

CONCESSIONER REVIEW PROGRAM - OPERATIONAL PERFORMANCE

A. GENERAL

The Concessions Operational Performance Program (formerly called the Concessions Evaluation Program) establishes operational standards for facilities and services afforded the public, a systematic method for determining their performance level on a periodic and annual basis, through comprehensive evaluations of each facility/service and permits concessioners the opportunity to correct deficiencies without being unfairly penalized. It also spells out specific responsibilities for all National Park Service management levels.

The standards established for each type of facility or service (operation) are composed of distinct elements which are pertinent to satisfactory performance. These elements are classified Major-First Priority (A), Second Priority (B), and Minor-Third Priority (C) based on the degree of their importance, from a visitor and/or employee's well being and enjoyment standpoint.

Whenever there is a conflict between the standards contained herein and any applicable existing or newly promulgated regulation(s) the latter will prevail and will be considered a part of the evaluation criteria under this program.

Conformance to the standards is measured periodically through a comprehensive evaluation and follow-up on each individual facility or operation authorized, based on the standards contained herein. Facilities and operations are rated for each period using the rating criteria set forth on page 7, of this Chapter except for Food Service Sanitation and Safety and Occupational Health which are rated in accordance with the procedures in Standards I and II located in Chapter 21, as Exhibits 1 and 2.

At the end of the year, the periodic operational ratings for each facility or service are summarized on the Summary of Periodic Operational Ratings Form 10-627 and an average periodic rating for the year computed. Such average ratings are then transferred to the Concession Operational Performance Report Form 10-629 and an annual average rating for all like facilities or operations calculated.

The final step in this operational evaluation process is to rate a concessioner's operational performance overall for the year. This annual overall concession operational rating is made by the Superintendent after a careful review of the factors listed on the Concession Operational Performance Report (Form 10-629) together with all supportive data. Following this review, the Superintendent assigns an Annual Operational Performance Rating of either "Satisfactory," "Marginal" or "Unsatisfactory." Where such word rating appears to be inconsistent with the annual numerical ratings assigned to the various

facilities/services, the reason for this is to be fully explained in the narrative segment of the NPS Concessioner Annual Overall Rating (Form 10-631).

Samples of the forms needed to conduct operational evaluations under this program are provided in Chapter 21, and their use is explained in the following detailed procedures.

B. CLASSIFICATION EVALUATION AND RATING PROCEDURES

Set forth below are the deficiency classification criteria and detailed evaluation and rating procedures to be used in conducting a concessioner's Operational Performance Evaluation.

1. Element Classification

Elements on the Periodic Concession Evaluation Report forms have been classified as follows:

a. MAJOR

First Priority (A) conditions or practices which have the potential for, or exert a significant impairment to the services essential to the well-being and enjoyment of visitors and/or employees.

Second Priority (B) conditions or practices which have the potential for, or exert a moderate impairment to the services essential to the well-being and enjoyment of visitors and/or employees.

b. MINOR

Third Priority (C) conditions or practices which have a potential for, or exert an impairment to the visitor and/or employee services which may result in inconvenience to such individuals.

2. Deficiency Correction Criteria

Deficiencies identified during an operational evaluation shall be corrected in accordance with the following time frames, provided that the correction period for Major deficiencies can be reduced or extended by the Superintendent when warranted by extenuating circumstances:

Major (A and B items) 15 days.

Minor (C items) Next routine operational performance evaluation.

It should be understood that A type deficiencies are more serious and may take longer to correct than what is desired. However, so as not to unfairly

penalize the concessioner by downgrading for not correcting the deficiency within a shorter period (as discussed below), the correction time frame assigned for A and B type deficiencies is the same.

When the concessioner fails to correct major (first and second priority) deficiencies within the correction period established by the Superintendent, the periodic rating shall be downgraded one (1) point. In addition, the Superintendent may, when circumstances warrant, also take one or more of the following actions:

a. Pursuant to 36 CFR, 1.5(a), close, by posting, all or part of the area of a concessioner's operation when necessary for the protection of the area or the safety and welfare of persons or property.

b. Not approve a specific facility's price increase request(s) until corrections are made.

c. Take other appropriate administrative action in direct relationship to the severity and/or magnitude of the problems.

If during a periodic operational evaluation a deviation from the standard is found but is not prevalent in other like services, facilities or operations in the park or area operated by the concessioner, the service facility or operation may be temporarily discontinued by the Superintendent, if warranted under 36 CFR, 1.5(a), until the deficiency is corrected. In such instances, the periodic rating need not be Unsatisfactory for this action to be taken.

C. EVALUATION

1. Personnel. All periodic operational evaluations other than those for the Safety and Occupational Health and Food Service Sanitation areas shall be conducted by NPS employees who have been designated by the Superintendent. Only NPS personnel who have received training in the proper use of the Concession Operational Performance Program may establish the periodic rating.

At least one annual comprehensive Safety and Occupational Health evaluation shall be conducted by a qualified Safety Officer. Food Service Sanitation evaluations shall be conducted by a PHS representative or an NPS, State or local Sanitarian. Follow-up evaluations, made to verify correction of deficiencies, shall be conducted by either the person who made the periodic evaluation or other NPS personnel designated by the Superintendent (See Standards I and II for specifics on evaluations and ratings on Food Service Sanitation and Safety and Occupational Health respectively).

