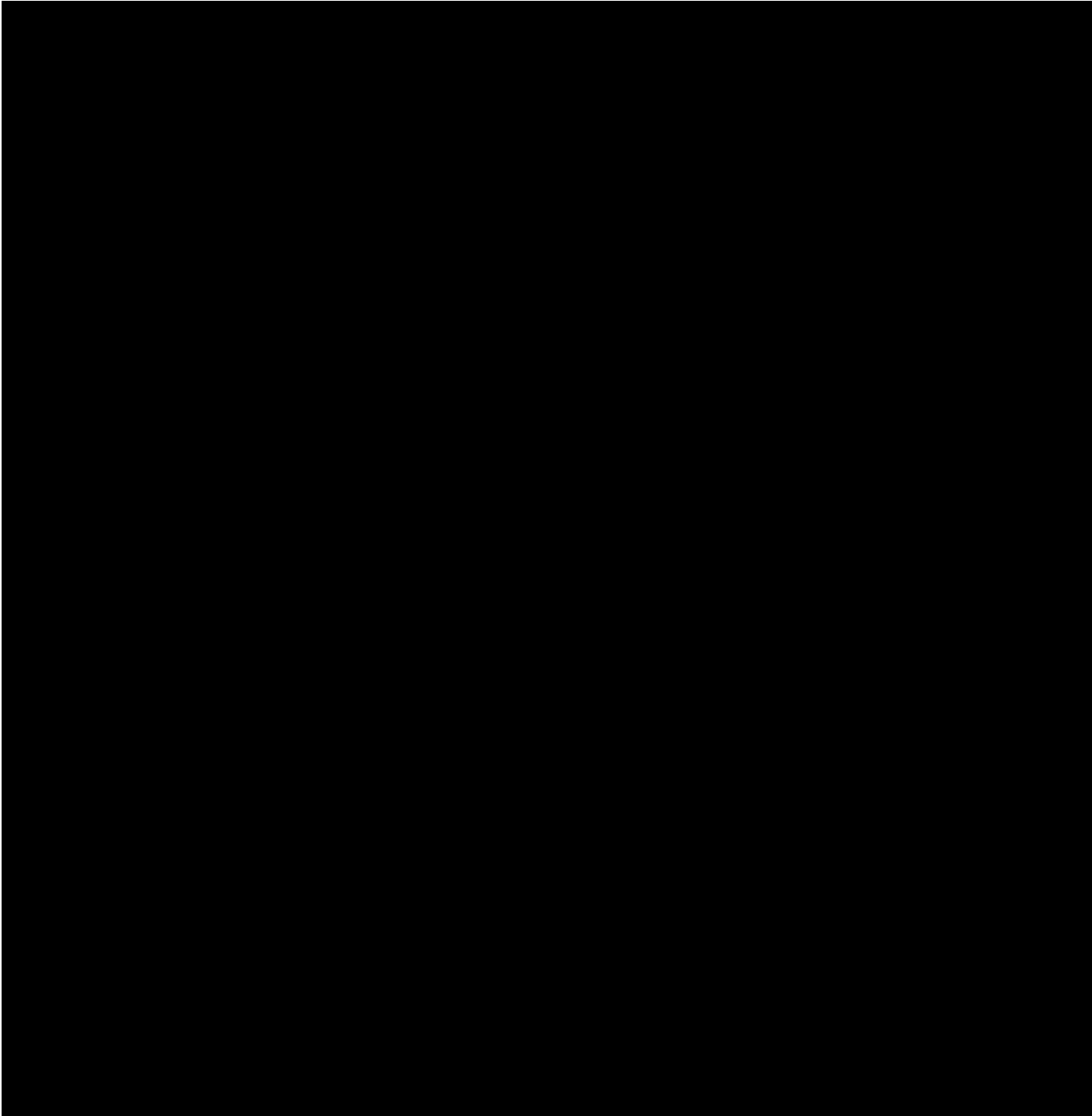
1. As advised by CSO, the subcontractor updates the CSO website with new grant announcements, solicitations and supporting documents.
2. The subcontractor includes news of grant cycles and awards in the e-news.
3. The subcontractor distributes stickers announcing the CSO grant funding for application to appropriate machinery by each grantee.
4. Subcontractor produces case studies (print and/or video) to document selected grants' outcomes.

## **5. Product & Market Development**

### **5.1. Testing Processes**

CARE enacts several testing processes to ensure that subsidies paid on products and materials meet specific criteria. Some elements of testing are performed by CSO staff while others are performed by third party or independent subcontractors.

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#### **5.4. Tier 2 Manufacturer Testing**

##### *Ash Content Test*

Lab personnel conduct testing. Refer to the [CARE Moisture and Ash Test Protocol](#) for more information.

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### *Moisture Content Test*

Lab personnel conduct testing. Refer to the [CARE Moisture and Ash Test Protocol](#) for more information.

#### **Noncompliance of Ash and Moisture:**

1. Resample and rerun analytical data to check for compliance.
2. If materials do not meet subsidy ash and moisture limits, then subsidy is reduced by the percentage amount that is out of compliance. (See allowable Ash and Moisture Limits)

#### **Allowable Ash and Moisture Limits**

##### ***(Fiber, Densified Fiber, PC4, and Type 1 Output)***

- Fiber < 5% H<sub>2</sub>O & < 25% Ash
- PC4 < 2% H<sub>2</sub>O
- Type 1 < 25% Ash

#### **5.5. Product Qualification Method**

A product qualification method is needed to address the post-consumer content contained within subsidized products and post-consumer carpet materials liberated from the recycling process.



*Fiber, Densified Fiber Product, PC4 and Finished Products containing post-consumer carpet material.*

- Initial Step: Fiber, Recycled Densified Fiber Product, and PC4 output is captured via the grab sample method.
- Four (4) grab samples are taken from five or more super sacks containing the densified fiber (Approximately 15g each sample compiled making a master blend weight of 50+g.)
- The sample is blended thoroughly, and additional five grab samples are taken from the master blend taken and placed within an air and light tight sealed glass container.
- The sample is sent to the Polymer Lab of Excellence where CSO's standard Ash and Moisture content analysis protocol is run.

- Initial Step: A sample of a Finished Product containing post-consumer carpet material is collected.

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- Finished Product containing post-consumer carpet material shall have no less than 10% by weight and no more than 5% H2O to qualify for subsidy payments by the program.

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### **6. Marketing, Education & Outreach (MEO)**

Program Marketing, Education & Outreach (MEO) activities described below are performed by a Subcontractor and are made up of ongoing tasks. Most of the MEO subcontractor's work involves working with and within CSO Staff projects, so that often the needed steps would be integrated into other sections of the Contingency Plan.

#### **6.1. Retailer Engagement**

Maintaining regular communication with retailers is of utmost importance to ensure they are well-informed of the assessment, any changes to the assessment and recycling opportunities available to them. The communication strategy is comprehensive and includes a range of channels such as direct mail, email, and phone contact. Each one-to-one interaction is tracked in a CRM, recording vital contact information as well as the current recycling status of each retailer.

To aid retailers in comprehending the assessment and its funding, Retailer-focused collateral materials such as the retailer brochure, drop-off site map booklet, and annual newsletters are provided.

