

**GENERAL MANAGEMENT:  
Treasury Faces Challenges In Meeting  
Goals Established In The National Energy  
Conservation Policy Act**

OIG-CA-03-003

January 10, 2003



**Office of Inspector General**

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The Department of the Treasury

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## Abbreviations

ATF	Bureau of Alcohol, Tobacco and Firearms
BBtu	Billion Btu
BEP	Bureau of Engraving and Printing
BPD	Bureau of the Public Debt
Btu	British thermal unit
Customs	U.S. Customs Service
DO	Departmental Offices
DOE	Department of Energy

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ECO	Energy Conservation Opportunities
EPACT	Energy Policy Act
FLETC	Federal Law Enforcement Training Center
FY	Fiscal Year
FMS	Financial Management Service
GSF	Gross Square Foot
IRS	Internal Revenue Service
Mint	U.S. Mint
NECPA	National Energy Conservation Policy Act
OCC	Office of the Comptroller of the Currency
OTS	Office of Thrift Supervision
OSHE	Office of Safety, Health and Environment
TIGTA	Treasury Inspector General for Tax Administration
Secret Service	U.S. Secret Service

*The Department of the Treasury  
Office of Inspector General*

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January 10, 2003

Teresa Mullett Ressel  
Acting Assistant Secretary for Management  
and Chief Financial Officer

The Energy Policy Act of 1992 (EPACT) encourages each Inspector General to periodically review its agency's progress on energy conservation. On July 26, 2001, the Chairman and Ranking Member of the U.S. Senate Committee on Government Affairs expressed their continued interest in the Department's energy conservation issues in a letter to our office.

In coordination with the Treasury Inspector General for Tax Administration (TIGTA), we conducted a review of Treasury's compliance with National Energy Conservation Policy Act (NECPA) as amended by EPACT. TIGTA will report separately on the Internal Revenue Service (IRS). Our objective was to determine whether Treasury met the goal established for Fiscal Year (FY) 2000 and will likely meet the Administration's goals for FY 2005 and FY 2010. This report covers what was discovered from the fieldwork and the review of the energy consumption data obtained from the Department's energy management officer and the bureaus' energy management coordinators.

We conducted fieldwork from March 2002 through May 2002 at Treasury headquarters with limited information verification at selected bureaus. We provide a more detailed description of our review approach in Appendix 1.

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## Results in Brief

Treasury, excluding IRS, slightly missed the energy efficiency goal established for its standard buildings for FY 2000 by NECPA as amended by EPACT. Treasury achieved a 19.5 percent energy consumption reduction from the base year FY 1985 on a Btu-per-Gross-Square-Foot (GSF) basis.<sup>1</sup> Four (4) of its 9 bureaus<sup>2</sup> that occupy standard buildings and are responsible to submit energy consumption reports did not meet the goal.<sup>3</sup>

Treasury's overall progress in energy conservation showed little change in recent years. The slow-down makes it difficult to anticipate that Treasury will meet mandated future goals, established for FY 2005 and FY 2010. Additionally, most of Treasury's law enforcement bureaus and offices will be divested from the Department during FY 2003 in accordance with the recently enacted Homeland Security Act of 2002. The divestiture will impact Treasury's achievement of the future energy conservation goals.

Treasury has made considerable efforts to improve energy efficiency in its industrial facilities. Despite the efforts, the improvement has not been sufficient, and Treasury may face challenges in meeting the future goals established for FY 2005 and FY 2010.<sup>4</sup>

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<sup>1</sup> British thermal unit (Btu) is the quantity of heat required to raise the temperature of one pound of water by one degree Fahrenheit.