2. Periodic Evaluations. In accordance with the schedule set forth below, the Superintendent or his (her) authorized representative is to conduct comprehensive operational evaluations of each concessioner activity, utilizing

the standards and forms provided in Chapter 21. The previous year's average operational rating, type of operating season (Year Round or Seasonal Operation), as well as size of operation, will determine the number of required periodic evaluations to be conducted.

a. PRE-SEASONAL EVALUATIONS: All operations, unless operationally impossible, are to have a comprehensive pre-season evaluation of each individual facility or operation based on the procedures contained herein and the standards provided in Chapter 21.

Purpose of Pre-Seasonal Evaluations:

The purpose of the pre-seasonal evaluation is to make certain the concessioner will be opening a safe and healthful operation, and to allow the park and the concessioner to arrive at a mutual understanding of the goals and objectives for the operating season. Such evaluations, while beneficial, may not be counted as one of the periodic evaluations and the concessioner is to be made aware of its purpose. This pre-season evaluation review is to be used as a management tool to alert both the park manager and the concessioner of those deficiencies which are in need of correction, prior to the operating season. When the concessioner fails to correct any major deficiencies (first & second priority) that may be found during the pre-season evaluation, the park may temporarily postpone the opening of the concessioner's operation, until the major deficiencies are corrected.

Time Schedule:

In order to allow the concessioner sufficient time to correct those deficiencies found in a pre-season evaluation, especially those which are classified as major deficiencies, pre-season evaluations are to be conducted within a reasonable period of time prior to the beginning of the operating season. Year-round operations are to have pre-season evaluations completed prior to the concessioner's peak season and for those parks with winter operations, pre-season evaluations are to be conducted in the fall, prior to the beginning of the winter operating season. Follow-up evaluation should be made as soon as possible (normally 15 days for A and/or B items) to determine whether deficiencies identified have been corrected prior to the beginning of the operating season.

Pre-Season Evaluation Forms:

Facilities and operations are evaluated using the forms and procedures contained herein. As stated earlier, pre-season evaluations are not to be counted as one of the periodic evaluations. In order to avoid confusion, PRE-SEASON EVALUATION should be printed in bold letters across the top of all forms used during the pre-season evaluation.

b. YEAR-ROUND OPERATIONS:

In addition to the pre-season evaluations, a minimum of three (3) periodic evaluations are to be conducted for all year-round operations. The number of such periodic evaluations may be reduced by one (1) per year if that facility received in the previous year an annual operational rating of four (4) or higher and each Periodic Rating in the current year continues to be four (4) or higher.

c. SEASONAL OPERATIONS (6 MONTHS OR LESS):

Large Operation: (gross revenue over \$250,000)

In addition to the pre-season evaluation, a minimum of two (2) evaluations are to be conducted for large seasonal operations. The number of evaluations cannot be reduced.

Small Operations: (Gross revenue less than \$250,000)

In addition to the pre-season evaluation, a minimum of (2) two evaluations are to be conducted of each concessioner's facility. However, the number of such periodic evaluations may be reduced by one (1) per year for that facility if the following criteria is met:

Previous year's average rating for that facility was four (4) or higher and current year's evaluation continues to be four (4) or higher.

When one evaluation is allowed for small seasonal operations, this one evaluation must be conducted before the end of the operating season, preferably mid-season.

NUMBER OF YEARLY EVALUATIONS

Type of Operation	Number of Periodic Evaluations			Number of Professional PHS Insp.			Number of Professional Safety Insp.
	HI	STD.*	Normal	HI	STD.**	Normal	ALL
Year Round	2		3	2		4	1
Large Seasonal	2		2	1		2	1
Small Seasonal	1		2	1		2	1

*HI STANDARD. Previous year's average rating for that facility was four (4) or higher and current year evaluations thus far continue to be four (4) or better.

** HI STANDARD (PHS). All scores for previous and current year thus far for that facility were 85 (Satisfactory) or higher.

Evaluations are generally to be unannounced. However, limited prior notice may be given when necessary to ensure that the concessioner or his designated representative will be available to accompany the NPS Evaluator. Discretion should be used regarding appropriate time frames, e.g., food service evaluations should not be conducted at busy meal periods.

When making operational evaluations of facilities housing several activities (e.g., overnight accommodations, merchandising, food) the general standard elements (usually those under the heading of Facility Exterior and Facility Interior) that are applicable to all activities should be evaluated on only one of the evaluation reports with appropriate cross referencing notations made on the other reports. The same reporting procedure is to be followed on all subsequent operational evaluations.

At the start of the operational evaluation, the evaluator will enter, in the spaces provided on the Periodic Concession Evaluation Report, all identifying data such as the concessioner's name, type of facility or service, etc., and will circle the item number of all applicable elements.