1. Direct mail: Each year all retailers are mailed a copy of the drop-off site map (January) and a California Carpet Recycling Highlights newsletter (July). Additional mailings may be sent as part of regional approach efforts. See also: [Differential Assessment Notification Process](#).
2. One-to-one contacts: retailers in areas specified in consultation with the CSO receive phone calls alerting retailers to new drop-off sites or other recycling options in their area; call scripts are created in concert with the CSO. It is estimated that up to one-half of all carpet retailers get a phone call from CSO each year (~1,000 calls).
3. Collateral distribution: Collateral (retailer brochures, drop-off site maps) are mailed upon request to retailers, usually following one-to-one contact. Collateral requests are recorded in the CRM and marked when complete.

#### **California Differential Assessment Notification Process**

Carpet retailers are kept well-informed about changes to the Differential Assessments thanks to the efforts of the CSO and its MEO subcontractor. They receive basic assessment information via direct mail, email, and phone calls, ensuring they are fully aware of what, when, how, and why to comply. The carpet mills are also encouraged to work with their customers to ensure compliance and relevant software companies are informed so they can update their programs. All stakeholders are given a minimum of three months' notice to adequately prepare for any changes.

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1. Confirm the new assessment change amounts and date; create a schedule of communications.
2. Roll out communications plan to include monthly direct mail (ranging from formal letter to postcard to point-of-sale signage) along with email alerts that parallel the direct mailings.
3. MEO subcontractor integrates assessment information into outreach call scripts for the duration of the campaign period.
4. Post implementation, MEO Subcontractor solicits and records feedback and, if necessary, conducts surveys (email and/or phone) to elicit details of ease/difficulty of implementation, barriers, and other pain points.
5. MEO subcontractor provides CSO with interim updates and a final report on the process and results of retailer contact efforts.

### **6.2. Consumer Outreach**

The CSO's approach to engaging with consumers centers around targeting homeowners who may be considering carpet tear-outs and installations. To affect this outreach, there are one to two initiatives annually, which involve disseminating information through English and Spanish mass media channels.

1. MEO subcontractor consults with CSO to determine best theme/time of year/content for placement of paid article in media statewide.
2. MEO subcontractor draft content (including text and images) and passes to CSO for edits/approval.
3. The MEO subcontractor often collaborates with other stewardship groups (mattresses, batteries, paint) on a joint article covering “hard to recycle” items.
4. Articles are placed via media broker.
5. Results (including click-throughs from the article to the CSO website) are reported to CSO.

### **6.3. Local Government Engagement**

Local governments are a major focus of marketing, outreach, and education strategies, as they have control within their jurisdictions to influence carpet recycling. This guide outlines strategies to use local governments as both implementers of carpet recycling and as clearinghouses of resources for stakeholders such as retailers and manufacturers within their jurisdiction to recycle carpet. Not only will strategies encourage local governments to include carpet recycling in their bids and programs that have a carpet component, but they will also encourage jurisdictions to have information on their websites about carpet recycling, drop-off locations, a list of Post

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Consumer Content (PCC) products, and more. By providing educational materials, presentations, coordinating with recycling coordinators, and presenting at local conferences, the CSO team will show they are a resource to local governments for them to reduce landfill waste within their jurisdiction and meet state requirements.

### **6.4. Recycling Coordinator (LG) Outreach Process**

There are 58 counties within California, with numerous cities and special districts within each. Targeting these entities, specifically the agencies responsible for collecting solid waste, is the primary focus of our local government outreach. Since recycling coordinators are typically involved with recycling issues daily, it makes the most sense to begin local government outreach with them. The following are some high-level instructions for engaging with this key audience.

#### **1. Develop Stakeholder Lists**

As a first step, stakeholder lists for the recycling coordinators at the County and local government level identified above will be developed to create a database. These lists will include a list of recycling coordinators at the county, city, JPA, special districts, building departments / Construction & Demolition (C&D) level. This allows the CSO team to reach out to these contacts and improve relationships by offering resources and presentations, and track areas for improvement and growth. The stakeholder lists will include contact information (both email and phone) for outreach to the recycling coordinators.

#### **2. Local Government Outreach Process**

After the stakeholder list(s) are developed, CSO staff should reach out to local government staff, starting with recycling coordinators, to obtain information about their level of knowledge about carpet recycling. This initial contact can be made via email and could include a questionnaire about carpet recycling and the types of communication tools preferred by the agency. Once this initial contact has been made, and information has been obtained, CSO staff should develop appropriate toolkits that can be shared with local government staff. Further information about the communication toolkits is shared below.

#### **3. Share Resources with Local Governments**

The CSO team will provide resources such as communications toolkits, language for local ordinances, instructions on how to set up and/or publicize drop-off sites and offer presentations to help local governments understand how to implement carpet recycling. Focus will be given to jurisdictions who do not include carpet in their Construction & Demolition (C&D) plans, as convincing them to include this will have a significant impact on the amount of

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carpet that is recycled. It is important to support efforts to encourage local procurement staff to include language in purchase orders and specification sheets about buying post-consumer recycled carpet products to support the circular economy. Additional outreach will be provided to organizations that serve local governments. These organizations can include the League of California Cities (Cal Cities), County Engineers Association of California (CEAC), California State Association of Counties (CSAC), and Rural County Representatives of California (RCRC). These organizations are uniquely situated to provide useful assistance to County recycling coordinators and can be a useful way to share information about carpet recycling through an already familiar and trusted resource.

### **4. Create Local Government Website Database**

CSO staff should create an inventory of all local government websites noting which jurisdictions include carpet recycling on their websites and which do not, to identify target jurisdictions for CSO staff to focus outreach efforts. In support of outreach efforts, CSO will draft language for email correspondence to the target jurisdictions to support requesting website updates to include carpet recycling guidance for their communities.

### **5. Tracking and Evaluation**

After the initial outreach has been completed, it is important to follow up with the local government agencies to track who is using the provided resources. This will help CSO staff evaluate the effectiveness of specific outreach tools and allow for course corrections as needed.

### **6.5. Business Assistance for Recyclers**

CSO provides business assistance to recyclers in the form of technical assistance. If recyclers need marketing assistance, CSO alerts MEO Subcontractor and advises on the need and feasible budget. Projects have included website redesign and analytics, print collateral creation and video production.

1. MEO Subcontractor contacts the recycler/grantee, assesses the needs, conducts research (e.g., website analytics) as needed.
2. MEO Subcontractor compiles project memo that confirms nature of marketing assistance, schedule, and details.
3. MEO Subcontractor conducts business assistance, while reporting to CARE.



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### **6.6. Public Drop-Off site support**

#### **Promotion / Collateral / Signage Process**

As part of the onboarding process, the Program provides signage at drop-off sites to raise awareness that carpet is recyclable and is accepted at that site. Signage can be standard or customized to fit the needs of the hosting site. The program offers signage in bilingual and/or languages other than English.