<sup>2</sup> IRS' progress on energy conservation will be addressed by TIGTA. Among Treasury's other bureaus, the Financial Crimes Enforcement Network occupies leased space and does not have direct facility-management responsibility and the Office of the Comptroller of the Currency (OCC) has not reported energy-consumption data until recently and was excluded from our review. The Bureau of Alcohol, Tobacco and Firearms (ATF), U.S. Mint (Mint), and Bureau of Engraving and Printing (BEP) are classified as industrial bureaus. The U.S. Secret Service (Secret Service) occupies both standard and industrial buildings.

<sup>3</sup> Some Treasury bureaus had initiated several energy-conservation projects in FY 2001, which were not reflected in the achievement of the FY 2000 goal.

<sup>4</sup> Unlike for standard buildings, there was no mandated goal established for industrial bureaus for FY 2000.

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We recommend that the Assistant Secretary for Management and Chief Financial Officer provide the necessary support to the Director of Office of Safety, Health and Environment (OSHE) to lead energy saving efforts by facilitating the energy conservation activities of the bureaus. With respect to the industrial bureaus, OSHE should assist the Mint and BEP in (1) implementing the energy saving measures already identified during recent Department of Energy (DOE)'s energy assessments, (2) developing a new measure tied to production rather than square footage, and (3) identifying additional saving opportunities.

In its response to our draft report, Management stated that OSHE will engage the bureaus individually, and as a group, to fully identify the challenges they face in meeting the reduction goals. OSHE will also work with the bureaus to identify projects that will assist them in meeting the goals, funding sources for the projects, and monitor progress. Specific action plans with goals and timeframes were outlined as well.

Management, however, pointed out that the energy consumption data that were used in the review did not reflect recent energy-saving activities implemented by Treasury bureaus. It raised a question about the source of the data, and commented that our draft report did not identify the underlying causes for the poor performance. Management also pointed out that the exclusion of the IRS, which accounts for 60 to 70 percent of the Department's annual energy consumption, "produced a set of data that does not represent Department overall." Management's response is provided in Appendix 2.

The data that we used were provided by OSHE and the sole source of our analysis. Although some of the bureaus implemented a series of energy-saving projects after FY 2000, according to the data provided by OSHE, the effects at least for FY 2001 were negligible. We identified the underlying cause for the poor performance of the industrial bureaus, and that is they have not developed a uniform measure that could appropriately measure their improvement. The IRS, the biggest energy consumer in the Department, was not included in the scope of our review.

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## Background

NECPA, as amended by EPACK of 1992, requires Federal agencies to take measures necessary to reduce energy consumption in Federal buildings by 20 percent by FY 2000 compared to FY 1985 consumption levels. Executive Order 13123 adds additional goals by mandating energy consumption reduction by 30 percent by FY 2005 and 35 percent by FY 2010 relative to FY 1985. Executive Order 13123 also requires Federal agencies to reduce energy use in Federal buildings classified as industrial/laboratory facilities<sup>5</sup> by 20 percent by FY 2005 and 25 percent by FY 2010 from FY 1990 levels.

Treasury Directive 75-04, *Energy Management Program*, issued on April 27, 2001, establishes policies and assigns responsibilities in order to comply with Executive Order 13123, particularly to meet the established energy reduction goals. EPACK of 1992 encourages each Inspector General to conduct periodic reviews of its agency compliance with the provisions of the Act and other laws relating to energy consumption.

An initial audit survey of Treasury's compliance with NECPA was conducted by our office in 1993 to (1) identify agency compliance with prescribed energy conservation practices in Federal buildings and (2) determine whether the agency has the internal accounting mechanisms necessary to assess the accuracy and reliability of energy consumption and energy cost figures. The audit survey concluded that Treasury was in general compliance with EPACK, but might not be able to meet the energy conservation goals established for FY 2000 due to the IRS Tax System Modernization project and certain new coin production requirements of the Mint.

Despite much verification effort, some of the bureaus' energy-consumption data – particularly Departmental Offices (DO)'s base-year data – remain questionable and require further examination.

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<sup>5</sup> NECPA defines the industrial/laboratory facilities as those that their primary functions are energy-intensive industrial operations, certain research and development activities, or electronics-intensive operations.

