Description of document: Social Security Administration (SSA) Inspector General (OIG) response to a Congressional request for "agency"-specific information on climate change, 2013

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Source of document: Social Security Administration
Principal Public FOIA Liaison
Room 3-A-6 Operations
6401 Security Boulevard
Baltimore, MD 21235
Fax: (410) 966-0869

SOCIAL SECURITY

Refer to:
S9H: AL2487

September 24, 2013

Thank you for your August 4, 2013 Freedom of Information Act (FOIA) request asking for records and any other response that we provided to the Bicameral Task Force on Climate Change.

I have enclosed a copy of our Office of Inspector General's (OIG) report, A-15-13-32104, dated April 2013. Additionally, this report is publically available on our OIG's webpage: http://oig.ssa.gov/sites/default/files/audit/full/pdf/A-15-13-32104.pdf.

If you disagree with this decision, you may appeal it. Mail the appeal within 30 days after you receive this letter to the Executive Director for the Office of Privacy and Disclosure, Social Security Administration, 617 Altmeyer Building, 6401 Security Boulevard, Baltimore, Maryland 21235. Mark the envelope "Freedom of Information Appeal."

Sincerely,

Dawn S. Wiggins

Dawn S. Wiggins
Freedom of Information Officer

Enclosure

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

Congressional Response Report

The Social Security Administration's Implementation and Compliance with Energy Conservation Policies

A-15-13-32104 | April 2013

April 30, 2013

The Honorable Henry A. Waxman
Co-Chair, Bicameral Task Force on Climate Change
Ranking Member, Committee on
Energy and Commence
House of Representatives
Washington, DC 20515

Dear Mr. Waxman:

In a February 25, 2013 letter, you asked that we review issues related to the Social Security Administration's (SSA) implementation of climate-change policies.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The enclosed report highlights facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

If you have any questions concerning this matter, please call me or have your staff contact Kristin Klima, Congressional and Intra-Governmental Liaison at (202) 358-6319.

Sincerely,

Patrick P. O'Carroll, Jr.
Inspector General

Enclosure

cc:
Carolyn W. Colvin

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

April 30, 2013

The Honorable Sheldon Whitehouse
Co-Chair, Bicameral Task Force on Climate Change
Chairman, Subcommittee on
Oversight
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

Dear Senator Whitehouse:

In a February 25, 2013 letter, you asked that we review issues related to the Social Security Administration's (SSA) implementation of climate-change policies.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The enclosed report highlights facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

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Patrick P. O'Carroll, Jr.
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Enclosure

cc:
Carolyn W. Colvin

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

April 30, 2013

The Honorable Edward Markey
Co-Chair, Bicameral Task Force on Climate Change
Ranking Member, Committee on
Natural Resources
House of Representatives
Washington, DC 20515

Dear Mr. Markey:

In a February 25, 2013 letter, you asked that we review issues related to the Social Security Administration's (SSA) implementation of climate-change policies.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The enclosed report highlights facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

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Sincerely,

Patrick P. O'Carroll, Jr.
Inspector General

Enclosure

cc:
Carolyn W. Colvin

April 30, 2013

The Honorable Benjamin L. Cardin
Co-Chair, Bicameral Task Force on Climate Change
Chairman, Subcommittee on
Water and Wildlife
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

Dear Senator Cardin:

In a February 25, 2013 letter, you asked that we review issues related to the Social Security Administration's (SSA) implementation of climate-change policies.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The enclosed report highlights facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

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Sincerely,

Patrick P. O'Carroll, Jr.
Inspector General

Enclosure

cc:
Carolyn W. Colvin

The Social Security Administration's Implementation and Compliance with Energy Conservation Policies
A-15-13-32104

April 2013 **Office of Audit Report Summary**

Objectives

To determine (1) whether the Social Security Administration (SSA) met all requirements set forth in climate-change legislation and (2) how SSA implemented the requirements.

Background

On January 24, 2007, the President signed Executive Order (EO) 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*. The EO requires that Federal agencies lead by example in advancing the nation's energy security and environmental performance by achieving several goals. The President signed EO 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, on October 5, 2009 to enhance EO 13423.

SSA is responsible for reporting energy performance for 18 buildings delegated to it by the General Services Administration. SSA is not responsible for energy improvements of non-delegated buildings.

In a February 25, 2013 letter, the Bicameral Task Force on Climate Change requested our assistance in determining whether SSA is taking the necessary steps to confront the growing threat of climate change.

Our Conclusions

Although we did not validate all the supporting documentation provided by the Agency, based on the Office of Management and Budget's review and approval of the Agency performance, we believe SSA is meeting all the requirements set forth in various pieces of climate-change legislation. Although SSA appears to be on track to reach all the goals set forth in the applicable legislation, SSA should continue to work with General Services Administration and the Office of Management and Budget to improve its energy efficiency. We also noted that the Agency's performance results for the various energy measures included both data from the 18 delegated buildings as well as Agency-wide data. The Agency should consider defining in the Strategic Sustainability Performance Plan what data are used for each measure.

TABLE OF CONTENTS

ABBREVIATIONS

Btu	British Thermal Unit
CEQ	Council on Environmental Quality
C.F.R.	Code of Federal Regulations
DOE	Department of Energy
ECO	Energy Conservation Opportunities
EO	Executive Order
EPEAT	Electronic Product Environmental Assessment Tool
Fed. Reg.	Federal Register
FEMP	Federal Energy Management Program
FY	Fiscal Year
GHG	Greenhouse Gas
GSA	General Services Administration
GSF	Gross Square Foot
IT	Information Technology
NCC	National Computer Center
OFSM	Office of Facilities and Supply Management
OMB	Office of Management and Budget
Pub. L. No.	Public Law Number
SSC	Second Support Center
SSPP	Strategic Sustainability Performance Plan
SSA	Social Security Administration
U.S.C.	United States Code

OBJECTIVES

Our objectives were to determine (1) whether the Social Security Administration (SSA) met all requirements set forth in climate-change legislation and (2) how SSA implemented the requirements.

BACKGROUND

On January 24, 2007, the President signed Executive Order (EO) 13423, *Strengthening Federal Environmental*, *Energy, and Transportation Management*.[1] This EO requires that Federal agencies lead by example in advancing the nation's energy security and environmental performance by achieving several goals. The President signed EO 13514, *Federal Leadership in Environmental, Energy, and Economic Performance,*[2] on October 5, 2009 to enhance EO 13423. EO 13514 introduces new greenhouse gas (GHG) emission management requirements; expands water reduction requirements for Federal agencies; and addresses waste diversion, local planning, sustainable buildings, environmental management, and electronics stewardship.