During the evaluation, all deviations from the standards for each applicable element shall be described in appropriate detail under the "Evaluation Observations" portion of the Periodic Concession Evaluation Report, using the continuation sheet as needed. A review will then be made of all such deviations to determine which are meaningful deviations. A meaningful deviation is a departure from the established standard which is frequent enough to indicate a general pattern of occurrence or important enough that one occurrence is too many. If the deviation is considered meaningful, a check will be placed after the appropriate numbered element in the "Elements/Classification" section of the report. If it is not meaningful, the remarks should remain in the "Evaluation Observation Section" as a future reminder for the concessioner and the evaluator, but not be counted as a deficiency.

The total number of A's, B's, and C's is then calculated and entered in the space provided at the bottom of the form. Regardless of the number of times a given element is found deficient, it should be checked and counted only once. Ratings are determined by the number of A, B or C elements found deficient, not by the number of occurrences under an element.

An acceptable alternate evaluation procedure is to use a copy of the continuation sheet, or a facsimile thereof, to record deficiencies and then transfer them to the official Periodic Concession Evaluation Report with all other evaluation procedures remaining the same. A sample Periodic Concession Evaluation Report and continuation sheet is shown as Exhibit 1 at the end of this Chapter.

D. ASSIGNING THE PERIODIC OPERATIONAL RATING

Upon completing the initial periodic operational evaluation, the evaluator will analyze and assign, in the space provided on the Periodic Concession Evaluation Report a preliminary numerical rating using the rating criteria set forth below (does not apply to Food Service Sanitation or Safety and Occupational Health Evaluations). Periodic rating scores may not be higher than preliminary periodic rating scores for any given periodic evaluation.

PERIODIC EVALUATION RATING CRITERIA

Numerical
Rating

SATISFACTORY

- | | |
|---|--|
| 5 | Always meets standards. No First Priority (A) or Second Priority (B) deficiencies exist. Very few, if any, third priority (C) deficiencies exist. Consistently provides outstanding visitor facilities and services. |
| 4 | Almost always meets standards. No First Priority deficiencies (A) exist. Second Priority (B) and Minor third priority (C) deficiencies may exist. |
| 3 | Usually meets standards. A few deficiencies of a First Priority (A) nature exist. Second priority (B) and third priority (C) deficiencies may exist. |

UNSATISFACTORY

- | | |
|---|---|
| 2 | Many Major (A & B) and other deficiencies exist. Generally does not meet standards. |
| 1 | Fails to meet 2nd level rating criteria. Overall performance is totally inadequate. |

Where no A or B deficiencies are noted, the rating given will be a final rating for that period. In other cases, the final rating will be made after the lapse of the 15 days or other time specified in the report.

Immediately upon completing the operational evaluation, the Superintendent and concessioner, or their representatives, are to discuss the entire evaluation and arrive at a specific plan for making corrections within the established correction period.

They shall then sign and date the form with a copy given to the concessioner or his designated representative, thus providing him with a notice of the

rating. When the alternate evaluation procedure is used, the evaluator may give the concessioner or his representative a copy of the completed work sheet but without a rating which will be included in the official Periodic Report submitted to the concessioner as soon as practical after the evaluation.

The concessioner's or his representative's signature does not necessarily indicate agreement, only that the concessioner or his representative has seen the rating and that it has been discussed with him. If the report has not been signed by the concessioner or his representative, then the report is to be transmitted promptly to the concessioner by Certified Mail/Return Receipt Requested.

If the park or area is not staffed with personnel to properly conduct the required operational evaluations, it is incumbent upon the Superintendent to seek assistance from the Regional Office.

E. FOLLOW-UP EVALUATIONS

The required periodic follow-up evaluations should be made as soon as possible after the time specified in the report (normally 15 days for A and/or B items or at the time of the next routine operational evaluation for C items) to determine whether or not deficiencies identified on the initial evaluation have been corrected. New deficiencies should not be included in the follow-up evaluations. If "A" or "B" deficiencies have not been corrected, the initial rating shall be downgraded one (1) point and such final rating shall be entered on the report and a copy furnished the concessioner or his representative. No periodic rating score may be higher than the preliminary score assigned. Copies of Final Periodic Reports showing unsatisfactory ratings are to be sent immediately to the Regional Director, Attention Regional Concessions Office. Region will in turn immediately provide an informational copy to WASO, Concessions Division.

F. AVERAGE PERIODIC OPERATIONAL RATINGS

At the end of the operational evaluation rating year, not to exceed September 30, the individual periodic ratings for a given facility or service are to be summarized on the Summary of Periodic Operational Ratings Form 10-627 (Exhibit 2). The rating scores are to be totaled at the bottom of this form and then an average score calculated for such facility/service. This periodic rating average is then to be transferred to the Concession Operational Performance Report Form 10-629 (Exhibit 3) and a numerical rating for all like facilities or services calculated and inserted in the space provided.

G. DETERMINING THE ANNUAL OPERATIONAL PERFORMANCE RATING

Upon completion of the individual facility annual summary ratings on Form 10-629, space is provided for the Superintendent to place the final deter-

mination as to the concessioner's degree of conformance to the operational standards, .e., Satisfactory, Marginal or Unsatisfactory.

In assigning the Annual Operational Rating, the Superintendent shall take into account the factors set forth in the Concession Operational Performance Report (Form 10-629), Exhibit 3 of this chapter, together with the supporting data relating thereto.

