



441 G St. N.W.
Washington, DC 20548

December 23, 2014

The Honorable Tom Harkin
Chairman
Committee on Health, Education, Labor, and Pensions
United States Senate

Federal Food Service Operations: Implementation of the HHS/GSA Health and Sustainability Guidelines

Dear Mr. Chairman:

The General Services Administration (GSA) and the Department of Health and Human Services (HHS) jointly released the Health and Sustainability Guidelines for Federal Concessions and Vending Operations, called the HHS/GSA guidelines, in 2011.¹ The guidelines are periodically updated and are based on information provided in the Dietary Guidelines for Americans (DGA), which encourages Americans to eat a healthful diet—one that focuses on foods and beverages that help achieve and maintain a healthy weight, promote health, and prevent disease.² The HHS/GSA guidelines provide a framework for (1) increasing the availability of healthy food and beverage options—such as foods with lower sodium levels, fresh fruits and vegetables, and low calorie beverages—in food service operations; (2) providing consumers with information on food and beverage choices that are healthier and more sustainable; and (3) increasing the sustainability of food service operations and supporting sustainable agricultural practices, such as offering organically or locally grown products. (See enclosure I for a summary of the guidelines.) The HHS/GSA guidelines are designed to make healthy and sustainable choices more accessible and appealing, and apply to all food service concession operations and vending machines managed by GSA and HHS.³ The HHS/GSA guidelines are designed to be flexible and can apply in all seven levels of food service operations in federal facilities, which range in complexity from level one—vending machines—to level seven—cafeterias. (See enclosure II.) Other federal agencies have also developed their own guidelines for offering healthy food and beverage options.

¹The Department of Health and Human Services and the General Services Administration, *Health and Sustainability Guidelines for Federal Concessions and Vending Operations*, accessed May 23, 2014, http://www.cdc.gov/chronicdisease/pdf/guidelines_for_federal_concessions_and_vending_operations.pdf.

²The DGA are jointly updated, if necessary, and published every 5 years by the Department of Agriculture and HHS. The next version of the DGA will be released in 2015. Department of Agriculture and Department of Health and Human Services, *Dietary Guidelines for Americans, 2010*, accessed Nov. 21, 2014, http://www.cnpp.usda.gov/sites/default/files/dietary_guidelines_for_americans/PolicyDoc.pdf.

³The guidelines may also be applied at agency sponsored or co-sponsored conferences and events onsite and offsite.

To operate food services in their facilities, GSA and HHS—specifically its operating divisions—generally award contracts or issue permits.⁴ For contracts and permits whose terms were negotiated or renegotiated after the guidelines were released in 2011, GSA and HHS are able to require implementation of some or all of the guidelines.⁵ For other food service operations in GSA and HHS facilities—those with contracts or permits whose terms were negotiated before the guidelines were released—vendors may voluntarily implement the guidelines. These vendors include blind individuals participating in the Randolph-Sheppard Vending Facility Program administered by the Department of Education’s (Education) Rehabilitation Services Administration, which gives blind individuals priority to operate vending facilities, including vending machines, snack bars, and cafeterias (which we call food service operations), on federal properties. Through this program, federal agencies may award contracts for cafeterias or issue permits for other food service operations to state licensing agencies, which arrange for Randolph-Sheppard vendors to operate food services on federal property.⁶

You requested that we examine the implementation of the HHS/GSA guidelines. This report examines (1) the status of implementation of the HHS/GSA guidelines in GSA and HHS facilities; (2) the challenges, if any, that have been reported in implementing the HHS/GSA guidelines, and how challenges have been addressed; and (3) how the HHS/GSA guidelines compare to health and sustainability guidelines developed by other federal agencies. We presented our findings to committee staff on December 15, 2014. (See enclosure III.)

To examine the status of implementation of the HHS/GSA guidelines in GSA and HHS facilities, we examined GSA data on the number of contracts and permits for food service operations in GSA facilities, and the number of contracts that require implementation of the HHS/GSA guidelines as of August 2014; HHS data on the number of HHS-owned facilities in fiscal year 2014, and implementation of the guidelines in HHS’s Centers for Disease Control and Prevention (CDC) facilities in Atlanta as of September 2014. Also, we reviewed documents and interviewed agency officials to collect information on how their data were collected, limitations of the data, and how GSA and HHS track and monitor implementation of the guidelines. We also interviewed officials from Education and vendor associations. We determined that the data collected were sufficiently reliable for our purposes by interviewing agency officials about their data.