EO 13514 requires that each agency develop, implement, and annually update an integrated Strategic Sustainability Performance Plan (SSPP) that will prioritize agency actions based on life-cycle return on investment. Each agency SSPP and update is subject to approval by the Director of the Office of Management and Budget (OMB). Each agency plan shall

- include a policy statement committing the agency to compliance with environmental and energy statutes, regulations, and EOs;
- achieve the sustainability goals and targets, including GHG reduction targets, established under section 2 of EO 13514;
- identify agency activities, policies, plans, procedures, and practices relevant to the agency's implementation of this order and, where necessary, provide for development and implementation of new or revised polices, plans, procedures, and practices;
- identify specific agency goals, a schedule, milestones, and approaches for achieving results and quantifiable metrics for agency implementation of this EO;
- outline planned actions to provide information about agency progress and performance with respect to achieving the goals of this EO on a publicly available Federal Website;
- incorporate actions for achieving progress metrics identified by the Director of OMB and the Chair of the Council on Environmental Quality (CEQ); and

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[1] 72 Fed. Reg. 17, 3919 (January 26, 2007), 48 C.F.R. 970.5223-6.

[2] 74 Fed. Reg. 194, 52117 (October 8, 2009).

- identify, in annual updates, opportunities to improve and evaluate past performance to extend or expand projects that have net life-cycle benefits and reassess or discontinue under-performing projects.[3]

SSA

At the time of our review, SSA was leasing approximately 29 million square feet of space at its Headquarters and regional/field offices from the General Services Administration (GSA) to conduct its business operations. In most cases, GSA is responsible for operating, maintaining, repairing, and protecting buildings. However, in some cases, GSA has transferred these functions to the agency that occupies the building, such as SSA. The Delegations Agreements[4] program gives SSA the authority to operate, maintain, repair, preserve, alter, and protect the Government-owned or leased buildings and program-designated grounds. GSA and SSA sign Delegations Agreements for each building in the program. SSA solely occupies all 18 delegated buildings. For a list of SSA-delegated buildings, refer to Appendix A.

SSA reports energy performance data for the 18 delegated buildings and the Second Support Center (SSC). However, SSA reports on environmental stewardship nationwide for several areas. According to the Agency, GSA has reporting accountability to OMB on energy for non-delegated buildings. SSA is not responsible for energy improvements to non-delegated buildings.

In a February 25, 2013 letter, the Bicameral Task Force on Climate Change requested our assistance in determining whether SSA is taking the necessary steps to confront the growing threat of climate change. See Appendix B for a copy of the congressional letter.

RESULTS OF REVIEW

Based on SSA's implementation of various requirements as reported in the agency SSPP and our inquiries with SSA, we aggregated the information to respond to the February 25, 2013 congressional inquiry. SSA also annually submits the performance data to OMB and the CEQ chair for their review and approval. See Appendix C for a summary of this report. Because of the limited timeframe for this response, we did not test the validity of the information SSA provided.[5]

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3 74 Fed. Reg. 194, 52122-52123, Section 8.

4 Laws authorizing such delegations include Section 205(d) of the *Federal Property and Administrative Services Act of 1949*, as amended; the *Public Buildings Act of 1959*; and the *Public Buildings Amendment of 1972*.

5 See Appendix D for more information on the scope and methodology.

Question 1: Identify the Existing Requirements in Legislation, Regulation, Executive Order, and Other Directives that Apply to the Government Entity You Oversee.

We identified the following energy conservation policies that apply to SSA.

- EO 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*, January 2007[6]
- EO 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, October 2009[7]
- *Energy Policy Act of 2005*[8]
- *Energy Independence and Security Act of 2007*[9]

In addition, we inquired with the Agency's General Counsel and Office of Facilities and Supply Management (OFSM) to determine whether any additional energy conservation policies apply to the Agency. General Counsel had no legal comments and OFSM referred us to the Department of Energy and the CEQ chair.

Question 2: Assess Whether it is Meeting These Requirements.

Energy Efficiency

According to EO 13423, agencies are required to reduce energy intensity[10] 30 percent by 2015 compared to a Fiscal Year (FY) 2003 baseline.[11] In the SSPP the Agency issued for FY 2011, the FY 2003 baseline was 124,300 British Thermal Units (Btu) per gross square foot (GSF). As of FY 2011, SSA had reduced energy intensity to 122,077 Btu/GSF or 1.8 percent. Because of the energy reductions made before the baseline was calculated and the employee population

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[6] 72 Fed. Reg. 17, 3919 (January 26, 2007), 48 C.F.R. 970.5223-6.

[7] 74 Fed. Reg. 194, 52117 (October 8, 2009).

[8] Pub. L. No. 109-58, 42 U.S.C. 15801 note.

[9] Pub. L. No. 110-140.

[10] Energy intensity is the energy consumption per gross square foot of building space, including industrial and laboratory facilities. For energy intensity purposes, the Agency reports on the 18-delegated buildings excluding the National Computer Center (NCC) and SSC.

[11] 72 Fed. Reg. 17, 3919, Section 2(a) (ii), 48 C.F.R. 970.5223-6.

increased in FYs 2010 and 2011, SSA did not expect to reach the 30-percent energy intensity reduction goal by FY 2015, as required by the EOs.

GHG emissions also reflect an agency's energy efficiency. EO 13514 requires that agencies establish and report to the CEQ chair and the Director of OMB a percentage reduction target for reductions of scope 1,[12] 2,[13] and 3[14] GHG emissions in absolute terms[15] by FY 2020, relative to a FY 2008 baseline.[16] SSA set a goal to achieve a 21-percent reduction in scope 1 and 2 GHG emissions by FY 2020 and a 13-percent reduction in scope 3 GHG emissions. According to the FY 2011 performance, as reported in the SSPP, SSA decreased scope 1 and 2 GHG emissions by 25.5 percent; however, scope 3 GHG emissions increased by 0.9 percent. Based on the SSPP, scope 3 GHG emissions increased because of the addition of 2,000 new commuters nationwide in FYs 2010 and 2011. According to the Agency, ". . . we do not expect the addition of these commuters to have a negative effect on our long-term goal of reducing overall scope 3 emissions 13 percent by FY 2020." Although the additional employees were added using funding from the *American Recovery and Reinvestment Act*, SSA's employee count has decreased over the past 2 FYs. Table 1 lists the employee counts from FYs 2009 through 2012.

Table 1: SSA Employee Count[17]

Year	Number of SSA Employees	Number of OIG Employees	Total
2009	67,462	575	68,037
2010	70,202	588	70,790
2011	66,873	587	67,460
2012	64,907	571	65,478

[12] This refers to direct GHG emissions from sources that are owned or controlled by the Federal agency. For scope 1 emissions, the Agency reports on the 18 delegated buildings.

[13] This refers to direct GHG emissions resulting from the generation of electricity, heat, or steam purchased by a Federal agency. For scope 2 emissions, the Agency reports on the 18 delegated buildings.

[14] This refers to GHG emissions from sources not owned or directly controlled by a Federal agency but related to agency activities such as vendor supply chains, delivery services, and employee travel and commuting. For scope 3 emissions, the Agency reports on Agency-wide data for the employee commuting and travel factors but only on the 18 delegated buildings for the remaining factors.

[15] Absolute GHG emissions mean total greenhouse gas emissions without normalization for activity levels and include any allowable consideration of sequestration.

[16] 74 Fed. Reg. 194, 52117-52118, Section 2(a) and (b), (October 8, 2009).

[17] These counts include full-time permanent, temporary, and part-time employees.

