



U.S. Occupational Safety and Health Review Commission

Executive Order 13514:

Strategic Sustainability Performance Plan

Fiscal Year 2011

SECTION I: AGENCY POLICY AND STRATEGY

I. Agency Policy Statement

The U.S. Occupational Safety and Health Review Commission (hereinafter “Review Commission”) is an independent, adjudicatory agency created by the Occupational Safety and Health Act (“Act”). Its sole statutory mandate is to serve as an administrative court providing just and expeditious resolution of disputes involving the U. S. Department of Labor’s Occupational Safety and Health Administration (OSHA), employers OSHA has charged with violations of federal safety and health standards, and employees and/or their representatives. The Review Commission was created by Congress as an agency completely independent of the Department of Labor to ensure that OSHA’s enforcement actions are carried out in accordance with the law, and that all parties are treated consistent with due process when disputes arise with OSHA.

The Act and the Review Commission’s Rules of Procedure, provide two levels of adjudication when an employer timely contests an OSHA citation. The first level affords an employer and/or affected employee who files a timely notice of contest with an opportunity for a hearing before a Review Commission administrative law judge (ALJ). The ALJ’s decision becomes a final order under the Act unless a member of the Review Commission exercises his/her discretion to direct the case for review. The second level involves the Review Commission’s review of an ALJ decision. The Review Commission has three members, appointed by the President and subject to Senate confirmation, who serve six-year terms. Both before its ALJs and the Review Commission members, the agency seeks to provide fair, impartial, and timely adjudication of cases concerning the safety and health of employees’ working conditions in the United States.

By statutes, Executive Orders, and agency policies, the Review Commission is committed to the goals of energy conservation, reducing energy use, eliminating or reducing greenhouse gas (GHG) emissions, and promoting the deployment of renewable energy technologies that are cleaner and more efficient. Where a proposal for internal administrative action implicates these goals, information on GHG emissions (qualitative or quantitative) that is useful and relevant to the decision will be used when deciding among alternatives.

In addition to its mission-sustaining efforts mentioned above, the Review Commission strives to cut emissions at the employee level. Approximately 78 percent of employees use alternate transportation to get to work, and this number is expected to increase in the years to come. In fact, the number increased by ten percent in comparison to fiscal year 2010. Participation in a telecommuting program is available and is strongly encouraged by management. Staff computers are installed with automatic energy-saving and paper-reduction settings. Employees are also required to turn off all non-essential electronics at the end of the workday and during the weekend. Offices have energy saving motion activated light switches. The cooling systems are upgraded with high efficiency units. The Review Commission continues to be dedicated to going green.

II. Sustainability and the Agency Mission

The Review Commission is a small independent agency in the executive branch of the United States Government. Its mission is to “provide an impartial forum for the just and prompt adjudication of workplace safety and health disputes involving the Department of Labor, employers, and employees, and/or their representatives under the Occupational Safety and Health Act of 1970 (Act), 29 U.S.C. §§ 651-678.”

The Review Commission has a staff of approximately 65 full time equivalent positions. Fifty positions are in the National Office located in Washington, DC. There are two regional offices: one is located in Atlanta, Georgia and has seven employees; the other office is located in Denver, Colorado and has eight employees. The Review Commission anticipates achieving its sustainability targets and goals.

III. Greenhouse Gas Reduction Goals

Scope 1 and 2 Targets

The Review Commission’s National office operates in 28,444 square feet of leased space in a privately owned office building. We are unable to measure our Scope 1 and 2 greenhouse gas emission because the space is not individually metered.

The Review Commission’s office located in Atlanta, Georgia operates in 2,720 square feet of space. The office located in Denver, Colorado operates in 3,397 square feet of space. The building services for these office spaces are provided by the General Services Administration (GSA).

Nonetheless, the Review Commission is committed to reducing energy consumption through changes in behavior. Some of the agency’s past accomplishments include: implementing a robust recycling program, green purchasing, purchasing CFL light bulbs, installing computers with automatic energy-saving options, installing motion activated light switches, implementing a lights-out policy, and working with building management to eliminate cooling and heating when the agency is closed.

Scope 3 Targets

Due to the agency’s leased space in a privately owned office building and the agency’s small size, the Review Commission is unable to track electricity transmission and distribution losses from purchased energy as well as contracted solid waste disposal.

