

CASE STUDY REPORT

The HHS Hubert H. Humphrey Building Cafeteria Experience:
*Incorporation of the Dietary Guidelines for Americans, 2010
into Federal Food Service Guidelines*

MAY 2012

PRESENTED TO:
Office of the Assistant Secretary
for Planning and Evaluation

PRESENTED BY:
NORC at the University of
Chicago



at the UNIVERSITY *of* CHICAGO

Acknowledgements

Researchers at NORC at the University of Chicago are grateful to the federal staff and industry experts who, through interviews and other communications, provided us with information essential to understanding the implementation of the *Health and Sustainability Guidelines* in this case study. We thank Joel Kimmons, PhD (CDC), Holly M. McPeak, MS (ODPHP), Samir N. Ayoub (GSA), and Paul Kalinowski (OS) for their thoughtful feedback on the draft case study.

The project team that contributed to this case study is listed below:

NORC Management

Project Director

Elizabeth Hair, PhD

Project Manager

Karen Harris Brewer, MPH

Case Study Task Leader

Alycia Infante Bayne, MPA

ASPE Leadership

Laina Bush, MBA

Julia Spencer, PhD, MSPH

Project Officer

Kathleen Koehler, PhD, MPH

Project Team

Rashida Dorsey, PhD, MPH

Amanda Cash, DrPH

Case Study Authors

Alycia Infante Bayne, MPA

Elizabeth Hair, PhD

Karen Harris Brewer, MPH

Arika Garg, BA

Project Background

The Department of Health and Human Services (HHS) is implementing an array of programs to address the increasing prevalence of obesity in the U.S. population. The HHS Healthy Weight and Obesity Initiative encompasses many of these programs, policies, and initiatives, which are taking place in a range of community, clinical, and marketplace settings. These interventions target multiple socio-ecological levels; engage stakeholders across sectors of influence (e.g., government, industry); and are designed to affect various outcomes (e.g., social norms and values, or changes to the social and physical environments in which health behavior occurs).

The HHS Office of the Assistant Secretary for Planning and Evaluation (ASPE) contracted with NORC at the University of Chicago to conduct evaluation and reporting activities spanning several of these initiatives. Through a 24-month project, “Evaluation and Analytic Support for the HHS Healthy Weight and Obesity Initiative,” NORC is assisting HHS by tracking progress on activities to reverse the obesity epidemic. NORC is collecting data from a selected portfolio of HHS healthy weight projects, preparing reports for HHS, and providing technical assistance and evaluation support to selected projects. The project began in September 2010.

NORC’s activities for this project include: 1) data collection and reporting, and 2) evaluation technical assistance and support. To help monitor progress and inform future program development, NORC is collecting, analyzing, and reporting on qualitative and quantitative data and information submitted by various offices and agencies. NORC is also complementing the work of HHS technical evaluation specialists by providing technical assistance and evaluation support to selected projects.

Suggested Citation

Bayne AI, Hair E, Harris Brewer K, Garg A. The HHS Hubert H. Humphrey Building Cafeteria Experience: Incorporation of the *Dietary Guidelines for Americans, 2010* into Federal Food Service Guidelines. Prepared by NORC at the University of Chicago. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. May 2012.

Table of Contents

Executive Summary	1
Introduction.....	11
Overview.....	11
Background.....	12
Summary of Case Study Methodology	14
Overview of the Case Study	17
Part I: Developing the <i>Health and Sustainability Guidelines</i>.....	18
A Cross-Agency Partnership to Develop the Health & Sustainability Guidelines	18
The Nutrition Elements of the <i>Health and Sustainability Guidelines</i>	19
The Sustainability Elements of the <i>Health and Sustainability Guidelines</i>	20
Key Considerations for the <i>Health and Sustainability Guidelines</i>	21
Agency-Wide Review of the Guidelines	23
Public Release of the Guidelines	23
Part II: Translating the <i>Health and Sustainability Guidelines</i> into a Request for Proposal .	25
Overview of the Humphrey Building Cafeteria.....	25
Developing the RFP for the Humphrey Building Cafeteria.....	25
Characteristics of the Final RFP	28
Challenges and Solutions Related to the Development of the RFP	28
Issuing the RFP and Selecting a Vendor.....	29
Part III: Implementing the <i>Health and Sustainability Guidelines</i> in the Humphrey Building Cafeteria	31
The Vendor’s Experience Implementing the Guidelines at the Humphrey Building Cafeteria.....	31
New Programs and Services Designed to Meet the Guidelines and Satisfy the Consumer.....	31
The Humphrey Building Cafeteria Vendor’s Challenges Related to Implementing the Guidelines .	33
Performance Oversight in the Humphrey Building Cafeteria.....	35
Preliminary Findings of the Impact of the Guidelines on Participation and Revenue at the Humphrey Building Cafeteria.....	36
The <i>Health and Sustainability Guidelines</i> : An HHS <i>Innovates</i> Award Program Finalist	38
Part IV: Other Vendor’s Perspectives on the <i>Health and Sustainability Guidelines</i>: Challenges, Opportunities, and Facilitators	39
Examples of the <i>Health and Sustainability Guidelines</i> that Other Vendors Have Implemented	39
Opportunities Associated with Implementing the Guidelines	40
Challenges Associated with Implementing the Guidelines.....	40
Key Facilitators.....	43
Part V: Discussion and Lessons Learned from Translating the <i>Health and Sustainability Guidelines</i> into a Request for Proposal.....	45
Endnotes.....	50
Appendix A: Timeline of the Development and Implementation of the <i>Health and Sustainability Guidelines</i>.....	1
Appendix B: Additional Detail on Case Study Methodology	3
Appendix C: Glossary and Abbreviations.....	7

List of Exhibits

Exhibit 1: Timeline of Key Events Related to the Development and Implementation of the <i>Health and Sustainability Guidelines</i>	13
Exhibit 2: Case Study Methodology	15
Exhibit 3: The Parallel Process of Developing the Health and Sustainability Guidelines and Request for Proposal for the Humphrey Building Cafeteria	26
Exhibit 4: The Health and Sustainability Guidelines in Practice: Menu Structure and Product Offerings at the Humphrey Building Cafeteria	32
Exhibit 5: Humphrey Building Cafeteria Percent Change in Monthly Sales and Check Averages, January through June 2010 to 2011	37
Exhibit 6: Humphrey Building Cafeteria Customer Participation, and Healthy Meals Served, January through June 2011.....	37

Executive Summary

Overview

This case study describes the inception, development and implementation of the *Health and Sustainability Guidelines for Federal Concessions and Vending Operations*. The case study was developed under contract to the HHS Office of the Assistant Secretary for Planning and Evaluation (ASPE), as part of a project entitled, “Evaluation and Analytic Support for HHS Healthy Weight and Obesity Initiatives.”

Background

In May 2009, the Office of Personnel Management began developing worksite wellness best practices and other initiatives to retain a strong federal workforce. The Offices of Management and Budget and Health Reform began coordinating with federal agencies to provide healthier food selections to federal employees. The effort to improve food choices and wellness at federal facilities was led by the U.S. Department of Health and Human Services (HHS), General Services Administration (GSA), and U.S. Department of Agriculture (USDA).

In February 2010, GSA released the *Wellness and Sustainability Requirements for Contracts at Federal Facilities*, a set of procurement guidelines that sought to make positive changes in concessions contracts by enhancing cafeteria operations and minimizing environmental impact. GSA planned to use the requirements to select cafeteria and concessions vendors that serve federal facilities. U.S. Department of Health and Human Services (HHS) strongly supported GSA’s actions to improve wellness and sustainability in the federal work place, and initiated a cross-agency partnership to develop specific food, nutrition, and sustainability standards to complement the GSA’s *Wellness and Sustainability Requirements*. Based on the HHS and USDA *Dietary Guidelines for Americans 2010* and sustainability best practices, the Centers for Disease Control and Prevention (CDC) coordinated a steering committee of staff from several HHS agencies and offices, together with GSA and other collaborators, to develop the *Health and Sustainability Guidelines for Federal Concessions and Vending Operations*.

The *Health and Sustainability Guidelines* focus on improving the health of the thousands of employees and others who eat at federal facilities each day and conserving vital environmental resources. The goal of the guidelines is to:

“assist contractors in maximizing a healthier and sustainable food service by increasing the offering of healthier and sustainable food and beverage choices, while eliminating industrially produced trans fats, decreasing the sodium content in available foods, and

allowing individuals to make informed choices about what they are purchasing and eating through the labeling of menu items.”¹

Shortly before the guidelines were publicly released, HHS and GSA developed a request for proposal (RFP) to issue a new contract to pilot the *Health and Sustainability Guidelines* at the HHS Hubert H. Humphrey Building Cafeteria. The Humphrey Building was the first federal food service operation to implement the *Health and Sustainability Guidelines*. As of March 2012, all of the GSA’s 32 federal facilities in the Capital Region are incorporating the guidelines in full or in part.

Between May 2011 and 2012, NORC at the University of Chicago developed a case study to document the collaborative process used by HHS, GSA, and others to incorporate the *Health and Sustainability Guidelines* into an RFP, and to describe vendors’ perspectives on the implementation of the guidelines in current and future cafeteria contracts.

Case Study Methods

The case study addressed four major research questions:

- ▶ How did GSA and HHS incorporate the *Health and Sustainability Guidelines* into the RFP for the Humphrey Building Cafeteria?
- ▶ What lessons can be learned from the RFP development process?
- ▶ To what extent will vendors that bid on federal food service contracts face new challenges or opportunities as a result of the implementation of the *Health and Sustainability Guidelines*?
- ▶ Based on the Humphrey Building Cafeteria vendor’s experience—as well as feedback from other federal food service vendors—to what extent does adherence to the *Health and Sustainability Guidelines* impact cafeteria sales, menu offerings, and food delivery?

Methods included a document review on the *Health and Sustainability Guidelines* and interviews with nine federal staff who participated in the development and implementation of the guidelines, and nine federal food service vendors, including the vendor that implemented the guidelines in the Humphrey Building Cafeteria. The purpose of the federal staff interviews was to gather detailed information about the development of the *Health and Sustainability Guidelines*, and the use of those guidelines in the Humphrey Building Cafeteria RFP. The purpose of the vendor interviews was to learn about federal food service vendors’ perspectives

¹ “Healthier Food at Federal Worksites: *Health and Sustainability Guidelines* for Federal Concessions and Vending Operations.” General Services Administration, accessed February 20, 2012.

on the *Health and Sustainability Guidelines* and possible implications for their operations and/or the federal cafeteria industry as a whole.

HHS and GSA identified the appropriate key individuals for the federal staff interviews, including operations staff who were familiar with the goals of HHS for healthy eating and sustainability, and individuals that reviewed the proposals for the Humphrey Building Cafeteria contract. GSA identified the appropriate company representatives for the vendor interviews from the food service industry. GSA identified vendors that are implementing or had the ability to implement the guidelines in established facilities, including companies that were interested in bidding on the Humphrey Building Cafeteria contract.

NORC also reviewed cafeteria sales data for the Humphrey Building Cafeteria to explore trends. Finally, NORC solicited feedback on this case study from a work group composed of key staff from HHS and GSA. The NORC Institutional Review Board approved the data collection procedures and study instruments under protocol 110802 on August 11, 2011.

Limitations

Although GSA informed federal food service vendors about the new *Health and Sustainability Guidelines*, and conducted discussions with vendors to solicit feedback on the guidelines, the nine vendor representatives who participated in interviews (on behalf of their vendor organizations) had varying levels of knowledge about the guidelines. At the time of the case study, some vendors had not yet implemented the guidelines, and therefore provided their perspectives on the feasibility of implementing the guidelines in the future.

Further, the case study focuses on vendors' experiences and perspectives related to concessions. The guidelines may have important implications for organizations that operate vending machines and snack bars, though this subject is not described in this case study.

Due to resource constraints, NORC did not conduct interviews with Humphrey Building Cafeteria patrons. Other unaddressed confounding variables—such as whether the vendor applied for the Humphrey Building Cafeteria contract but was not awarded the contract—may have influenced vendors' perspectives.

Key Findings

The case study identified key findings related to the development of the guidelines, the translation of the the guidelines into an RFP for the Humphrey Building Cafeteria, and the implementation of the guidelines. Vendors also reported common challenges and opportunities.