When the Superintendent assigns an Annual Operational Rating which is, or appears to be somewhat inconsistent with the annual numerical ratings set forth on the Concession Operational Performance Report (Form 10-629), that action must be discussed **in the narrative section** on Form 10-631 (NPS Concessioner Annual Overall Rating). The statement should include, where applicable, actions needed or being taken to upgrade any deficient facilities or services. (**NOTE:** Even though the Concession Operational Performance Report (Form 10-629) and the Superintendent's Contract/Permit Compliance Report (Form 10-630) have signature blocks for the Superintendent and the Concessioner, these signatures are no longer required. Only the Periodic Evaluation Reports and the NPS Concessioner Annual Overall Rating (Form 10-631) require signatures. Forms 10-629 and 10-630 will be revised in the future and the signature blocks will be deleted.

H. USE OF MARGINAL RATINGS

The marginal rating is provided for the purpose of permitting the Superintendent, where warranted, to adjust the Annual Operational Rating up or down to more accurately reflect the true performance of the concessioner. For example, a concessioner's operational performance in an area or areas may be slightly less than satisfactory yet not sufficiently so to warrant declaring the entire operation Unsatisfactory. Also, situations may arise where a concessioner's average rating for one or more of the activities listed on the Concession Operational Performance Report (Form 10-629) may be three (3) or slightly higher yet individual units within specific activities are not in themselves satisfactory as indicated.

The Marginal rating may also be used in rating: (1) The Food Service Sanitation (2) Safety and Occupational Health (3) Contract Compliance, and (4) in arriving at the Annual Overall Rating.

I. DEVELOPMENT OF NEW STANDARDS

There are certain activities not currently covered in this program. In such cases where parks have activities for which standards have not been developed, they are to prepare draft standards, including classification of elements utilizing this program's format. The draft is to be submitted to WASO's Concessions Division, through the Regional Office. WASO will then be responsible for finalizing the standards with appropriate Regional input.

J. DEVELOPMENT OF REVISED SUPPLEMENTAL ELEMENTS

It is recognized that not all elements of the following standards will be applicable for certain visitor services/facilities of significant uniqueness of either operation or age. In such cases, the Superintendent may submit to Region, which will provide an informational copy to WASO, supplemental elements that are applicable to that park's particular situation. Region will then be responsible for approving and finalizing those submissions, which shall be submitted in the same format as the standards herein.

In situations where revised/supplemental elements are a means to provide a smooth transition period for a visitor service/facility to come into compliance with Servicewide standards, that intent, as well as a time schedule, shall be clearly stated in the park's supplemental elements.

*K. LIMITED CONCESSIONS PERMIT

Operational Performance rating, procedures for Limited Concessions Permits are described in Chapter 19, Paragraph K.*

SAMPLE - PERIODIC CONCESSION EVALUATION REPORT

UNITED STATES DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE PERIODIC CONCESSION EVALUATION REPORT Food and Beverage Service (Including Employee Operations) Standard No. III		Form 10-303 (Rev. 6/82)
REGION RMRO		PARK Anywhere NP
NAME OF CONCESSIONER U.S. Concessions		FACILITY/SERVICE Blue Sky Inn

NOTICE TO CONCESSIONER: The elements checked (✓) below were found deficient this date and must be corrected by the date(s) specified below. Failure to make correction(s) within the date (s) specified will result in downgrading the initial rating and may result in an unsatisfactory rating which may affect your contract/permit. Follow-up evaluations will be conducted to determine corrective action taken.

ELEMENTS/CLASSIFICATION
 (Circle applicable element numbers and (✓) in space provided those which are deficient)

A. FACILITY EXTERIOR ① Structure Condition (B) _____ ② Grounds (B) _____ ③ Public Signs (C) _____ ④ Garbage and Trash (A) _____ B. FACILITY INTERIOR ⑤ Public Restrooms (A) ✓ ⑥ Public Signs (C) _____ ⑦ Public and Other Areas (B) _____ C. OPERATIONAL ⑧ Employee Performance (A) _____ ⑨ Employee Attitude (A) _____ ⑩ Employee Appearance (A) _____ ⑪ Operating Hours (B) ✓ ⑫ Staffing (A) _____	D. RATES ⑬ Menus (B) _____ ⑭ Authorized Rates (A) _____ E. FOOD & BEVERAGE SERVICE ⑮ Food Availability (B) _____ ⑯ Availability of Condiments (B) _____ ⑰ Customer Attention (B) _____ ⑱ Food Temperatures (B) _____ ⑲ Food Prepared to Order (B) _____ ⑳ Merchandising (C) _____ ㉑ Table Appearance (B) ✓ ㉒ Tableware (A) _____	E. (CONT'D) ㉓ Guest Checks (C) _____ ㉔ Furniture Arrangement & Cond. (C) _____ ㉕ Floors, Walls & Ceilings (B) _____ ㉖ Environment (B) _____ ㉗ Employee Meal Hours (C) ✓ F. BEVERAGE ㉘ Beverages (B) _____ ㉙ Drink Presentation (C) _____ ㉚ Liquor Laws (A) _____ ㉛ Vending (B) _____ ㉜ Beverage Container Guidelines (B) _____
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ITEM NO.	EVALUATION OBSERVATIONS	CORRECT BY (Date)	DATE CORRECTED
5	RESTROOM IN NEED OF CLEANING	3-30-82	3-30-82
11	OPERATING HOURS NOT POSTED	3-30-82	3-30-82
21	TABLECLOTHS USED ARE VERY SOILED & STAINED. SHOULD BE REPLACED	3-30-82	
27	DESIGNATED EATING AREA FOR EMPLOYEES IS NEEDED	3-30-82	