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In addition, OCC has not reported its energy-consumption data until recently. It has just begun to reconstruct the past years' data and the result could change the overall Treasury's energy conservation standing, although the effect is not known at this time.

Except for its headquarters building, the rest of the IRS' facilities have been reclassified as industrial since FY 2001. This reclassification dwarfs the significance of presenting the Treasury-wide industrial energy efficiency exclusive of IRS, as IRS consumes more energy than the other four industrial bureaus combined.<sup>6</sup>

In FY 2003, Treasury will divest most law enforcement activities to other Federal agencies. The bureaus that will be divested in part or in whole to the new Department of Homeland Security are the U.S. Customs Service (Customs), Secret Service, and Federal Law Enforcement Training Center (FLETC). ATF's law enforcement responsibilities are to be divested to the Department of Justice. The divestiture of the bureaus will impact Treasury's efforts to achieve future energy conservation goals.

## Finding and Recommendation

### **Finding 1A Treasury, Excluding The IRS, Slightly Missed Its Energy Efficiency Goal For Standard Buildings In FY 2000, And Faces Challenges In Meeting The Future Goals**

In FY 2000, Treasury, excluding the IRS, reduced its energy consumption 19.5 percent on a Btu-per-GSF basis when compared with the baseline FY 1985; this was a half of a percentage point below the goal established for standard buildings. Four (4) of its 9 bureaus occupying standard buildings – Customs, FLETC, Financial Management Service (FMS), and Bureau of the Public Debt (BPD) – did not meet the goal. (See Table 1A and Figure 1A.)

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<sup>6</sup> In FY 2001, IRS consumed 1,245 billion Btu in its industrial facilities, while the combined four other industrial bureaus consumed 942 billion Btu.



Table 1A. Energy Use, Space, Energy Use per Gross Square Foot in Standard Buildings for FY 2000

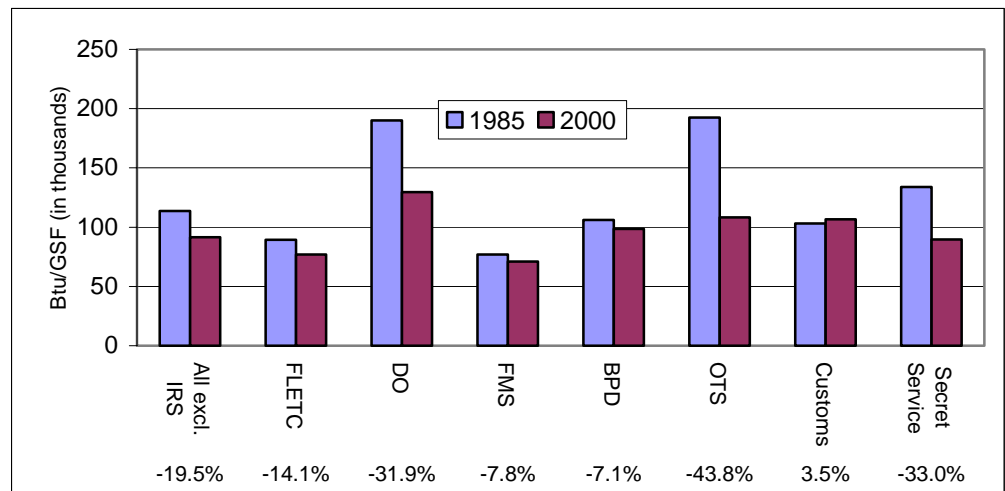
	BTU (Billions)	GSF (000)	BTU/GSF (000)	BTU/GSF Percent Change from FY1985
All excluding IRS	426	4,660	91.4	-19.5
FLETC	183	2,380	76.8	-14.1
DO	77	595	129.4	-31.9
FMS	18	249	70.9	-7.8
BPD	30	304	98.6	-7.1
OTS*	32	300	108.1	-43.8
Customs	72	671	107.3	3.5
Secret Service**	14	161	86.9	-33.0

\*: OTS stands for Office of Thrift Supervision.