Developing the Health and Sustainability Guidelines.

The steering committee that developed the *Health and Sustainability Guidelines* was led by the Centers for Disease Control and Prevention (CDC) and included experts in nutrition, sustainability and management from across HHS, and from GSA's Capital Region Office and Central Office and the U.S. Department of Agriculture (USDA). HHS steering committee participants, in addition to those from CDC, were from several offices and agencies, including the U.S. Food and Drug Administration (FDA), the National Institutes of Health (NIH), the Office of Disease Prevention and Health Promotion (ODPHP), the Office of the Assistant Secretary for Administration (ASA), and the Office of the Assistant Secretary for Planning and Evaluation (ASPE).

The steering committee considered a number of factors when developing the *Health and Sustainability Guidelines*, including linkages between agriculture and industry; implications for the food supply chain; the balance between healthier choices and consumer satisfaction; the impact on the hospitality industry's profits; and marketplace limitations for specific products (e.g., lower-sodium deli meats and cheeses). The nutrition elements of the *Health and Sustainability Guidelines* are based on the *Dietary Guidelines for Americans 2010*. The sustainability guidelines were developed from GSA's *Wellness and Sustainability Requirements for Contracts at Federal Facilities*; executive orders that promote environmentally sound and sustainable methods of operation; and legislation and initiatives such as the USDA's Organic Foods Production Act and the National Organic Program.

Experts from across HHS reviewed the guidelines. The steering committee incorporated this feedback, and publicly released the *Health and Sustainability Guidelines* on March 24, 2011.

Translating the Health and Sustainability Guidelines into a Request for Proposal (RFP) for the Humphrey Building Cafeteria. While the steering committee was developing the guidelines, several GSA stakeholders from this committee began planning to pilot the guidelines in a federal cafeteria. Key stakeholders from HHS and GSA identified the HHS Hubert H. Humphrey Building Cafeteria in Washington, DC as the pilot location. Federal employees at the Humphrey Building were eager for healthier food options and greener products, which helped HHS to rebid the current contract that was up for renewal. HHS and GSA collaborated to develop an RFP that incorporated the *Health and Sustainability Guidelines*. Many of the same individuals who developed the guidelines also participated in the process of translating the guidelines into a RFP. Staff from GSA developed the RFP, in collaboration with HHS operations and management staff. Other HHS staff (i.e., experts in sustainability and nutrition) were also involved throughout the review and vendor selection process. In developing the RFP, GSA solicited feedback from federal vendors to gauge the feasibility of including some or all of the *Health and Sustainability Guidelines* in the RFP. HHS operations staff provided review and participated in the final HHS procurement selection process. The final RFP incorporated the preliminary draft of the *Health and Sustainability Guidelines*, with an understanding that both the guidelines and the RFP would require flexibility and future revisions.

Key stakeholders that were involved in the RFP development process did not report challenges related to interpreting the guidelines or translating them into contract language. The main challenge was striking a balance between the types of health and sustainability initiatives that GSA and HHS proposed for the cafeteria and the reality of what the industry could reasonably support because of the availability of products in the marketplace, costs, and other factors. To overcome these challenges, GSA built flexibility into the RFP. For example, the guidelines suggest that 25 percent of the product offerings must be organically, locally or “sustainably” grown. In the event that reasonably priced local food is not available year-round, the vendor can choose to source organic or fair trade items instead. The RFP allows for different combinations of menu choices so that vendors have some flexibility in meeting the guidelines. Also, according to the RFP, vendors must ensure that 40 percent of their menu offerings meet all of the *Health and Sustainability Guidelines*.

HHS reported that a diverse group of vendors responded to the RFP, including both large and small companies. Vendor proposals were scored on criteria including: Corporate Capability/Sanitation/ Management Controls and Accountability (20%); Resources and Staffing (15%); Menu Cycle and Variety (15%); Wellness Program (20%); Price and Portion Policies (10%); and Sustainability (20%). Reviewers from GSA and HHS brought experience in nutrition, sustainability, and operations. The winning vendor was awarded the Humphrey Building Cafeteria contract in November 2010 and began serving customers in January 2011. In February 2011, after the contract was in place, the final *Health and Sustainability Guidelines* were incorporated into the contract’s operating procedures for the cafeteria.

Implementing the Health and Sustainability Guidelines in the Humphrey Building Cafeteria.

The Humphrey Building was the first federal food service operation to implement the *Health and Sustainability Guidelines*. The vendor implemented a range of programs and services that embody the guidelines, including a healthier choice menu program, a promotional program that offers healthier options each day that meet all of the guidelines; access to nutrition information and a dietitian; a refillable coffee mug and water bottle program; and composting. The vendor’s website provides customers with a place to provide feedback. The vendor also plans to administer a customer satisfaction survey one year post-implementation. Vendor representatives and federal staff commented that the cafeteria has a “healthier” appearance. Nutrition information on signage, and promotional materials about fair trade coffee, and recycling, are featured at the point of purchase.

The vendor has tried to price healthy meals competitively. GSA data indicated that, comparing the first six months of 2010 to the first six months of 2011, monthly cafeteria sales increased by 34 percent on average. Monthly check averages (i.e., the average amount each guest spends on a meal) also increased (comparing the first six months in 2010 to the first six months in 2011). Increases in prices between 2010 and 2011 may have contributed to the change in monthly check averages. In June 2011, about 50 percent of the meals purchased met all of the *Health and*

Sustainability Guidelines. HHS shares data with cafeteria patrons on healthy meal sales and customer participation.

HHS meets on a monthly basis with the Humphrey Building Cafeteria vendor to discuss mutual objectives, including but not limited to service levels, wellness, sustainability menus and marketing programs. GSA also meets on a quarterly basis with the vendor to conduct an operational review of the menu, and discuss monthly reports on customer participation and sales. GSA uses a similar operational review process in all of its 32 federal facilities that incorporate the *Health and Sustainability Guidelines*. Additionally, GSA continues to provide guidance to all vendors about the guidelines through meetings, emails, and newsletters.

Upon implementation of the guidelines in the Humphrey Building Cafeteria, 40 percent of the vendor's menu items were required to meet the guidelines. The percentage of the guidelines that vendors must meet will increase in response to customer demand and industry direction.

Challenges. The Humphrey Building Cafeteria vendor and/or other vendors that serve federal facilities identified several common challenges with respect to implementing the *Health and Sustainability Guidelines*: meeting the sodium guidelines; sourcing specialty products; access to local and organic produce; the cost of healthier products; and customer acceptance.

Meeting the sodium guidelines. The Humphrey Building Cafeteria vendor and other vendors that serve federal facilities reported that a key challenge has been meeting the sodium criteria in the *Health and Sustainability Guidelines*. According to the guidelines, all individual food items must contain ≤ 480 mg sodium as served, unless otherwise specified. All meals must contain ≤ 900 mg sodium as served (approximately 39% of the *Dietary Guideline* recommendation of 2,300 mg for daily intake). The following offerings must contain ≤ 230 mg sodium per serving: all cereal, bread and pasta offerings; all vegetable offerings; processed cheeses; and vegetable juices. There are two key challenges associated with sodium. The first challenge is a lack of availability of lower sodium products, especially in the institutional pack size, in the marketplace. According to vendors, the marketplace does not offer a wide variety of lower sodium products that meet the guidelines' standard criteria. Specifically, the Humphrey Building Cafeteria vendor reported that it is difficult to identify bread, deli meat, and cheese products that meet the sodium criteria. The second challenge is that vendors believe customers are acclimated to the high levels of sodium in foods like pizza and deli meats. Therefore, a few of the vendors expressed concern that reductions in sodium could impact customer participation.

Sourcing specialty products. The Humphrey Building Cafeteria vendor reported challenges related to sourcing specialty products such as lower sodium deli meat. The vendor indicated that food service distributors are reluctant to purchase specialty products with a limited shelf life from manufacturers. The vendor explained that in order for the product to be profitable—due to high fuel costs and other factors—manufacturers have high shipping requirements and products are shipped in bulk pallets and inventory quantities. However, the cafeteria may not be able to

sell a large volume of specialty products, and/or fresh items, before they expire, and therefore, could lose money.

Access to local and organic produce. The *Health and Sustainability Guidelines* have standard criteria related to offering organically, locally or documented sustainably grown products as well as seasonal varieties of fruits and vegetables. Vendors described challenges associated with meeting the guidelines on organic and locally grown produce (e.g., to meet the standard criteria, 25 percent of the product line must be organic, local or sustainably grown). Vendors commented that food service operations on the East Coast face challenges in securing organic and local produce year round.

Cost. A majority of the vendors expressed concern that their profit/loss ratio could be affected by the guidelines. Vendors noted that healthy items cost more to purchase and prepare. Foods that are more costly include fresh vegetables and fruits, depending upon the time of the year, and any item that is fresh and not processed. Vendors reported that compostable and disposable products are more costly. Other costs include infrastructure costs related to upgrading facilities for fresh cooking and fresh product storage, and front-of-house updates to offer chilled tap water. Additionally, vendors reported that they would need to provide additional training to chefs and other staff to prepare healthier options rather than using as many ready-made products.

Customer acceptance. Some vendors were concerned that the food that fulfills the guidelines would only appeal to a health conscious consumer, affecting sales. Vendors acknowledged that this challenge could be addressed through educational efforts. For example, the Humphrey Building Cafeteria vendor indicated that consumers were initially dissatisfied with the transition to organic, bird friendly coffee because it cost patrons 10 to 15 cents more per cup. The vendor addressed this challenge by collaborating with GSA and HHS to launch a successful marketing and education campaign about the benefits of purchasing organic, bird friendly coffee. Today, coffee is one of the vendor's best-selling products.

Vendors noted other concerns such as the cost of organic products; the increased labor associated with providing locally produced items; the ongoing costs associated with updating and printing nutrition materials; and a lack of local composting facilities in some areas. Several vendors said that they expected the guidelines would have an impact on their menu offerings, by limiting the types of beverages they could offer and reducing the variety of dry cereal products (i.e., cereals must have at least 3g of fiber and less than 10g total sugars per serving).

Opportunities. The guidelines present a number of opportunities. The Humphrey Building Cafeteria vendor found that the experience of implementing the guidelines has changed the way their company offers and markets foods—not only in their HHS contract, but in others as well. Other vendors commented that the guidelines are an opportunity for cross-company learning for their management, staff, and marketing and communications departments. Additionally, some thought the guidelines would enable vendors to be more creative and innovative.

Lessons Learned

The Humphrey Building Cafeteria vendor's experience implementing the guidelines offers a model for other federal, state and local agencies, organizations, and businesses. The guidelines have changed the way that food is purchased, prepared and presented in the Humphrey Building Cafeteria. Since the implementation of the guidelines, HHS and GSA have collaborated to promote the guidelines to other federal agencies. GSA frequently engages vendors that serve both government and non-government cafeterias to discuss opportunities for creating healthier menus and more sustainable food products. As of March 2012, all of the GSA's 32 federal facilities in the Capital Region are incorporating the guidelines in full or in part.

Key stakeholders involved in developing the *Health and Sustainability Guidelines* and the RFP for the Humphrey Building Cafeteria offer several valuable lessons learned for government staff; food service vendors; and other public and private agencies that may consider implementing the guidelines in the future.

Lessons Learned for Government

Federal staff found that having a multi-disciplinary cross-agency partnership was instrumental to their success in developing the guidelines and translating them into an RFP. The *Health and Sustainability Guidelines*, and the resulting RFP that incorporated them, are products of a cross-agency, multi-disciplinary collaborative. Federal staff noted that the development of the guidelines, and translation of these guidelines into an RFP, was a team approach, and that the collaboration across agencies to bring the best available nutrition science to vendors facilitated their success.

There is a need for more industry education about the guidelines, and specifically, the flexibility associated with the implementation of the guidelines. GSA's contract with the Humphrey Building Cafeteria vendor contains flexible terms about the implementation of the guidelines. For example, according to the RFP, the current Humphrey Building cafeteria vendor must ensure that 40 percent of their product offerings meet the guidelines. Discussions with other federal cafeteria vendors suggested that they may not be aware of the flexibility associated with implementing the guidelines and the standard criteria for some of the guidelines. As the guidelines are implemented more broadly within state, local and private organizations, more direct-to-new vendor education may be needed about the standard criteria and the possibility of a flexible implementation strategy.