EVALUATION	DATE	NO. OF OBSERVATIONS BY CLASSIFICATION			NUMERIC PERIODIC RATING	NPS EVALUATOR	CONCESSIONER
		(A)	(B)	(C)			
INITIAL	3-15-82	1	2	1	(3) PRELIMINARY	T. Jones	S. Quich
FOLLOW-UP	3-30-82	0	1	1	(2) FINAL	T. Jones	S. Quich

REMARKS:

SUPERINTENDENT'S COPY

December 15, 1995

Memorandum

To: Field Directorate Senior Concession Analysts,
Chief, Concession Program Center

From: Chief, Concession Program Division \s\ Robert K. Yearout

Subject: Concessioner Review Program Changes for Fiscal Year 1995

In September the Concession Operations Task Force met and conducted a preliminary review of the Concessioner Review Program with the perspective of looking at the "value added" provided by current procedures. It has been determined that the work of the task force will need to be conducted in two-stages in order to be most effective.

The first stage was to recommend immediate changes of a fine-tuning nature to the existing Concessioner Review Program. These changes are intended to increase effectiveness and efficiency, and to eliminate tasks which add little or no value to the program. The second stage will consist of (1) a verification of the purpose for various operations-related components of the current Concessions Management Program, (2) identification and evaluation of alternate processes, procedures, and methods related to each component, and (3) the development of recommendations for long-term changes to the operations-related components of the Concessions Management Program. If new concession legislation is enacted, the Task Force will also have to consider any changes called for in the new law. New work groups have been formed to begin implementation of the second stage.

The following programmatic changes fall within the first stage, and are to be implemented for the 1996 reporting season.

1. The 12-month operating year concept for evaluating concessioner performance is retained, but the reporting year may be on either a Federal fiscal year (Oct. 1 - Sept. 30) or a calendar year (Jan. 1 - Dec. 31) basis. The Annual Overall Ratings for fiscal year evaluations are to be forwarded from the parks to the SSOs by December 1st, and calendar year evaluations by March 1st.

Discussion: This change will better accommodate winter season parks by reporting on a full season instead of two partial seasons, and it will somewhat break up the workload for other offices. Other options discussed included the status quo (Federal fiscal year) and allowing the performance cycle to be established for each concession authorization independently, as is currently done with annual financial reporting. The Task Force membership felt that having the performance cycle established for each authorization was also workable and preferable to the existing situation, however the recommended action would provide some flexibility while retaining some of the reporting consistency of the existing system.

2. Eliminate the requirement for all pre-season evaluations, retain the option for a quick

on-site review by park staff prior to opening, and require that the first formal evaluation be conducted within 15 days of opening for seasonal operations.

Discussion: The purpose of the pre-season evaluation as stated in the Guideline works in theory but does not work easily in real life. There may be real benefit to be gained with a pre-season as a management tool, however, pre-openings often occur immediately prior to the doors being thrown open to the public, and, unless there are life-safety concerns, this evaluation can be otherwise very disruptive and of limited immediate value during a very hectic period.

In addition, many of the factors on the evaluation forms deal with service delivery which can not be observed until after the services and facilities are actually in operation. The "approval to open" given by park staff occasionally ends up being premature because of factors such as staff training inadequacies, but this is not discovered since many operational items are not observed until later. Adopting the recommendation would help resolve this.

Eliminating the pre-season evaluation will improve the program in several other ways. First, it will eliminate a redundant evaluation for year-round operations. Second, it will reduce the overall workload, frustration, and stress associated with seasonal openings for both the concessioners and park staff. Third, it will make the concessioner more responsible for full quality of service from the day they open and help assure that the park visitor coming early in the season has a good experience since the first formal evaluation will be conducted shortly after opening.

3. Parks will have the option to conduct two evaluations for year-round operations, or three or more evaluations of an entire operation, or specific parts of it, if problems exist and are not corrected.

Discussion: There is only limited value in formally evaluating concession operations three or four times a year which are managed in a consistently good fashion. For this reason, hotel chains conduct formal evaluations only twice a year. And as is done in the hotel industry, attention should be directed to those operations with problems.

4. Retain the current minimum number of formal evaluations but include wording which allows the park the option for operations grossing under \$100,000 to either conduct regular evaluations as are currently provided, or to utilize simplified procedures for evaluating the concessioner as currently provided for Limited Concession Permits at Chapter 19.

Discussion: This change is intended for services only not facilities and will provide the park with flexibility and eliminate unneeded paperwork for simpler concession operations. As Limited Concession Permits are converted to regular Concession Permits, we feel that it makes sense to retain and perhaps expand the use of the simpler evaluation procedures for permits which do not impact park resources in a major way, are not highly visible, or have a history of satisfactory performance.