During fiscal year 2011, approximately 78 percent of the agency’s employees commuted to work utilizing public transit. This consisted of MetroRail, MetroBus, Virginia Rail Express, Maryland Area Commuter (MARC) train service, and regional bus systems that accept the SmarTrip card.

In addition to encouraging employees to utilize public transportation, the Review Commission searches for other ways to reduce Scope III emissions through employee commuting. The Agency encourages eligible employees to consider an Alternate Work Schedule (AWS), which reduces the need to commute one or two days per pay period, or a total of 26 or 52 days per year.

In fiscal year 2011, approximately 21 percent of employees worked an AWS. This number increased three percent in comparison to fiscal year 2010. Another way to reduce the need to commute is through routine or situational telework, which approximately 43 percent of employees utilized in fiscal year 2011. This number increased 17 percent in comparison to fiscal year 2010.

Given the Agency's mission, the ALJs are required to frequently travel to various locations in order to conduct hearings. There may be little discretion in reducing the amount of travel in these instances. However, the Review Commission will strive to coordinate its annual judicial conferences locally, which means that fewer employees would be required to travel to attend them.

IV. Plan Implementation

- a) *Internal Coordination and Communication:* The Review Commission is committed to its "going green" environmental initiative. The Agency will take the following steps in efforts to meet the targets described above.
 - 1) Maintain a greenhouse gas reduction task force. The group is tasked with creating strategic plans for reducing greenhouse gas reductions and evaluating the costs of these different scenarios.
 - 2) Get employees involved in GHG reduction activities. The plan will be reviewed regularly, and changes will be made as needed to ensure the actions allow the Review Commission to achieve its goals.
 - 3) Continue to encourage employee participation in utilizing public transportation. Transit can reduce greenhouse gas emissions by facilitating compact development, which conserves land and decreases the distance people need to travel to work. By reducing congestion, transit reduces emissions from cars stuck in traffic.
 - 4) Continue to encourage employees to participate in the Agency's telework program.
 - 5) Work with the leasing company to coordinate lighting projects (sensors, CFL and high efficiency lights). Existing light bulbs will be replaced with CFLs since they use less power and have a longer rated life.
 - 6) Where necessary, reduce plug load through use of high efficiency equipment.
- b) *Coordination and Dissemination of the Plan to the Field:* The Office of the Executive Director is responsible for ensuring that the staff in the regional offices receives a copy of this Plan.
- c) *Leadership and Accountability:* The Executive Director, in coordination with his/her staff, provides leadership, direction, coordination and management of the Agency's policy regarding GHG strategies and goals. This involves enhancing communication, coordination and cooperation with the greenhouse gas reduction team. The Executive

Director works with the team to build and support their confidence in GHG actions (e.g. target setting, reduction projects, etc.). The Executive Director also identifies methods for improving GHG management systems and data collection processes.

- d) *Agency Policy and Planning Integration:* Review Commission employees have access to the agency's plan. Senior management incorporates sustainability strategies into policy and planning components of the agency's administrative work.
- e) *Agency Budget Integration:* Throughout the budget process, the Executive Director ensures that projects within the agency support the goals and requirements of Executive Order 13514.
- f) *Methods for Evaluation of Progress:* Senior management will focus on meeting the targets set for Scope 3 greenhouse gas emissions. It will meet on a routine basis to review practices and make new recommendations as necessary.

V. Evaluating Return on Investment

The Review Commission's strategic plan is focused on the attainment of one public service goal: to assure fair, just, and expeditious adjudication of disputes brought before the Review Commission and its ALJs. The agency has set measurable, outcome-oriented objectives which advance the agency's ability to meet its goals. The agency will include its strategic goal and performance objectives and their associated measures in the annual performance plans as part of its performance budget. The agency has established outcome goals to assist it in achieving its general public service goal of assuring fair, just and expeditious adjudication of disputes brought before the agency.

Over the next several years, the agency plans to conduct evaluations and continue ongoing evaluations that will provide information the agency can use to improve its operations, processes, and procedures. The program evaluations required under GPRA will be included in each of our annual performance budgets. The agency's evaluation schedule is noted as follows: Evaluate/monitor electronic filing of legal documents; evaluate the security of information technology systems and security management measures used for addressing security issues annually; and audit financial statements annually.