Lessons Learned for Food Service Vendors

Industry experts provided valuable feedback on the feasibility of implementing some of the *Health and Sustainability Guidelines*, which impacted the content of the RFP. In addition to consulting nutrition and sustainability experts from across the federal government, GSA solicited feedback from current federal cafeteria vendors to determine the feasibility of the guidelines.

Vendor feedback confirmed the challenges that were noted by federal staff, such as requesting specific products from food purveyors or developing a composting program. Therefore, GSA created an RFP that can be easily adapted to different agencies in different locations with different timelines and priorities.

Lessons Learned for Other Public and Private Agencies or Organizations

Consumers played a major role in the successful implementation of the *Health and Sustainability Guidelines* at HHS. Another lesson learned was the importance of support from HHS cafeteria patrons. Prior to the guidelines, HHS employees expressed a desire for healthier and more sustainable food choices and practices, making the Humphrey Building Cafeteria an ideal location to pilot the guidelines. The HHS Cafeteria Patrons Committee gathered feedback from employees, and found that patrons were willing to invest more for healthier options and greener products. Federal stakeholders commented that cafeteria patrons' awareness of the importance of sustainable practices and their commitment to making healthier choices contributed to a smooth transition to the guidelines.

The successful implementation of the guidelines at HHS can be attributed, in part, to effective education and marketing efforts about health, wellness and sustainability. Federal stakeholders commented that consumer education about healthier products and sustainability practices contributed greatly to the success of the implementation of the guidelines. When the guidelines were piloted at the Humphrey Building, HHS collaborated with the vendor to communicate the value of the initiative and other important changes to consumers. Key strategies included marketing through interactive menu boards, promotions of healthier meals, and information about specific changes such as composting and sustainable coffee. Federal stakeholders reported that agencies or other entities that wish to implement the guidelines may achieve better outcomes if they collaborate with their vendor to provide education about nutrition and sustainability, and changes to product offerings and pricing.

Federal staff offered guidance to other public and private entities developing a similar RFP based on the *Health and Sustainability Guidelines*. Federal staff responded to a final and important question: "If another public or private entity were to develop a similar RFP based on *Health and Sustainability Guidelines*, what advice would you give them?" First, federal operations staff said that it is important to appoint a person to oversee the implementation of the guidelines in the facility and hold the vendor accountable to meeting the standards. Second, stakeholders talked about the importance of the relationship between GSA, the tenant agency, and the vendor. This trio is best suited to create a process for working within the constraints of the supply chain to maximize the guidelines and push beyond them. A final theme was the need for the tenant agency to demonstrate their commitment to health and wellness programs and communicate that commitment to employees before they ever enter the cafeteria. Stakeholders believe that the *Health and Sustainability Guidelines* and the RFP developed as part of this

process will help agencies and vendors to customize their offerings based on the targeted consumer base while still driving improvements.

Future research should track the long-term impacts of the guidelines on consumer demand, the food supply chain, and the hospitality and manufacturing industries, more generally. Additionally, future studies on the guidelines could incorporate customer feedback about whether they select healthier menu offerings and why. Based on this study, GSA may consider developing a mechanism for documenting vendors' progress over time; identifying challenges and opportunities; and sharing best practices that would be of interest to other food service operations that are implementing the *Health and Sustainability Guidelines*.

Introduction

This case study describes the inception, development and implementation of the *Health and Sustainability Guidelines*. The case study was developed under contract to the HHS Office of the Assistant Secretary for Planning and Evaluation (ASPE), as part of a project entitled, “Evaluation and Analytic Support for HHS Healthy Weight and Obesity Initiatives.”

Overview

The U.S. Department of Health and Human Services (HHS) is implementing an array of programs to address the increasing prevalence of obesity in the U.S. population. The HHS Healthy Weight and Obesity Initiative encompasses many of these programs, policies, and initiatives, which are taking place in a range of community, clinical, and marketplace settings. These interventions target multiple socio-ecological levels; engage stakeholders across sectors of influence (e.g., government, industry); and are designed to affect various outcomes (e.g., social norms and values, or changes to the social and physical environments in which health behavior occurs).

The HHS Office of the Assistant Secretary for Planning and Evaluation (ASPE) contracted with NORC at the University of Chicago to conduct evaluation and reporting activities spanning several of these initiatives. Through a 24-month project, “Evaluation and Analytic Support for HHS Healthy Weight and Obesity Initiatives,” NORC is assisting HHS by tracking progress on activities to reverse the obesity epidemic. NORC is collecting data from a selected portfolio of HHS healthy weight projects, preparing reports for HHS, and providing technical assistance and evaluation support to selected projects. The project began in September 2010. NORC’s activities for this project include: 1) data collection and reporting, and 2) evaluation technical assistance and support. To help monitor progress and inform future program development, NORC is collecting, analyzing, and reporting on qualitative and quantitative data and information submitted by various offices and agencies. NORC is also complementing the work of HHS technical evaluation specialists by providing technical assistance and evaluation support to selected projects.

One of the evaluation support activities was to develop a case study that describes the process followed by HHS, the General Services Administration (GSA), and others to translate the *Health and Sustainability Guidelines* for Federal Concessions and Vending Operations into a request for proposal (RFP) for the HHS Hubert H. Humphrey Building in Washington, DC.

Background

In May 2009, the Office of Personnel Management began developing worksite wellness best practices and other initiatives to retain a strong federal workforce.¹ Additionally, the White House Offices of Management and Budget and Health Reform began coordinating with federal agencies to provide healthier food selections to federal employees.² This effort to improve food choices and wellness at federal facilities was led by the GSA with assistance from the U.S. Department of Agriculture (USDA).

In February 2010, GSA released the *Wellness and Sustainability Requirements for Contracts at Federal Facilities*,³ a set of procurement guidelines that sought to make positive changes in concessions contracts by enhancing cafeteria operations and minimizing environmental impact. GSA planned to use the requirements in concessions contracts for federal facilities. HHS strongly supported GSA's actions to improve wellness and sustainability in the federal work place, and initiated a cross-agency partnership to develop specific food, nutrition, and sustainability guidelines to complement the GSA's requirements. Based on the HHS and USDA *Dietary Guidelines for Americans 2010*⁴ and sustainability best practices, the Centers for Disease Control and Prevention (CDC) coordinated a steering committee of staff from several HHS agencies and offices, together with GSA and other collaborators to develop the *Health and Sustainability Guidelines for Federal Concessions and Vending Operations*.⁵ HHS and GSA released the *Health and Sustainability Guidelines for Federal Concessions and Vending Operations* in March 2011. The goal of the *Health and Sustainability Guidelines* is to:

“Assist contractors in maximizing a healthier and sustainable food service by increasing the offering of healthier and sustainable food and beverage choices, while eliminating industrially produced trans fats, decreasing the sodium content in available foods, and allowing individuals to make informed choices about what they are purchasing and eating through the labeling of menu items.”⁶

HHS and GSA intended for the *Health and Sustainability Guidelines* to assist vendors that provide concessions and vending services to federal government facilities. GSA also uses the guidelines to evaluate the services provided by federal vendors.⁷ The *Health and Sustainability Guidelines* apply to all food service concession operations and vending machines managed by HHS and GSA.

Shortly before the *Health and Sustainability Guidelines* were publicly released, HHS and GSA issued a new contract to pilot them at the HHS Humphrey Building Cafeteria.⁸ HHS and GSA collaborated to develop a request for proposal (RFP) that incorporated *Health and Sustainability Guidelines*. As of January 2012, all of the GSA's 32 federal facilities in the Capital Region incorporate the guidelines in full or in part. Exhibit 1 is a timeline of key events related to the development and implementation of the guidelines. A comprehensive timeline of events is provided in the Appendix A.

Exhibit 1: Timeline of Key Events Related to the Development and Implementation of the *Health and Sustainability Guidelines*

October 2008 – December 2010	U.S. Department of Agriculture (USDA) and U.S. Department of Health and Human Services (HHS) convene to develop the <i>Dietary Guidelines for Americans, 2010</i> .
May 2009	The Office of Personnel Management (OPM) and Office of Management and Budget (OMB) began developing wellness best practices and a plan for the federal workforce. GSA led this effort.
October 2009	President Obama signed Executive Order 13514, requiring federal agencies to purchase and operate in a more sustainable manner.
February 2010	GSA released the <i>Wellness and Sustainability Requirements for Contracts at Federal Facilities</i> . GSA, HHS and collaborators initiated the development of the <i>Health and Sustainability Guidelines</i> .
March – July 2010	GSA and HHS developed the request for proposal (RFP) for the Humphrey Building Cafeteria to pilot the <i>Health and Sustainability Guidelines</i> .
July 2010	GSA and HHS received clearance on the draft <i>Health and Sustainability Guidelines</i> so that the guidelines could be used in the Humphrey Building Cafeteria RFP. Release of the RFP for Humphrey Building Cafeteria.
August 2010	Proposals due for the Humphrey Building Cafeteria.
November 2010	GSA and HHS awarded the Humphrey Building Cafeteria contract to a new vendor.
December 2010	GSA, HHS and collaborators incorporated cross-agency feedback into the <i>Health and Sustainability Guidelines</i> .
January 2011	HHS and USDA released the <i>Dietary Guidelines for Americans, 2010</i> .
February 2011	GSA, HHS and collaborators completed the final <i>Health and Sustainability Guidelines</i> .
March 2011	GSA and HHS publicly released the <i>Health and Sustainability Guidelines</i> at a ribbon cutting ceremony at the Humphrey Building.

Summary of Case Study Methodology

The purpose of the case study was two-fold: 1) to document the collaborative process used by HHS, GSA, and other agencies to incorporate the newly released *Health and Sustainability Guidelines* into an RFP, so that other agencies and vendors may learn from this experience, and 2) to describe vendors' perspectives on the *Health and Sustainability Guidelines* and their ability to implement these guidelines in current and future cafeteria contracts. This is the first case study to document the process used by HHS and GSA to develop the *Health and Sustainability Guidelines*.

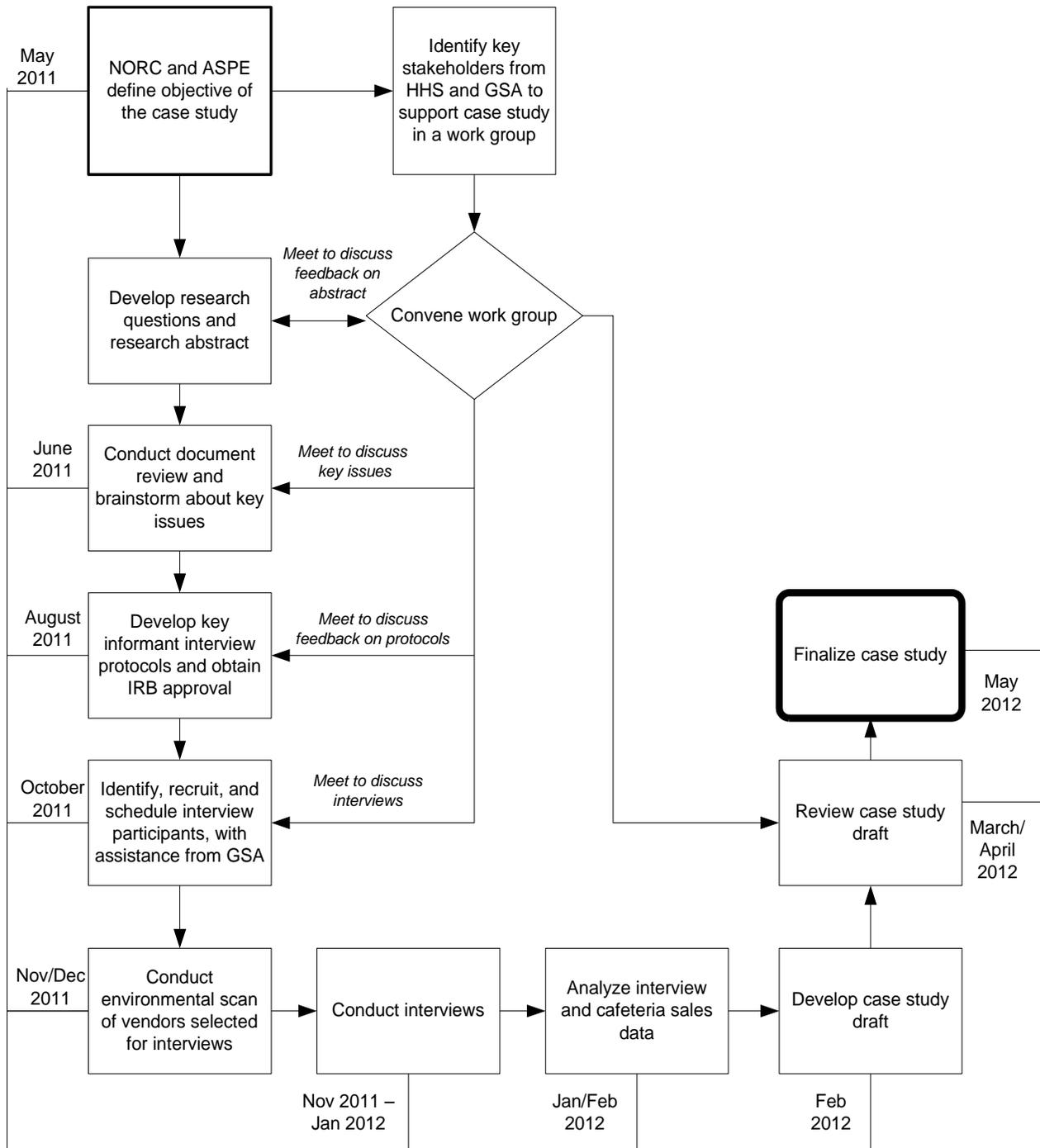
Research Questions and Data Sources

The case study addressed four major research questions.

