



## National Credit Union Administration

March 28, 2013

### Office of Inspector General

The Honorable Henry A. Waxman  
Co-Chair  
Bicameral Task Force on Climate Change  
Ranking Member  
House Committee on Energy and Commerce  
2204 Rayburn House Office Building  
Washington, D.C. 20515

Dear Chairman Waxman:

This letter represents the National Credit Union Administration (NCUA) Office of Inspector General's (OIG) response to the February 25, 2013, letter to numerous Federal agency OIGs from the Co-Chairs of the Bicameral Task Force on Climate Change. The Task Force is seeking information concerning agency actions to address climate change in accordance with Executive Order 13514 of October 5, 2009, "*Federal Leadership in Environmental, Energy, and Economic Performance*," (E.O.) and the "*Energy Independence and Security Act of 2007*" (Act). The letter requested that each OIG identify existing requirements in these legal authorities which apply to the government entity each OIG oversees, and assess whether that Federal agency is meeting these requirements. If not, you requested that the OIG make recommendations for improving performance.

The letter further sought an assessment of any additional authorities the Federal agency has to reduce emissions of heat-trapping pollution and make the nation more resilient to the effects of climate change. Finally, you asked each OIG to assess the most effective additional steps the agency could take to reduce emissions or strengthen resiliency.

#### The Executive Order and the Act

NCUA advised us at the outset of our research into your questions that it was unaware of either the E.O. or the Act. Consequently, after NCUA Office of General Counsel (OGC) reviewed both authorities, it concluded that, while the E.O. is not binding on NCUA, the Act is, and NCUA must comply with the Act's applicable requirements. Specifically, the OGC determined that Titles III, IV, and V of the Act mandate actions that apply to NCUA. Because NCUA was unaware—prior to our inquiry—of the requirements imposed under the Act, the many steps the agency has taken over the years to ensure energy efficiency in its headquarters and regional office facilities were not done under the aegis of the Act's requirements. Nevertheless, we delineate below the energy and environmental stewardship measures NCUA has taken recently and over the past decade.

## NCUA Energy Stewardship

NCUA is a relatively small agency, with 1,195 employees. Of these employees, 831 do not routinely report to an agency-owned or leased building to accomplish their official duties.<sup>1</sup> Of the seven (7) office buildings throughout the nation where employees report to duty, NCUA owns two (2) of these buildings and leases the remaining five (5) from private, non-government entities. The following discussion sets forth the measures the agency has undertaken and implemented to conserve energy and improve energy efficiency in NCUA facilities.<sup>2</sup>

### NCUA Headquarters Facility

NCUA headquarters building in Alexandria, Virginia was built in 1993 with an automated energy management system and with load share capabilities. At that time, the agency installed sensor lighting as well as adjustable thermostats with a temperature range of 74-76 degrees. Property management staff also had the ability to set parameters for the operation of different building systems (time of operation, equipment use, control of temperature in each office) through a software-based program.

Throughout the years, NCUA has made changes and additions to the equipment and to the software to achieve greater energy efficiency in the headquarters. These changes and additions include the following:

1. Retrofitted the parking garage lighting to T-8 light bulbs;
2. Turned off building operations on Saturdays, Sundays, and holidays;
3. Installed variable frequency drives (VFDs) on most of the building equipment (chillers, pumps, fans, air handler units, etc.);
4. Changed the agency's electric schedule with Dominion Virginia Power to Schedule 10. This allows NCUA to pay a lower cost for electricity by using the generator on high usage days determined by Dominion;
5. Installed a ground level meter to measure water evaporation from our cooling tower;
6. Contracted with PEPCO Energy Services in 2004 to survey the building to find additional ways to save energy. The report offered three recommendations, two of which NCUA found cost-effective and, in 2005, implemented: (1) retrofit main lobby lighting; and (2) replace one of the main condenser pump motors to a higher efficiency motor;
7. Also in 2005, installed solar film on all building windows. NCUA concurrently repaired the building façade, a project that involved caulking all windows and replacing sealant to better insulate the building;
8. In 2007, NCUA contract cleaners switched to green cleaning products where possible for building maintenance; and

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<sup>1</sup> This category includes field employees and remote duty station employees.

<sup>2</sup> While our review was able to gather information regarding NCUA's headquarters building and 4 of the five regional office leased sites, NCUA was unable to provide information about its Region I leased building located in Albany, New York or the Asset Management and Assistance Center leased office space located in Austin, Texas.