We met with the Agency to discuss the processes it had in place to address these reduction targets and determine whether more recent performance information was available. According to the FY 2012 Energy Management Performance Summary provided by SSA, the energy intensity for FY 2012 decreased by 22.1 percent compared to the FY 2003 baseline. This met the Agency's target of a 21-percent reduction in FY 2012 and was on track to reach the target of a 30-percent reduction by FY 2015, as required by EO 13423. We asked management what improvements the Agency made to reach the goal since there was only a 1.8 percent decrease in energy intensity in FY 2011. According to the Agency, for FY 2012 reporting, it excluded the NCC and SSC from calculating energy intensity. The FY 2003 baseline was also recalculated to reflect the change in reporting. Over 50 percent of the electrical load at the NCC and 90 percent at the SSC was dedicated to process-driven critical information technology (IT) computing. SSA believed the energy requirements were impractical because of the mission criticality of the IT equipment. Therefore, SSA requested the Department of Energy (DOE) allow the exclusion of the NCC and SSC for reporting purposes. SSA also stated that improvements to the heating, ventilation, and air conditioning system as well as improvements in lighting throughout the Headquarters buildings improved energy intensity performance.

For FY 2012 performance, SSA also reported a significant improvement in the scope 3 GHG emissions, reducing emissions by 12.3 percent in relation to the FY 2008 baseline. Because of limited travel and a hiring freeze, scope 3 emissions from air and ground travel and employee commuting decreased between FYs 2011 and 2012. The Agency noted that these areas were only a minor factor that affected the reduction in scope 3 emissions.

Renewable Energy

Policy requires that an agency ensure that at least half the statutorily required renewable energy[18] consumed by the agency in a FY come from new renewable sources and, to the extent feasible, implement renewable energy generation projects on agency property for agency use.[19] In addition, the *Energy Policy Act of 2005* requires that renewable energy make up not less than 5 percent in FYs 2010 to 2012 and not less than 7.5 percent in FY 2013 and each FY thereafter, of the total amount of electric energy consumed during a FY.[20] According to the Agency's SSPP, it anticipates it will be able to achieve the requirement to obtain 7.5 percent of electricity from renewable sources from FY 2013 onward. According to data provided by the Agency, as of FY 2011, 17.7 percent of electricity used was from renewable sources, and in FY 2012, 10 percent of electricity used came from renewable energy sources.

[18] This refers to energy produced by solar, wind, biomass, landfill gas, ocean (including tidal, wave, current, and thermal), geothermal, municipal solid waste, or new hydroelectric generation capacity achieved from increased efficiency or additions of new capacity at an existing hydroelectric project. The Agency's reporting for renewable energy includes data from the 18 delegated buildings.

[19] 72 Fed. Reg. 17, 3919, Section 2(b), 48 C.F.R. 970.5223-6.

[20] Pub. L. No. 109-58, 42 U.S.C. 15852, Section 203(a) (2) and (a) (3).

To comply with this requirement, the Agency has implemented three renewable energy projects in the delegated buildings. These projects resulted in adding rooftop photovoltaic array[21] in three buildings and solar water heating and urban wind turbines at one building. The Agency has met the requirements for the past 2 FYs and plans to meet the requirement for FY 2013.

Water Consumption Intensity

According to EOs 13423 and 13514, an agency is required to reduce water consumption intensity,[22] relative to the baseline of the agency's water consumption in FY 2007, through life-cycle, cost-effective measures by 2 percent annually through FY 2020, or 26 percent by the end of FY 2020.[23] An agency is also required to reduce industrial, landscaping, and agricultural water consumption by 2 percent annually or 20 percent by the end of FY 2020 relative to a baseline of the agency's water consumption in FY 2010.[24]

According to the Agency's SSPP, SSA uses no water for industrial or agricultural purposes and uses limited water for landscaping since the majority of the delegated buildings has native grasses and plants that require little or no irrigation. The FY 2007 baseline established for potable water consumption was 17.8 gallons per square foot. For FY 2011, SSA reduced potable water consumption by 15.8 percent compared to the baseline. According to SSA's FY 2012 Energy Management Performance Summary, it used 11.4 gallons per square foot in FY 2012 compared to the 17.8 gallons per square foot baseline, a reduction of 35.6 percent. These results have already exceeded the EOs' requirement for a 26-percent reduction by the end of FY 2020. Since the Agency does not meter landscaping water consumption separately from other water usage, it plans to install sub-metering to determine the amount of outdoor water use. The Agency also plans to determine whether it should install water sensors at Headquarters to determine the need for watering. In addition, the Agency has implemented strategies at two field facilities to reuse ground water.

Sustainable Buildings

According to EO 13514, an agency is required to implement high performance sustainable Federal building design, construction, operation and management, maintenance, and deconstruction.[25] This includes ensuring that all new construction, major renovation, or repair

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[21] A photovoltaic array is a linked collection of solar panels.

[22] This refers to water consumption per square foot of building space. The Agency's reporting for water intensity includes data from the 18-delegated buildings and the SSC.

[23] 74 Fed. Reg. 194, 52118, Section 2(d) (i).

[24] Id., Section 2(d) (ii).

[25] Id., Section 2(g).

and alteration to Federal buildings complies with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings* (Guiding Principles).

As noted in SSA's SSPP, SSA does not report on compliance with the Guiding Principles because it does not own any facilities. GSA has delegated the responsibility for managing the operations and maintenance of some larger facilities to SSA; however, SSA has requested that GSA obtain third-party certification to meet the requirements of the Guiding Principles.

Federal Fleet Management

Policy requires that if an agency operates a fleet of at least 20 motor vehicles, the agency, relative to agency baselines for FY 2005, will

1. reduce the fleet's total consumption of petroleum products by 2 percent annually through the end of FY 2015;

2. increase the total fuel consumption that is non-petroleum-based by 10 percent annually; and

3. use plug-in hybrid vehicles when they are commercially available at a cost reasonably comparable to non-plug-in-hybrid vehicles.[26]

According to the Agency's SSPP for FY 2011, the FY 2005 baseline for petroleum use was 374,437 gasoline gallon equivalents, and the baseline for alternative fuel use (gasoline gallon equivalent) was 2,365. For FY 2011, SSA reported a 31.6-percent reduction in petroleum use and an increase of 3,810.7 percent in the use of alternative fuel consumption.[27] SSA has strategies in place to help ensure positive results in this area. For instance, the Agency plans to reduce the fleet size and ensure the timely return underutilized vehicles to GSA. SSA will replace all eligible gasoline vehicles with alternative fuel vehicles or hybrids as it renews leases and it uses alternative fuels for all flex-fuel vehicles.

Electronics Stewardship

EO 13514 requires that Federal agencies promote electronics stewardship by

- ensuring procurement preference for Electronic Product Environmental Assessment Tool (EPEAT)-registered electronic products;

- establishing and implementing policies to enable power management, duplex printing, and other energy-efficient or environmentally preferable features on all eligible agency electronic products;

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[26] 72 Fed. Reg. 17, 3919, Section 2(g), 48 C.F.R. 970.5223-6.

[27] The Agency's reporting for fleet management includes Agency-wide data including the Office of the Inspector General's fleet.