- ▶ How did GSA and HHS incorporate the *Health and Sustainability Guidelines* into the RFP for the Humphrey Building Cafeteria?
- ▶ What lessons can be learned from the RFP development process?
- ▶ To what extent will vendors who bid on federal food service contracts face new challenges or opportunities as a result of the implementation of the *Health and Sustainability Guidelines*?
- ▶ Based on the Humphrey Building Cafeteria vendor's experience—as well as feedback from other federal food service vendors—to what extent does adherence to the *Health and Sustainability Guidelines* impact cafeteria sales, menu offerings, and food delivery?

Exhibit 2 is a flow chart of the case study methodology. NORC convened a work group composed of HHS and GSA staff; conducted a document review on the *Health and Sustainability Guidelines* to identify issues to explore in the case study; collected data through interviews with nine government staff that were involved in developing and implementing the guidelines and the RFP, and nine representatives from seven different federal food service vendors; and analyzed the interview data to identify themes for the case study. The NORC Institutional Review Board reviewed and approved the data collection procedures and study instruments under protocol 110802 on August 11, 2011. A summary of the methodology is presented next. Additional detail on the methodology is provided in Appendix B.

Exhibit 2: Case Study Methodology



Work Group

Prior to beginning this study, NORC convened a work group of HHS and GSA staff that developed the *Health and Sustainability Guidelines* and the RFP for the Humphrey Building Cafeteria. Through several conference calls, and one in-person meeting, federal staff played a key role in framing the goals of this research, and provided feedback on the study design and data collection instruments at multiple points in the project. The work group also reviewed the draft of this case study.

Data Collection and Analysis

This section provides a short summary of the data collection activities—a document review and interviews—as well as a description of the analysis activities.

Document Review. NORC reviewed the *Dietary Guidelines for Americans, 2010* and the *Health and Sustainability Guidelines* as well as other grey literature sources^{9,10,11,12,13} that describe the *Health and Sustainability Guidelines* and their implementation at the Humphrey Building Cafeteria. NORC also reviewed the previous RFP for the Humphrey Building Cafeteria, and the new RFP that incorporates the guidelines. Additionally, NORC reviewed publicly available information on the food service vendors that were selected to participate in interviews; the purpose of this environmental scan was to identify whether the vendor uses the *Health and Sustainability Guidelines* or participates in other health, wellness or sustainability activities. NORC also reviewed preliminary sales and operations data for the Humphrey Building Cafeteria vendor, which were provided by GSA.

Interviews. NORC conducted 16 interviews with three different types of individuals: federal staff who participated in the development of the *Health and Sustainability Guidelines* and/or the RFP for the Humphrey Building Cafeteria (n=9); representatives from the current Humphrey Building Cafeteria vendor (n=2); and representatives from other vendors that hold federal food services contracts (n=7). Table 1 displays the research questions and corresponding data sources. The purpose of the federal official interviews was to gather detailed information about the development of the *Health and Sustainability Guidelines*, and the implementation of those guidelines in the Humphrey Building Cafeteria RFP. HHS and GSA collaborated with NORC to identify the appropriate federal staff to participate in the interviews. The purpose of the vendor interviews was to learn about federal food service vendors' perspectives on the *Health and Sustainability Guidelines* and possible implications for their business and/or the industry.

GSA identified the vendors, and vendor representatives, to participate in the interviews. NORC developed an advance letter to recruit both groups of participants. NORC sent the advance letter to federal staff, while GSA sent the advance letter to each vendor via email to secure their participation. Prior to each interview, NORC sent each individual a list of possible discussion

topics. Telephone interviews lasted between 45 and 60 minutes, and were conducted between October 2011 and January 2012.

Data Analysis. Data collected through the interviews were analyzed using traditional methods of qualitative data analysis, based on the discernment of themes and patterns in the data through a content analysis. Data collected through the interviews and the document review process were used to develop this case study.

Limitations

Although GSA informed federal food service vendors about the new *Health and Sustainability Guidelines*, and conducted discussions with vendors to solicit feedback on the guidelines, the nine vendor representatives who participated in interviews (on behalf of their vendor organizations) had varying levels of knowledge about the guidelines. At the time of the case study, some vendors had not yet implemented the guidelines, and therefore provided their perspectives on the feasibility of implementing the guidelines in the future.

Further, the case study focuses on vendors' experiences and perspectives related to concessions. The guidelines may have important implications for organizations that operate vending machines and snack bars, though this subject is not described in this case study.

Due to resource constraints, NORC did not conduct interviews with Humphrey Building Cafeteria patrons. Other unaddressed confounding variables—such as whether the vendor applied for the Humphrey Building Cafeteria contract but was not awarded the contract—may have influenced vendors' perspectives.

Overview of the Case Study

The case study begins with an overview of the development of the *Health and Sustainability Guidelines*, including key considerations related to food, nutrition, and sustainability. The next sections discuss the development and implementation of the RFP to pilot guidelines in the Humphrey Building Cafeteria, and other vendors' perspectives on the *Health and Sustainability Guidelines*. The case study concludes with a discussion and lessons learned.

Part I: Developing the *Health and Sustainability Guidelines*

In February 2010, HHS and GSA initiated a cross-agency partnership to develop specific guidelines for food and nutrition based on the HHS and USDA *Dietary Guidelines for Americans, 2010*¹⁴ and GSA's *Wellness and Sustainability Requirements for Contracts at Federal Facilities*. The product of this collaboration was the *Health and Sustainability Guidelines* for Federal Concessions and Vending Operations. According to a key stakeholder, the motivation for creating the *Health and Sustainability Guidelines* was simple: "Federal employees should be healthy and have an opportunity to consume a nutritious diet while at work." The guidelines were intended to provide assistance to vendors about how to implement changes to improve healthy food and beverage choices and sustainable practices at federal worksites (see Appendix A for a timeline of events).

A Cross-Agency Partnership to Develop the Health and Sustainability Guidelines

Subject matter experts from HHS, GSA, and USDA participated in a steering committee to develop the *Health and Sustainability Guidelines* between February and December 2010. The steering committee was led by the Centers for Disease Control and Prevention (CDC) and included experts in nutrition, sustainability and management from across HHS, and from GSA's Capital Region Office and Central Office and the U.S. Department of Agriculture (USDA). HHS steering committee participants, in addition to those from CDC, were from several offices and agencies, including the U.S. Food and Drug Administration (FDA), the National Institutes of Health (NIH), the Office of Disease Prevention and Health Promotion (ODPHP), the Office of the Assistant Secretary for Administration (ASA), and the Office of the Assistant Secretary for Planning and Evaluation (ASPE).

"The Health and Sustainability Guidelines are about assistance... We are providing guidance, a service for people. I've spoken to many [federal concession vendors]. They really appreciate this assistance because their job isn't easy anyway, and if they can get some solid dietary guidelines, they can focus on getting the guidelines implemented."

- Steering committee member

Key stakeholders across the agencies participated on a steering committee to facilitate this cross-agency collaboration. Each agency's involvement varied. In some cases, one or more stakeholders represented each agency in the development of the *Health and Sustainability Guidelines*, whereas in other cases, agency leadership was involved as a reviewer of the guidelines. Other stakeholders on the committee provided important perspectives on the feasibility of implementing the guidelines. According to one participant, the committee was "useful" because participants came from "various fields and [offered] various rationales around how to get people to make healthy choices."

Over time, the steering committee evolved into a core group of people from HHS and GSA. These individuals participated in smaller working groups to research and draft the guidelines. HHS staff developed the nutrition elements of the guidelines. Where possible, staff also aligned the guidelines with the FDA’s requirements on food and nutrition labeling. The sustainability guidelines were based on content from the CDC Office of Sustainability. GSA provided some of the core sustainability language, and USDA provided technical assistance. Finally, GSA staff operationalized the definitions set forth in the nutrition and sustainability guidelines to ensure that each element was clear and concise. GSA staff also identified potential challenges that vendors might face in meeting specific guidelines.

The Nutrition Elements of the *Health and Sustainability Guidelines*

The development of the nutrition elements of the *Health and Sustainability Guidelines* was based on the *Dietary Guidelines for Americans, 2010*.¹⁵ The *Dietary Guidelines for Americans* are “the federal government’s evidence-based nutritional guidance to promote health, reduce the risk of chronic diseases, and reduce the prevalence of overweight and obesity through improved nutrition and physical activity.”¹⁶ The *Dietary Guidelines for Americans* “summarize and synthesize knowledge about individual nutrients and food components into an interrelated set of recommendations for healthy eating that can be adopted by the public.”¹⁷ The recommendations are intended for Americans aged two years and older, including those at increased risk of chronic disease.

“Our challenge was to take these scientifically developed Dietary Guidelines and translate them into menu practice.”

- Steering committee member

The *Dietary Guidelines* reflect two overarching objectives—to maintain a calorie balance, in order to achieve and sustain a healthy weight, and to focus on consuming nutrient rich foods and beverages:

“Maintain calorie balance over time to achieve and sustain a healthy weight. People who are most successful at achieving and maintaining a healthy weight do so through continued attention to/ consuming only enough calories from foods and beverages to meet their needs and by being physically active. To curb the obesity epidemic and improve their health, many Americans must decrease the calories they consume and increase the calories they expend through physical activity.”¹⁸

“Focus on consuming nutrient-dense foods and beverages. Americans currently consume too much sodium and calories from solid fats, added sugars, and refined grains. These replace nutrient-dense foods and beverages and make it difficult for people to achieve recommended nutrient intake while controlling calorie and sodium intake. A healthy eating pattern limits intake of sodium, solid fats, added

sugars, and refined grains and emphasizes nutrient-dense foods and beverages—vegetables, fruits, whole grains, fat-free or low-fat milk and milk products, seafood, lean meats and poultry, eggs, beans and peas, and nuts and seeds.”¹⁹

In the past, GSA advised vendors to incorporate the *Dietary Guidelines for Americans* into their proposals for federal facilities. This was a challenging request given that these guidelines provide a general dietary pattern rather than meal-level guidance. Given that cafeteria vendors typically serve one to two meals per day, they required more guidance about how to implement the guidelines. One representative who served on the committee commented: “The *Dietary Guidelines for Americans* is the best translation of nutrition science to date... [However,] there is a fair amount of distance between the science of the guidelines and the menu standards.” Therefore, HHS and its collaborators set out to review and translate the *Dietary Guidelines for Americans* into specific menu suggestions that could be implemented by vendors: “From a nutrition perspective, we relied on the *Dietary Guidelines for Americans*, but that doesn’t include the translation. The translation was done by subject matter experts.”