VI. Transparency

As part of the Open Government Directive, the Review Commission is committed to providing as much transparency as possible in the work we do. The Review Commission was created to decide contests of citations or penalties resulting from OSHA inspections of American work places and our portfolio includes providing administrative trial and appellate review. The Review Commission functions as a two-tiered administrative court with established procedures for (1) conducting hearings, receiving evidence and rendering decisions by its administrative law judges (ALJs) and (2) discretionary review of ALJ decisions by a panel of Commissioners.

The Review Commission's Strategic Plan, Performance Budget and Justification, Performance, and Accountability Reports are already available on the Review Commission's website, as well as other publications we have produced in the past several years.

Information is shared through in-person meetings and on our agency website. Within the agency, the Review Commission will use all-hands staff meetings to provide regular updates on progress toward meeting the goals of Executive Order 13514. Updates will occur as needed.

SECTION II: PERFORMANCE REVIEW & ANNUAL UPDATE

The Review Commission has three overarching strategic goals: 1) Respect for the rule of law by assuring fair, just, and expeditious adjudication of disputes brought before the Review Commission and its judges; 2) Expanding transparency and openness by providing for stakeholder engagement and ensuring that the Review Commission keeps interested parties and the public it serves informed of the agency's work at all levels, consistent with due process requirements; and 3) Responsible stewardship of the fiscal and human resources employed by the Review Commission in accordance with the agency's statutory mandate and other applicable law.

I. Summary of Accomplishments

Commission Function

The Commissioners are appointed by the President and confirmed by the Senate, and serve as an appellate level of review. The Commissioners review and decide cases contested under the Act, following an initial decision by an Administrative Law Judge. This appellate level of review must be prompt, fair, and protective of the parties' rights.

In FY 2011, the Review Commission had 31 cases pending at the beginning of the year. It received 30 new cases and resolved 26 cases by year-end. Actual dispositions, of course, may be affected if a full Commission is not in place.

During the first seven months of FY 2011, the Review Commission operated with a full Commission. For the remainder of the fiscal year, the Review Commission operated with only two Commissioners due to one Commissioner's term expiring. The Review Commission resolved 26 cases during fiscal year 2011 and met its high priority goal of resolving all the "legacy" cases on its docket, those cases docketed at the Commission level prior to 2008.

Administrative Law Judge Operations

The Review Commission strives to expedite the judicial process in a fair and impartial manner, and to strengthen its settlement procedures and case management responsibilities by constant monitoring of its Simplified Proceedings and Mandatory Settlement programs. The Administrative Law Judge function addresses a caseload that is becoming larger and more complex, as reflected by the increasing number and complexity of OSHA citations.

OSHA completed 40,648 inspections in FY 2011, and estimates that it will complete 42,250 inspections in FY 2012 and 43,100 inspections in FY 2013. Of particular importance from the Review Commission's resource perspective has been a marked increase in the number of citations being contested, and the resulting number of contests being docketed. We received 2,058 new contests during FY 2009, 2,565 during FY 2012 and 3,175 during FY 2011. This represents an increase of about 50 percent.

II. Goal Performance Review

GOAL 1: Scope 1 & 2 Greenhouse Gas Reduction

This goal does not apply to the Review Commission because our leased office space is not individually metered. The National office operates in 28,444 square feet of leased space in a privately owned office building.

Nonetheless, the Review Commission is committed to reducing energy consumption through changes in behavior. Some of the agency's past accomplishments include: implementing a robust recycling program, green purchasing, purchasing CFL light bulbs, installing computers with automatic energy-saving options, installing motion activated light switches, implementing a lights-out policy, and working with building management to eliminate cooling and heating when the agency is closed.

Goal-Specific Items

- a. *Goal description* – N/A
- b. *Agency lead for goal* – If/when leased office space is required to report Scope 1 and 2 greenhouse gas target reductions, the Review Commission's Office of the Executive Director will be responsible for tracking and reporting this requirement.
- c. *Implementation methods* – N/A
- d. *Positions* – If/when the agency's space is separately metered, the Review Commission's Office of the Executive Director will track this data.
- e. *Planning table* – N/A
- f. *Agency status* – We are unable to provide a status at this time.
- g. *Return on Investment* – N/A
- h. *Highlights* – N/A

GOAL 2: Scope 3 Greenhouse Gas Reduction & Develop and Maintain Agency Comprehensive Greenhouse Gas Inventory

- a. *Federal Employee Travel:* The Review Commission's National office is within walking distance of several Metro Rail lines and multiple bus lines. The regional offices also have public transportation available to them. As a result, a substantial number of our employees participate in the transit subsidy program provided as a part of their federal employee benefits. A monthly subsidy is available to employees who utilize bus, rail and train trips with Metro and its regional transportation partners. This service provides an easy, affordable and environmentally sustainable way to commute to and from work.