- employing environmentally sound practices with respect to the agency's disposition of all agency excess or surplus electronic products;
- ensuring the procurement of Energy Star and Federal Energy Management Program (FEMP) designated electronic equipment; and
- implementing best management practices for energy-efficient management of servers and Federal data centers.[28]

According to SSA's SSPP, in FY 2011, 100 percent of covered agency-wide electronics acquisitions was FEMP-designated, Energy Star qualified, and EPEAT-registered. To improve in this area, SSA will install sub-meters in FY 2013 for electricity in the data centers and integrate the meters into energy information systems. The sub-meters will help calculate the power use effectiveness by differentiating the mechanical electric load and the critical information technology load. Since July 2012, the Agency has reported to OMB that it was 100-percent compliant with EPEAT requirements by converting all agency-wide printers to duplex-enabled and implementing power management on all computers. The Agency also plans to install water meters.

Procurement

As noted in EO 13514, Federal agencies are to advance sustainable acquisition to ensure 95 percent of new agency-wide contract actions including task and delivery orders, for products and services with the exception of acquisition of weapon systems, are energy-efficient, water-efficient, bio-based, environmentally preferable, non-ozone depleting, and non-toxic or less-toxic alternatives as well as contain recycled content.[29] To ensure compliance with this requirement, the Agency reviewed a sample of contract actions for the first and second quarters in FY 2012. The sample represented 5 percent of the eligible environmentally related contract actions. Based on this review, the Agency determined that all sampled contract actions were environmentally compliant. The Agency stated, ". . . the limitations of current acquisition management systems, such as the Federal Procurement Data System, create a challenge for the complete tracking of green purchasing clauses"; therefore, the Agency has planned to continue reviewing at least 5 percent of eligible contracts each quarter. The SSPP states that the Agency will include the 95-percent requirement in the next revision of the green purchasing plan.

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[28] 74 Fed. Reg. 194, 52120, Section 2(i).

[29] Id., 52119, Section 2(h).

Pollution Prevention and Waste Reduction

EO 13514 requires that Federal agencies promote pollution prevention and eliminate waste. Some of the requirements include

- minimizing the generation of waste and pollutants through source reduction;
- diverting at least 50 percent of non-hazardous solid waste, excluding construction and demolition debris, by the end of FY 2015;
- diverting at least 50 percent of construction and demolition materials and debris by the end of FY 2015;
- reducing printing paper use and acquiring uncoated printing and writing paper containing at least 30 percent postconsumer fiber; and
- reducing and minimizing the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of.[30]

Because of the Delegations Agreements, SSA is only responsible for the waste management in the delegated buildings. Because GSA owns the buildings, SSA does not directly construct or renovate them or report on the construction and demolition debris portions of the requirements. As reported in the SSPP, in FY 2011, the Agency diverted 1,670 tons (70 percent) of non-hazardous solid waste, exceeding the EO goal of 50 percent. SSA stated that this goal was primarily reached through active recycling at all the delegated facilities. The Agency has also reported that 91 to 100 percent of printing and writing paper purchased is made of at least 30 percent postconsumer fiber. According to the SSPP, the Agency planned to implement single-stream recycling at Headquarters to increase the amount of recyclable materials diverted from the waste stream resulting in a projected 10-percent increase in the Headquarters diversion rate.

Because of the improvements SSA has implemented, the Agency has reported to OMB in the current reporting cycle that it is on task to meet all the targets required through the various climate change policies. SSA also informed us that it has contracted with Dynamic Energy Concepts, Inc., to verify the energy and water billings for FYs 2011 and 2012. This will help SSA ensure the utility companies are properly billing the Agency so it can report accurate information to OMB. SSA plans to continue working with GSA and OMB to improve the Agency's energy efficiency.

[30] Id., 52118, Section 2(e).

Question 3: If it is Not Fully Meeting the Requirements, Make Recommendations for Improving its Performance.

The Agency has completed and scheduled several energy audits at Headquarters and regional office buildings. Based on results from an energy audit completed by Science Applications International Corporation, the Agency has an implementation plan in place to address 81 percent of the Energy Conservation Opportunities (ECO) identified in that audit by the end of FY 2013.[31] With these implemented actions in place, the Agency expects to save approximately 21 million kilowatt hours annually, totaling about 34.5 percent of the main campus' use in FY 2010. The Agency also anticipates saving 10 million gallons of water annually, totaling about 37 percent of the main campus' use in FY 2010. As previously noted, for FY 2012, the Agency reduced energy intensity by 22.1 percent and water intensity by 35.6 percent in part due to the implementation of the ECOs identified in the energy audit.

We recommend that the Agency continue using the resources available for these energy audits to identify areas of improvement and seek funding to allow the implementation of the improvements recognized through these audits.

Question 4: The Authorities the Government Entity You Oversee Has to Reduce Emissions of Heat-Trapping Pollution.

We did not identify additional authorities for SSA to reduce emissions of heat-trapping pollution other than the regulations noted in response to Question 1.

Question 5: Its Authorities to Make the Nation More Resilient to the Effects of Climate Change.

The Agency is making strides to meet all requirements of the noted authorities. OMB and DOE approved the Agency's performance data submitted for FY 2012 where SSA reported having met all the requirements noted in the climate change policies. In addition, the Agency is continuing to work with GSA/FEMP to meet the Energy Savings Performance Contract goal and ensure all major renovations comply with the Guiding Principles. In response to our draft report, the Agency provided the following response.

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[31] This audit focused on the following buildings at the Headquarters complex: (1) Altmeyer, (2) East High Rise, (3) East Low Rise, (4) Operations, (5) Annex, (6) West High Rise, (7) West Low Rise, (8) Supply Building, (9) Child Care Center, (10) Salt Dome Maintenance Warehouse, and (11) 10 Guard Shacks.

> The Agency is making strides to meet all requirements of the noted authorities. In March 2011, CEQ issued instructions for federal agencies regarding Climate Change Adaptation Planning, and in March 2012, it issued further instructions requiring agencies to complete a climate change vulnerability analysis and an FY 2013 Climate Change Adaptation Plan, which is to be attached to the Agency's SSPP submitted in June 2013. SSA is in compliance with these requirements, having developed its FY 2013 Climate Change Adaptation Plan in the first quarter of FY 2013. SSA plans to have the final version approved by the Senior Sustainability Officer for submittal to CEQ and OMB with the SSPP in June. In addition to the heart of the plan, which consists of a set of adaptation goals and actions, the plan includes the process used for adaptation planning, a summary of scientific projections of coming change, and the vulnerability and the agency's risk assessments conducted in the process of developing the plan.

The Agency could not provide us with the FY 2013 Climate Change Adaptation Plan for our review and validation because it is still in draft form.

Question 6: The Most Effective Additional Steps it Could Take to Reduce Emissions or Strengthen Resiliency.

As noted in response to Question 3, the Agency has conducted and scheduled several energy audits. Site visits for an audit were completed during FY 2010, and in FY 2012 the Agency started an Energy Savings Performance Contract at Headquarters that included the NCC. By continuing to conduct these audits, the Agency will identify key areas of improvement that will help reduce emissions and strengthen resiliency.

We initiated an audit of SSA's unused office space at Headquarters. Our objective is to identify unused office space in buildings at the SSA Headquarters in Woodlawn, Maryland.