In developing the *Health and Sustainability Guidelines*, HHS and GSA operationalized the recommendations in the *Dietary Guidelines for Americans*. The team also wanted to include menu labeling standards in the guidelines in anticipation of FDA regulations under the Patient Protection and Affordable Care Act of 2010, Section 4205, “Nutrition Labeling of Standard Menu Items at Chain Restaurants.”²⁰

The Sustainability Elements of the *Health and Sustainability Guidelines*

In addition to promoting healthy dietary behaviors, the *Health and Sustainability Guidelines* also “promote sustainable systems that protect our people, our planet and our economic vitality.”²¹ The goal of HHS and GSA were to develop guidelines that emphasize a number of aspects of sustainability, including:

- Optimal land and water use efficiency;
- Less food and energy waste;
- Recyclable packaging;
- Fewer food miles;
- Use of organic, local, and sustainable foods; and
- A lower carbon footprint.

The guidelines incorporated content from the GSA’s *Wellness and Sustainability Requirements for Contracts at Federal Facilities*; executive orders that promote environmentally sound and sustainable methods of operation;^{22,23} and USDA legislation and initiatives such as the USDA’s

Organic Foods Production Act, and the National Organic Program, which requires that any agricultural products that are sold, labeled and represented as organic are produced and processed in accordance with these standards.²⁴ One individual reflected on the development of the sustainability guidelines: “A lot of the [sustainability] information is already worked into GSA’s process...it was just a matter of tapping into that expertise and trying to apply it to the concessions side.”

Key Considerations for the Health and Sustainability Guidelines

The committee considered a number of factors when developing the *Health and Sustainability Guidelines*. Key stakeholders involved in this process discussed several cross-cutting considerations that informed the development of both the nutrition and sustainability aspects of the guidelines.

Use the Dietary Guidelines for Americans as the framework. The committee’s goal was to create nutrition guidelines within the parameters of the *Dietary Guidelines for Americans*. One participant noted: “I remember having debates from time to time, when we were moving away from the [*Dietary*] Guidelines—to have folks research to make sure that what we were asking for was not so far outside the guidelines that we would get push-back or not get support...for the [*Health and Sustainability*] Guidelines.”

“You have a responsibility to the Dietary Guidelines; you have a responsibility to the food supply chain, and to maintaining your customer base.”

- Steering committee member

Focus on the food supply chain. The committee wanted the *Health and Sustainability Guidelines* to focus on the link between agriculture and industry, specifically by promoting sustainable agriculture, encouraging stronger connections between agriculture and consumers, and minimizing the distance that produce travels to reach the consumer. Additionally, one committee member commented that the steering committee “had [a] ‘Farm to Table’ mentality...to reduce the length of time it takes for the food to reach the table before the nutrients diminish. We wanted to engage local farmers to minimize the distance from point of consumption.”

“[In developing the Health and Sustainability Guidelines,] the idea was not to remove all of the bad food... It was not to create a restrictive environment. We are creating these guidelines for facilities where adults work. Adults are capable of going outside of their building to eat or bringing food from home. If we were too rigid in how we developed the guidelines, and the implementation of them actually hurt sales, then we are not succeeding in anything.”

- Steering committee member

Maintain a customer base. The committee was striving to create guidelines that vendors could implement while also satisfying consumers and maintaining a strong consumer base in cafeterias. According to the 2011 Health and Food Survey, taste continues to be one of the main drivers of Americans’ purchasing decisions.²⁵ As one steering committee member put it: “If you walk out with guidelines that don’t work, you haven’t

achieved anything. Pragmatism is important.” Therefore, the committee carefully selected the criteria for different menu items. They developed “standard criteria,” which refers to standards that are expected to be implemented during daily concession operations. They also included “above standard” criteria which represents the highest value and best practices to the government. By building in flexibility to meet or exceed the guidelines, the agency and vendors can work together to design a menu that meets their needs.

Provide guidance to food service vendors. The *Health and Sustainability Guidelines* were intended to provide guidance to enable vendors to implement nutrition science and sustainability best practices in their operations. A steering committee member commented: “We started talking about how this would make sense to a group of people trying to run a business.”

Consider vendors’ profit/loss ratio. The stakeholders were also committed to understanding how the guidelines would impact vendors’ operations. Developing the *Health and Sustainability Guidelines* was “not just about having healthy food in cafeterias. It was about how do you sell the healthy food in the cafeterias?” The steering committee members were careful to consider the business perspective, and specifically whether the guidelines would negatively impact vendors’ profit/loss ratio.

“The challenge in our environment is that the vendors we engage have to operate on a profit/ loss basis, and so we have to create an environment that is conducive to health and wellness, but at the same time conducive from a business perspective. Unless we marry the two, any attempt to establish the guidelines will be very hard to implement.”

- Committee member

Focus on environmental change. The guidelines were not designed to limit consumption choices. Rather, as two steering committee members commented, they are about “creating environments where healthier foods would be chosen” and “building the likelihood that you will be healthy—subtracting bad food and eating good food.” Another individual commented that the guidelines could affect consumer demand and eventually lead to broader environmental changes: “Public demands and needs are going to drive the market, and that is going to change the things that are ordered. It will trickle all the way through the system.”

Impact manufacturers. A final consideration was given to manufacturers that produce many of the products that vendors sell: “For the manufacturers to re-work their recipes and how they process, it’s not an easy task.” For example, sodium was a widely debated topic in the development of the *Health and Sustainability Guidelines*. According to key stakeholders, it is challenging to maintain taste without sodium in products such as bread and cheese. Sodium was identified as one of the greatest challenges in developing the guidelines, given that it is largely driven by manufacturing. Reflecting on the lack of lower-sodium products in the marketplace, a committee member commented that the guidelines will “send the message to manufacturers that they need to reduce the sodium but keep flavor the same and shelf life the same.”

Focus on gradual changes. The committee members commented that the guidelines should focus on gradual changes and permit leniency. According to stakeholders, it may not be possible for vendors to fully comply with every nutritional recommendation from the *Dietary Guidelines for Americans* or to meet all of the sustainability criteria. For example, vendors in some metropolitan areas may not be able to develop a composting program.

One committee member noted that the feasibility of each guideline was a key consideration: “We scaled back [on the standard criteria associated with some guidelines] when it came time to finalizing the guidelines because what we wanted to accomplish...is hard to do in some areas. Infrastructure to support those efforts is often not there yet.”

Drive meaningful change. The committee consulted other government-wide sustainability initiatives and established metrics to ensure that the sustainability guidelines would drive meaningful change related to environmental impact, carbon footprint, and composting.

Agency-Wide Review of the Guidelines

Upon the completion of the draft *Health and Sustainability Guidelines*, a number of HHS agencies participated in a formal process to provide feedback on the content. The guidelines were first sent through CDC’s review process. The core committee addressed comments from CDC. Then, the guidelines were sent to the other HHS agencies for review simultaneously, coordinated by the HHS Office of the Secretary.

Overall, the primary concern during the review process was the standard criteria for the sodium guidelines. Specifically, there was a desire from nutrition staff to implement aggressive standard criteria; however, there was concern about whether vendors could reasonably meet the sodium criteria given marketplace limitations. A lead committee member commented on the need to pursue a gradual reduction in the sodium level of foods:

“We based [the sodium criteria] on best practices for gradual sodium reduction. We could have gone much lower on sodium but we didn’t because of simple practical issues...It would probably hurt sales. It was an issue of failure of the supply chain.”

To reflect this gradual reduction in sodium, the *Health and Sustainability Guidelines* indicate that “all sodium values are intended as a beginning step for sodium reduction in the overall diet, the values will be reassessed annually and adjusted based on consumer acceptance, contract feasibility, and nutrition science.”²⁶

Public Release of the Guidelines

The final version of the *Health and Sustainability Guidelines* was developed over time. Following the release of the updated *Dietary Guidelines for Americans, 2010* in January 2011,

the committee made changes to the *Health and Sustainability Guidelines* to maintain consistency. The second and current version of the *Health and Sustainability Guidelines* was publicly released on March 24, 2011, in a ribbon-cutting ceremony in Washington, DC at the HHS Humphrey Building. In the future, the HHS/GSA team will update the guidelines to reflect consumer acceptance, contract feasibility, and changes in nutrition science. GSA will work with vendors to respond to any changes to the guidelines.

Part II: Translating the *Health and Sustainability Guidelines* into a Request for Proposal

One of the overarching goals of the *Health and Sustainability Guidelines* was to assist vendors, and by extension, consumers, in making healthy food and beverage choices and creating and promoting a sustainable food system.²⁷ As HHS and GSA staff were developing the guidelines, a subset of this larger team began planning to implement them in a federal cafeteria. Key stakeholders from HHS and GSA identified the HHS Hubert H. Humphrey Building Cafeteria in Washington, DC as the pilot location.

Federal employees at the Humphrey Building were eager for healthier food options and greener products, which helped HHS to rebid the current contract that was up for renewal. GSA translated the *Health and Sustainability Guidelines* into a request for proposal (RFP) for a new contract at the Humphrey Building Cafeteria. The RFP and the subsequent contract were based on the draft *Health and Sustainability Guidelines*. GSA intended for the RFP to serve as a model for wellness and sustainable operations that could be useful across the federal government, and potentially to other public and private entities. This section describes the translation of the *Health and Sustainability Guidelines* into an RFP for the Humphrey Building Cafeteria.

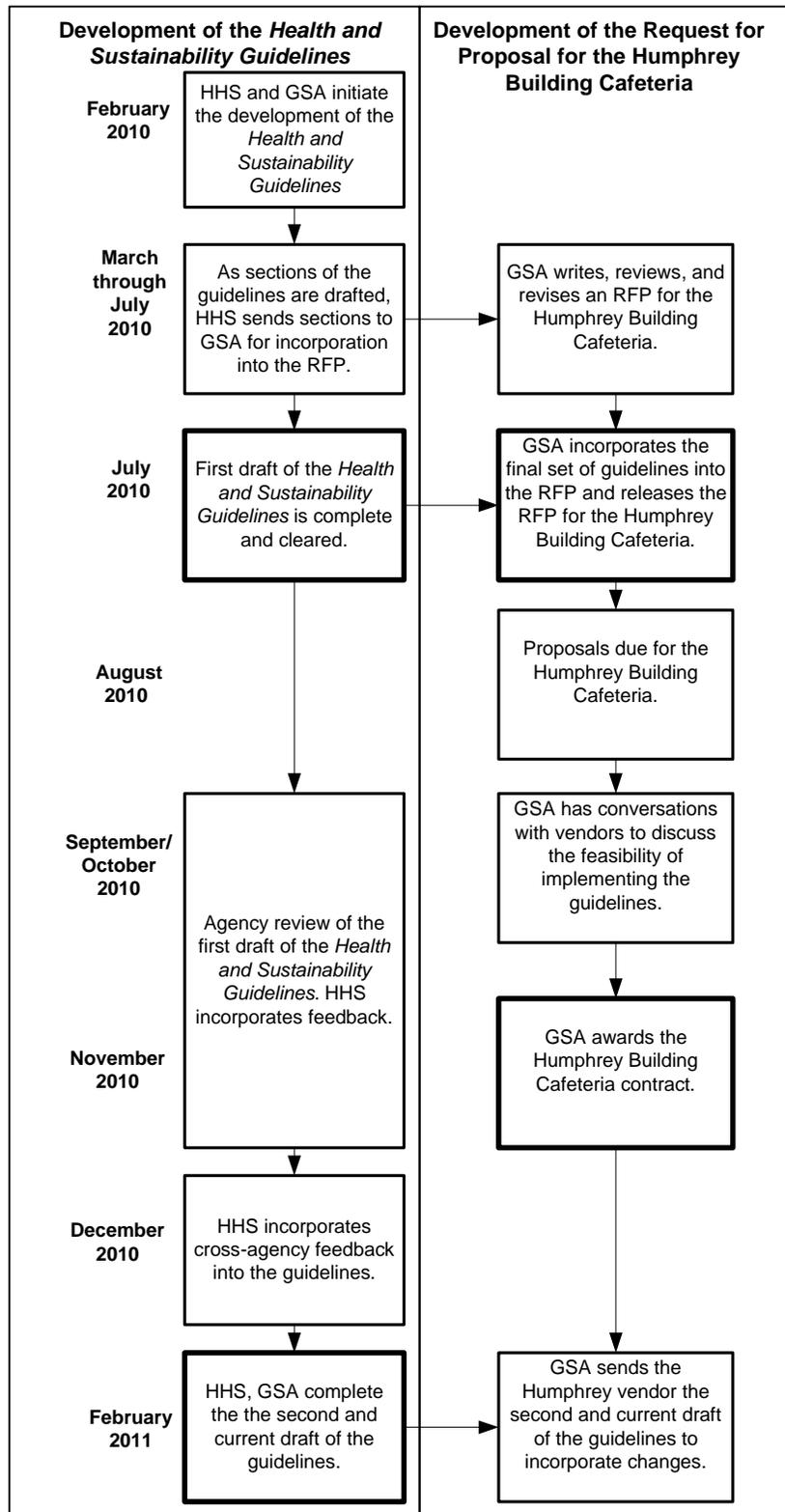
Overview of the Humphrey Building Cafeteria

The Humphrey Building Cafeteria is located in the Hubert H. Humphrey Building, the HHS headquarters. The Humphrey Building houses the Office of the Secretary and Deputy Secretary; Office of General Counsel; Office of the Assistant Secretary for Public Affairs; Office of the Assistant Secretary for Legislation; Office of the Assistant Secretary for Budget, Technology and Finance; Office of the Assistant Secretary for Administration and Management; Office of the Assistant Secretary for Planning and Evaluation; and the Office of Public Health and Science, Assistant Secretary for Health. The Centers for Medicare and Medicaid Services, one of HHS' operating divisions, also has offices in this building.²⁸ The Humphrey Building Cafeteria and 6th floor dining room are available for 2,000 building occupants. The building has an average of 300 visitors during the day who enter the building to attend short seminars, on-site meetings and other functions. The cafeteria has about 150 seats, and is open for breakfast (between 7:00 and 9:30 am) and lunch (11:30 to 2:00 pm).