⁴GSA’s Public Buildings Service, the landlord for the civilian federal government, acquires space on behalf of the federal government through new construction and leasing, and acts as a caretaker for federal properties across the country. According to GSA, it maintains an inventory of more than 370 million square feet of workspace for about 1 million federal employees. HHS operating divisions—such as the Centers for Disease Control and Prevention (CDC) and the National Institutes of Health—are responsible for implementing HHS programs.

⁵According to GSA officials, GSA’s policy is to require implementation of some or all of the guidelines for contracts negotiated after the guidelines were released.

⁶The Randolph-Sheppard Vending Facilities Program was created by federal law to provide blind individuals with greater economic opportunities. In competing for the award of federal cafeteria contracts against other commercial vendors, Randolph-Sheppard vendors are given priority in the selection process for award if their contract proposals fall in the competitive range. For other vending facilities, federal agencies issue permits to state licensing agencies that include the negotiated terms and conditions under which a blind person licensed by the state agency will operate the vending facility. These permits are generally for an indefinite period of time—that is, they are not renewed unless the needs of the facility change; for example, if remodeling results in a need for a different level of food service operation or relocation within a building. According to Education, in fiscal year 2012, there were 762 Randolph-Sheppard vendors managing food service operations on federal property.

To examine challenges, if any, that have been reported in implementing the HHS/GSA guidelines, and how challenges have been addressed, we reviewed relevant laws and regulations on the Randolph-Sheppard Vending Facilities Program, reviewed relevant reports discussing vendor experiences implementing the guidelines,⁷ and attended an October 2014 National Prevention Council (NPC) workshop that brought together agency officials and Randolph-Sheppard vendors to discuss challenges to and benefits of implementing the HHS/GSA guidelines.⁸ We also interviewed officials from GSA; HHS, including CDC and NPC; Education; and stakeholders—health advocacy groups and vendor associations.

To examine how the HHS/GSA guidelines compare to health and sustainability guidelines developed by other federal agencies, we compared the HHS/GSA guidelines to health and sustainability guidelines developed by three other federal agencies—the Department of Defense (DOD), the National Park Service (NPS), and the Department of Veterans Affairs (VA).⁹ To identify the guidelines that were developed by other federal agencies, and to collect information on similarities and differences across the guidelines, we reviewed documents that we identified through online searches, and interviewed officials from GSA, HHS (including officials from CDC and NPC), Education, and stakeholders.¹⁰

We conducted this performance audit from September 2014 to December 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In summary, we found the following in terms of implementation of the HHS/GSA guidelines, challenges to their implementation, and other agencies' health and sustainability guidelines:

Implementation: The HHS/GSA guidelines, which apply to food service operations managed by GSA and HHS, are being implemented in some GSA and HHS food service operations, but data on implementation are limited. Vendors operating food service operations in these facilities are required to implement the guidelines if they are included in their contracts or permits; otherwise, vendors may implement some or all of the guidelines voluntarily. As of August 2014, GSA reported that it awarded about 100 contracts to operate cafeterias, some of which predate the release of the HHS/GSA guidelines.¹¹ Of these contracts, GSA reported that about half required

⁷To identify relevant reports discussing vendor experiences implementing the HHS/GSA guidelines, we conducted searches in online databases, and interviewed agency officials and stakeholders.

⁸NPC comprises 20 federal departments, agencies, and offices, and is chaired by the Surgeon General.

⁹We contacted DOD, NPS, and VA and confirmed that we reviewed the most recent version of their guidelines, and asked about agencies' plans to update their guidelines. The guidelines we reviewed included: Department of Defense, *United State Army Food Program Implementation Guide for Initial Military Training Soldier Fueling Initiative*, accessed Oct. 27, 2014, http://www.quartermaster.army.mil/jccoe/operations_directorate/quad/nutrition/Implementation_Guide_January_2012.pdf; Department of Veterans Affairs, *Veterans Health Administration Directive 2010-007, Healthy Diet Guidelines*, accessed Oct. 16, 2014, http://www.va.gov/vhapublications/ViewPublication.asp?pub_ID=2167; and National Park Service, *National Park Service Healthy Food Choice Standards and Sustainable Food Choice Guidelines for Front Country Operations*, accessed Dec. 1, 2014, http://concessions.nps.gov/docs/policies/Frontcountry_Healthy_Foods.pdf.

¹⁰The DOD, NPS, and VA guidelines were the only ones identified through this process.