1. CSO alerts Subcontractor that a new public drop-off site has been added, submits Required Information Form.
2. The subcontractor adds the new site to the digital map.
3. Subcontractor announces new site in the e-news.
4. The subcontractor includes the new site(s) in the next iteration of the print drop-off site map (currently printed up to four times a year.)
5. The subcontractor contacts new site and confirms their order for signage along with any requests for customization.
6. The subcontractor has signs printed and sends them to the site.
7. The subcontractor creates custom installer sheet for the site, including site's location, hours, handling instructions and site's logo and sends to site for distribution.

#### **Regional Approach Methodology**

The MEO Subcontractor typically conducts one to two regional projects each year.

1. The appropriate region (county or parts of several counties) is selected in consultation with the CSO.
2. Subcontractor conducts baseline research, contacting all retailers to fill in gaps in data and confirm availability of recycling and container service opportunities in the area and which retailers are already recycling.
3. Approximately one month after baseline research is complete, Subcontractor conducts "broadcast phase" – a mass media campaign that can include print and digital ads in local media; billboards; Google/YouTube ads based on keywords; targeted direct mail to local retailers and installers, ads on streaming services, etc. This phase is designed to reach retailers, installers, and consumers.
4. Approximately 3-4 months after close of broadcast phase, outreach calls are conducted again to see if there have been increases in uptake of recycling service. CSO staff provide data on whether carpet collection at local drop-off sites has increased.

Subcontractor reports to staff on broadcast phase results, details of in-person outreach

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and opportunities for placing additional drop-off sites.

### **6.7. General Support**

#### *Conference Exhibition*

Attending and sponsoring conferences is a vital way to increase awareness of carpet recycling statewide. Examples of target conferences that can reach audiences at the state level are provided below. The CSO team can attend these conferences to foster relationships with attendees and provide resources for how to implement a carpet collection and recycling program. CSO staff can work on conference logistics; this work entails securing booth spaces and coordinating attendance with appropriate staff, managing the booth assets and print collateral, and making any necessary updates to attract and engage key audiences. The CSO team ensures that conferences are publicized in the CARE e-newsletter, social media, and other existing communication channels.

The CSO should develop an annual list of appropriate conferences to attend or sponsor. An initial list of conferences CARE has attended is included below:

- (a) California Resource Recovery Act Conference and Trade Show (CRRRA)
- (b) GreenBuild
- (c) The Southern California Waste Management Forum's Annual Waste Management Conference and Exhibit
- (d) California Association of Public Procurement Officials (CAPPO)
- (e) National Waste and Recycling Association (NWRA) Industry Conference
- (f) Solid Waste Association of North America (SWANA) Western Regional Symposium

After the CSO has reviewed the list and agreed on the appropriate conferences to attend or exhibit at, efforts should be made to contact the conference organizers to obtain details about sponsorships or the cost of having an exhibit.

These details should include what benefits are included in any sponsorship or exhibit opportunity. These benefits can include speaking opportunities (usually at the high end of sponsorship levels), free attendance at the conference for some CSO attendees, and exhibit space. Some conferences will allow organizations to pay for a conference exhibit; this is usually less expensive than sponsoring the conference.

After specific conference information is obtained and exhibit space is secured, CSO should identify staff who will exhibit during the conference. More than one staff member should staff the booth.

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The CSO should have assets and print collateral that is set up at the conference exhibit booth. Other assets that might draw interest include:

- (a) a digital presentation and examples of products containing post-consumer carpet content.
- (b) print materials (brochures, press kits if available, flyers specific to the conference audience) available for attendees to take away.
- (c) a bowl of candy or other giveaways to further attract attention to the booth.
- (d) a sign-up sheet or vessel to collect business cards for follow-up after the conference ends.
- (e) a counter to track the number of people engaged during the conference.

The CSO should prepare a logistics sheet prior to each conference. This will identify responsibility for exhibit booth assets, staffing, and ensuring that appropriate staff are in attendance.

Prepared talking points for conference attendees are scripted ahead of conference and should be focused on the anticipated conference audience.

Staff members prepared to answer questions and share the benefits of carpet recycling.

After the conclusion of each conference, a high-level summary is prepared. The summary should indicate conference attendance numbers and level of interest in carpet recycling, as well as any new contacts made that might result in new participation in the carpet recycling program. CSO staff is notified to follow up with interested attendees following the conference.

After all conferences have been attended, compare summaries to identify which conference proved most beneficial results to identify which is most appropriate for future attendance.

### *Website Management*

In terms of general stakeholder engagement, MEO Subcontractor:

- Updates and manages the California section of the CSO's website, including:
  - Creating and posting web pages as needed.
  - Posting media releases.
  - Writing and posting blog posts (timebound announcements).

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- Creating and managing campaign landing page (see also Regional Approach).
- Providing quarterly reports on web content, traffic, and social media statistics.

### **Website Process:**

1. Website content/updates are gathered from CSO staff during team meetings and through individual check-ins.
2. Website edits are implemented.
3. Website traffic is reported.

### *Stakeholder Database*

The MEO Subcontractor updates and manages the Customer Relationship Management (CRM) software, capturing contact information along with more detail about recycling practices, collateral needs, etc. Records are kept of each stakeholder contact, collateral ordered and current practices and attitudes of relevance to CSO. The CRM has some 7,000 records to date, including retailers, drop-off sites, local government entities, grantees, etc. (organizations and personnel associated with the organizations). Edits and updates are made by the MEO Subcontractor's outreach team and by those CSO staff and other Subcontractors that have been trained in the CRM.

### *Mapping Support*

Upon request from CSO, MEO Subcontractor provides mapping assistance of data, such as drop-off sites, retailer locations, population density, etc.

## **6.8. Collateral Development Process**

### *General Marketing Collateral*

The MEO Subcontractor creates collateral in consultation with the CSO to meet needs for informing/educating the public or another specific stakeholder group. Collateral includes print, digital, video, or other formats.

1. MEO Subcontractor assesses the need, the target audience, and the call to action desired and creates a plan with schedule, distribution method and metrics.
2. MEO Subcontractor works with CSO staff to draft content addressing the goal(s) of the collateral piece and best format (print, digital, video, advertisement, e.g.).
3. CSO gives initial content feedback. Additional iterations are provided until approval.

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4. MEO Subcontractor proceeds with design/creation of collateral piece.  
Note: sometimes the collateral takes the form of a paid article placed on statewide media channels.
5. CSO gives final edits and approval.
6. MEO Subcontractor implements creation and distribution of all collateral pieces.
7. MEO Subcontractor reports to CSO on results of the collateral piece per the plan.

### *Local Government Marketing Collateral*

Developing appropriate collateral material for local government agencies is a key part of a Local Government outreach toolkit. It is important to build from the existing brand and provide messaging that will resonate with the targeted audience. This should be a collaborative process with CSO collections staff. The steps below provide guidance for developing this type of material.

### *LG Collateral Planning*

1. Conduct an initial planning meeting to discuss the purpose of the collateral piece.
  - a. Attendees should include staff that will develop the content and the graphic designer that will be responsible for creating the collateral piece.
2. Discuss potential concepts for the piece. During this meeting, the following actions should be accomplished:
  - a) Identify the audience. May include:
    - Agency staff involved in site management.
    - Agency staff who will provide materials to external audiences/stakeholders (the public, commercial entities, etc.)
    - Agency Leadership or Policy Makers
  - b) Define the goals of the piece — what is the target goal to accomplish with this collateral material?
    - Communicate a specific message.
    - Create a “Call to Action”
3. Once the goal(s) are identified, determine if a digital or professionally printed method will be the best tool to achieve results.
  - a. Note: this will determine how much content is needed and what kind of graphics to develop.
4. Identify the specific issues to address, and the channels to be used to disseminate the message.