Developing the RFP for the Humphrey Building Cafeteria

GSA developed the RFP for the Humphrey Building between March and July 2010. The draft of the *Health and Sustainability Guidelines* was being developed while GSA and HHS were working on the RFP. A timeline of key events is provided in Exhibit 3.

Exhibit 3: The Parallel Process of Developing the *Health and Sustainability Guidelines* and Request for Proposal for the Humphrey Building Cafeteria



HHS viewed the guidelines as an opportunity to develop an RFP that would facilitate sustainable and healthy food choices in cafeterias. The intention was to pilot the RFP in the headquarters building at HHS and then, depending upon its effectiveness, consider extending the use of the RFP to other buildings.

Reflecting on the motivations for developing the RFP, several stakeholders commented that the “timing was right for embracing wellness.” The HHS Cafeteria Patrons Committee gathered feedback from HHS employees, and found that cafeteria patrons were willing to invest more for healthier options and greener products.

“We knew we had an opportunity to put together a document to demand stronger aspects of sustainability and healthy food in our cafeteria.”

- Steering committee member

Additionally, the timing was right from a business perspective, as the guidelines offered an opportunity to provide vendors with more guidance on their products and practices. One stakeholder commented: “We were able to wrap both [health and sustainability] into a business drive. [We have also] recently identified that our concessions [weren’t] working. We were putting out the same RFPs and getting back the same proposals and wondering why our food wasn’t getting any better and our operations were not getting any greener.” The goal in developing the RFP was to use the guidelines to demand stronger aspects of health and sustainability through concessions.

Many of the same individuals who developed the guidelines also participated in the process of translating the guidelines into an RFP. Staff from GSA developed the RFP, in collaboration with HHS operations and management staff. Other HHS staff (i.e., experts in sustainability and nutrition) were also involved throughout the review and vendor selection process.

HHS stakeholders guided the aspects of the RFP that promote healthier menu planning and wellness. In developing the RFP, GSA developed a crosswalk between the previous RFP and the *Health and Sustainability Guidelines*, and “sharpened the language” from the previous RFP. Additionally, GSA met with each federal vendor to evaluate the feasibility of including some or all of the *Health and Sustainability Guidelines* in the Humphrey Building RFP. Their goal in speaking with vendors was to determine whether any of the guidelines would place an “undue hardship” on specific types of vendors—for example, small businesses. One stakeholder commented:

“I know of the challenges that [vendors] are facing, because I have had the opportunity to meet with every single one of our vendors. My objective is to evaluate, in my own mind, how far can I push the envelope? How much can I get out of these guidelines, in reality, on the table? We had lengthy discussions with all vendors...because we are not only looking at one contract...we are also looking at future and past contracts. We are looking at vendors who have been under contract for years to revamp and revise their menu offerings.”

Characteristics of the Final RFP

The final Humphrey Building Cafeteria RFP incorporated the preliminary draft of the *Health and Sustainability Guidelines*, with an understanding that the industry would evolve and both the guidelines and the RFP would require future revisions. Specifically, in the RFP, vendors were asked to comply with nutrition and sustainability requirements:

Nutrition requirements. On the nutrition side, GSA and HHS encouraged vendors to offer a variety of food options to customers, including vegetarian, vegan, organic, light eater and lean-meat entrees. The RFP requested that vendors develop menus that offer lower fat, lower sodium, lower calorie and reduced sugar menu items, as well as seasonal vegetables and fruits, whole grain and high fiber options, lower sugar cereals, freely available drinking water, and foods that are low in sodium and free of synthetic sources of trans fats.

“Now we have a much more methodological approach to defining what the health and wellness program should look like.”

- Steering committee member

Sustainability requirements. On the sustainability side, the RFP encouraged vendors to provide incentives for using reusable beverage containers, green cleaning and pest-control practices, and compostable and bio-based products. Additionally, the RFP asked vendors to offer food that is organically, locally or sustainably grown and labeled accordingly, and seafood identified as “Best Choices” or “Good Alternatives” on the Monterey Bay Aquarium’s Seafood Watch List or certified by the Marine Stewardship Council (or an equivalent program).

Finally, the RFP suggested that vendors develop creative plans for product placement, for example, by arranging healthy menu offerings in the front of each serving line or at key places that are closest to eye level, or by offering marketing promotions for specific meals.

Challenges and Solutions Related to the Development of the RFP

Key stakeholders that were involved in this process did not report challenges related to interpreting the *Health and Sustainability Guidelines* or translating the information into contract language. The main challenge was trying to “find a balance between what [GSA and HHS] would like to see in the cafeteria and what the industry can support.” For example, there were concerns about meeting the sodium guidelines and identifying local products at all times of the year. There was also some concern about vendors’ ability to implement the composting guidelines. Further, there was uncertainty as to how much time the vendor would require to meet all of the guidelines (i.e., would it be a matter of weeks? Months?)

To overcome these challenges, GSA built some flexibility into the RFP. For example, the guidelines suggest that 25 percent of the product offerings should be organically or locally or documented sustainably grown (e.g., integrated pest management, pesticide free, other labeling

programs, etc.). In some regions, reasonably priced local food is not available year-round. Therefore, the vendor can choose to source organic or fair trade items instead. Similarly, the RFPs allows for different combinations of menu choices so that vendors have some flexibility in meeting the guidelines. According to the GSA, the vendor must ensure that 40 percent of their menu meets all of the guidelines (i.e., for every 10 items in the cafeteria, four must meet all of the guidelines). The GSA selected the 40 percent benchmark because industry averages show that 31 percent of people are interested in healthy foods.²⁹ A GSA stakeholder commented that the goal was for vendors to achieve a higher target: “[The target] was aggressive, which is okay, but we mitigated that by how we valued the requirements. If we had required all items to meet the guidelines, then no one can meet that.” This stakeholder also commented that the target may need to change in the future, depending on demand for healthy foods.

Another challenge was related to timing. GSA was developing the RFP for the Humphrey Building Cafeteria around the same time that the *Health and Sustainability Guidelines* were developed and finalized. While the draft of the guidelines was completed in December 2010, GSA and HHS were awaiting the release of the *Dietary Guidelines for Americans, 2010*. The draft of the *Health and Sustainability Guidelines* was based on the *Dietary Guidelines for Americans, 2005*. The *Dietary Guidelines for Americans* is reviewed, updated if necessary, and published every 5 years. Stakeholders knew that any updates in the *Dietary Guidelines for Americans* would need to be reflected in the final *Health and Sustainability Guidelines*. Given that some of the key HHS staff were involved in developing the *Dietary Guidelines for Americans, 2010*, the team was able to anticipate some of the changes to specific recommendations. The final *Health and Sustainability Guidelines* was released after the Humphrey Building Cafeteria RFP was awarded. Therefore, the new vendor’s proposal and contract was developed on the draft of the guidelines, and the vendor was expected to incorporate the final guidelines.

Issuing the RFP and Selecting a Vendor

HHS reported that a diverse group of vendors responded to the RFP, including both large and small companies. Vendor proposals were scored on criteria including: Corporate Capability/Sanitation/ Management Controls and Accountability (20%); Resources and Staffing (15%); Menu Cycle and Variety (15%); Wellness Program (20%); Price and Portion Policies (10%); and Sustainability (20%). Reviewers, who brought experience in nutrition, sustainability, and operations, applied different weights to each evaluation factor, with emphasis on factors that relate to sustainability and wellness.

The winning vendor scored “excellent” on the sustainability portion and “very good” on the nutrition portion of the guidelines; their proposal had very few weaknesses. The proposals for the next few highest scoring companies suggested that they were also well-prepared to address the

guidelines. Among the unsuccessful bidders, approximately 50 percent scored “very good” on both the health and sustainability aspects, and 20 percent scored “average.”

HHS reported that there were common strengths and weaknesses across the average and low-scoring proposals:

Strengths. These proposals included plans to use a local farmer’s market, sustainable agriculture and local produce. Vendors proposed to provide nutrition information in the cafeteria, and also suggested they would consult a nutritionist or dietitian on the development of their menus. Some of the companies reported previous experiences implementing similar wellness and sustainability plans in the past.

“As reviewers, we were cognizant of [vendors’] challenges, but wanted to see how they would overcome them.”

- Steering committee member

Weaknesses. Several proposals lacked information on plans for marketing wellness and lacked discussion of how they would meet specific aspects of the guidelines, including food selection standards, menu choices for vegetarians and vegans, and the elimination of trans fatty acids. On the sustainability side, vendors did not discuss their plans for bulk item purchasing, marketing of green products, pre-packaging bottle beverage programs, and fair trade coffee purchases. Some vendors did not have robust proposals regarding compostable products.

The winning vendor was awarded the Humphrey Building Cafeteria contract in December 2010 and began serving customers in January 2011.³⁰ In February 2011, the vendor incorporated the final *Health and Sustainability Guidelines* into their operating procedures.

Part III: Implementing the *Health and Sustainability Guidelines* in the Humphrey Building Cafeteria

On January 3, 2011, the Humphrey Building Cafeteria became the first operation to implement the *Health and Sustainability Guidelines*. The guidelines apply to all food service concession operations and vending machines managed by HHS and GSA.³¹ The Humphrey Building Cafeteria vendor's experience implementing the guidelines offers a model for other state and local agencies, organizations, and businesses. This section discusses the vendor's implementation of the *Health and Sustainability Guidelines*, new programs and activities at the Humphrey Building Cafeteria, challenges with respect to implementing some of the guidelines, processes used to manage performance, and preliminary sales data.

The Vendor's Experience Implementing the Guidelines at the Humphrey Building Cafeteria

While the Humphrey Building Cafeteria vendor was involved in wellness and sustainability activities in the past—such as purchasing organic and local foods and engaging in sustainability practices, among others—this was their first contract with specific *Health and Sustainability Guidelines*. Post-award, the vendor had one month to prepare for their opening in January 2011.² The first few months of the contract required extensive coordination among the vendor's president, professional dietitian, purchasing manager, and district manager.

One of the first steps towards implementing the guidelines was sourcing food, paper and chemical products. The vendor collaborated with manufacturers and distributors to identify products that would meet the guidelines as well as the avenues of distribution. In some cases, the vendor identified new manufacturers to obtain products that meet the guidelines. Prior to the start date of service, the vendor also developed a price/portion book for the account (e.g., hamburger patty size and selling price; ounces of meat for a deli sandwich). The vendor reported that they were able to meet the vast majority of the nutrition guidelines and all of the sustainability guidelines, with no phase-in time needed.

New Programs and Services Designed to Meet the Guidelines and Satisfy the Consumer

One of the vendor's priorities was to implement new programs and services that embody the *Health and Sustainability Guidelines* while also satisfying the consumer. Exhibit 4 provides examples of changes to the cafeteria's menu structure and product offerings.