¹¹The contracts GSA reported include contracts GSA awarded to Randolph-Sheppard vendors and other vendors; and other agreements, such as revocable licenses.

vendors to implement some or all of the HHS/GSA guidelines. Of the remaining contracts that did not require vendors to implement the guidelines, GSA reported that most of these vendors were voluntarily implementing the guidelines, or offering some healthy options or implementing sustainable practices. Additionally, GSA reported that some food service operations in its facilities are operated under Randolph-Sheppard permits that predate the guidelines. Although these vendors are not required to implement the guidelines, some of these vendors voluntarily offered healthy foods and beverages, or implemented sustainable practices, according to GSA officials. As of August 2014, GSA reported issuing over 1,400 permits for Randolph-Sheppard vendors. HHS officials reported that the department does not centrally maintain information on food service operations or implementation of the guidelines, but food service operations in some HHS facilities—such as most food service operations in CDC facilities in the Atlanta area and the cafeteria in the Hubert H. Humphrey building in the District of Columbia—have implemented the HHS/GSA guidelines. According to HHS officials, information on food service operations and implementation of the HHS/GSA guidelines is managed by HHS operating divisions, such as CDC and the National Institutes of Health. GSA and HHS oversight varies regarding the implementation of the HHS/GSA guidelines, including tracking and monitoring implementation.

Challenges: Agency officials and stakeholders reported a range of challenges to implementing the HHS/GSA guidelines, including limitations in agencies' ability to require vendors—particularly vendors operating under preexisting Randolph-Sheppard permits—to implement the guidelines; perceived conflicts between the goals of vendors to maximize profits and agencies to offer more healthy food and beverage options; limited availability of food and beverage products that meet the guidelines; and limited information and resources on foods and beverages that meet the HHS/GSA guidelines. Agency officials and stakeholders reported having taken steps to address some of these challenges—for example, establishing a workgroup that includes officials from federal agencies and Randolph-Sheppard vendors. Moreover, agency officials and stakeholders described additional steps that may facilitate implementation of the HHS/GSA guidelines, such as providing more information and resources to vendors.

Other Guidelines: When compared to health and sustainability guidelines developed by DOD, NPS, and VA, the HHS/GSA guidelines have similar elements to these other guidelines—such as limits on sodium and fats—because all of them are based on the DGA. However, DOD, NPS, and VA have tailored their guidelines to meet their particular needs; for example, DOD's guidelines include nutritional standards to meet the needs of soldiers.

We provided a draft of this product to Administrator of the U.S. General Services Administration, the Secretary of Health and Human Services, and the Secretary of Education for comment. The agencies provided technical comments that were incorporated, as appropriate. We also verified with the National Park Service and the Department of Veterans Affairs the accuracy of the information in the draft report on their respective health and sustainability guidelines, and with the Department of Defense that we reviewed their current guidelines.

We are sending copies of this report to the Administrator of the U.S. General Services Administration, the Secretary of Health and Human Services, the Secretary of Education, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7114 or dsouzav@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. In addition to the contact named above, Kim Yamane, Assistant Director; Kristin Ekelund; Matthew Gever; Drew Long; and Jennifer Whitworth made key contributions to this report.

Sincerely yours,

A handwritten signature in black ink that reads "Vijay A. D'Souza". The signature is written in a cursive, flowing style.

Vijay A. D'Souza
Director, Health Care

Enclosures – 3

HHS/GSA Health and Sustainability Guidelines for Federal Concessions and Vending Operations

Food & nutrition guidelines	Standard criteria for concessions	Standard criteria for vending
Menu labeling	<ul style="list-style-type: none"> In general, all items available in cafeterias must be labeled with calories per serving as sold.^a Additional nutritional information—such as total fat, cholesterol, and sodium—must be available in written form, upon request. A prominent statement regarding the availability of additional nutritional information must be placed on the menu or menu board, upon request. 	<ul style="list-style-type: none"> Clearly display calorie content for each article of food.
Trans fats	<ul style="list-style-type: none"> Eliminate use of partially hydrogenated vegetable oils, shortenings, or margarines for frying, pan-frying, grilling, baking, or as a spread unless the label or other documentation for the oil indicates 0 grams of trans fat per serving.^b Eliminate foods containing partially hydrogenated vegetable oils, shortenings, or margarines unless the label or other documentation for the food indicates that the food contains 0 grams of trans fat per serving.^b 	<ul style="list-style-type: none"> Only offer items with 0 grams of trans fat per serving as defined by the Food and Drug Administration.
Sodium	<ul style="list-style-type: none"> All individual items must contain no more than 480 mg of sodium as served, unless otherwise designated in the specific categories of the Food Selection Standards in Concessions. Meals must contain no more than 900 mg of sodium as served. 	<ul style="list-style-type: none"> Only offer snack items that contain no more than 230 mg of sodium per serving (excludes refrigerated meals). Individual meal items must contain no more than 480 mg of sodium per serving.
Fruits	<ul style="list-style-type: none"> All canned or frozen fruit must be packaged in 100 percent water or unsweetened juice with no added sweeteners. Offer a variety of at least three whole or sliced fruits daily. Offer a variety of seasonally available fruits. 	
Vegetables ^c	<ul style="list-style-type: none"> Offer daily at least one raw, salad-type vegetable and at least one steamed, baked, or grilled vegetable seasoned without fat or oil. Mixed dishes containing vegetables must contain no more than 480 mg of sodium, as served. Offer a variety of seasonal vegetables. 	