5. Modify the Periodic Evaluation Rating Criteria as follows:

(a) When no First Priority (A) deficiencies are identified, but a significant number of Second Priority (B) deficiencies exist, or any single Second Priority (B) deficiency is serious enough to consider the facility or service as satisfactory, but not at the "4" Level (almost always meets standards.), a "3" Level rating may be applied.

(b) When a First Priority (A) deficiency exists which in itself does not have a significant impact upon visitor services or employees, it will be identified and documented as a deficiency. However, the evaluator may apply a "4" Level rating with a supporting explanation.

Discussion: This change will allow staff conducting evaluations in the park more flexibility in assigning ratings and make the rating assigned more reflective of the seriousness of the situations found at the operation being evaluated.

6. Eliminate the required use of Form 10-627, Summary of Periodic Operational Ratings, and Form 10-622, Summary of Periodic Food Service Sanitation Rating Scores.

Discussion: Both of these forms are utilized to total, average, and display periodic rating scores. The forms have no value beyond this display function yet their use requires hours of labor and results in the generation of piles of paper. It is very cumbersome, wasteful, and time consuming process which should be discontinued.

7. Follow-up evaluations are changed as follows.

(a) Evaluators have the flexibility to set any correction date, which may be fewer or more than 15 days as conditions may warrant.

(b) The Concessioner is required to notify the park, within the prescribed timeframe, that corrections have been made. The method of notification will be determined by the Superintendent.

(c) Replace the current notification requirements with, "Parks must notify the Field Director of any evaluation score which is less than satisfactory."

Discussion: Regarding (a), while the current language can be read to allow the evaluator the flexibility noted in the proposed revision, including specific language will provide park staff with solid authority when dealing with difficult concessioners. Regarding (b), since several different timeframes can be listed on the same evaluation, and often concessioners will complete all corrections in a shorter timeframe, "requiring" (there are no penalties for not notifying the park) the concessioner to notify the park helps to track individual items, increases communications between the staffs, and gives park staff a better feel for the responsiveness of the concessioner. Regarding (c), this change provides for notification of the Field Director who may then request additional information and pass the information on to WASO, depending on the seriousness of the less than Satisfactory rating. It will eliminate the unnecessary flow of paper.

8. Development of new standards is modified to specify the following in place of the current requirements:

- (a) Parks will be responsible for finalizing and approving local evaluation standards.
- (b) Parks will submit new local evaluation standards to the Concession Program Center directly, with a copy to the Field Director.
- (c) The Concession Program Center will serve as the point of coordination for all evaluation standards.

Discussion: This change is consistent with the concept of delegation to the lowest level while providing communications both up the chain of command and laterally to the program center. This allows for review of the standard for program consistency, and where there is sufficient need, for formalization of new evaluation standards for the Service as a whole.

- 9. Formalize the use of a daily observation form as an informal process in the overall evaluation process. Include the information from these informal observation forms as well as verified visitor comments within the periodic evaluations where trends are indicated.

Discussion: Many parks now use this type of form under various names. The form provides a way to document observations between formal evaluations, communicate these observations to the concessioner, and track recurring problems or situations. The items noted would only be noted as a deficiency on the formal evaluation when indicative of a trend or recurring problem not being adequately addressed by the concessioner. The inclusion of visitor comments is in keeping with obtaining consumer feedback as called for by Vice President Gore in his efforts to re-invent Government. Forms currently in use in various parks are being reviewed by the Operations Task Force and a proposed format will be recommended by the task force at a later date.

Item 1 will require an eventual change to NPS-48, chapter 19; item 6 in chapters 20 & 21, and items 2-5, 7-9 in chapter 20. As part of a general review and revision of the NPS-48, these changes will be published in the Concession Staff Manual, once it is developed. However, in the interim this memorandum is to serve as official notification of changes that are to be implemented for the Concessioner Review Program.

cc: Marty Nielson, Yosemite National Park, Concessions Management
Mike Cumiskey, Chesapeake Allegheny SSO, Concessions Management
Phil Parker, Columbia Cascade SSO, Concessions Management

bcc:2410-Yearout
2410-Highnote
2410-Owen
2410-Watson

FNP:NIELSON/HIGHNOTE/WATSON/YEAROUT:12/16/95:DISK-BobY2/MEMO-Review.Cha

CONCESSIONER REVIEW PROGRAM-OPERATIONAL PERFORMANCE STANDARDS

INTRODUCTION

The following General Standard elements apply to almost all concession operations. There are, however, some instances where individual elements contained in the operating standards, include additional requirements to the general standards. In such cases, the operating standard element so states. Exhibits of the various operating standards and forms used in this program can be found at the end of this chapter.