CONCLUSIONS

Although we did not validate all the supporting documentation provided by the Agency, based on OMB's review and approval of the Agency performance, we believe SSA is meeting all the requirements set forth in various climate change legislation. Although SSA appears to be on track to reach all the goals set forth in the applicable legislation, SSA should continue working with GSA and OMB to improve its energy efficiency. We also noted that the Agency's performance results for the various energy measures included both data from the 18 delegated buildings as well as Agency-wide data. The Agency should consider defining in the SSPP what data are used for each measure.

APPENDICES

Appendix A – SOCIAL SECURITY ADMINISTRATION-DELEGATED BUILDINGS

Table A–1: Social Security Administration-Delegated Buildings

Count	Office Location	Federal/Leased
1	ALTMEYER BLDG, MD	Federal
2	OPERATIONS/ROBERT BALL, MD	Federal
3	ANNEX BLDG, MD	Federal
4	SUPPLY BLDG, MD	Federal
5	EAST BLDG – LOW, MD	Federal
6	EAST BLDG – HIGH, MD	Federal
7	NCC, MD	Federal
8	WEST BLDG – LOW, MD	Federal
9	WEST BLDG – HIGH, MD	Federal
10	UTILITY, MD	Federal
11	SSA METRO WEST, MD	Federal
12	SECURITY WEST BLDG, MD	Leased
13	CHILD CARE CENTER, MD	Federal
14	FEDERAL BUILDING (WBDOC), PA	Federal
15	FRANK HAGEL BUILDING (WPSC), CA	Federal
16	JOSEPH P ADDABBO FEDERAL BUILDING (NEPSC), NY	Federal
17	MATPSC, PA	Federal
18	HAROLD WASHINGTON CENTER, IL (GLPSC)	Federal

Appendix B – FEBRUARY 25, 2013 CONGRESSIONAL REQUEST

Congress of the United States
Washington, DC 20515

February 25, 2013

The Honorable Patrick P. O'Carroll
Inspector General
U.S. Social Security Administration
6401 Security Boulevard, Suite 300
Baltimore, MD 21235

Dear Mr. O'Carroll:

Earlier this month, the Government Accountability Office added climate change to its High Risk List. GAO found that climate change "presents a significant financial risk to the federal government." According to GAO, "[t]he federal government is not well organized to address the fiscal exposure presented by climate change." As the co-chairs of the Bicameral Task Force on Climate Change, we are seeking your help in assessing whether the U.S. Social Security Administration is doing everything it can to confront this growing threat.

There are existing requirements that federal agencies carry out policies to address climate change. In 2007, Congress enacted the Energy Independence and Security Act, which requires federal agencies to reduce the energy intensity of federal buildings 30% by 2015, to achieve even greater reductions when renovating existing buildings or constructing new ones, and to designate an energy manager to conduct evaluations and commissioning processes. In 2009, the President issued Executive Order 13514, which directs federal agencies to establish a greenhouse gas emission reduction target for 2020, to reduce vehicle fleet petroleum use by 30% by 2020, and to ensure that 95% of applicable contracts meet sustainability requirements. The order also required the agencies to "evaluate agency climate-change risks and vulnerabilities to manage the effects of climate change on the agency's operations and mission in both the short and long term." In 2010, the President announced that the federal government will reduce its greenhouse gas pollution by 28% by 2020 as a result of targets submitted under Executive Order 13514.

Additionally, the President issued a memorandum requiring agencies to enhance their building energy efficiency through performance-based contracts totaling a minimum of $2 billion across the federal government. Federal agencies also recently released their latest Strategic Sustainability Performance plans, which for the first time include their plans "to reduce the vulnerability of Federal programs, assets, and investments to the impacts of climate change, such as sea level rise or more frequent or severe extreme weather."

As the first part of our request, we ask that you (1) identify the existing requirements in legislation, regulation, executive order, and other directives that apply to the government entity you oversee, (2) assess whether it is meeting these requirements, and (3) if it is not fully meeting the requirements, make recommendations for improving its performance.

In his State of the Union address, the President recognized that additional action by federal agencies is needed to combat climate change. The President called upon federal agencies to "identify additional executive actions from across the administration to help reduce pollution, prepare our cities and nation for the worsening effects of climate change, and accelerate the transition to more sustainable sources of energy." This call to action presents an opportunity and obligation for agencies to develop strategies to meet the challenge of preventing and responding to climate change.

As the second part of our request, we seek your assessment of (1) the authorities the government entity you oversee has to reduce emissions of heat-trapping pollution, (2) its authorities to make the nation more resilient to the effects of climate change, and (3) the most effective additional steps it could take to reduce emissions or strengthen resiliency.

Because this is now a timely matter before both the executive and legislative branches, we ask that you provide answers to these questions as expeditiously as possible, ideally no later than March 29, 2013. If you have any questions, you can contact Kiren Gopal of Rep. Waxman's House Energy and Commerce Committee staff at Kiren.Gopal@mail.house.gov or Emily Enderle of Sen. Whitehouse's staff at Emily_Enderle@whitehouse.senate.gov.

Thank you for your assistance.

Sincerely,

Henry A. Waxman
Co-Chair
Bicameral Task Force on Climate Change
Ranking Member
Committee on Energy & Commerce

Sheldon Whitehouse
Co-Chair
Bicameral Task Force on Climate Change
Chairman
Subcommittee on Oversight, Senate
Committee on Environment and Public Works

Edward J. Markey
Co-Chair
Bicameral Task Force on Climate Change
Ranking Member
Committee on Natural Resources

Benjamin L. Cardin
Co-Chair
Bicameral Task Force on Climate Change
Chairman
Subcommittee on Water and Wildlife, Senate
Committee on Environment and Public Works

Appendix C – SOCIAL SECURITY ADMINISTRATION STRATEGIC SUSTAINABILITY PERFORMANCE PLAN

Social Security Administration

Strategic Sustainability Performance Plan

November 2012

Social Security Administration – 1

CONTENTS

Agency Point of Contact:

Michael J. Keegan

Senior Sustainability Officer

POLICY STATEMENT

The Social Security Administration (SSA) touches the lives of virtually every person in America. We run one of the Nation's largest entitlement programs and the Supplemental Security Income program, providing financial support for the Nation's aged, blind, and disabled adults and children with limited resources. While fulfilling our mission to provide economic security to many individuals, we will continue our history of promoting a clean energy economy, environmental leadership, and sustainability. We will work cooperatively with other Federal, State, county, and local governments to promote sound environmental management practices while providing a safe and healthy work environment for our employees.

We are pleased to publish this Strategic Sustainability Performance Plan, which provides our agency with a structured, systematic approach for managing environmental and regulatory responsibilities to continuously improve overall environmental stewardship.

To promote environmental stewardship, our officials will:

- Comply with all environmental and energy-related statutes, Executive Orders, and any applicable Federal, State, and local regulations.
- Consider environmental aspects when making planning, purchasing, operating, and budgetary decisions.
- Continue our employee awareness campaign to educate and encourage employees to reduce energy consumption and water usage, reduce the amount of waste produced, and promote re-use and recycling whenever possible.
- Continue improving environmental stewardship by setting environmental goals, measuring progress, taking corrective action when necessary, and communicating the results.
- Incorporate climate change and adaptation considerations in our agency operations.
- Communicate and reinforce this policy throughout the agency.