Food & nutrition guidelines	Standard criteria for concessions	Standard criteria for vending
Cereals and grains ^c	<ul style="list-style-type: none"> When cereal grains are offered—e.g. rice, bread, etc.—then a whole grain option must be offered for that item as the standard choice. All cereal, bread, and pasta offerings must contain no more than 230 mg of sodium per serving. At least 50 percent of breakfast cereals must contain at least 3 grams of fiber and no more than 10 grams of total sugars per serving. 	
Dairy	<ul style="list-style-type: none"> If milk is offered as a beverage, only offer 2 percent, 1 percent, and fat-free milk. If cottage cheese items are offered, only offer low-fat (2 percent or less) or fat-free items. If yogurt is offered, only offer 2 percent, 1 percent, or fat-free yogurt. If yogurt is offered, only offer yogurt with no added caloric sweeteners, or yogurts labeled as reduced or less sugar according to the Food and Drug Administration labeling standards. Processed cheese must contain no more than 230 mg of sodium per serving. 	
Protein foods ^c	<ul style="list-style-type: none"> When protein entrees are offered, offer lean meat, poultry, fish, or low-fat vegetarian entree choices. At least twice per week, offer an entree with a vegetarian protein source. Canned or frozen tuna, seafood, and salmon must contain no more than 290 mg of sodium per serving, and canned meat no more than 480 mg of sodium per serving. 	
Beverages ^c	<ul style="list-style-type: none"> At least 50 percent of available beverage choices (other than 100 percent juice and unsweetened milk) must contain no more than 40 calories per serving. If juice is offered, only offer 100 percent juice with no added caloric sweeteners. Vegetable juices must contain no more than 230 mg of sodium per serving. Drinking water, preferably chilled tap water, must be offered at no charge at meal service. 	<ul style="list-style-type: none"> At least 50 percent of available beverage choices (other than 100 percent juice and unsweetened milk) must contain no more than 40 calories per serving. If milk is offered, only offer 2 percent, 1 percent, or non-fat milk dairy-type products. If juice is offered, offer at least one 100 percent juice with no added caloric sweeteners. Vegetable juice must contain no more than 230 mg of sodium per serving.

Food & nutrition guidelines	Standard criteria for concessions	Standard criteria for vending
Other considerations ^c	<ul style="list-style-type: none"> • Deep-fried options must not be marketed or promoted as the special or feature of the day. • Limit deep-fried entree options to no more than one choice per day. • Offer half- or reduced-sized choices for some meals and concession items, when feasible. • Where value meal combinations are offered, always offer fruit or a non-fried vegetable as the optional side dish, instead of chips or cookie. 	
Overall		<p>At least 25 percent of all packaged food items must:</p> <ul style="list-style-type: none"> • Limit all snack (not refrigerated meals) items to no more than 200 calories per item (excluding nuts and seeds without added fats, oils, or caloric sweeteners). • Limit total calories from saturated fat to no more than 10 percent (excluding nuts and seeds without added fats or oils). • Limit calories from sugar to no more than 35 percent of total weight (excluding fruits or vegetables without added caloric sweeteners).
Sustainability guidelines	Standard criteria for concessions	Standard criteria for vending ^c
General operations	<ul style="list-style-type: none"> • Participate in waste reduction, recycling, and composting programs, as available. • Promote and incentivize the use of reusable beverage containers. • Promote use of tap water over bottled water. • Use green cleaning practices. • Use integrated pest management practices and green pest control alternatives to maximum extent feasible. • Provide materials for single-service items (e.g. trays, flatware, plates, and bowls) that are compostable and made from bio-based products. 	
General food ^c	<ul style="list-style-type: none"> • Offer 25 percent of the product line to be organically, locally, or documented sustainably grown (e.g. pesticide free). • Offer seasonal varieties of vegetables and fruits. 	
Sustainability labeling ^c	<ul style="list-style-type: none"> • Label organic, local, or documented sustainably grown food items available in food service at the point of choice. 	

Sustainability guidelines	Standard criteria for concessions	Standard criteria for vending ^c
Animal products ^c	<ul style="list-style-type: none"> Where seafood options are offered, provide those procured from responsibly managed, sustainable, healthy fisheries. 	
Beverages ^c	<ul style="list-style-type: none"> Offer drinking water, preferably chilled tap. 	