² The *Health and Sustainability Guidelines* was released to the vendor in February 2011. Therefore, while the RFP and contract reflected the draft guidelines, the vendor incorporated the final guidelines once they were available.

Healthier Choice Menu Program. The vendor offers a healthier choice menu program, a promotional program that is offered on a daily basis to provide customers with healthier options. Through this program, the vendor offers meals that provide “nutritionally sound amounts of calories, fat, sugar, cholesterol, and sodium.”³²

The vendor’s dietitian and other staff prepared 80 to 90 recipes that meet the *Health and Sustainability Guidelines* (e.g., vegetarian chili served with a garden salad; Thai-style baked tilapia served on a bed of brown rice and a side of spinach).³³ These lunchtime entrees include a starch and a vegetable. A vegetarian and fish meal are offered each day. The vendor developed this program prior to the Humphrey Building Cafeteria contract, and adjusted the recipes to ensure that all recipes meet the guidelines. To promote healthier choices, employees that purchase 10 qualifying meals receive the 11th meal for free.

Nutrition Center. Merchandizing stands list menu items and their respective nutritional content (e.g., fat, sodium). The vendor also uses an LCD screen to provide information about sustainability.

Availability of a Dietitian. The vendor’s dietitian prepares a quarterly newsletter for distribution in the Humphrey Building Cafeteria as well as informational handouts. The dietitian is also available on-site four times per year to answer questions about nutrition and food safety.

Refillable Bottles. The Humphrey Building Cafeteria has a refillable coffee mug and water bottle program to reduce waste. Bottled water in compostable bottles is offered as well; proceeds benefit clean water projects.

“Healthier” Look. The vendor noted that they redesigned the cafeteria to have a “healthier look and fresh new feel.” Nutrition information on signage, and promotional materials about fair trade

Exhibit 4: The Health and Sustainability Guidelines in Practice: Menu Structure and Product Offerings at the Humphrey Building Cafeteria

- **Lower sodium.** The Humphrey Building Cafeteria vendor does not use salt to prepare foods. Vegetables are seasoned using pepper and herbs rather than spice blends. Lower sodium products are used when possible. Salt shakers are no longer available in the cafeteria.
- **Availability of whole grain and lower fat products.** Brown rice and brown pasta are always available as an option. Yogurt contains 2 percent milk fat, 1 percent milk fat, or is fat free. Whole milk yogurt products are not offered.
- **Portion size.** The vendor adjusted portion sizes to meet the guidelines. For example, the vendor sells a smaller muffin to meet the sodium requirements. Half portions are offered whenever feasible (e.g., sandwiches, macaroni and cheese).
- **Substitutions.** Normally entrees are accompanied by a starch and a vegetable, but if a customer requests two vegetables, or a vegetable and a side fruit salad, the vendor tries to accommodate these requests.
- **Product Placement.** The vendor markets healthy items in the front of the cafeteria and at eye-level whenever possible. Less healthy items are stacked on the lower display shelves. Fried foods are still available, but customers must request them.

coffee, and recycling, are featured at the point of purchase. The cafeteria’s new look was described by the vendor as “nutty, crunchy, green, and brown.”

Cafeteria Website. The vendor’s website advertises the healthy meal options each day and provides customers with a place to provide feedback. Customers can also e-mail questions via the “Ask Our Dietitian” link on the cafeteria’s website. The vendor plans to administer a customer satisfaction survey one year post-implementation.

Lower Prices for Healthy Meals. Part of the vendor’s proposal was to price healthy meals competitively, specifically, by lowering the price of healthy foods to encourage participation.

Composting. The vendor also implemented a composting program.

The Humphrey Building Cafeteria Vendor’s Challenges Related to Implementing the Guidelines

The Humphrey Building Cafeteria vendor did not report any challenges related to interpreting the *Health and Sustainability Guidelines* or developing a proposal that reflects the guidelines. Additionally, the vendor commented that even changes with respect to their product offerings (i.e., no longer offering whole milk products) and reduced portion sizes did not result in customer dissatisfaction. Rather, their main challenges were related to implementation—the availability of products in the marketplace that meet the sodium guidelines; purchasing specialty products in bulk from food service distributors; customer dissatisfaction with respect to the increased cost of organic, bird friendly coffee; and cost increases.

Availability of products in the marketplace that meet the sodium Guidelines. The Humphrey Building Cafeteria vendor reported that their greatest challenge has been meeting the sodium criteria in the *Health and Sustainability Guidelines*:

- All individual food items must contain ≤ 480 mg sodium as served, unless otherwise specified.
- All meals must contain ≤ 900 mg sodium as served (approximately 39% of the *Dietary Guideline* recommendation of 2,300 mg for daily intake).
- The following offerings must contain ≤ 230 mg sodium per serving: all cereal, bread and pasta offerings; all vegetable offerings; processed cheeses; and vegetable juices.
- Mixed dishes containing vegetables must contain ≤ 480 mg sodium as served.
- Canned or frozen tuna, seafood and salmon must contain ≤ 290 mg sodium per serving.

- Canned meat must contain ≤ 480 mg sodium.

According to the vendor: “It was challenging because in some cases [the products that the] government was looking for did not yet exist by manufacturers.” A GSA stakeholder reflected on the challenge of identifying lower sodium substitutes that meet the guidelines: “The big thing for manufacturers is to find a substitute for salt—salt has so much impact on flavor. The challenge is not only reduce the salt, but also to maintain the flavor profile. If you don’t, no one will buy it.”

To meet the sodium criteria, the vendor does not use salt to prepare foods and the chef uses a lowered sodium base (e.g., lower fat cottage cheese, lower sodium mayonnaise). However, the main challenge has been identifying bread, meat, and cheese products that meet the sodium criteria. For example, the vendor has not been able to meet the standard sodium criteria for deli sandwiches.

“The biggest hurdle is the sodium part of [the Health and Sustainability Guidelines]. The rest of the Guidelines work—and the sodium works too—but it’s just taking more time to get there.”

- Humphrey Building Cafeteria Vendor

In the vendor’s portion guide, a ham or turkey deli sandwich contains four ounces of meat. However, the vendor found that it was “extremely difficult” to find ham or turkey deli meat that meet the sodium criteria at four ounces—only two ounces of meat, or one slice of bread rather than two, would satisfy the sodium criteria. The vendor contacted the major meat manufacturers, but they were not able to provide deli meat that would satisfy the sodium criteria. Rather than eliminating deli meat from the menu, the vendor uses lower sodium meat; deli sandwiches do not precisely satisfy the sodium criteria. The vendor also offers a half-sized sandwich to reduce the sodium content of the meal.

Key stakeholders commented that manufacturers have made strides since the *Health and Sustainability Guidelines* were first released in March 2011. However, while they offer lower sodium alternative meats, such products are not available in bulk from food service distributors. The Humphrey Building Cafeteria vendor is investigating the possibility of cooking deli meat on site, which would help to reduce the sodium in deli sandwiches.

Operational challenges related to purchasing. Other challenges that the vendor reported are related to sourcing specialty products. The vendor indicated that food service distributors are reluctant to purchase specialty products with a limited shelf life from manufacturers. The vendor explained that in order for the product to be profitable—due to high fuel costs and other factors—manufacturers have high shipping requirements and products are shipped in bulk pallets and inventory quantities. However, the cafeteria may not be able to sell a large volume of specialty products and fresh items before they expire, and therefore, could lose money. When discussing the challenges related to sourcing lower sodium deli meats, the vendor noted:

“The other piece of it is—if you find the product that you need, how does it get from the manufacturer to the distributor? The shipping minimums in many cases are one and two pallets of product, and one or two facilities...would never rotate that product fast enough...it’s not so difficult if it is a frozen item, because shelf life is longer, but if it is a fresh item, you are probably talking about a 30 to 40 day shelf life and it just doesn’t get the movement. The distributor is very reluctant to bring this product in.”

Customer dissatisfaction related to the higher cost of organic, bird friendly coffee. The vendor indicated that cafeteria customers were, in general, satisfied with the product offerings and services at the Humphrey Building Cafeteria. However, one specific challenge was related to the transition to organic, bird friendly coffee. The guidelines’ standard criteria for beverages state that “if offering coffee or tea, include coffee or tea offerings that are Certified Organic, shade grown, and/or bird friendly.”³⁴ The vendor transitioned the cafeteria’s regular coffee to organic, fair trade, bird friendly coffee, which costs patrons 10 to 15 cents more per cup.

At first, customers were dissatisfied with the change. The vendor addressed this challenge by collaborating with GSA and HHS to launch a successful marketing and education campaign about the benefits of purchasing organic, bird friendly coffee. A GSA representative commented: “Because we did a marketing campaign about how this is fair trade coffee and you are helping local farmers, the negative feedback died down.” Today, coffee is one of the vendor’s best-selling products.

The vendor also initially received some complaints that French fries and fried foods were no longer served with daily specials; over time, patrons have become more receptive to these changes.

Cost increases. The Humphrey Building vendor purchased several new products to meet the *Health and Sustainability Guidelines*. Such products—sodium-free and lower sodium products, cage-free eggs, organic vegetables and yogurt, compostable paper products, and certified green seal chemicals—are 30 to 50 percent more expensive than everyday items. According to the vendor, the unit cost is not the only challenge. The vendor observed increased labor costs associated with preparing organic foods. For example, the chef must spend more time preparing organic vegetables. One individual noted: “Organic locally grown products are not as uniform and nice looking...it takes a bit more work in terms of peeling and slicing and making it look nice.” Additionally, the guidelines also required the chefs and dietitians to modify recipes and preparation methods, another indirect labor cost.

Performance Oversight in the Humphrey Building Cafeteria

The Humphrey Building Cafeteria vendor meets on a monthly basis with HHS to discuss mutual objectives, including but not limited to service levels, wellness, sustainability menus and marketing programs. Many individuals commented that GSA and HHS do not “regulate” adherence to the guidelines. Rather, GSA oversees the process, providing guidance to the

vendors and discussing their progress on meeting the guidelines and next steps. To do so, GSA meets on a quarterly basis with the vendor to conduct an operational review of the menu, and review monthly reports on customer participation and sales. GSA uses a similar operational review process in all of its 32 facilities that incorporate the *Health and Sustainability Guidelines*. Additionally, GSA continues to provide guidance to all vendors about the guidelines through meetings, emails, and newsletters.

Over time, GSA expects that demand for healthy products will escalate. GSA plans to increase the percentage of the guidelines that vendors must meet in response to customer demand and industry direction, resulting in tiered production of healthy menu items. A representative from GSA noted:

“We started with the average of 40 percent [of the menu items meeting the guidelines]...so we monitor consumption. As the demand is escalating, and that is really consumer driven, we can up the ante on the number of offers... We tier the production of menu items that meet the health and wellness criteria alongside demand.”

Preliminary Findings of the Impact of the Guidelines on Participation and Revenue at the Humphrey Building Cafeteria

The Humphrey Building Cafeteria vendor noted that they have experienced an increase in sales. Comparing the first six months of 2010 to the first six months of 2011, the cumulative average increase in monthly cafeteria sales (in dollars) was 34 percent and the increase in monthly check averages³ was 17 percent. The change in sales and check averages by month is shown in Exhibit 5. Increases in prices between 2010 and 2011 may have contributed to the change in monthly check averages.

Exhibit 6 displays monthly customer participation based on the building’s 2,000 occupants. (This hypothetical customer participation rate assumes that all building occupants are present and that no visitors are among the Humphrey Building Cafeteria customers.) On this basis, in June 2011, 43 percent of the building population participated in either breakfast or lunch; approximately 20 percent of people participated in breakfast and 23 percent in lunch. GSA expects that the building population is less than 2,000 by an average of 25 to 35 percentage points because of employee vacations, sick leave, meetings, travel, telework or alternative work schedules. The customer participation rate on any given day depends upon the building population and the number of visitors.

³ The monthly check average is the average amount each guest spends during a transaction.