9. In 2008, in an effort to seal the building and reduce the amount of energy escaping from the building, NCUA completed additional façade work to replace worn out mortar, caulked windows and balcony doors, and replaced broken bricks.
10. In 2010, NCUA also completed the following:
  - upgraded light fixtures in offices and conference rooms to a more efficient T-5 bulb;
  - installed light sensors in all office and file rooms to ensure lights would turn off when the rooms were unoccupied; and
  - renovated all kitchens and pantries to include energy efficient appliances and lighting.
11. In 2011, NCUA:
  - introduced energy efficient lighting into the rest rooms and fitness center;
  - replaced original emergency generator with new generator; and
  - switched the contractor crew work schedule to daytime business hours, from evening hours.
12. In 2013, NCUA:
  - signed a 5-year contract with EnerNoc to move the generator to load-shed on an as-needed basis. This will reduce the amount of electricity NCUA uses to operate, while giving the electric company back the power for use elsewhere during peak periods during the summer months;
  - NCUA anticipates, on April 1, 2013, obtaining an Energy Star certificate with a rating of 79; and
  - Upgraded the meter to measure evaporation of water from the cooling tower.

#### Austin, Texas Facility

NCUA also owns a building located in Austin Texas, which houses its Region IV offices. Actions taken to conserve energy in that facility include the following:

1. Installed window film;
2. Switched to energy efficient light bulbs and ballasts; and
3. Replaced old HVAC units with units that have a Seasonal Energy Efficiency Rating (SEER) of at least 13 (very energy efficient).

#### Region II Facility (Alexandria, Virginia)

NCUA leases office space in this building, located across the street from its headquarters building. This new office space was built to include the following:

1. Energy efficient lighting fixtures with motion sensors;
2. Use of low volatile organic compounds (VOC) paint; and
3. Energy efficient appliances installed in the kitchen area.

Region III (Atlanta, Georgia)

This leased office space includes the following:

1. Installed motion sensor light switches; and
2. Use of LED desk lamps or daylight instead of office lights when possible.

Region V – (Tempe, Arizona)

This leased office space is within a building less than five years old, and which was built to be energy efficient. It also includes the following energy saving features:

1. Office lighting is on a 24-hour timer; and
2. NCUA purchased and uses energy efficient equipment.

In addition to the foregoing, NCUA has long offered all of its employees the choice of flexible work schedules and the option of telecommuting. It encourages the use of public transportation through participation in the transit subsidy program. In addition, it has implemented the following actions:

1. Allows episodic telecommuting one to two days a week for eligible positions;
2. Encourages the use of carpooling or public transportation to the office. For its field examiners, NCUA encourages carpooling to and from credit unions where possible;
3. Encourages the use of web-based training where possible; and
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NCUA Green Initiatives

When NCUA's current Chairman, Debbie Matz, returned to NCUA Board in 2009, she set the goal of making NCUA a model corporate citizen, including leading in the implementation of environmentally sound practices through the GreenNCUA Initiative. Some recent accomplishments of the GreenNCUA Initiative include:

1. Reducing Paper Use. The Chairman championed an effort to reduce the circulation of paper within the agency. The agency eliminated the hard copy distribution of several recurring documents and manuals which staff now accesses electronically. The paper reduction initiative further involved aggressively promoting NCUA Express and NCUA CU Express systems that distribute NCUA communications via email. In the last two years, NCUA sent out millions of emails via these systems, saving countless sheets of paper and greatly reducing the environmental costs for mail delivery. Additionally, NCUA adopted new software reducing its use of paper and toner by more than 75 percent.
2. Recycling Waste. The Central Office hosted information technology and paper recycling days, collecting more than 30 boxes of electronic equipment and 20 boxes of paper beyond normal recycling procedures. NCUA also now recycles all obsolete cell phones.

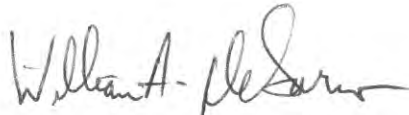
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3. Protecting the Environment. When conducting refurbishment projects, NCUA now requires the use of paint low in VOCs. NCUA also uses a bulb crusher when disposing burned out bulbs. When full, the contents are shipped to a recycling facility.