Source: GAO summary of the *Department of Health and Human Services (HHS) and General Services Administration (GSA) Health and Sustainability Guidelines for Federal Concessions and Vending Operations*. | GAO-15-262R

Notes:

^aExceptions to this standard include items not listed on the menu or menu board, such as condiments, and other items placed on the table or counter for general use; daily specials; temporary menu items appearing on the menu for less than 60 days; and custom orders.

^bProducts listed as “0 grams of trans fat” on the Nutrition Facts panel must contain less than 0.5 grams of trans fat per serving. Oils and fats used in food preparation and as spreads must also be low in saturated fats.

^cGuidelines also have “above standard” criteria, which represent the highest value and best practices to the government. For example, concession operations that offer at least one prepared vegetable option with no more than 140 mg of sodium as served, meet the above standard criteria for the vegetable guideline. Meeting “above standard” criteria requires that the appropriate “standard criteria” to also be met.

The General Services Administration’s Levels of Food Service Operations in Federal Facilities

Level of food service	Description
1. Vending machines	Vending machines are coin activated machines that automatically dispense goods or sundries. Food products are prepared and packaged off-premise by licensed commissaries. Products may include prepackaged and onsite mixed beverages, and prepackaged milk, soups, salads, sandwiches, meals, snacks, pastries, and ice cream. The service may or may not have an onsite operator.
2. Sundry	Sundry may include newsstand materials, gifts, cards, state sanctioned lotteries, snacks, candy, other sundry items, and beverages. Sundry stands generally exclude food items and have an onsite operator.
3. Prepackaged snack bar	In addition to products offered in sundry, prepackaged snack bars may include self-served selections of packaged or onsite mixed beverages and prepackaged foods. Prepackaged snack bars have no onsite food preparation and may have attendants and an onsite manager.
4. Limited on-site snack bar	In addition to products offered in prepackaged snack bars, limited on-site snack bars include food preparation on premise, require sanitation inspections by certified sanitation workers, and may have attendants and an onsite manager. These food service operations may offer a limited range of food prepared on premise, such as soups, salads, and cold sandwiches that are self or attendant served.
5. On-site grill	In addition to products offered in limited on-site snack bars, on-site grills may include a full line of prepared hot foods from a grill and fryer station. This level of service requires complex food service equipment, building utilities, and operational food preparation practices. On-site grills require sanitation inspections, and have attendants and an onsite manager.
6. Cafe	In addition to products offered in on-site grills, cafes may include a limited line of prepared hot vegetables and entrees each day. This level of service requires complex food service equipment, building utilities, and operational food preparation practices. Cafes require sanitation inspections, and have attendants and an onsite manager.
7. Cafeteria	In addition to products offered in cafes, cafeterias may include a wide range and selection of hot and cold foods each day. This level of service requires complex food service equipment, building utilities, and operational food preparation practices. Cafeterias require sanitation inspections, and have attendants and an onsite manager.

Source: General Services Administration. | GAO-15-262R

Federal Food Service Operations: Implementation of the HHS/GSA Health and Sustainability Guidelines

Briefing to staff of the Chairman
Committee on Health, Education, Labor, and Pensions
United States Senate

December 15, 2014

For more information, contact Vijay A. D'Souza at (202) 512-7114 or dsouzav@gao.gov

- The General Services Administration (GSA) and the Department of Health and Human Services (HHS) jointly released the Health and Sustainability Guidelines for Federal Concessions and Vending Operations (HHS/GSA guidelines) in 2011. These guidelines
 - are designed to make healthy and sustainable choices more accessible and appealing; and
 - can apply to all food service concession operations and vending machines managed by GSA and HHS.
- The HHS/GSA guidelines are based on the Dietary Guidelines for Americans (DGA), which encourage Americans to focus on a healthful diet and are published by the U.S. Department of Agriculture and HHS.

- To operate food services in their facilities, GSA and HHS generally use contracts and permits.
- To implement the HHS/GSA guidelines in their contracts or permits, GSA and HHS may
 - include the guidelines as a requirement when they are awarding or renewing their contracts and permits; and
 - negotiate to include elements of the guidelines in preexisting contracts or permits.

- GSA has seven levels of food service operations:
 - Level one is coin operated vending machines.
 - Levels two through six include sundry shops, two levels of snack bars, on-site grills, and cafes.
 - Level seven is cafeterias, which offer a wide selection of hot and cold foods daily.
- In addition to the HHS/GSA guidelines, other federal agencies have issued health and sustainability guidelines.