\*\* : Secret Service occupies both standard and industrial facilities. Secret Service here refers to its standard buildings.

Source: OSHE

Figure 1A. Energy Use per Gross Square Foot in Standard Buildings for FY 1985 and FY 2000



Note: Numbers below bureau names represent total percent change in energy use from 1985 to 2000.

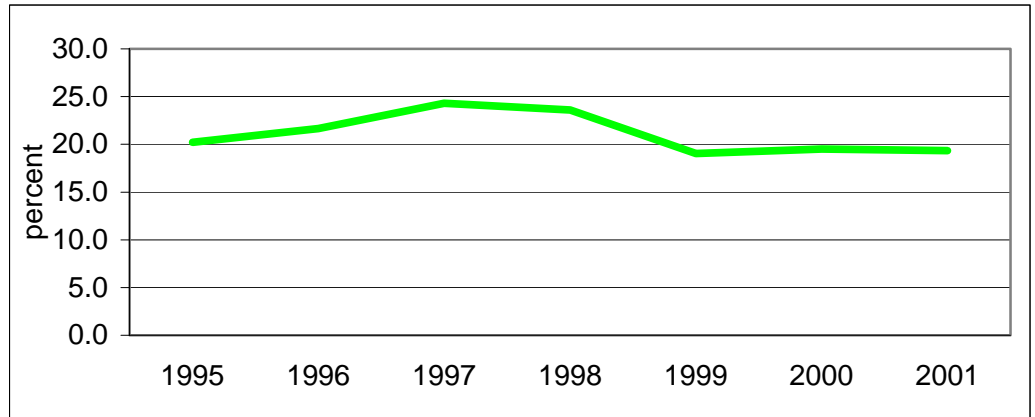
Source: OSHE

In addition, the prospects of meeting the FY 2005 and FY 2010 goals face challenges, as the recent progress on energy

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conservation shows little change. Since 1999, the energy reduction rate has been leveled off at below 20 percent. (See Figure 1B.)

Figure 1B. Energy Conservation Improvement in Standard Buildings in Recent Years



Note: Reduction in Btu/GSF relative to base year 1985 is expressed in percent.  
Source: OSHE

FLETC, the biggest energy user in this class, was unable to meet the goal due to a rapid expansion in its mission that lead to significant use of temporary facilities, such as energy-inefficient trailers. FLETC began to install energy-efficient measures prior to FY 2000, but the full benefits of the measures were not realized until recently. At the end of FY 2001, FLETC reached 21.8 percent energy reduction.

DO exceeded the goal, yet its energy efficiency was quite low, as it used 129.4 Btu per GSF in FY 2000.<sup>7</sup> Through an internal audit DO identified additional energy conservation opportunities (ECOs), but the measures to address the opportunities have not been implemented.

Due to small and decentralized nature of its facilities, Customs' energy consumption is affected largely by temperature variation,

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<sup>7</sup> According to *Annual Report to Congress on Federal Government Energy Management and Conservation Programs Fiscal Year 2000*, the average U.S. civilian agencies' energy efficiency is 108.9 Btu/GSF.