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### *LG Collateral Development*

1. Develop draft content and where needed, graphics.
2. Identify and confirm program graphic standards and branding guidelines.
3. Draft content that is understandable by the audience. Avoid jargon and overly technical terms when necessary (depending on the audience, and content matter).
4. Assign a Subject Matter Expert (SME) to review and refine content, improving or editing, as necessary.
5. Design the collateral piece, ensuring that Program graphics standards are followed.
6. After the initial design is complete, create a Proof copy and initiate CSO review and approval.
  - a. Note: This is the time to suggest graphic refinements that could improve the piece. Ideally, the graphic designer will have participated in initial planning sessions and is informed of the goals of the collateral.

### *LG Collateral Publication*

1. Once the collateral piece has been refined perform a final quality assurance/quality control (QA/QC) process.
2. Once collateral passes QA/QC , move to production (if a print piece) or digital deployment.

## **6.9. Earned Media**

MEO Subcontractor creates and distributes press releases and maintains the California-focused media list.

1. In consultation with CSO staff, MEO Subcontractor drafts press release.
2. Upon CSO approval, MEO Subcontractor distributes press release to appropriate media list via the e-news platform.
3. Press release is uploaded to CSO website.
4. Press release content is included in e-news and posted to Twitter.

MEO Subcontractor monitors and reports to CSO on pick-ups of the news.

### *E-News & Social Media*

The monthly e-news is a major distribution channel for updates on CARE’s programs, accomplishments, and calls to action. Using contact management software, it is distributed to stakeholders that have opted in to receive it, including retailers, local government representatives, grantees, mill staff, and others.

1. Each month, the MEO Subcontractor alerts CSO staff to the upcoming

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issue and confirms desired content, usually during the weekly CSO staff meeting.

2. MEO Subcontractor drafts e-news content, working with CSO staff and researching/interviewing as needed.
3. MEO Subcontractor sends e-news content is sent to CSO Executive Director and CA Program Director for edits/comments and approval.
4. MEO Subcontractor lays out content in e-news software platform, proofed and sent.
5. MEO Subcontractor monitors e-news open/click metrics and updates the contact database.
6. MEO Subcontractor reports e-news statistics in the quarterly website/social media report.

Current social media used by CSO includes a Twitter feed and YouTube channel. Additional/replacement social channels are possible, including LinkedIn or Instagram.

The MEO Subcontractor manages the Twitter account (@CarpetRecycle), posting 4-5 times a week. Topics include CARE calls to action, frequent posts on collection opportunities, especially the drop-off site map landing page, grant opportunities, video posts, etc. Twitter and YouTube statistics are included in the quarterly web/social media report.

### **7. Union Training and Engagement**

#### **7.1. Relationship Development Process**

Under AB1158, language stipulates that “including incentives or grants to state-approved apprenticeship programs for training apprentice and journey-level carpet installers in proper carpet recycling practices.” (Cal. Pub. Resources Code § 42972)

During the previous 5-year plan (2018-2023), CARE initiated a partnership with The International Union of Painters and Allied Trades. That relationship led to the inclusion of carpet recycling in DC16 and DC36 apprentice training programs.

Relationships between CSO Staff and DC16/DC36 trainers develop through:

- CSO staff, contractors, and IUPAT trainers collaborating together.
- Group and one-on-one meetings to discuss training content.
- one-on-one training for the IUPAT trainers 5 presented by CSO.
- CSO Staff conducted training with IUPAT trainers in attendance for 25 apprentices.
- On-going check-in with CSO Staff and IUPAT trainers.
- Quarterly (or as-needed) attendance at apprentice training courses by CSO staff.

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## 7.2. Train the Trainer Process

The following describes the approach to train new union group trainers and/or newly hired / appointed existing union group trainers.

1. CSO to meet with the CEO and Staff of national floor-covering installation training groups to develop content for floor covering installer trainings.
  - a. Make an agreed upon training schedule at the beginning of each year.
2. CSO to collaborate with communications firm to update/modify floor covering installer video in both English and Spanish.  
(<https://www.youtube.com/watch?v=T21D4PNqUnw>)
3. CSO staff to collaborate with communications firm to create individualized PowerPoint training, promotional collateral, supporting materials, and on-line quiz.
4. CSO solicits PowerPoint presentation feedback from flooring installation trainers, and then integrates feedback about floor covering processes, common language use, tools, and gear into training.
5. CSO Staff collaborates with communications firm, IUPAT trainers and staff to create Union focused carpet recycling video for IUPAT apprentices and journey-level installers: (<https://www.youtube.com/watch?v=S9kHkrBqvqk>)
6. CSO Staff provide in-person training to apprentices with trainers in attendance until trainers are ready to give the training on their own.
7. CSO attends in-person training provided by IUPAT Trainers to apprentices to provide support and feedback.
  - a) CSO provides training to apprentices as requested by IUPAT trainers.
8. CSO staff attend apprentice training quarterly or as needed to provide support.
9. If the union agrees, IUPAT and CSO conduct an end of year (EOY) meeting to review results of quizzes and incorporate any lessons learned or changes to training needs in the coming year's schedule and content.
10. CSO staff collaborates with trainers and communications firm to update training presentation as needed.

## 7.3. Budget & Legislative Requirements Tracking Process

Expended funds are tracked at the program plan level where the effort is performed.

- Education & Outreach: Tracked under MEO budget.
- Grants: Tracked by grant manager under individual grant award.

Legislative plan deliverables are tracked and reported on in Annual Reports unless otherwise noted under the Carpet law.

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## 8. Public Drop-Off Site Recruitment, Management & Reporting Methodology

### 8.1. Recruitment

CARE has multiple methods for recruiting and expanding its Public Drop-Off Sites (DoS). Utilizing industry-standard “Sales & Marketing” tactics as well as employing unique approaches such as financial incentives, hauling cost reimbursement, and other creative methods. Local government entities (County/Region) may be involved in the recruitment process, particularly if the site is a permitted Landfill, MRF, Transfer Station, or a Construction & Debris (C&D) permitted sorting facility overseen by that entity.

Typically, CARE has used an effective model of transportation cost coverage or reimbursement (if self-hauling) to pique interest and adoption of becoming a DoS. CARE suggests any new CSO implement strategies that meet both the CSO’s business methodologies and the program needs.

During the process of recruitment and adoption, deliverables are documented and stored in the CSO’s preferred method of tracking and archives.

The following is CARE’s approach to conducting recruitment driven outreach. Steps may be completed in tandem of each other or separate. In some cases, some steps may be modified or omitted to meet the needs of a particular effort.