- The Randolph-Sheppard Vending Facilities Program was created by federal law to provide blind individuals with greater economic opportunities by giving them priority to operate vending facilities, including vending machines, snack bars, and cafeterias (which we call food service operations) on federal properties.
- At the federal level, the Department of Education's (Education) Rehabilitation Services Administration oversees the program, while states are responsible for program operations.
- Through this program, federal agencies may award contracts for cafeterias or issue permits for other food service operations to state licensing agencies, which arrange for blind vendors to operate food services on federal property.
- According to Education, in fiscal year 2012, there were 762 Randolph-Sheppard vendors managing food service operations on federal property.

GAO was asked to

1. Examine the status of implementation of the HHS/GSA guidelines in GSA and HHS facilities.
2. Examine the challenges, if any, that have been reported in implementing the HHS/GSA guidelines, and how challenges have been addressed.
3. Examine how the HHS/GSA guidelines compare to health and sustainability guidelines developed by other federal agencies.

1. To examine the implementation of the HHS/GSA guidelines in GSA and HHS facilities, we
 - examined the available data from GSA and HHS on food service operations, and implementation of the HHS/GSA guidelines; and
 - reviewed documents and interviewed officials from GSA, HHS, Education, and vendor associations.

2. To examine challenges, if any, in implementing the HHS/GSA guidelines, and how these challenges have been addressed, we
- reviewed laws and regulations on the Randolph-Sheppard Vending Facilities Program, and relevant reports;
 - attended an October 2014 National Prevention Council (NPC) workshop on working with Randolph-Sheppard vendors; and
 - interviewed officials from GSA, HHS—including the Centers for Disease Control and Prevention (CDC) and NPC—Education, and stakeholders—health advocacy groups and vendor associations.

3. To examine how the HHS/GSA guidelines compare to guidelines developed by other federal agencies, we compared the HHS/GSA guidelines to health and sustainability guidelines developed by the Department of Defense (DOD), the National Park Service (NPS), and the Department of Veterans Affairs (VA). We identified these agencies' guidelines for review based on interviews with officials from GSA, HHS (including officials from CDC and NPC), Education, and stakeholders.

- The HHS/GSA guidelines are implemented in some GSA and HHS food service operations, but data on implementation are limited.
- Agency officials and stakeholders reported a range of challenges and steps to address them.
- Health and sustainability guidelines are similar across federal agencies, but vary based on each agency's needs.

The HHS/GSA Guidelines Are Implemented In Some GSA and HHS Food Service Operations
Some GSA Food Service Operations Implemented the Guidelines

- As of August 2014, GSA reported awarding about 100 contracts to operate cafeterias in GSA facilities, some of which predate the release of the HHS/GSA guidelines.¹
 - According to GSA, about half of these contracts required vendors to implement the HHS/GSA guidelines, but these contracts may not include all elements of the guidelines.
 - GSA reported that the remaining contracts did not require vendors to implement the guidelines; however, most of these vendors were voluntarily implementing the guidelines, or offering some healthy options or implementing some sustainable practices.

¹The contracts GSA reported include contracts GSA awarded to Randolph-Sheppard vendors and other vendors; and other agreements, such as revocable licenses.

The HHS/GSA Guidelines Are Implemented In Some GSA and HHS Food Service Operations
Some GSA Food Service Operations Implemented the Guidelines

- As of August 2014, GSA officials reported that the National Capital Region—a region with many federal facilities with food service operations—had 21 contracts to operate 30 cafeterias, and all of these contracts require vendors to implement the HHS/GSA guidelines.
- Nationwide, GSA reported it issued over 1,400 Randolph-Sheppard permits to operate food service operations in GSA facilities as of August 2014:
 - More than 200 of these permits were for food service levels two through six, including cafes, snack bars, and sundry shops.
 - About 1,200 of these permits were for vending machines.
 - Some Randolph-Sheppard permits predate the HHS/GSA guidelines, and, therefore, do not require vendors to implement the HHS/GSA guidelines. However, some of these vendors voluntarily offered healthy foods and beverages, and implemented sustainable practices.

The HHS/GSA Guidelines Are Implemented In Some GSA and HHS Food Service Operations
Some HHS Food Service Operations Implemented the Guidelines;
HHS Does Not Track Implementation Centrally

- HHS officials reported that the department does not centrally maintain information on food service operations or implementation of the HHS/GSA guidelines.
- As of June 2014, HHS did not centrally maintain information on HHS food service operations, including information on the number of Randolph-Sheppard permits that include the HHS/GSA guidelines.²
- However, according to HHS officials, information on food service operations and implementation of the guidelines is managed by HHS operating divisions, such as CDC and the National Institutes of Health.