A. GENERAL STANDARD FACILITY EXTERIOR

1. Structure Condition. The exterior of the buildings and other outdoor appurtenances must be in good physical condition, well painted or otherwise treated to protect against deterioration and kept clean and in good repair. (B)
2. Grounds. Grounds shall be well maintained, properly illuminated, uncluttered and free of litter, and debris. This will include facility entrances, stairways, parking areas, trails, driveways, walkways and other areas for which the concessioner is responsible or as outlined in the land assignment. (B)
3. Public Signs. Public signs for which the concessioner is responsible must be appropriately located, accurate, attractive and well maintained. Signs of a permanent nature shall be prepared in a professional manner, consistent with NPS standards, appropriate for the purpose they serve and, be approved by the Superintendent prior to installation. (B)or(C)
4. Garbage and Trash. The concessioner shall provide an effective system for the collection and disposal of garbage and trash within its areas of responsibility at the facilities. Waste should not accumulate in trash containers to the point of overflowing. Trash containers shall be conveniently located and in sufficient quantity to handle the needs of the area. Refuse shall be stored in receptacles which are covered, waterproof, and which comply with all relevant construction standards (such as bear and vermin proof), as specified by the National Park Service. State and/or county codes shall also be followed if applicable. (A)or(B)

B. FACILITY INTERIOR

5. Public Restrooms. Public toilet areas shall be clean, odorless, free of litter, well illuminated, ventilated, and maintained. Toilet bowls, sinks and urinals shall be clean, reasonably free of stains and in proper operating condition. Toilet tissue, towels or air drying devices and soap shall be provided. Walls, floors, ceilings, mirrors, waste receptacles, chairs and other furnishings shall be clean, and well maintained. (A)
6. Public Signs. Public signs for which the concessioner is responsible must be appropriately located, accurate, attractive and well maintained. Signs of a permanent nature shall be prepared in a professional manner consistent with NPS standards, appropriate for the purpose they serve and, be approved by the Superintendent prior to installation. (C)
7. Public and Other Areas. The lobby, offices, storerooms, workrooms, ticket booths, tackrooms, corridors and other space shall be clean, properly illuminated and well maintained. All furniture provided should be commensurate with the size of the area and its intended purpose, present a well organized and uncluttered appearance and, be in good repair. Chairs, lamps, tables, ash trays, draperies and other furnishings shall be appropriate and adequate for the visitors' comfort. Floors must be clean, free of litter and stains. Vinyl floor coverings must be clean, waxed or buffed, free of cracks, chips and worn places. Masonry tile or flagstone grouting must be in good repair and clean. Wood floors are to be clean and waxed or otherwise sealed. Carpeting must be clean, reasonably free of stains and be in good repair. Walls and ceilings are to be free of breaks and stains and have a fresh appearance. Windows must be clean and free of breaks. (B)

C. OPERATIONAL

8. Employee Performance. An active training program for the development of the necessary skills and techniques must be provided for all employees.

These sessions shall stress work performance and also include product and service presentation,

cleanliness, employee attitudes and NPS philosophy and policy. Performance should be indicative of good training. (A)

9. Employee Attitude. Each employee is to project a hospitable, friendly, helpful, positive attitude and be capable and willing to answer visitors' questions (about both job and general park information). (A)
 10. Employee Appearance. The concessioner may be required to have its employees who come in direct contact with the public, so far as practicable, to wear a uniform or badge by which they may be known and distinguished as the employees of the concessioner. The concessioner shall require its employees to exercise courtesy and consideration in their relations with the public and present a neat, clean and otherwise attractive personal appearance. (A)
 11. Operating Hours. All facilities and services shall be operated in accordance with the hours authorized by the Superintendent or as specified in the operating plan and/or rate schedule. Hours of operation shall be prominently displayed at each facility in such a manner as to be easily visible to the public. (B)
 12. Staffing. All facilities and services must be properly staffed so as to prevent undue delays, e.g., registration areas, tour and transportation services, rental services, etc. In determining what constitutes undue delay, consideration shall be given to the kinds and types of service being rendered and situations or conditions beyond the control of the concessioner such as unanticipated influxes of visitors, facility or equipment breakdowns or sudden weather changes. The reasonableness of the delay, based on the above, should be the determining factor. (A)
- D. RATES
13. Authorized Rates. All rates being charged shall not exceed those approved by the Superintendent. These rates are to be verified against the specific approved service, portion size, quality, price or other such criteria. (A)

14. Posting of Rates. Rates shall be prominently posted in sales areas (point of purchase) as necessary. (B)

15. Sales Verification. Sales must be accurately and legibly recorded. Receipts shall be given for purchases when requested. (C)

E. OTHER

16. Vending. Vending and ice machines and their location shall be easily identified, adequately illuminated, conveniently located as approved by NPS, clean, properly stocked and be in good working condition. (B)

17. Beverage Container Guidelines. All of the requirements of the NPS Beverage Container Guidelines, as stated in Chapter 33 must be followed for all beverage sales including vending machines. Any State mandatory deposit law in effect must also be adhered to. (B)

OPERATING STANDARDS FOR MERCHANDISING OPERATIONS - NO. V

A. FACILITY EXTERIOR

1. Structure Condition. Refer to General Standard, Element No. 1. (B)
2. Grounds. Refer to General Standard, Element No. 2. (B)
3. Public Signs. Refer to General Standard, Element No. 3. (C)
4. Garbage and Trash. Refer to General Standard, Element No. 4. (B)