With regard to your request that we assess any additional authorities NCUA relies upon to reduce emissions of heat-trapping pollution and make the nation more resilient to the effects of climate change, we have not identified any such additional authorities. Moreover, we are not at this time making recommendations for improving performance or assessing additional steps the agency could take to reduce emissions or strengthen resiliency. Rather, we are recommending that NCUA, now that it is aware of the Act and the requirements incumbent upon it, conduct a full analysis of the Act and devise a plan—and share that plan with us—for meeting those requirements.

Please let me know if we can provide further assistance. We welcome the opportunity to work with the Task Force in promoting economy, efficiency, and effectiveness in government operations to combat climate change.

Sincerely,



William A. DeSarno  
Inspector General



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The Honorable Sheldon Whitehouse  
Co-Chair  
Bicameral Task Force on Climate Change  
Chairman  
Subcommittee on Oversight  
Senate Committee on Environment and Public Works  
530 Hart Senate Office Building  
Washington, D.C. 20510

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## National Credit Union Administration

March 28, 2013

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Co-Chair  
Bicameral Task Force on Climate Change  
Ranking Member  
House Committee on Natural Resources  
2108 Rayburn House Office Building  
Washington, D.C. 20515

Dear Chairman Markey:

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NCUA is a relatively small agency, with 1,195 employees. Of these employees, 831 do not routinely report to an agency-owned or leased building to accomplish their official duties.<sup>1</sup> Of the seven (7) office buildings throughout the nation where employees report to duty, NCUA owns two (2) of these buildings and leases the remaining five (5) from private, non-government entities. The following discussion sets forth the measures the agency has undertaken and implemented to conserve energy and improve energy efficiency in NCUA facilities.<sup>2</sup>

#### NCUA Headquarters Facility

NCUA headquarters building in Alexandria, Virginia was built in 1993 with an automated energy management system and with load share capabilities. At that time, the agency installed sensor lighting as well as adjustable thermostats with a temperature range of 74-76 degrees. Property management staff also had the ability to set parameters for the operation of different building systems (time of operation, equipment use, control of temperature in each office) through a software-based program.

Throughout the years, NCUA has made changes and additions to the equipment and to the software to achieve greater energy efficiency in the headquarters. These changes and additions include the following:

1. Retrofitted the parking garage lighting to T-8 light bulbs;
2. Turned off building operations on Saturdays, Sundays, and holidays;
3. Installed variable frequency drives (VFDs) on most of the building equipment (chillers, pumps, fans, air handler units, etc.);
4. Changed the agency's electric schedule with Dominion Virginia Power to Schedule 10. This allows NCUA to pay a lower cost for electricity by using the generator on high usage days determined by Dominion;
5. Installed a ground level meter to measure water evaporation from our cooling tower;
6. Contracted with PEPCO Energy Services in 2004 to survey the building to find additional ways to save energy. The report offered three recommendations, two of which NCUA found cost-effective and, in 2005, implemented: (1) retrofit main lobby lighting; and (2) replace one of the main condenser pump motors to a higher efficiency motor;
7. Also in 2005, installed solar film on all building windows. NCUA concurrently repaired the building façade, a project that involved caulking all windows and replacing sealant to better insulate the building;
8. In 2007, NCUA contract cleaners switched to green cleaning products where possible for building maintenance; and

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<sup>1</sup> This category includes field employees and remote duty station employees.

<sup>2</sup> While our review was able to gather information regarding NCUA's headquarters building and 4 of the five regional office leased sites, NCUA was unable to provide information about its Region I leased building located in Albany, New York or the Asset Management and Assistance Center leased office space located in Austin, Texas.

9. In 2008, in an effort to seal the building and reduce the amount of energy escaping from the building, NCUA completed additional façade work to replace worn out mortar, caulked windows and balcony doors, and replaced broken bricks.
10. In 2010, NCUA also completed the following:
  - upgraded light fixtures in offices and conference rooms to a more efficient T-5 bulb;
  - installed light sensors in all office and file rooms to ensure lights would turn off when the rooms were unoccupied; and
  - renovated all kitchens and pantries to include energy efficient appliances and lighting.
11. In 2011, NCUA:
  - introduced energy efficient lighting into the rest rooms and fitness center;
  - replaced original emergency generator with new generator; and
  - switched the contractor crew work schedule to daytime business hours, from evening hours.
12. In 2013, NCUA:
  - signed a 5-year contract with EnerNoc to move the generator to load-shed on an as-needed basis. This will reduce the amount of electricity NCUA uses to operate, while giving the electric company back the power for use elsewhere during peak periods during the summer months;
  - NCUA anticipates, on April 1, 2013, obtaining an Energy Star certificate with a rating of 79; and
  - upgraded the meter to measure evaporation of water from the cooling tower.