We are pleased to promote environmental leadership and sustainability at SSA.

Michael J. Keegan

Michael J. Keegan

Senior Sustainability Officer

EXECUTIVE SUMMARY

Progress in Fiscal Year 2011

The Social Security Administration achieved some notable successes in fiscal year (FY) 2011. We reduced Scope 1 and 2 greenhouse gas (GHG) emissions by more than 25 percent in FY 2011 compared to the FY 2008 baseline. Our purchase of renewable energy was the prime driver for this reduction: the amount of electricity coming from renewable energy was five times larger in FY 2011 than in FY 2008. The purchase of renewable energy was not the only reason for our success, as our stationary sources of GHG emissions from facility energy consumption were 6.6 percent lower in FY 2011 than in FY 2008.

Reducing our Scope 3 GHG emissions has been more challenging. Emissions generated by our commuting employees dominated our Scope 3 emissions, and these emissions rose in FY 2011 due to the hiring of an additional 2,000 employees in FY 2010 and FY 2011. However, significant reductions in emissions from contracted solid waste and the decrease in employee business air and ground travel offset the increase in emissions secondary to commuters. Overall, Scope 3 emissions, increased by only 0.9 percent compared to the baseline. Despite this increase, we expect to achieve our long-term goal of reducing overall Scope 3 emissions by 13 percent by FY 2020.

We reduced energy intensity by 1.8 percent in FY 2011 relative to a FY 2003 baseline, falling short of the 18 percent goal established by Executive Order (EO) 13423, primarily due to the additional 2,000 employees. However, we hired contractors to conduct energy audits in three of our nine delegated facilities in FY 2010 and FY 2011, and are implementing the recommended energy efficiency measures. We are also procuring energy savings performance contracts (ESPC) for water as well as energy that will improve the efficiency of our operations. We substantially surpassed the target for potable water intensity in FY 2011, delivering a reduction from the FY 2007 baseline of almost 16 percent, compared to the target value of 8 percent. We also exceeded our target for non-hazardous solid waste diversion, avoiding the disposal of 70 percent of our waste stream compared to the EO 13514 goal of 50 percent and the agency goal of 62 percent.

We reduced fleet petroleum consumption by almost 32 percent in FY 2011 relative to the FY 2005 baseline, far exceeding the EO 13423 target of 12 percent. We increased the use of alternative fuel by 3,811 percent in FY 2011 over the baseline, through a combination of replacing conventional fuel vehicles with alternative fuel vehicles (AFV), fueling AFVs using our Headquarters' fueling station, and training fleet liaisons. In FY 2011, we replaced all eligible gasoline vehicles with AVFs or hybrids.

Vision for Fiscal Year 2013

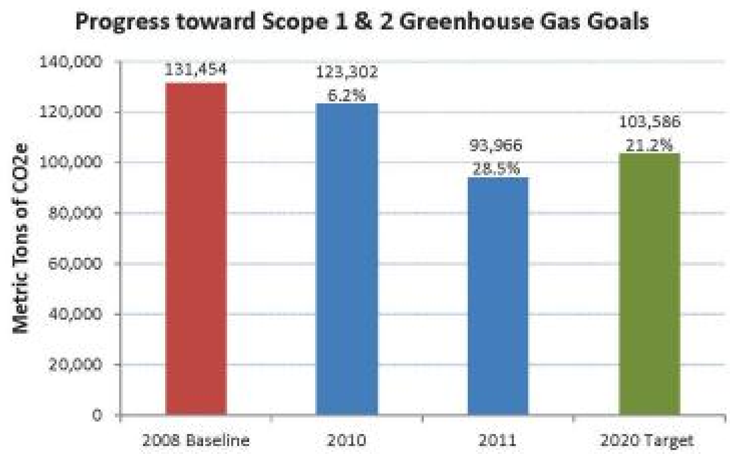
Our sustainability strategy will reduce reliance on fossil fuels. We will achieve this result by continuing to implement energy conservation measures from the 2011 energy audit of Headquarters facilities, reducing fleet petroleum consumption, purchasing renewable energy, and awarding ESPCs in FY 2013. We released Notice of Opportunities for ESPCs for Headquarters and the National Computer Center in March 2012, representing an estimated $8.1 million investment. The ESPCs will address water as well as energy, advancing our progress on Goals 1, 2, and 4. In FY 2013, we will install sub-meters for electricity in our data centers and integrate the meters into our energy information systems. The data center improvements will also include the addition of meters for water. Also, we do not currently meter our landscaping water consumption separately, but next year we will begin using the Department of Energy's Federal Energy Management Program guide, entitled "Guidelines for Estimating Unmetered Landscaping Water Use," to estimate consumption. We will continue to replace all leased gasoline-powered vehicles with AFVs or hybrids as leases expire. To increase the amount of recyclable materials diverted from the waste stream, we will implement single-stream recycling at our Headquarters complex in FY 2012.

SIZE AND SCOPE OF AGENCY OPERATIONS

Agency Size and Scope	FY 2011
Total Number of Employees as Reported in the President's Budget	67,094
Total Acres of Land Managed	0
Total Number of Facilities Owned	0
Total Number of Facilities Leased (GSA and Non-GSA lease)	1,718
Total Facility Gross Square Feet (GSF)	25,624,939
Operates in Number of Locations Throughout U.S.	1,634
Operates in Number of Locations Outside of U.S.	0
Total Number of Fleet Vehicles Owned	7
Total Number of Fleet Vehicles Leased	499

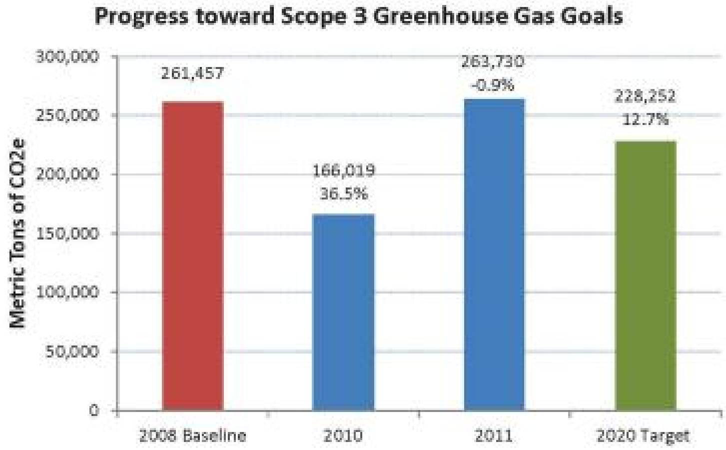
GOAL 1: GREENHOUSE GAS REDUCTION AND MAINTENANCE OF AGENCY COMPREHENSIVE GREENHOUSE GAS INVENTORY

Agency-Specific Performance Metrics for Scope 1 & 2 GHG Emissions Reduction:



Note: E.O. 13514 requires each agency to establish a scope 1 & 2 GHG reduction target for FY2020. The target for this agency is 21.2% compared to FY2008. The red bar represents the agency's FY2008 baseline. The green bar represents the FY2020 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2008 baseline.