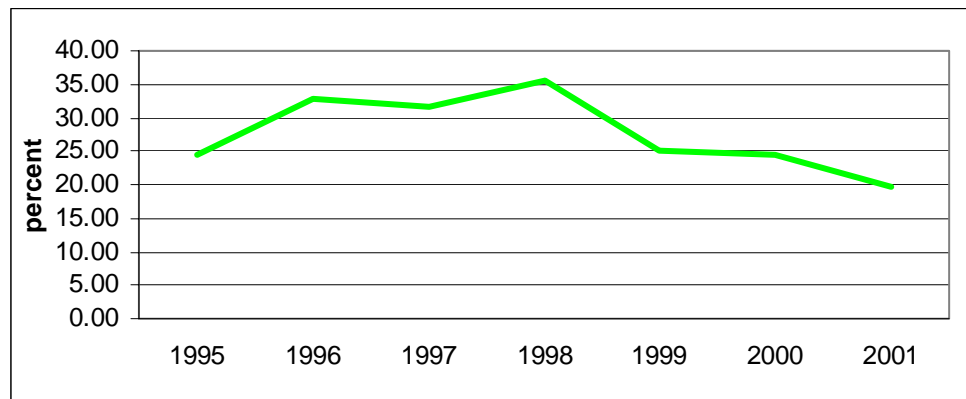
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which would eclipse any effects gained from energy-saving measures.<sup>8</sup> Nonetheless, Customs has not improved its energy efficiency.

These three bureaus consumed more than two thirds of the energy used by Treasury, excluding the IRS. Executive Order 13123 mandates each agency to reduce energy use by 30 percent in FY 2005 and 35 percent in FY 2010 relative to the base year 1985.

With the divestiture of FLETC, Customs, and Secret Service, Treasury's success in meeting the goals depends upon the remaining four bureaus' sustained improvement in energy conservation. Figure 1C below shows the recent energy conservation improvement of the four remaining bureaus (DO, FMS, BPD, and OTS).

Figure 1C. Energy Conservation Improvement in Standard Buildings in Recent Years excluding the Bureaus to be Divested



Note: Reduction in Btu/GSF relative to base year 1985 is expressed in percent.  
Source: OSHE

The graph shows that the combined four bureaus' performance has slid down from the peak in FY 1998, and fell below 20 percent in FY 2001. To bring up the improvement levels to 30 percent by FY 2005 and 35 percent by FY 2010, Treasury needs to maintain the earlier-years' energy conservation efforts illustrated in the graph.

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<sup>8</sup> The Customs' border stations that report energy-consumption figures are located at more than 40 different locations.

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**Finding 1B****Treasury, Excluding The IRS, Has Made Efforts To Improve The Energy Efficiency In Its Industrial Facilities, But The Data Trends Suggest That Treasury May Face Challenges In Meeting The Future Goals**

Four bureaus – Secret Service, ATF, Mint, and BEP – occupy buildings classified as industrial/laboratory facilities. Stepped-up efforts are needed to conserve energy and make progress toward the energy efficiency goals established for FY 2005 and FY 2010 by Executive Order 13123. The goals are 20 percent and 25 percent, respectively.

Excluding ATF, which began occupying at a new facility in FY 2000, the bureaus did not reduce their energy consumption levels compared to the base year FY 1990 when measured in Btu/GSF. Instead, the three bureaus increased energy consumption in FY 2000 relative to FY 1990. (See Table 2 and Figure 2.)

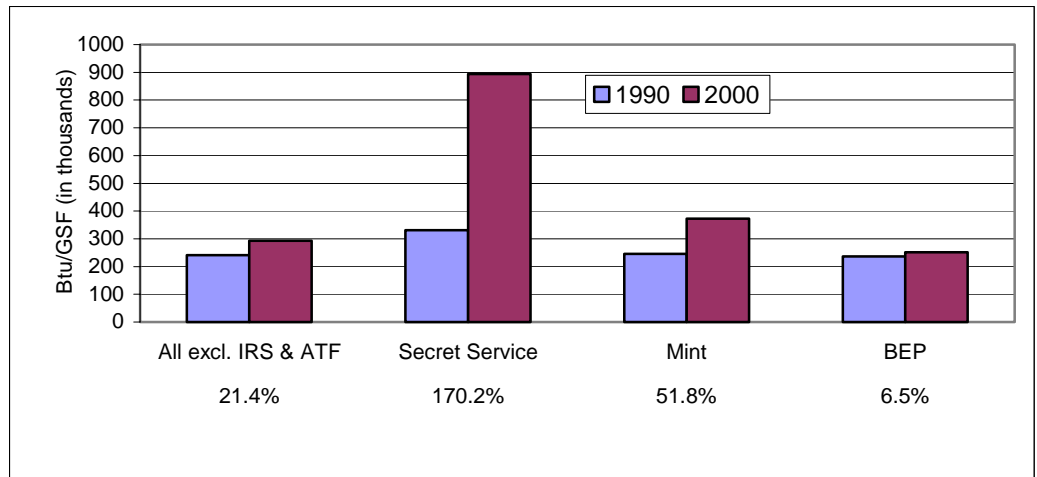
Table 2. Energy Use, Space, Energy Use per GSF in Industrial/Laboratory Facilities for FY 2000