²HHS reported that as of June 2014, the department owned 546 buildings. This number excludes 2,079 buildings operated by the Indian Health Service (1,413 of which HHS identified as family housing units). According to HHS, the 546 HHS-owned buildings are owned by CDC, the Food and Drug Administration, and the National Institutes of Health.

The HHS/GSA Guidelines Are Implemented In Some GSA and HHS Food Service Operations
Some HHS Food Service Operations Implemented the Guidelines;
HHS Does Not Track Implementation Centrally

- HHS officials reported that some food service operations in HHS facilities have implemented the HHS/GSA guidelines.
- CDC officials reported that as of September 1, 2014, all five non-vending machine food service operations in CDC facilities in Atlanta were operating under Randolph-Sheppard permits that require vendors to implement the HHS/GSA guidelines. Additionally, CDC officials reported that the agency will award a contract that will require the vendor to implement the HHS/GSA guidelines in another CDC cafeteria in the Atlanta area, which is scheduled to open in mid-2015.
- HHS, in collaboration with GSA, implemented the guidelines in the cafeteria in the Hubert H. Humphrey building—HHS’s headquarters building located in the District of Columbia—in January 2011.³

³Many federally owned buildings, including the Hubert H. Humphrey building, are managed by GSA.

The HHS/GSA Guidelines Are Implemented In Some GSA and HHS Food Service Operations
GSA and HHS Oversight of Implementation of the Guidelines Varies

- GSA tracks some information on implementation of the HHS/GSA guidelines, and GSA officials reported plans to collect additional information.
 - GSA tracks information on food service operations at the regional level, and all 11 GSA regions track whether food service operations offer healthy food and beverage options, and implement sustainable practices.
 - Data across the regions are not tracked consistently.
 - GSA officials reported that they are currently developing an approach to collect more consistent information on food service operations, and anticipated having additional information on GSA implementation of the HHS/GSA guidelines in May 2015.
- Although HHS officials told us that the department does not centrally track information on implementing the HHS/GSA guidelines, officials said they could consider collecting such data across the operating divisions if the department determined it was needed.⁴

⁴NPC officials reported that they are working to develop a strategy to collect information on implementation of health and sustainability guidelines across the 20 departments, agencies, and offices that are NPC members.

The HHS/GSA Guidelines Are Implemented In Some GSA and HHS Food Service Operations
GSA and HHS Oversight of Implementation of the Guidelines Varies

- GSA officials reported conducting regular monitoring of cafeterias in GSA owned or leased facilities through quarterly reviews and using tools, including a check list, to monitor vendors' compliance with HHS/GSA guidelines.
- HHS officials reported that HHS does not have departmental guidance for monitoring vendors' compliance with contracts or permits, and each operating division determines how to oversee vendors, including monitoring of implementation of the HHS/GSA guidelines. For example, CDC officials said the agency designated staff who oversee food service operations in CDC facilities in the Atlanta area. For the cafeteria in the Hubert H. Humphrey building, HHS monitors implementation of the guidelines (for example, by meeting with the vendor monthly); the department also conducted a formal evaluation of the implementation of the guidelines in this cafeteria.⁵

⁵See A.I. Bayne et al. *The HHS Hubert H. Humphrey Building Cafeteria Experience: Incorporation of the Dietary Guidelines For Americans, 2010 into Federal Food Service Guidelines* (Washington, D.C.: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, 2012).

**Agency Officials and Stakeholders Reported a Range of Challenges,
and Steps to Address Them**

Challenges to Implementing the HHS/GSA Guidelines in Federal Facilities

Reported limitations on agencies' abilities to require vendors to implement guidelines:

- Some food service contracts and permits pre-date the HHS/GSA guidelines and, therefore, do not include the guidelines. GSA and HHS cannot require vendors to implement the guidelines unless these contracts are recompleted or renegotiated or unless these permits are renegotiated. GSA officials told us that their policy is to include the HHS/GSA guidelines in any new agreements.
- Randolph-Sheppard permits for food service operations are issued for an indefinite period of time, and GSA and HHS reported that they cannot amend these permits to include the guidelines unless the needs of a facility change and the permits are renegotiated.

**Agency Officials and Stakeholders Reported a Range of Challenges,
and Steps to Address Them**

Challenges to Implementing the HHS/GSA Guidelines in Federal Facilities

Perceived conflict of goals:

- Some vendors may be reluctant to implement the HHS/GSA guidelines if they perceive that offering healthier foods and beverages conflicts with their goal of maximizing profits.
- Agency officials and stakeholders reported that little data are available on how sales are affected by implementing the guidelines.