During fiscal year 2011, approximately 21 percent of employees worked an AWS. Employees were given the option to work eight 9-hour days and one 8-hour day during each pay period and designated one non-work day during the pay period, or four 10-hour days during each pay period with two non-work days during the pay period. Employees also have the option of working credit hours.

During fiscal year 2011, approximately 43 percent of employees were on a routine or situational telework schedule.

Because the Review Commission is a small agency and 78 percent of employees utilize public transit, additional reductions in Scope III greenhouse gas emissions will be challenging. Opportunities to reduce our emission include:

- Encouraging employees to incorporate teleworking into their schedule;
- Encouraging employees to consider an AWS;
- Encouraging less travel. Given the Agency's mission, the ALJs are required to frequently travel to various locations in order to conduct hearings. There may be little discretion in reducing the amount of travel in these instances. However, the Review Commission will strive to coordinate its annual judicial conferences locally, which means that fewer employees would be required to travel to attend them.

- b. *Contracted waste disposal:* The Review Commission does not currently track contracted waste disposal. This service is part of our existing building lease, and our waste disposal is grouped with other offices sharing the building.
- c. *Transmission and distribution losses from purchased energy:* The Review Commission does not currently track T&D losses from purchased energy. This is part of our existing building lease, and our energy use is grouped with other offices sharing the building.
- d. *Discuss any planned activity or policy to improve data accuracy and overall data collection and analysis methods related to Scope 2 GHG emissions:* The Review Commission used GSA's Carbon Footprint for data collection of Greenhouse Gas Inventory information. We found the tool very helpful and user friendly (especially the commuter survey) and anticipate using it again next year.
- e. *Discuss the methods used by the agency to calculate its scope 3 GHG emissions (i.e., identify specific surveys or tools used to help estimate emission, etc.):* The Review Commission used GSA's Carbon Footprint Tool.

- f. *Discuss the development of the agency's FY 2011 Greenhouse Gas Inventory: This should include a discussion on the agency's process for collecting and verifying energy and GHG data. Did the agency use an inventory management system? Did the agency use 2nd and 3rd party verification of its GHG data? Identify any challenges or issues related to the FY 2010 inventory process, and discuss how the agency plans to integrate GHG data collection, inventory management, and reduction strategies into overall planning practices: The Review Commission used GSA's Carbon Footprint Tool.*

SCOPE 3 GHG TARGET	Units	FY 08	FY 09	FY 10	FY 11	FY 12	FY 13	FY 14	FY15-FY19	FY 20
Total Scope 3 Emissions (Comprehensive)	MMTCO _{2e}		.46	.46	.46	.46	.46	.46	.46% each yr	.46
Total Scope 3 GHG Emissions (Subject to Agency Scope 3 GHG Reduction Target)	MMTCO _{2e}		.46	.46	.46	.46	.46	.46	.46% each yr	.46
Overall Agency Scope 3 Reduction (reduced from FY08 base year)	%	134.8	-2.23%	+18.1%	+6.38%					
Other, as defined by agency	%									

**The FY 11 (MMTCO_{2e}) reflects an increase from FY 08 base year due to travel (air and ground) for the ALJs. The ALJs are required to frequently travel to various locations in order to conduct hearings. However, the MMTCO_{2e} decreased approximately 11.5 percent in FY 11 in comparison to FY 10. Please note that there were more vacancies during the FY 08 base year in comparison to recent fiscal years.*

Goal-Specific Items

Goal description: Through increased telework and AWS scheduling, the Review Commission set an annual Scope III greenhouse gas emissions reduction goal of five percent by fiscal year 2020.

Agency lead for goal: The Executive Director and his/her staff are responsible for target development, implementation, and oversight for the Review Commission.

Implementation methods: The Review Commission continues to encourage employees to sign up for telework privileges or AWS scheduling where feasible. As much of our work is also collaborative, the greatest challenge is ensuring that adequate staff is available on a daily basis to attend meetings and ensure assignments move forward.

Positions: The Review Commission is adequately staffed to support the development and implementation of this plan. The staff is dedicated to meeting the Agency's goals, but the actual work is considered a collateral duty.