	BTU (Billions)	GSF (000)	BTU/GSF (000)	BTU/GSF Percent Change from FY1990
All excluding IRS and ATF	902	3,084	292.4	21.4
Secret Service	11	13	893.6	170.2
Mint	362	972	372.4	51.8
BEP	529	2,100	271.9	6.5

Note: Secret Service here refers to Secret Service' industrial facility.

Source: OSHE

Figure 2. Energy Use per GSF in Industrial Facilities for FY 1990 and FY 2000



Note: Numbers below bureau names represent total percent change in energy use from 1990 to 2000.

Source: OSHE

Due to the lack of a common unit of production, Treasury has used the Btu/GSF as the tool to measure the industrial bureaus' energy efficiency. However, the Btu/GSF-based improvement figures shown in the last column of the table are misleading, because they do not reflect the improvements that some of the bureaus have made. Mint, for instance, has achieved 16.1 percent of energy efficiency improvement in FY 2000 relative to the base year, when measured on a Btu-per-unit-of-production basis.

A statistical analysis on Mint's energy use shows that the Mint's energy use is highly correlated with its unit production (number of coins produced), but no correlation is found with its gross square footage.<sup>9</sup> This suggests that for Mint, Btu-per-unit-production should be a more appropriate method to gauge its energy efficiency.

However, when applying the unit production measure, BEP's energy reduction performance becomes much worse and unlike the

<sup>9</sup> The coin production and the energy use are positively correlated with the correlation coefficient being 0.89. However, the space (or GSF) and the energy use are negatively correlated and insignificant.

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Mint, no meaningful correlation is found between its energy use and its unit production (number of currencies and stamps produced). This is perhaps due to the printing process, which has significantly and progressively been more complex and energy-intensive since the base year. A more sophisticated measure than the simple Btu/unit production needs to be developed to take the complex process into account.

BEP's energy consumption has been highly volatile from year to year, presumably indicating that its energy use largely depends upon currency-printing demand from the Federal Reserve Board.

According to DOE's annual energy report to Congress for FY 1999, the increase in energy consumption for Mint is largely due to the Commemorative Quarter Program and the stamping of the new dollar coins.

Increased demand for more and sophisticated information processing has led to the Secret Service's use of additional computers and hi-tech equipment resulting in considerably more energy consumption. However, compared to the other bureaus, its energy consumption is low – about 3 percent of the Mint's and 2 percent of BEP's.

### **Recent Energy Assessments on Mint and BEP**

DOE conducted energy assessments on two Mint facilities located in San Francisco and Denver in July 2001 and January 2002, respectively, and identified a number of ECOs. According to the assessment reports, if the ECOs were fully addressed, Mint would save 7.2 billion Btu (BBtu) per year. This saving, however, would not be enough to meet the FY 2005 goal.

DOE's energy review team also conducted an energy assessment on BEP's Washington, D.C., facilities in March 2001. The energy assessment identified 13 different ECOs that could result in savings of 46.0 BBtu/year. However, BEP would need nearly two and half times as much savings as those identified by DOE to meet the 20 percent energy reduction requirement.