1. Identify a Site’s compatibility with program parameters. This may include spatial requirements, public access constraints, operational procedures, and a site’s willingness to perform under program requirements.
2. If eligible, contact the site’s decision-making staff.
3. Provide an overview of the California Carpet Stewardship Program and the benefits of becoming a CARE Drop-Off Site (DoS).
4. If interest is expressed, conduct an in-person site-visit to further evaluate facility and nurture expanded interest.
5. Continue to deploy established marketing strategies to garner interest and adoption.
6. Once adopted, initiate the New DoS Enrollment and Onboarding & Training Processes.

#### Public Drop-off Site (DOS) Selection and Load Routing Protocol

CARE’s [Public Drop-off Site \(DOS\) Selection and Load Routing Protocol](#) addresses consideration parameters surrounding how sites are selected and where those loads are directed. The reader is encouraged to review the most current version of the protocol which can be found on CARE’s website.

Selecting a site suitable for a Public DoS site includes several factors. Considerations

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such as Collection Convenience, regional saturation, population densities, proximity to retailers or flooring professionals and redundancy are just a few.

The following are some of the recommended considerations to aid in determining site eligibility.

1. Evaluate the spatial area of the site. Does it allow enough space for program designated containers or services?
2. Is the location willing/allowed to provide public access to drop-off post-consumer carpet?
3. Is the site already recycling with private pickup service or under contract with a CARE recycler?
4. Is the area / region being served through an existing CARE Public DoS?

CARE prefers to deliver loads to the closest Recycler destination, however, that is not always the optimum solution. CARE uses several factors to determine eligibility for a site and then make decisions on where the carpet loads collected at that site will be routed. Our assessment considers several factors, including the distance between the site and the Recycler, the type of container used at the site, the Recycler's receiving capacity and operating hours and, in some cases, a Recycler's limits on the type of material that can be processed (Broadloom, Carpet Tile, etc.).

***Note: Effective October 2023, all pounds originating at a CARE Public Drop-Off site must be sent to a Processor who physically processes the material in California.***

The following are some considerations to aid in determining destination when onboarding a new site.

1. Evaluate the distance to the closest eligible delivery point (Recycler).
2. Are there any *current* pre-existing relationships between the site and a particular recycler that prohibits delivery to the closest facility?
3. Are there any constraints at the closest facility that prevents receiving a load from a site? (Examples may include lack of off-loading equipment, hours of operations, material type restrictions, etc.)
4. Does the 3<sup>rd</sup> Party Hauler / Self-Hauler include the destination on their routes?
5. Does the delivery create an undue financial burden on the program?

### **8.2. New DoS Enrollment**

The following describes tasks and steps taken to enroll or activate a DoS that has opted to adopt the program. These steps are listed in general order but may be completed in tandem with other steps described in the process.

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### **Initiating DoS Status**

1. Identify Operational effective date.
2. Identify Service and Container Type
3. Finalize Rate Approval [See Hauling Rate Approval Process]
4. Complete all required paperwork and store in DoS designated document repository file.
5. Add to or update site information in CRM database and on service-related forms.
6. Conduct Onboarding & Training with Site [See Onboarding & Training Process]
7. Schedule Delivery of Initial container (3<sup>rd</sup> Party Haulers only)
8. Request promotional materials.

### **Required Paperwork**

1. Completed Required Information Form (DoS)
2. Approved Rate Documentation
  - a. 3<sup>rd</sup> Party Hauler – Rate Quote Email
  - b. Self-Hauler – Rate Quote Email and Welcome & Responsibilities Document (Signed)
3. High Resolution Logo (for Collateral)

### **Hauling Rate Approval Process**

*Includes all Hauling Rates with 3<sup>rd</sup> Party (non-contracted) and self-haul vendors.*

Rates are determined to be “Not-to-Exceed (NTE)” with rare exceptions. The process for approving hauling rates is the following.

1. Prior to the official onboarding of a newly established drop-off site, CSO Staff identifies container type and size needed/requested to service incoming Drop-Off Site.
2. CSO requests hauler to submit a rate quote (either on official business letterhead or by email) for delivery of load to destination(s).
  - a. Any Storage Fees (Container/Trailer Rental) must be listed as a separate quote line and on a per calendar month charge basis.
3. CSO Staff reviews rate(s) and checks it against one or more variables:
  - a. Known current offerings in the region.
  - b. previous rates charged by other service providers (if a transfer)
  - c. Cost per mile
  - d. Estimated cost per pound.
  - e. Level of effort
4. Once approved, CSO Staff sends approval via email to hauler and

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notifies acceptance of rate.

5. Copy of rate acceptance email is saved to file folder “Hauling Rates” located in document repository directory.

### **Initial Delivery (Serviced by 3<sup>rd</sup> Party Hauler Only)**

7. For Drop-off sites using 3<sup>rd</sup> Party Haulers: Initial delivery of container/unit is ordered via a CSO service request where a work order is assigned for invoicing.
8. The work order shall include facility name, physical address, site contact name, email, and telephone, and an aerial image of the facility with container location spotted or highlighted on map.

### **Self-Haul Site Activation**

Self-Haul site receives instruction on how to submit a Self-Haul Pre-Delivery Report from during Onboarding & Training.

### **Onboarding & Training Process**

Newly enrolled Public Drop-off sites and/or site staff who are new to the program are provided with program training designed to provide information on the purpose of the program, best carpet collection practices and program participation requirements. The following describes CARE’s approach to Onboarding and Training new sites or new hires within those sites.

1. CSO schedules training with site management and/or operations staff.
2. CSO sends applicable staff webinar call-in information via email, along with a confirmation of date and time of training. Training typically lasts approximately 30 minutes depending on the level of discussion required and/or questions that arise.
3. Training consists of:
  - a. An introduction to the CSO program as a whole
  - b. Resources on the CSO website
    - i. Drop-off site map
    - ii. Service request order form
    - iii. Promotional templates
    - iv. Informational resources
  - c. Container loading and container weight targets
  - d. Micro-grants
  - e. Promotional materials and signage
  - f. Technical assistance
  - g. Contact resources.
  - h. Questions/discussion

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4. After the training, the CSO sends any follow-up information or resources that may have been discussed.
5. The CSO coordinates with MEO Subcontractor to send the drop-off site outreach collateral (bi-lingual handout, brochures) and signage.

### **8.3. Technical Support**

#### **DoS Performance Based Technical Support**

Performance-based Technical Support for a Drop-off site is initiated when the volume of pounds collected fails to meet anticipated expectations or program participation diminishes. These changes may be due to operational limitations, staff turnover or an unexpected decrease in volume. Additional triggers may include:

- Consistent low weight loads by container size.
- Contaminated loads
- Quarterly Report comments/suggestions
- Grant related issues
- Reported consumer concerns (such as carpet acceptance policies).



### **8.4. Quarterly Outreach and Report Data Collection Process**

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### **Public Drop-Off Site Quarterly Outreach Process**

Once every quarter, the CSO Collections team contacts public Drop-off Sites via telephone. These calls help to strengthen the CSO's relationship with each site as well as be informed of operational or staff changes, provide technical assistance, update promotional materials, schedule new or refresher staff trainings, and remind DoS staff of the requirement to submit a Quarterly Report and attend the Bi-Annual Webinar. Other communications with Drop-off Sites occur as needed or requested throughout the year.

Outreach efforts are recorded in a shared document or within a designated CRM database under each account file.

