

C62(2410)

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.

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