Planning table: Because the Review Commission's is a small agency and 78 percent of employees utilize public transit, additional reductions in Scope III greenhouse gas emissions will be challenging.

Agency status: As reported in our most recent submission to CEQ, our agency continues to support and encourage use of public transit. We plan to continue participation in this program and encourage those not yet enrolled to do so.

Return on Investment – None

Highlights – See above

GOAL 3: High-Performance Sustainable Design/Green Buildings

The Review Commission does not own any facilities. Therefore, we are not reporting on the assigned goals for this measure.

GOAL 4: Water Use Efficiency and Management

- a. Achieve objectives established by EPA in Storm water Guidance for Federal Facilities

The Review Commission leases its space and can not track potable and non-potable water use at this time.

- b. Incorporate appropriate reduction strategies for non-potable water use into agency policy and planning.

The Review Commission leases its space and can not track potable and non-potable water use at this time.

GOAL5: Pollution and Waste Reduction

Sub-goals a, b, c, d, i, j, and k do not currently apply to the Review Commission. Please see responses to e, f, and h below.

e) Reduce printing paper usage.

The Review Commission strives to reduce its paper usage. It will look for ways to determine which office is using the most paper in the years to come. The information technology staff is considering ordering tablet computers which will help to eliminate printing of documents.

f) Increase use of uncoated printing and writing paper containing at least 30% post-consumer fiber.

The Review Commission purchases uncoated printing and writing paper containing at least 30% post-consumer fiber.

h) Increase diversion of compostable and organic materials from the waste stream.

The Review Commission has a robust recycling program which includes bins at every employee's desk. The lunch room includes recycling for plastic products as well. We are not able to determine the amount of waste that is diverted from the landfill.

Goal-Specific Items

a. Goal description – Continue to reduce our printing requirements and replace paper document distribution with electronic distribution where feasible.

b. Agency lead for goal – The Office of the Executive Director is responsible for leading this goal.

c. Implementation methods – Use of the agency website and e-mail to communicate agency announcements.

d. Positions – The agency is adequately staffed to support the development of this plan.

e. Planning table – See below.

f. Agency status – The Review Commission anticipates a decrease in paper use throughout the remainder of the fiscal year.

g. Return on Investment – N/A

h. Highlights – N/A

GOAL 6: Sustainable Acquisition

a) Ensure 95% of new contract actions, including task and delivery orders under new contracts and existing contracts, require the supply or use of products that are energy efficient (Energy Star or FEMP-designated), water efficient, bio based, environmentally preferable (including EPEAT-registered products), non-ozone, depleting, contain recycled content, or are non-toxic or less toxic alternatives.

The Review Commission follows GSA's recommendations for sustainable product purchases through the agency's "Go Green Environmental Initiative." Our office utilizes GSA Advantage's Go green aisle for purchase of office products. All new computers/equipment purchased are energy star if available.

b) Update agency affirmative procurement plans (also known as green purchasing plans or environmentally preferable purchasing plans), policies and programs to ensure that all Federally-mandated designated products and services are included in all relevant acquisitions.

The Review Commission utilizes GSA Advantage Go Green recommendations for sustainable product purchases. The Review Commission's purchasing plan, which is in draft, includes provisions to ensure that all Federally-mandated designated products and services are included in all relevant acquisitions.

The "sustainable acquisition" contracts include the following:

- Contract with GSA to purchase paper products, office supplies, etc.
- Contract with GSA to provide preventive maintenance to the HVAC system in the agency's back-up server room.

Goal-Specific Items

- a. *Goal description* – Continue to utilize GSA Advantage's Go Green recommendations for sustainable product purchased, and issue the Green Purchasing Plan in fiscal year 2012.
- b. *Agency lead for goal* – The Office of the Executive Director is responsible for leading this goal.
- c. *Implementation methods* – Issue the Green Purchasing Plan that includes target goals for procurement/contracting personnel.
- d. *Positions* – Procurement staff and managers/supervisors in requesting offices. As we already actively participate in efforts to procure sustainable products, the agency is adequately staffed to support the development of this plan.
- e. *Planning table* – See below
- f. *Agency status* – See Goal A which addresses the status of the Agency's Green Purchasing Plan.
- g. *Return on Investment* – The Agency has not yet identified substantial savings or cost since the draft of the Green Purchasing Plan was developed.
- h. *Highlights* – none

GOAL 7: Electronic Stewardship and Data Centers

- a. *Ensure acquisition of EPEAT registered, ENERGY STAR qualified, and FEMP designated electronic office products when procuring electronics in eligible product categories.*

The Review Commission will make every effort to procure products that are EPEAT registered, Energy Star qualified, etc.