#### *Preparation*

1. Review Drop-off Site performance data which may include the following information for each site:
  - a. frequency of container swaps in a given period (quarterly, annually, etc.),
  - b. average weight per swap
  - c. review of any reports of loads containing contamination (debris, moisture, etc.), either delivered or undelivered to recyclers
  - d. consistency of attendance at bi-annual webinar and submittal of quarterly reports.
2. Review drop-off site notes from previous quarter .
3. Identify drop-off sites that may need special attention, such as sites that are showing volume changes or sites that are lower performing and be prepared to initiate a Technical Site Visit if necessary.

#### *Outreach Activities*

1. Contact the primary contact. If the primary contact does not answer, leave a reminder message with the quarterly report due date and that the form is submitted online: <https://carpetrecovery.org/ca-service-quarterlyreport/>.
  - a. Provide the next Bi-Annual Webinar date (if applicable).
  - b. Inquire as to how things are going and if they have any needs.
  - c. Advise call back date and time.
2. Call alternate contact(s).
  - a. If an alternate contact is unreachable, call the Site's public phone number and inquire about a contact change.
  - b. Update distribution lists and CRM database with new contact information as changes in staff occur.

#### *Upon contact with a facility:*

3. Remind them of the quarterly report due date and that the form is submitted

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online: <https://carpetrecovery.org/ca-service-quarterlyreport/>.

4. Remind them of the next Bi-Annual Webinar and ask if they will be attending. If they cannot attend, note the reason. Remind them that the bi-annual webinar is a requirement to program participation and ask if another staff-person can attend the webinar. If not, let them know that a recording of the webinar will be posted on the Drop-off Site Service Webpage.
5. Let them know you are calling to check-in, ask or communicate the following:
  - a. Ask how carpet recycling is going for them.
  - b. Review the number of pounds collected at the site during the calendar year.
  - c. If weights per load are high or low, let them know. Congratulate or discuss as needed.
  - d. If the number of swaps has increased or decreased let them know. Discuss the change to identify factors impacting the change.
  - e. Confirm that the Drop-off Site received (and installed) materials that were previously ordered.
  - f. Ask about previous technical assistance or other projects being conducted at the site.
  - g. Thank them for their sites continued participation in the program.
6. If a site needs improvement, be gentle and supportive. Ask if there have been any challenges (staff turnover, site construction and estimated completion date, issues with catastrophic events, such as fires or storms). The program provides them with many benefits, but it also takes up staff time and labor. Not all sites prioritize carpet recycling at all times; be understanding that this is just a single aspect of their business while encouraging continued participation.
  - a. See if there is any support the CSO can provide.
  - b. Does the site need updated signage?
  - c. Do they need new additional flyers (Such as Installer information handouts)?
  - d. Do they need staff training? (This is applicable especially if there has been a recent turnover in staffing.)
  - e. Evaluate and discuss the opportunity for a micro or capital grant if one is available to them.
7. Document in CRM tool or tracking sheet:
  - a. The Person contacted at each site.
  - b. Indicate if a message was left or if a follow-on email was sent.
  - c. Contact's receptivity to the call.
  - d. Mark down any challenges or successes discussed.
  - e. Note any support the CSO can provide for follow-up.
  - f. Other notes as applicable.

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### *Post Outreach Steps*

1. Document all actions identified as a result of outreach into CRM database. Assign actions as noted.
2. Follow-up with individual sites as determined/noted during the quarterly calls. This may include conducting staff trainings or site visits, changing container types, changing Drop-off Site contact information, or other technical assistance,
3. Order new flyers or signage from the MEO communications team
4. Provide introductions to Grants Manager for Drop-off Sites potentially interested in a grant.
5. Meet with MEO communications team to review any additional outreach needs and confirm that promotional materials were sent.

### **Quarterly Reporting & Reminder Process**

CSO public Drop-off sites are required to submit quarterly reports via an online form (<https://carpetrecovery.org/ca-service-quarterlyreport/>) . The purpose of these reports is to afford CSO with an opportunity to evaluate patterns or anomalies that may impact the effectiveness of the program.

Quarterly reports are due by 5:00 PM (Pacific Time) on the third Tuesday of the month following the end of a quarter. These dates generally land between the 16<sup>th</sup> and 20<sup>th</sup> day of the new quarter.

The reports are filed electronically through the website link listed above and emailed to CARE staff for review. An example of a completed report can be found in the Appendices.

Reminders are sent to report filers at the beginning of each quarter by CSO staff.

1. CSO staff updates DoS Distribution list with any changes or additions from previous quarter.
2. CSO staff adds contacts in the bcc field with subject line: "Reminder: Quarterly Report due [Date]"
  - a. In the body of email, provide due date and time, report form link and contact of support staff in the event of any questions.
  - b. If the quarter includes a Bi-Annual Webinar event, include reminder of the event date, and start time.
3. CSO notes any rejected emails and either corrects email addresses or locates alternate contacts.
4. CSO staff updates distribution list with any changes to contacts.

### **Quarterly Reporting Data Collection and Synthesis Process**

After the report submission deadline has passed, Quarterly report data is collected and

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analyzed. The following is the process in which CARE approaches the collection and synthesis of DoS Quarterly Report data.

1. Download submission data from website as a csv file.
2. Check data for duplication and/or erroneous entries.
3. Copy and paste data onto RAW DATA tab in excel workbook.
4. Refresh data to automatically update existing pivot tables and/or charts.
5. Present synthesized data to Collections Team for evaluation.
6. Identify any actions items resulting from compiled data.

### **8.5. Service**

#### **Pre-Delivery Report for Self-Haul Service**

Self-Haul service vendors are CSO Public Drop-Off sites that have opted to use their own equipment to collect, and haul collected carpet to a designated CSO designated Recycler. The Pre-Delivery Report for Self-Haulers is a required form that generates a Work Order number for invoicing CSO. The following is the process for submitting a report.

When the material is ready to haul to the recycler, the self-hauler submits a Pre-Delivery Report for Self-Haul Facilities (CSO Public DoS) by filling out the online form (<https://carpetrecovery.org/california/ca-service/pre-delivery-report-for-self-haul-facilities/>).

1. Hauler contacts the designated CSO Recycler and makes a delivery appointment [Scheduled Delivery Date]
2. Complete the form by providing the following information:
  - a. Select Hauling Facility Name [Public Drop-Off Site]
  - b. Enter the first and last name of the requestor or site contact.
  - c. Enter the telephone number of the requestor or site contact.
  - d. Enter the email address of the requestor or site contact.
  - e. Enter the name of the facility the load is being delivered to [CSO Recycler]
  - f. Select the Scheduled Delivery Date
  - g. Select the type and size of the container/trailer being delivered.
  - h. Add any notes or comments for CSO Staff.
  - i. Upload a photo of the load so that the load volume can be clearly seen.

#### **DoS Service Requests**

DoS Service Requests are reserved for Public Drop-off Sites where CSO has hired a 3<sup>rd</sup> party hauler to perform services. A DoS Service Request is a required form that

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generates a Work Order number for 3<sup>rd</sup> party haulers to invoice CSO. The request provides specific details that the hauler may need to know such as container type/size, delivery instructions and site information or instructions.