#### Austin, Texas Facility

NCUA also owns a building located in Austin Texas, which houses its Region IV offices. Actions taken to conserve energy in that facility include the following:

1. Installed window film;
2. Switched to energy efficient light bulbs and ballasts; and
3. Replaced old HVAC units with units that have a Seasonal Energy Efficiency Rating (SEER) of at least 13 (very energy efficient).

#### Region II Facility (Alexandria, Virginia)

NCUA leases office space in this building, located across the street from its headquarters building. This new office space was built to include the following:

1. Energy efficient lighting fixtures with motion sensors;
2. Use of low volatile organic compounds (VOC) paint; and
3. Energy efficient appliances installed in the kitchen area.

Region III (Atlanta, Georgia)

This leased office space includes the following:

1. Installed motion sensor light switches; and
2. Use of LED desk lamps or daylight instead of office lights when possible.

Region V – (Tempe, Arizona)

This leased office space is within a building less than five years old, and which was built to be energy efficient. It also includes the following energy saving features:

1. Office lighting is on a 24-hour timer; and
2. NCUA purchased and uses energy efficient equipment.

In addition to the foregoing, NCUA has long offered all of its employees the choice of flexible work schedules and the option of telecommuting. It encourages the use of public transportation through participation in the transit subsidy program. In addition, it has implemented the following actions:

1. Allows episodic telecommuting one to two days a week for eligible positions;
2. Encourages the use of carpooling or public transportation to the office. For its field examiners, NCUA encourages carpooling to and from credit unions where possible;
3. Encourages the use of web-based training where possible; and
4. Encourages the use of video conference or teleconference in lieu of face-to-face meetings.

NCUA Green Initiatives

When NCUA's current Chairman, Debbie Matz, returned to NCUA Board in 2009, she set the goal of making NCUA a model corporate citizen, including leading in the implementation of environmentally sound practices through the GreenNCUA Initiative. Some recent accomplishments of the GreenNCUA Initiative include:

1. Reducing Paper Use. The Chairman championed an effort to reduce the circulation of paper within the agency. The agency eliminated the hard copy distribution of several recurring documents and manuals which staff now accesses electronically. The paper reduction initiative further involved aggressively promoting NCUA Express and NCUA CU Express systems that distribute NCUA communications via email. In the last two years, NCUA sent out millions of emails via these systems, saving countless sheets of paper and greatly reducing the environmental costs for mail delivery. Additionally, NCUA adopted new software reducing its use of paper and toner by more than 75 percent.
2. Recycling Waste. The Central Office hosted information technology and paper recycling days, collecting more than 30 boxes of electronic equipment and 20 boxes of paper beyond normal recycling procedures. NCUA also now recycles all obsolete cell phones.

Further, NCUA purchases only recycled paper and double-sided printing is now the default setting on all of the agency's network printers.

3. Protecting the Environment. When conducting refurbishment projects, NCUA now requires the use of paint low in VOCs. NCUA also uses a bulb crusher when disposing burned out bulbs. When full, the contents are shipped to a recycling facility.

With regard to your request that we assess any additional authorities NCUA relies upon to reduce emissions of heat-trapping pollution and make the nation more resilient to the effects of climate change, we have not identified any such additional authorities. Moreover, we are not at this time making recommendations for improving performance or assessing additional steps the agency could take to reduce emissions or strengthen resiliency. Rather, we are recommending that NCUA, now that it is aware of the Act and the requirements incumbent upon it, conduct a full analysis of the Act and devise a plan—and share that plan with us—for meeting those requirements.

Please let me know if we can provide further assistance. We welcome the opportunity to work with the Task Force in promoting economy, efficiency, and effectiveness in government operations to combat climate change.

Sincerely,

A handwritten signature in black ink, appearing to read "William A. DeSarno", with a long horizontal flourish extending to the right.

William A. DeSarno  
Inspector General