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The energy reduction goals set by Executive Order 13123 of FY 2005 and FY 2010 for industrial/laboratory facilities are 20 percent and 25 percent, respectively. Unless additional energy-saving measures are implemented, Treasury may not comply with the Executive Order.

### **Recommendation**

The Assistant Secretary for Management and Chief Financial Officer should provide necessary support to the Director, Office of Safety, Health and Environment (OSHE) to lead energy saving efforts by facilitating the energy conservation activities of the bureaus. With respect to the industrial bureaus, OSHE should assist:

- The Mint and BEP in implementing the energy saving measures already identified during recent DOE energy assessments and developing a new measure tied to production rather than square footage, as appropriate; and
- The bureaus in identifying additional savings opportunities.

### **Management Response**

Management will direct OSHE to engage the bureaus individually, and as a group, to fully identify the challenges they face in meeting the reduction goals. Over the next several months, OSHE will work with the bureaus to identify projects that will assist them in meeting the goals, identify funding sources for the projects, implement the projects, and monitor progress toward the goals. A bureau scorecard will be developed to track each bureau's progress and accountability will be enforced.

### **OIG Comment**

Management's planned actions meet the intent of our recommendation. Accordingly, we consider the recommendation to have a management decision.

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Please be advised that we will record the recommendation contained in this report in the Department of the Treasury Inventory, Tracking and Closure (ITC) System.

We appreciate the cooperation and courtesies extended to our staff. If you have any questions, please contact me at (202) 927-5400 or a member of your staff may contact Marj P. Leaming, Director, Office of Evaluations at (202) 927-5171. Major contributors to this report are listed in Appendix 4.

Marla A. Freedman  
Assistant Inspector General for Audit



In coordination with the TIGTA, we conducted a review of Treasury's compliance with NECPA. TIGTA will report separately on the IRS.

The objective of our evaluation was to determine whether Treasury, excluding IRS, met the energy efficiency goal in FY 2000 and is making progress to meet future goals. Our fieldwork was performed in the Washington, D.C. area. We based our conclusions on: (1) interviews with the Treasury's energy management officer and the energy coordinators of DO, Mint, and BEP; (2) a review of annual energy reports; (3) an analysis of Treasury bureaus' energy consumption data; (4) a review of various energy audits to Treasury bureaus' facilities; (5) a review of Treasury bureaus' energy bills; and (6) a review of lists of energy efficiency improvement measures and implementation plans reported directly by bureau energy coordinators in response to our requests. OCC had not reported its energy-consumption data until recently and was excluded from our review.

We performed our work between March 2002 and May 2002 in accordance with the President's Council on Integrity and Efficiency *Quality Standards for Inspections*.



ASSISTANT SECRETARY

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C.

NOV 25 2002

**MEMORANDUM FOR MARLA A. FREEDMAN  
ASSISTANT INSPECTOR GENERAL FOR AUDIT**

**FROM:**

Teresa Mullett Ressel *Teresa Mullett Ressel*  
Acting Assistant Secretary for Management  
and Chief Financial Officer

**SUBJECT:**

Draft Report – GENERAL MANAGEMENT: Treasury's  
Progress In Meeting Goals Established In The National Energy  
Conservation Policy Act

Thank you for the opportunity to comment on the draft report from your office regarding Treasury's progress toward the federal goals for energy use reduction established in the Energy Conservation Policy Act.

Attached are general observations and specific comments on various sections of the report and our proposed action plan to correct the findings.