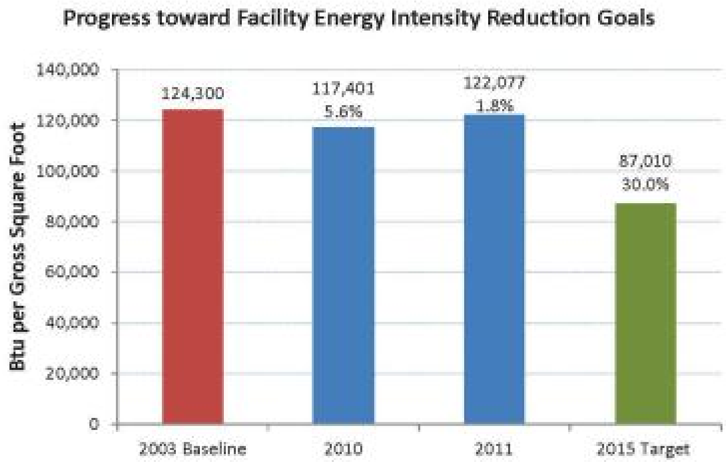
Agency-Specific Performance Metrics for Scope 3 GHG Emissions Reduction:



Note: E.O. 13514 requires each agency to establish a scope 3 GHG reduction target for FY2020. The FY2020 target for this agency is 12.7% compared to the FY2008 baseline. The red bar represents the agency's FY2008 baseline. The green bar represents the FY2020 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2008 baseline. A negative percentage reflects an increase in scope 3 greenhouse gas emissions.

GOAL 2: BUILDINGS

Agency-Specific Performance Metrics for Facility Energy Intensity Reduction:



Note: EISA requires agencies to reduce energy intensity by 18% for FY2011, compared to an FY2003 baseline; a 30% reduction is required by FY2015. The red bar represents the agency's FY2003 baseline. The green bar represents the FY2015 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2003 baseline.

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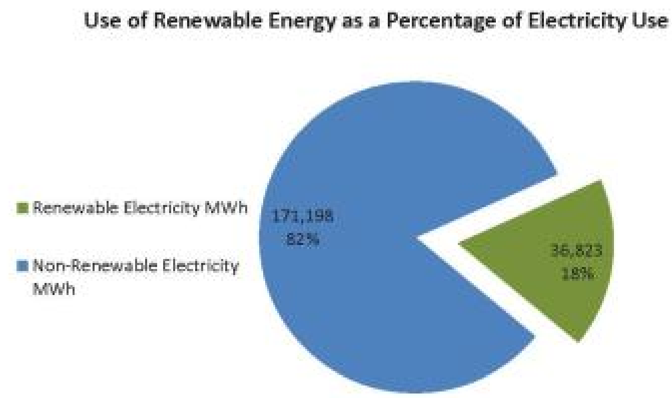
Agency-Specific Performance Metrics for Renewable Energy:



Note: EPAct requires agencies to increase the use of renewable energy as a percentage of electricity use to 5% by FY2010-2012 and 7.5% by FY2013 and beyond.

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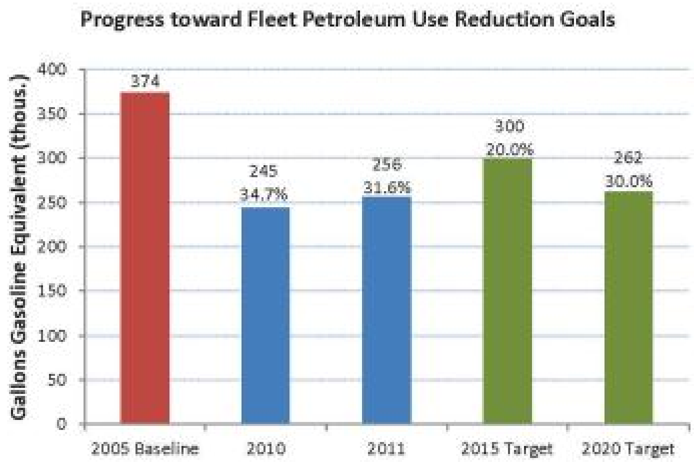
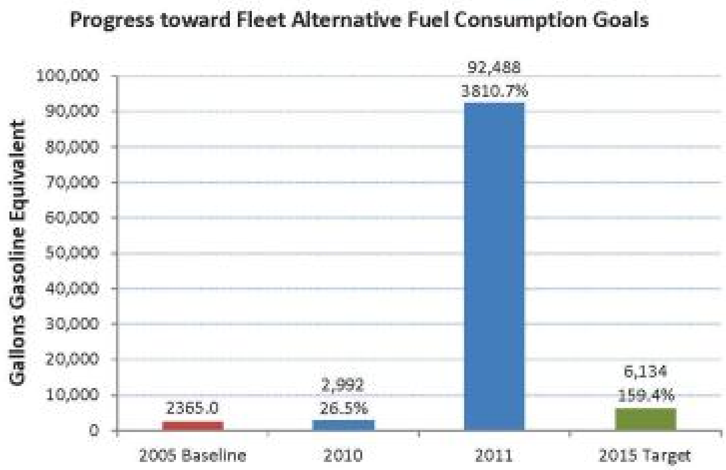
GOAL 3: FLEET MANAGEMENT

Agency-Specific Performance Metrics for Fleet Petroleum Reduction:



Note: E.O. 13514 and EISA require that by FY2011 agencies reduce fleet petroleum use by 12%, compared to an FY2005 baseline. A 20% reduction is required by FY2015 and a 30% reduction is required by FY2020. The red bar represents the agency's FY2005 baseline. The green bars represent the FY2015 and FY2020 target reductions. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2005 baseline.

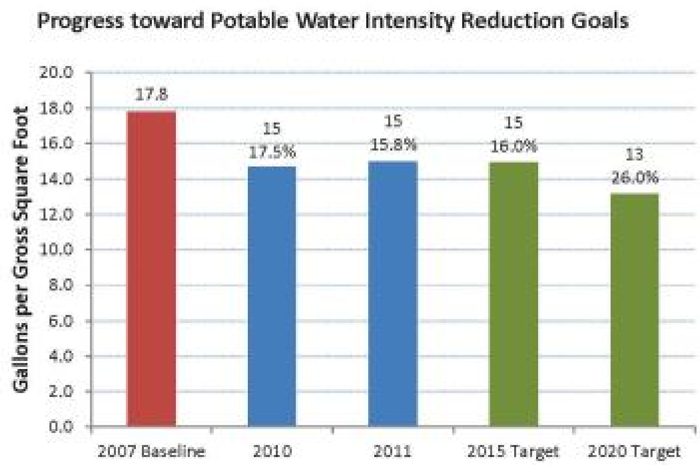
Agency-Specific Performance Metrics for Fleet Alternative Fuel Use:



Note: E.O. 13423 requires that agencies increase total non-petroleum-based fuel consumption by 10% annually compared to an FY2005 baseline. Consequently, by FY2011 agencies must increase alternative fuel use by 77%, compared to an FY2005 baseline. By FY2015, agencies must increase alternative fuel use by 159.4%. The red bar represents the agency's FY2005 baseline. The green bar represents the FY2015 target. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2005 baseline.