B. FACILITY INTERIOR

5. Public Restrooms. Refer to General Standard, Element No. 5. (A)
6. Public Signs. Refer to General Standard, Element No. 6. (C)
7. Display/Sales and Other Areas. In addition to General Standard, Element No. 7, the following shall apply. Display areas and aisles shall not be cluttered or crowded. Shelving and other display fixtures may be rustic, if appropriate but must be of high quality, good taste and appearance, and be suitably finished as to be easily cleaned and maintained. Professionally manufactured display equipment is recommended. Hanging or displaying of a variety of merchandise from rafters, ceilings ropes, chains, over windows, in doorways or in the aisles, etc., is not acceptable, unless normally hung that way in ordinary use. Overall, the shops shall have an uncluttered appearance. (B)

C. OPERATIONAL

8. Employee Performance. Refer to General Standard, Element No. 8. (A)

9. Employee Attitude. Refer to General Standard, Element No. 9. (A)
10. Employee Appearance. Refer to General Standard, Element No. 10. (A)
11. Operating Hours. Refer to General Standard, Element No. 11. (B)
12. Staffing. Refer to General Standard, Element No. 12. (A)

D. RATES

13. Authorized Rates and Labeling. In addition to General Standard, Elements No. 13 & 14, the following shall apply. All merchandise must be properly tagged as to selling price. Use of stickers, grease pencils, or stringed price tags are acceptable. Identical items may be marked by display area, rather than on each item. Pricing labels however, shall not conceal point of origin (if foreign made) or other identification. *Merchandise fabricated from animal skins must be labeled to indicate that skins were obtained from legally authorized sources and are not from threatened and/or endangered species. The manufacturer of such merchandise must certify in writing to the concessioner that their products meet these requirements.* Articles sold as genuine Indian/Eskimo handcraft shall be so labeled. Such items can be identified by display provided the display is exclusively native handcraft. The authenticity of each item shall be clearly stated, so as to distinguish from commercial or machine-made Indian/Eskimo merchandise. Intermingling of other items of different origin is not permissible. Such handcraft items shall be physically separated from manufactured fascimiles, from novelty items, from foreign imports, etc., to reduce purchaser confusion. Handcraft merchandise shall be clearly visible to attract visitors and promote sales. Additionally, producers or associations of producers of genuine handcraft articles must certify in writing to the concessioner that their products are produced according to production standards outlined in the Handcraft and Merchandise policy. (See Chapter 28) (A)
14. Sales Verification. Refer to General Standard, Element No. 15. (OC)

E. MERCHANDISE

15. Authentic United States Handcrafts and Indian/Eskimo Handcraft. Such merchandise shall be checked to see if it is given preferred treatment in the selection, display, and sales promotion and meets the following production standards. (A)
- a. Is predominately handmade
 - b. Is predominately individually produced under conditions not resembling an assembly line of the factory system; and
 - c. Is produced by using only such devices or machines that allow the manual skill of the maker or makers to condition the overall shape and design of each individual product.
16. Other Preferred Merchandise. Articles or items associated with or in interpretive of the area or geographical regions in which the concession shop is located. (B)
17. Other Acceptable Merchandise. The sales of these items is permitted under the following conditions: (B)
- a. Commercially or machine manufactured Indian type merchandise, including articles which copy in design handmade jewelry and craft items, which must be labeled individually or collectively.
 - b. Foreign imports must be properly labeled to indicate the origin of manufacture. They should not, however, be handled in such quantity as to exclude other merchandise.
 - c. Natural merchandise symbolic or representative of those found in the area but not originating in National Park Service areas must be labeled and identified so as to indicate their origin. Plant materials or other natural materials originating in National Park Service areas cannot be sold.

- d. Animal skins, fabricated into such items as leather gloves, skirts, or jackets, mukluks, etc., may be sold provided they are * obtained from legally authorized sources and are not from threatened and/or endangered species.*
 - e. Souvenir or novelty articles which identify the park by simple area, name, decal or by picture of the area or popular feature, such as pennants, sweatshirts, T-shirts, linens, etc.
 - * f. Outdated merchandise such as film and other items where spoilage is not a problem may be sold at a discount rate provided that it is properly labelled as being outdated, and is displayed separately from merchandise which has not exceeded the manufacturers "Do not sell after" date.*
18. Unacceptable Merchandise. Souvenirs or other merchandise may be sold with the exception of the following: (A)
- a. All articles which persons of normal sensitivity might consider obscene, sexually oriented, suggestive, indecent, blasphemous, profane, vulgar, or in ridicule of established institutions, persons or customs. Also, merchandise that is harmful or hazardous.
 - b. Archeological specimens or objects of American Indian origin, such as pottery or arrowheads more than 100 years old, regardless of the place of origin.
 - c. Plant materials or natural plants and animals and products therefrom, including animal skins, taxidermal specimens, imported and domestic skins or parts of animals, etc., except as permitted in 17(d) above.
 - d. Merchandise * which is subject to spoilage and has * exceeded the producer's specific "Do not sell after" date.

F. OTHER

- 19. Vending. Refer to General Standard, Element No. 16. (B)
- 20. Beverage Container Guidelines. Refer to General Standard, Element No. 17. (B)