Sites should anticipate individual rotation needs; however, in most cases CSO haulers and recyclers require a **minimum** of two business days' notice. Certain container types may require a minimum of 7 business days' notice. While haulers try to honor the sites' requested service date, haulers may service a site outside of their requested service date due to scheduling conflicts, weather or natural disaster impacts, or road conditions. Alternately, some haulers may offer service based on a first-come-first-served or next-availability convenience.

The following is the process for submitting and managing a DoS Service Request:

### **Submitting a CSO Drop-Off Site Swap-out Service Order Form.**

When the material is ready to haul the site submits a CSO Drop-Off Site Swap-out Service Order Form by filling out the online form.

1. Select Facility Name [Public Drop-Off Site]
2. Enter the first and last name of the requestor or site contact.
3. Enter the telephone number of the requestor or site contact.
4. Enter the email address of the requestor or site contact.
5. Select the Desired Service Date
6. Select the type and size of the container/trailer being serviced.
7. Add any notes or comments for the hauler or CSO Staff.
8. If required, upload a photo of the load so that the load volume can be clearly seen.

### **Drop-Off Site Service Order (Swap) Form: Managing & Tracking**

Once a form has been submitted, the CSO Drop-Off Site Swap-out Service Order Form is automatically routed to the CSO Service email and is routed to the hauler assigned to the site. The form generates a work order number that the hauler must reference on any related invoices. CSO prefers to provide autonomy to the hauler with regards to scheduling delivery appointments. If a hauler has repeated no shows or deliveries without a scheduled appointment, CSO may opt to control dispatching until such time as the hauler can demonstrate independence.

1. CSO Staff documents Work Order number in DoS Tracker and adds to Scheduling Calendar with a "Pending" status. [[see DoS Data Tracking Process](#)]
2. Routing:
  - a. If automatically generated: Hauler contacts CSO recycler and

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- schedules delivery.
- b. If not automatically generated: CSO Staff contacts the recycler and the hauler to coordinate pickup (hauler) and delivery (recycler) date(s) that are convenient for all parties.
  3. Hauler confirms service date by responding to all contacts on the generated email.
  4. CSO Staff updates Work Order Calendar entry with a “Confirmed” status.
  5. Hauler performs service on confirmed date.
  6. Hauler Invoices CSO for services performed [See section Work Order Invoicing – Hauler Invoicing Process]
  7. CSO Staff updates DoS Tracker with information pulled from Hauler Invoice.
  8. Recycler Invoices CSO for related recycler fees [See section Work Order Invoicing – Recycler Invoicing Process]
  9. CSO Staff updates DoS Tracker with information pulled from Recycler’s Invoice.
  10. Once all invoices related to a work order have been received and posted to the DoS Tracker, the record is reconciled and closed.

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### 8.7. DoS Data and Tracking

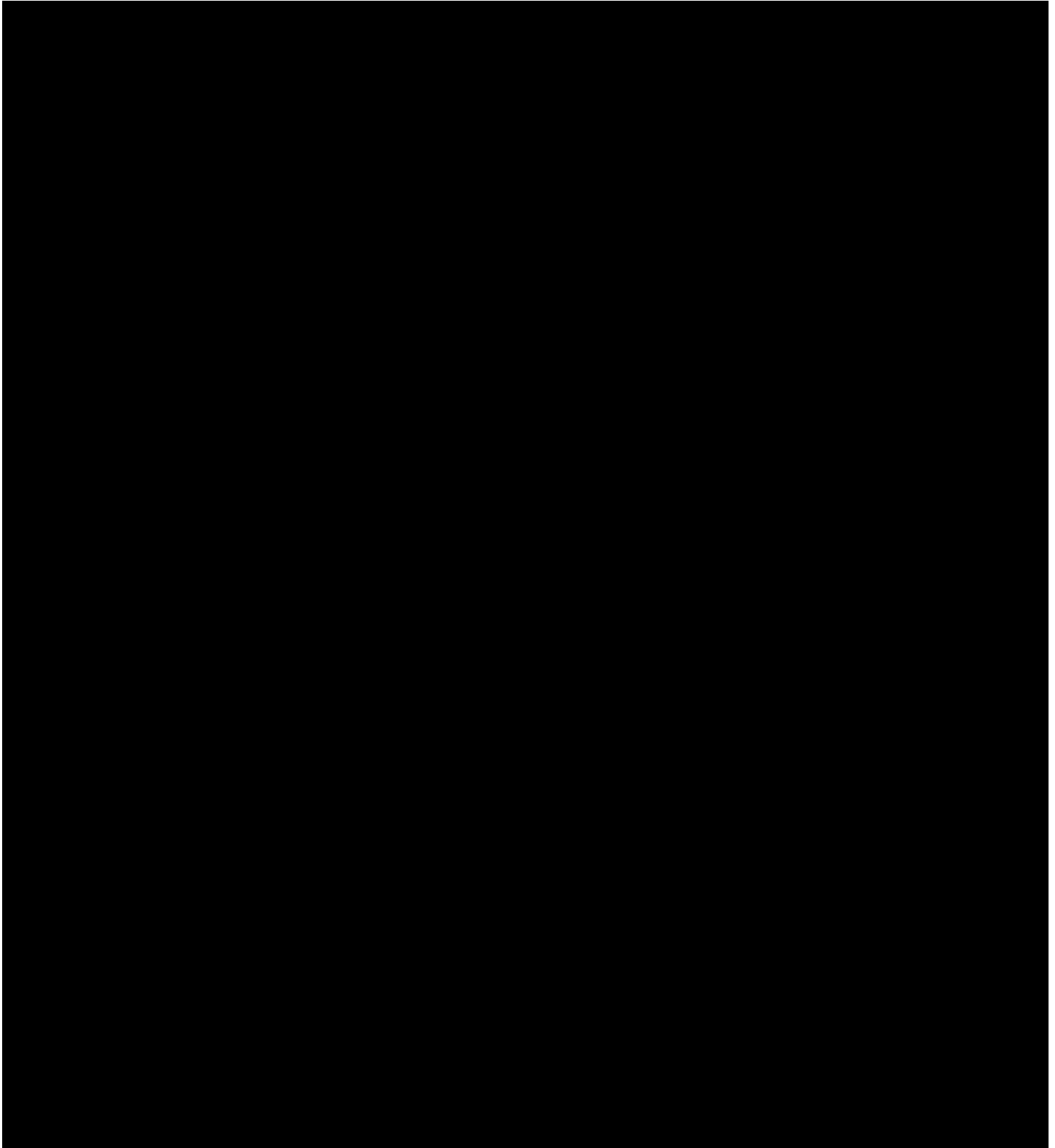
As of the initial writing of this training guide, CARE deploys the use of an Excel Workbook with multiple columns to track specific data points associated with a CARE work order. This data is collected from invoices submitted by 3<sup>rd</sup> party haulers, including self-haulers, and program recyclers.

The data is collected on a transactional level for every operational step associated with an assigned work order. The data is then reconciled on a quarterly basis and used to feed other program reporting functions such as AB901 Reporting and quarterly

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summary reports.



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### **DoS Data Reconciliation Process**

At the end of each quarter, DoS data is reconciled to ensure reporting accuracy at the program level and to meet AB901 reporting requirements. To reconcile data, the following process is performed.