### Observations

Reading the draft report leaves the impression that little is being done within Treasury to meet the federal energy reduction goals. This is incorrect. Recent annual reports identify a number of excellent projects that have been implemented in the bureaus. It should be noted that most of this activity is too recent to be reflected in the fiscal year (FY) 2000 energy consumption data that your office reviewed and from which the report conclusions were drawn. Some specific accomplishments not identified in the report are listed below:

- The IRS National Office at 1111 Constitution Avenue underwent a complete energy retrofit in FY 2001 and the Austin Service Center won a FY 2002 Energy and Water Management Award. Energy retrofits are underway at three other IRS facilities, currently.
- The section on Departmental Offices does not recognize the multiple energy efficiency projects that are included in the renovation of the Main Building. The old chillers and cooling towers have been replaced, the old, single-pane windows have been replaced by energy efficient ones (a major achievement in a National Historic Landmark), and electrical and lighting retrofits are being performed in each phase of the renovation.
- The Customs Service's energy reduction efforts have been hampered by expanding mission requirements and the generally small and geographically disperse nature of their facilities. However, the new Harpers Ferry Advanced Training Center is being designed to incorporate all appropriate energy efficiency measures.
- The new Alcohol, Tobacco and Firearms Headquarters Building is being designed to a "Leadership in Environmental and Energy Design" silver rating.
- As with the standard buildings, none of the industrial bureaus receive acknowledgement for projects they have implemented over the past few years. Mint has won two Energy and Water Management Awards in the past two years for their efforts. BEP was named and Department of Energy's (DOE) "Energy Showcase" in FY 2001 for their chiller replacement and emission control changes. Additionally, Mint developed an implementation plan for the projects identified during the DOE industrial audits and has started implementing projects.

Under Finding 1 on Energy efficiency for Standard Buildings, it appears that some bureaus provided your office with different data from that which was submitted to the Department's Office of Safety, Health and Environment (OSHE). Under Finding 2, for industrial facilities, OSHE records show a 6.1 percent decrease in consumption on a BTUs/Gross Square Foot basis in FY 2000 compared to the FY 1990 base year. Your report states that "None of the bureaus has made any progress toward the energy efficiency goals established for FY 2005 and FY 2010 by Executive Order 13123." We

would appreciate receiving copy of the data your staff obtained from the bureaus for reconciliation of our records.

While the draft report correctly identifies Treasury's failure to meet the FY 2000 goals of the Energy Policy Act and the likelihood that Treasury will not meet the goals for FY 2005 and FY 2010 of Executive Order 13123, it does not identify the underlying causes for this poor performance. Without this type of information, it is difficult to determine how to attempt to redeploy our limited resources to address the problem.

Finally, the draft report analyzed the Treasury data in a manner which does not compare with the way Treasury normally reports energy data. The exclusion of the Internal Revenue Service (IRS) produced a set of data that does not represent Department overall. The IRS accounts for 60-70 percent of the energy consumed by the Department each year. Over the past two years, OSHE has been concentrating on driving energy reduction within the IRS and encouraging them to actively pursue energy retrofits.

**Action**

The draft report recommends that I provide the "necessary support" and "authority" to the Director, Office of Safety, Health and Environment (OSHE) to lead energy saving efforts by facilitating the energy conservation activities of all bureaus. The current Treasury directive provides the delegated authority to OSHE and I will direct the Office to engage the bureaus individually, and as a group, to fully identify the challenges they face in meeting the reduction goals.

Over the next several months, OSHE will work with the bureaus to identify projects that will assist them in meeting the goals, identify funding sources for the projects, implement the projects, and monitor progress toward the goals. A bureau scorecard will be developed to track each bureau's progress and accountability will be enforced. The table below outlines the specific actions:

Activity	Goal	Timeframe	Completion
Annual Energy Reporting Training	Improve completeness, accuracy and timeliness of bureau energy reports	October each year	Completed on October 17, 2002
Meetings with Individual Bureaus	Identify challenges and opportunities in each bureau	Annually (starting in March 2003)	
Group Meetings with Bureaus	Exchange Information on Energy Program Requirements and Changes	Semi-annually (starting in March 2003)	
Develop Scorecard	Tracking individual bureau progress and management reporting	January after development for FY 2002.	

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**The Department of the Treasury**

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