GOAL 4: WATER USE EFFICIENCY AND MANAGEMENT

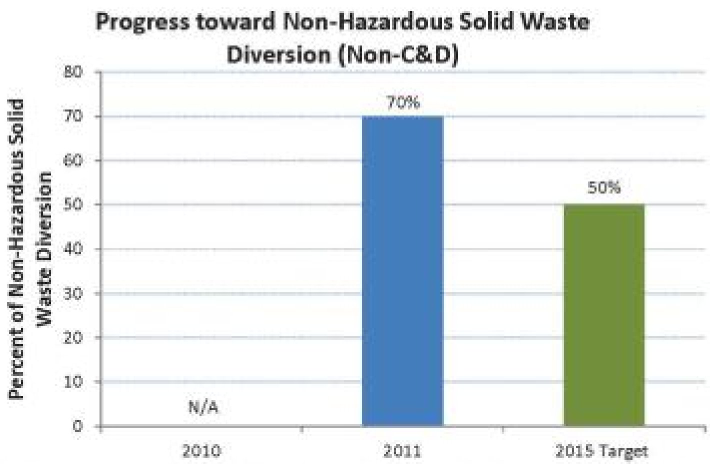
Agency-Specific Performance Metrics for Potable Water Intensity Reduction:



Note: E.O. 13514 requires agencies to reduce potable water intensity by 2% annually through FY2020, compared to an FY2007 baseline. Consequently, by FY2011 agencies are required to reduce potable water intensity by 8%, compared to an FY2007 baseline. A 16% reduction is required by FY 2015 and a 26% reduction is required by FY2020. The red bar represents the agency's FY2007 baseline. The green bars represent the FY2015 and FY2020 target reductions. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2007 baseline.

GOAL 5: POLLUTION PREVENTION AND WASTE REDUCTION

Agency-Specific Performance Metrics for Non-Hazardous Solid Waste Diversion (Non-C&D):



Note: E.O. 13514 requires that by FY2015 agencies annually divert at least 50% of non-hazardous solid waste from disposal. The green bar represents the FY2015 target. The blue bars show actual progress toward the target.

GOAL 7: ELECTRONIC STEWARDSHIP AND DATA CENTERS

EPEAT	POWER MANAGEMENT	END-OF-LIFE	COMMENTS

EPEAT:

	95% or more Monitors and PCs/Laptops purchased in FY2011 was EPEAT Compliant Agency-wide
	85-94% or more Monitors and PCs/Laptops purchased in FY2011 was EPEAT Compliant Agency-wide
	84% or less Monitors and PCs/Laptops purchased in FY2011 was EPEAT Compliant Agency-wide

Power Management:

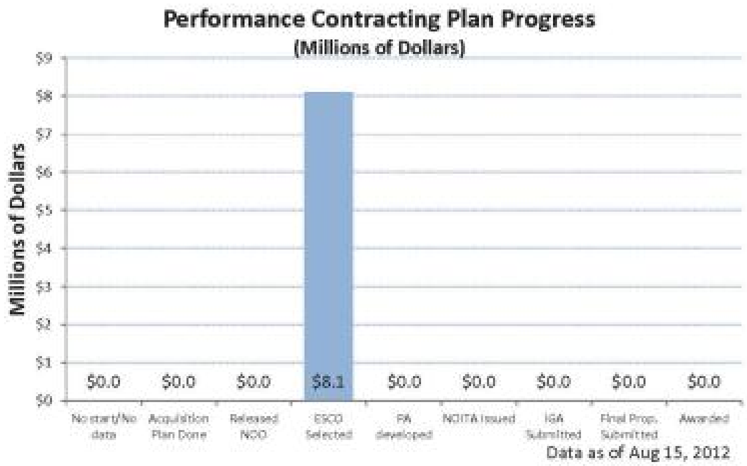
	100% Power Management Enabled Computers, Laptops and Monitors Agency-wide
	90-99% Power Management Enabled Computers, Laptops and Monitors Agency-wide
	89% or less Power Management Enabled Computers, Laptops and Monitors Agency-wide

End-of-Life:

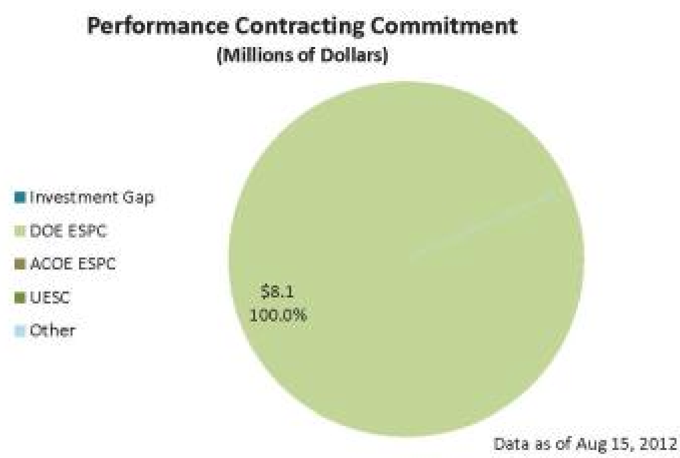
	100% of Electronics at end-of-life disposed through GSA Xcess, CFL, Unicor or Certified Recycler (R2, E-Stewards)
	100% of Electronics at end-of-life disposed through GSA Xcess, CFL, Unicor or non-Certified Recycler
	Less than 100% of Electronics at end-of-life disposed through GSA Xcess, CFL, Unicor or non-Certified Recycler

PRESIDENT'S PERFORMANCE CONTRACTING COMMITMENT

Agency-Specific President's Performance Contracting Commitment Metrics:



Agency-Specific President's Performance Contracting Commitment Metrics:



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Appendix D– SCOPE AND METHODOLOGY

To accomplish our objectives, we:

- Reviewed applicable Federal laws and regulations.
- Obtained performance data from Agency staff.
- Interviewed Agency staff about the implementation projects to address the legislative requirements.
- Reviewed the Agency's performance data to ensure compliance with applicable legislation.

We did not validate the computerized data used during our review; however, we determined the data were sufficiently reliable given our objective, and the intended use of the data should not lead to incorrect or unintentional conclusions.

We performed our review during March 2013 in Baltimore, Maryland. We conducted our review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation.*

Appendix E – MAJOR CONTRIBUTORS

Vicki Vetter, Director, Financial Audit Division

Judith Kammer, Audit Manager, Financial Audit Division

Kelly Stankus, Senior Auditor

MISSION

By conducting independent and objective audits, evaluations, and investigations, the Office of the Inspector General (OIG) inspires public confidence in the integrity and security of the Social Security Administration's (SSA) programs and operations and protects them against fraud, waste, and abuse. We provide timely, useful, and reliable information and advice to Administration officials, Congress, and the public.

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Mail:	Social Security Fraud Hotline P.O. Box 17785 Baltimore, Maryland 21235
FAX:	410-597-0118
Telephone:	1-800-269-0271 from 10:00 a.m. to 4:00 p.m. Eastern Standard Time
TTY:	1-866-501-2101 for the deaf or hard of hearing