Reported limitations in the availability of products:

- Some suppliers carry few products that meet the guidelines.
- According to vendor associations, available products that meet the HHS/GSA guidelines can be poor sellers due to poor tasting foods and beverages, and high cost.

**Agency Officials and Stakeholders Reported a Range of Challenges,
and Steps to Address Them**

Challenges to Implementing the HHS/GSA Guidelines in Federal Facilities

Reported limitations in information and resources:

- Agency officials and stakeholders reported that little information is available on which foods meet the HHS/GSA guidelines, resulting in vendors having difficulty identifying foods that meet the guidelines.
- Vendor associations also reported that inconsistencies across health and sustainability guidelines at the federal, state, and local levels can lead to confusion among vendors.

**Agency Officials and Stakeholders Reported a Range of Challenges,
and Steps to Address Them**
Steps Taken To Address Challenges

- GSA and HHS officials reported that they have taken steps to encourage vendors to implement the guidelines, including
 - developing and disseminating resources for vendors, such as educational materials describing successful strategies for implementing healthier food and beverage options; and
 - establishing a workgroup that encourages collaboration between federal agencies and Randolph-Sheppard vendors.
- GSA officials and stakeholders reported that suppliers have made more quality, healthy products available, and the cost of some of these products has declined.

**Agency Officials and Stakeholders Reported a Range of Challenges,
and Steps to Address Them**

Additional Steps That May Facilitate Implementation of the HHS/GSA Guidelines

Agency officials and stakeholders described additional steps that may facilitate implementation of the HHS/GSA guidelines.

- *Making additional resources available to vendors*, such as a list of food and beverage products that meet the HHS/GSA guidelines. CDC officials reported that they are developing an approach to help vendors quickly identify food and beverage products that meet the guidelines.
- *Addressing concerns about vendor profits* by increasing the research and data available on the economic benefits of providing healthier food and beverage options.

**Health and Sustainability Guidelines are Similar across Agencies,
but Vary Based on Each Agency's Needs**

- Health and sustainability guidelines developed by DOD, NPS, and VA are similar to the HHS/GSA guidelines, because they are all based on the DGA. For example, all the guidelines include limits on sodium and fat content for foods offered.
- Each agency tailored its guidelines to meet its particular needs. For example, DOD's guidelines include nutritional standards to meet the needs of soldiers, and the NPS guidelines are targeted to national park visitors.
- Agencies indicated that their guidelines are flexible, and officials from GSA, HHS, and VA reported that they were updating or planning to update their guidelines.

**Health and Sustainability Guidelines are Similar across Agencies,
but Vary Based on Each Agency's Needs**

Food and nutrition guidelines	HHS/GSA	DOD	NPS	VA
Menu labeling	X		X	X
Limits on trans fats	X	X	X	X
Limits on sodium	X	X	X	X
Fruits; for example, a fresh fruit option at each meal	X	X	X	X
Vegetables; for example, offer a vegetable with meals	X	X	X	X
Cereal and grain; for example, offering whole grain products	X	X	X	X
Dairy, such as offer low-fat milk	X	X	X	X
Protein foods; for example, offer lean meats or low-fat vegetarian entrees	X	X		X
Beverages; for example, offer selections with no sugar added (e.g. 100% fruit juices) ^a	X	X	X	
Other considerations; for example, limits on fried food and desserts	X	X	X	X

Source: GAO analysis of General Services Administration (GSA), Department of Health and Human Services (HHS), Department of Defense (DOD), National Park Service (NPS), and Department of Veterans Affairs (VA) health and sustainability guidelines. | GAO-15-262R

Note:

^aVA officials reported that upcoming revisions to their guidelines, planned for 2015, will include offering 100 percent fruit juices as a standard, and that VA facilities are currently offering 100 percent fruit juices.

**Health and Sustainability Guidelines are Similar across Agencies,
but Vary Based on Each Agency's Needs**

Sustainability guidelines	HHS/GSA	DOD	NPS	VA
General operations; for example, composting and recycling	X			X
General food; for example, organic or seasonal food options	X	X	X	X
Sustainability labeling, such as labeled as organic, local, or documented sustainably grown at point of choice	X		X	
Animal products; for example, seafood options that are procured from responsibly managed, sustainable, healthy fisheries	X		X	X
Beverage requirements; for example, offer tap water instead of bottled	X		X	X

Source: GAO analysis of General Services Administration (GSA), Department of Health and Human Services (HHS), Department of Defense (DOD), National Park Service (NPS), and Department of Veterans Affairs (VA) health and sustainability guidelines. | GAO-15-262R



Enclosure III

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