1. Inspect any open or unbilled transactions that were scheduled or serviced during the reporting period.
  - a. Request any invoices that have not been received and mark the line item as “Pending”.
2. Inspect sum formulas on each line level for total hauling cost, total recycling cost, total miscellaneous cost, and transaction weight calculations to ensure accuracy.
3. For any errors, consult original invoice(s) and adjust where appropriate. If error requires vendor correction, forward invoice back to vendor and request correction within 3 business days.
4. Make notes on the transaction line, as necessary.
5. Once reconciliation is complete and all invoices for services performed in the reporting period are complete, enter figures into Finance & Reporting software to be incorporated into program reports.
6. Run AB901 pivot table to collect AB901 reporting figures.

### **AB901 Reporting Process for Public Drop-Off Sites**

AB901 is a California Statutory Reporting requirement. All PCC collected at CSO Public Drop-Off Sites must be reported in the Recycling & Disposal Reporting System located on CalRecycle’s website [<https://calrecycle.ca.gov/swfacilities/rdreporting/>]. Under agreement with CalRecycle, effective Q4 2019, CSO operates as a decentralized organization and is classified as an entity activity type of “Recycler/Composter”. In 2020, all but one RD number was inactivated and closed to prevent confusion. AB901 data is extrapolated from the DoS Tracker and summarized by destination (Recycler). This data is known as Outflows in RDRS. The CSO staff calculates total PCC outflows and reports according to destinations. CARE’s AB 2398 RD number will be terminated upon disengagement. Any new CSO(s) must register to acquire their own RD# for use in AB901 reporting. The following steps were valid as of the date of this publication (October 2023)<sup>2</sup>. CARE strongly recommends that any new CSO be intimately familiar with current AB901 Reporting Regulations and techniques

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<sup>2</sup> Note: These instructions do not supersede established guidelines under the law.

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for reporting outflows in RDRS. The following is the process to collect CSO Public Drop-Off Site data and recommended sequences of entering data into RDRS. Please refer to the RDRS website for further training information.

1. Non excluded Public Drop-Off sites (any qualified entity who meets the quarterly de minimis tonnage threshold of reportable outflows) are instructed to report in RDRS any carpet outflows to the CSO's single RD number, not to the CARE designated recycler.
2. After all quarterly data has been reviewed by CSO Executive Management, Public DoS lbs. are tallied according to the destination [Recycler Facility].
  - a. Enter all Out of State Outflows first. This addresses a glitch in the RDRS system.
  - b. Enter the remaining total tonnage for the remaining recyclers.
  - c. Carefully review the submission for errors. Check total outflow tonnage with final total tons collected for reporting quarter.
    - i. Make any necessary changes.
  - d. Submit report.
  - e. Save copy of auto generated acknowledgement email in document repository directory.
  - f. Create a snapshot of data used in calculations and save a copy in AB901 document repository directory.

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### **9. Definitions**

AUP: (Agreed Upon Procedures): A prescribed procedure executed by an external accounting firm or contractor to examine the records of Program participants to verify compliance and prevent fraud.

Broadloom: See Carpet

Carpet: A manufactured article that is used in commercial or residential flooring applications as a decorative or functional feature and that is primarily constructed of a top visible surface of synthetic or natural face fibers or yarns or tufts attached to a backing system derived from synthetic or natural materials.

- “Carpet” includes, but is not limited to, a commercial or a residential broadloom carpet or modular carpet tiles.
- “Carpet” does not include a rug, pad, cushion, or underlayment used in conjunction with, or separately from, a carpet.

Carpet America Recovery Effort (CARE): A nationwide, 501(c)(3) non-profit organization whose focus is on post-consumer carpet stewardship.

Carpet Mill: A primary producer of carpet, carpet tiles, or related products covered under the Plan. Also referred to as a carpet manufacturer.

Carpet Stewardship Organization (CSO): An organization responsible for developing, operating, and financing a program that is established to address the environmental challenges posed by carpet products in addition to the mitigation of their impact on natural resources. In California, the CSO is accountable for meeting legislative requirements under the Carpet Law and must be a non-profit organization exempt from taxation under Section 501(c)(3) of the Internal Revenue Code of 1986.

Carpet Squares: See Carpet Tile

Carpet Tile: also known as modular carpets or carpet squares, are squares cut from wall-to-wall rolls which can be fitted together to make up a carpet.

Collateral Materials - Any digital or printed material used to communicate or promote a company or agency’s brand message, products, or services.

Collected: Gross collected pounds of California PCC (total includes material that may eventually be sent to landfill). Also referred to as Gross Collected and Gross Collection.

Collection: Any method of consolidating and temporarily storing recovered commercial and/or residential carpet.

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Collector/Sorters: See Collector/Sorter Entrepreneur (CSE) below.

Collector/Sorter/Entrepreneur – A business that provides carpet recycling collection services for retailers, disposal sites or other sites. CSEs sort received PCC by material type for third-party reuse, or wholesale to Tier 1 processors for recycling. CSEs do not convert material into Recycled Output. Also referred to as Collector/Sorters.

CSO: see Carpet Stewardship Organization

Drop-Off Site a CARE Public Drop-off Site who receives certain benefits, including program funded hauling and container provisions.

DoS – see Drop-Off Site.

Entrepreneur: For the purposes of this report, it is defined as an individual or privately held company that actively collects, sorts, processes, or manufactures products made from post-consumer carpet. It does not refer to a carpet manufacturer.

Grab Sample: See Spot Sampling

Outflows: a term used under AB901/ RDRS to describe material removed from a reporting entities facility and sent to a location other than landfill.

Post-Consumer Carpet (PCC) Materials: Carpet that has completed its lifecycle as a consumer item or is no longer used for its manufactured purpose. Also referred to as discards.

Press Kit- a package of promotional material provided to members of the press to brief them, especially about a product or service.

Processor: Qualified recipient participating under the Plan, which uses industry-recognized processes such as shredding, grinding, sheering, depolymerization, etc., to convert discarded whole carpet into finished (Type 1 or Type 2) Recycled Output, ready to be utilized as an input material for secondary products. In this report, processors are referred to as Tier 1 processors. Some processors may also function as collector/sorter entrepreneurs or Tier 2 manufacturers.

Quality Assurance/Quality Control (QA/QC) - a formalized control system to ensure the continuing integrity and quality of all services and deliverables.

Recycler – A CSO entity that accepts PCC from a Public Drop-off Site (Public or Private). May be a Collector/Sorter/Entrepreneur or a Processor.

RD Number – a number assigned to a reporting entity by CalRecycle's RDRS System.

RDRS - Recycling and Disposal Reporting System

Rolled Carpet: See Carpet

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Rural County: California counties that meet the CalRecycle definition of rural: “A rural county is defined as a county which disposes of less than 200,000 tons of waste annually.” (PRC Section 40183-4)

Spot sampling: (Also known as Grab Sampling) involves the collection of processed face fiber and PC4 materials from the containment bale or container. The sample is then analyzed to help operators validate process conditions, evaluate the RO products purity to ensure materials meet Product Qualifications for Subsidies and detect whether the product is up to customer specifications.

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