- b. *Establish and implement policy and guidance to ensure use of power management, duplex printing, and other energy efficient or environmentally preferred options and features on all eligible agency electronic products.*

Legacy office equipment or office equipment not adaptable to acceptable levels of power management will continue to be replaced as soon as is practically possible and/or adequate funding is available.

- c. *Update agency policy to reflect environmentally sound practices for disposition of all agency excess or surplus electronic products.*

The Review Commission's information technology staff monitors agency equipment to determine if it is non-recyclable or if it should be disposed of. In addition, they are required to sign a form certifying that the equipment has no value and should be disposed of.

- d. *Discuss how the agency will increase the quantity of electronic assets disposed through sound disposition practices. Include in the discussion how your agency is using or plans to use programs such as disposal through GSA Xcess, recycling through Unicor, donation through GSA's Computer for Learning (CFL) or other nonprofit organizations, and/or recycling through a private recycler certified under the Responsible Recyclers (R2) guidance or equivalent certification.*

The Review Commission follows GSA's guidelines for disposal of the agency's personal property including the use of GSA Xcess for transfer and utilization of excess or surplus personal property items and for donations of surplus computer equipment to educational institutions and non-profit organizations. For nonfunctional or obsolete electronics, the Review Commission uses electronics recycling companies for disposal and recycling. Computer equipment has been disposed of since we last submitted our agency's Sustainability Plan.

- e. *Discuss how the agency will require IT planning/Life Cycle Manager to replace and or waive equipment that does not meet "Green" compliance requirements.*

The information technology staff routinely evaluates its inventory and continuously looks for opportunities to virtualize more of the agency's servers and infrastructure.

- f. *Update agency policy to ensure implementation of best management practices for energy efficient management of servers and Federal data centers, including how the agency will meet data center reduction goals included in the Federal Data Center Consolidation Initiative.*

The Review Commission is reviewing the agency network server inventory and data center space requirements and exploring technology solutions (server virtualization and cloud computing) to identify the most appropriate methods to simplify and consolidate its

data center. Once a strategy has been adopted and minimum data center operating standards established, a consolidation plan will be developed and project timeline established to complete the effort. We anticipate adoption of a strategy in FY 2012. The Review Commission is committed to ensure that all future acquisitions of network servers, appliances and equipment for the data center meet Energy Star standards.

Goal-Specific Items

a. Goal description - Identify technology solutions to allow for the implementation of mandatory operational policies for the Review Commission computer systems and computer monitors to operate in an off or low power mode during non-business hours and/or pre-set periods of inactivity.

b. Agency lead for goal - The Office of the Executive Director.

c. Implementation methods - Implementation will be provided by the Review Commission's in-house information technology staff.

d. Positions - As we already actively participate in efforts to procure sustainable products, the agency is adequately staffed to support the development of this plan.

e. Planning table - see below.

f. Agency status - Through further streamlining.

g. Return on Investment - N/A

h. Highlights — None

GOAL 8: Agency Innovation & Government-Wide Support

The Review Commission's case resolution strategic goal is straightforward: To ensure fair, just, and expeditious adjudication of disputes brought before the Review Commission and its Administrative Law Judges. The Review Commission's Strategic Plan covering the period FY 2010 - 2015 reflects this objective. It also reflects the Review Commission's overall goal of management excellence.

In FY 2011, the Review Commission had 31 cases pending at the beginning of the year. It received 30 new cases and resolved 26 cases by year-end. Actual dispositions in the future, of course, may be affected if a full Commission is not in place.

SECTION III. AGENCY SELF EVALUATION

Agency Self Evaluation	Answer
Does your Sustainability Plan incorporate and align sustainability goals, GHG targets and overarching objectives for sustainability with the Agency Strategic Plan?	Yes
Does it provide annual targets, strategies and approaches for achieving the 2015 and 2020 goals?	Yes
Is the Sustainability Plan consistent with the FY2012 President's Budget?	Yes
Does the Sustainability Plan integrate all statutory and Executive Order requirements into a single implementation framework for advancing sustainability goals along with existing mission and management goals, making the best use of existing and available resources?	Yes
Does your plan include methods for obtaining data needed to measure progress, evaluate results, and improve performance?	Yes