Approximately 50 percent of meals purchased at breakfast or lunch were “healthy meals,” meaning that they met all of the *Health and Sustainability Guidelines*. A meal is defined as breakfast or lunch offering from the grill, deli or entrée area. A meal consists of an entrée with two sides (e.g., baked chicken, a vegetable and a starch; a sandwich with a salad and fruit). A healthy meal is similar in structure, but consists of ingredients that meet all of the guidelines. The vendor counts the number of healthy meals purchased on a daily basis, and provides this information to GSA on a monthly basis. Given that healthy meal purchases were not tracked in 2010, a baseline is not available.

In the first six months of 2011, about 67 percent of the menu items met the guidelines, demonstrating that the vendor surpassed the GSA’s target of 40 percent. According to the vendor, some of the most popular healthy items included single grab-and-go style snacks, such as nutrition bars and organic granola bars.

Exhibit 5: Humphrey Building Cafeteria Percent Change in Monthly Sales and Check Averages, January through June 2010 to 2011

	January	February	March	April	May	June	<i>Cumulative Average % Change for 6 Months</i>
Change in monthly sales, in dollars, 2010 to 2011 (%)	46%	71%	32%	31%	17%	20%	34%
Change in check average, 2010 to 2011 (%) ^a	17%	21%	13%	19%	22%	8%	17%

^a The monthly check average is the average amount each guest spends during a transaction. The check average is a ratio of total daily sales: total daily customer count.

Source: General Services Administration, September 2011. Exhibit 6: Humphrey Building Cafeteria Customer Participation, and Healthy Meals Served, January through June 2011

Monthly averages	January 2011	February 2011	March 2011	April 2011	May 2011	June 2011
Customer participation (%) ^a	49%	50%	49%	44%	43%	43%
Healthy meals sold (%) ^b	48%	52%	44%	45%	41%	50%

^a Customer participation is based on the daily customer count and number of transactions. The hypothetical customer participation rate assumes all employees are present in the building and that no visitors are among the Humphrey Building Cafeteria customers.

^b Healthy meals sold is a ratio of the percentage of healthy meals sold at breakfast and lunch: all meals sold at breakfast and lunch. A healthy meal is defined as breakfast or lunch offering from the grill, deli or entrée area. A healthy meal consists of an entrée with two sides that meet all of the guidelines.

Source: General Services Administration, September 2011.

The Health and Sustainability Guidelines: An HHSinnovates Award Program Finalist

The development of the *Health and Sustainability Guidelines*, the translation of the guidelines into an RFP, and their implementation in the Humphrey Building Cafeteria was highlighted in the HHSinnovates Award Program. Launched in May 2010, HHSinnovates was created to highlight innovative programs and practices developed by HHS employees. HHSinnovates Awards are presented twice each year to HHS projects. Finalists were posted for on-line review and voting by the entire HHS community. The *Health and Sustainability Guidelines* was highlighted as one of 85 entries. A total of 8,000 HHS staff voted on six finalists, including the *Health and Sustainability Guidelines*, through a secure mechanism. The guidelines received the first of the Honorable Mentions (4th place). The comments on the guidelines included:

“This innovation is an opportunity for federal agencies to set a good example. It is well known that environmental factors do play a role in the choices one makes as it [sic] relates to healthy eating. There is a need to address the food options available in vending machines and cafeterias and this project demonstrates an opportunity to put into practice a government-endorsed initiative (i.e., 2010 Dietary Guidelines for Americans) with its own employees.”

“By HHS being the example for all other cafeterias, it can be a start for others to offer healthier options. Part of behavior change is having the environment around you be supportive. This innovated approach can show that HHS is a role model for other food service operations nationwide.”

“I like the idea of healthier options at the cafeterias. I also like the one of reducing waste that is produced in big amount[s] at those places.”

The winning innovations are recognized by the Secretary of HHS in an awards ceremony. The *Health and Sustainability Guidelines* were highlighted as a finalist in July 2011, with the Award Ceremony following in September. Reflecting on this award, one HHS stakeholder commented: “The point that we made in selling this as an innovation was not the guidelines; it was the process of developing and implementing them. We treated [everyone] as an equal partner...we pulled in experts, we ran this by industry.”

Part IV: Other Vendor's Perspectives on the *Health and Sustainability Guidelines*: Challenges, Opportunities, and Facilitators

The *Health and Sustainability Guidelines* have changed the way that food is purchased, prepared and presented in the Humphrey Building Cafeteria. Since the implementation of the guidelines, HHS and GSA have collaborated to promote the guidelines to other federal agencies. GSA frequently engages vendors that serve both government and non-government cafeterias to discuss opportunities for creating healthier menus and more sustainable food products. All of the GSA's 32 federal facilities in the Capital Region are incorporating the guidelines in full or in part.

This section captures the perspectives of seven representatives from six other federal food service vendors that are implementing the guidelines or preparing to implement the guidelines in future contracts. Vendors provided examples of the *Health and Sustainability Guidelines* that they have implemented. They also identified potential opportunities and challenges associated with implementing the guidelines, more generally. Finally, vendors described factors that may facilitate successful adoption of the guidelines.

Examples of the *Health and Sustainability Guidelines* that Other Vendors Have Implemented

Vendors provided anecdotes about elements of the *Health and Sustainability Guidelines* that they have implemented in their facilities. Several vendors reported that they are already complying with the guidelines through their own wellness programs. Specifically, vendors noted that they offer "healthy" promotional meals that are lower in calories, fat, saturated fat, and sodium; provide a variety of lower fat dairy products; offer drinking water at no charge and 100% juice; cook vegetables without added salt; use green cleaning supplies; and engage in product positioning. One vendor reported preparing its own deli meat as a method to control sodium. A couple of vendors reported that they are trying to make healthier options more appealing to customers by pricing them at a lower cost point than less-healthy alternatives.

Vendors also discussed their efforts related to menu labeling, eliminating the use of partially hydrogenated oils, and using education as a tool to promote the guidelines.

Menu labeling. Three of the six vendors are either addressing the menu labeling guidelines or believe that they will be able to address them fairly easily. The guidelines recommend that vendors provide consumers with calorie and nutrient information at the point of choice on a menu board or posted on signs adjacent to the food items. One of the vendors provides calorie count information on their menu boards, and supplies a nutrition card with the items that are not on the menu board. This vendor also plans to promote menu information on LCD screens in the cafeteria. Another vendor provides calorie information for items at the point of purchase. A third

vendor noted that menu labeling would be a fairly easy to implement. Other vendors did not comment on menu labeling.

Eliminating partially hydrogenated oils. Three of the six vendors also reported that they have eliminated the use of partially hydrogenated vegetable oils, shortenings, or margarines for frying, pan-frying, grilling, and baking. One of the vendors commented that they eliminated the use of partially hydrogenated oils a couple of years ago by making different purchasing decisions. Another vendor commented that the company has moved away from trans-fat products, but some of products contain palm or coconut oil as substitutes; these oils contain saturated fat.

Using education. Five of the six vendors commented on the importance of using education to promote the guidelines. This was particularly important for issues related to sustainability. One vendor noted that while their customer base has been “very positively inclined” towards their recycling and composting program, “it can be a slow process to bring them on board.” The other vendors emphasized that a sound education strategy must accompany the implementation of the guidelines.

Opportunities Associated with Implementing the Guidelines

The guidelines offer an opportunity to provide a range of new choices to customers while being more creative and innovative. Several commented that they customize their menus to the needs of their clients and the particular markets they serve (e.g., government, private sector). According to one vendor, while they must follow their clients’ direction and cannot “impose guidelines on them,” they encourage and help them to establish standards for healthier and more sustainable food choices.

Vendors also commented that the guidelines are an opportunity for cross-company learning for their management, staff, and marketing and communications departments. Three of the vendors commented that the guidelines might impact the “look and feel” of their facilities in a positive way. One noted that they have developed “bright and colorful” materials to engage people at the point of purchase in a “positive way.” The other two vendors have not changed their marketing approaches as a result of the guidelines. One vendor remarked that the guidelines offer opportunities to the vendors that can meet all of the guidelines and make a profit.

Challenges Associated with Implementing the Guidelines

Most vendors acknowledged that implementing the *Health and Sustainability Guidelines* is a process that will take time. Each vendor also discussed the challenges associated with implementing specific guidelines. The most common challenges are described below.

Meeting the sodium guidelines. Like the Humphrey Building Cafeteria vendor, all of the vendors reported that the sodium guidelines are the “the biggest stumbling block” on the

nutrition side of the *Health and Sustainability Guidelines*. There are two key challenges associated with sodium: lack of availability of lower sodium products in the marketplace and consumer acceptance of lower sodium products. According to vendors, while sodium reduction is a key focus area of the guidelines, the marketplace does not offer a wide variety of lower sodium products that meet the guidelines' standard criteria that all individual food items must contain ≤ 480 mg sodium as served. Multiple vendors identified the availability of lower sodium products as “the biggest problem” and “hurdle” that they face. Also, vendors noted that customers are acclimated to the high levels of sodium in foods like pizza and deli meats. Therefore, a few vendors expressed concern that reductions in sodium could impact customer participation rates:

“The average sodium consumption in the American diet is recommended to be 2,300 [mg], but is probably in the range of 3,000 to 3,500 [mg] on the low level and 4,500 to 5,000 [mg] [on] the high level in terms of average consumption...If you look at an average slice of pizza sold on the street...you may be looking at significantly over 1,000 mg of sodium in a slice of pizza. If you take that slice of pizza and take it to 480 [mg of sodium] or below, you will have people going elsewhere for food without a doubt. And we have experienced that.”

“By just changing something and saying, across the board, everything is going to be less than 480 mg of sodium...a person will purchase it and not like the way it tastes, and never purchase it again. And that's the end of the experience—finished and over. You get one shot, I believe.”

“We are in a competitive environment...customers can easily go outside of the building and get the products they are looking for if we are not able to offer them. We are looking at that from the customer perspective.”

Several vendors commented that the guidelines should support a more gradual reduction in sodium—such as 10 to 20 percent over two to three years, and 25 percent over three to six years—or that the guidelines should place a lower priority on sodium reduction:

“The guidelines should be on cooking with less fat, getting people to eat more whole grain, and leaner meat, more fruits and vegetables. We can work on sodium later.”

Access to local and organic produce. On the sustainability side, vendors described challenges associated with meeting the guidelines on organic and locally grown produce (e.g., to meet the standard criteria, 25 percent of the product line must be organic, local or sustainably grown). Vendor commented that food service operations on the East Coast face challenges in securing organic and local produce year round:

“Being on the East Coast, the quality of organic products is horrible. Trying to meet the guidelines as far as a percentage of local/organic can be a challenge... We are outside of our local growing season. May to end of September you can get squashes and greens, but the availability of local produce drops off the charts. So unless we move our government to warmer states, the produce will always be an issue for organic products.”

At least one vendor commented that there is no single definition of ‘local:’ “One challenge to implementing the guidelines is the lack of an objective, accepted definition of ‘local.’” This vendor defined a local product as one that travels less than seven hours by truck from point of origin to point of consumption. The guidelines use the USDA definition of local which specifies the number of food miles (i.e., transporting a product less than 400 miles from its origin). Another vendor also commented that their company needs greater specificity on whether the standard criteria in the guidelines related to local and sustainable apply to limited time offerings in the product line.

Cost. A majority of the vendors expressed concern that their profit/loss ratio could be affected by the guidelines. They expressed concern that healthy items cost more to purchase and prepare. Foods that are more costly include fresh vegetables and fruits, depending upon the time of the year, and any item that is fresh and not processed. For example, one vendor explained that tomato based products are a staple in cafeterias, but they contain a great deal of sodium. This vendor said that developing tomato sauce from fresh tomatoes rather than canned tomatoes could be cost prohibitive: “It costs more in labor to be able to make things from absolute scratch versus 50 percent from scratch.” Additionally, vendors reported that they would need to provide additional training to chefs and other staff to prepare healthier options rather than using as many ready-made products. Another vendor was concerned about infrastructure costs, noting that some facilities might need to be upgraded to allow for fresh cooking and fresh product storage; other facilities might need new equipment to offer chilled tap water.

“Companies are concerned about sales and how [the guidelines] will affect their business.”

- Vendor representative

Customer acceptance. Final challenges described by many vendors were customer acceptance of changes associated with the guidelines, and sales. Some vendors were concerned that the guidelines “will only appeal to a health conscious consumer;” “a sustainable consumer;” and “a crowd that wants a healthy meal.” One vendor said that customer preferences drive the types of products they offer and while “healthy items are moving, [the] shelves are not emptying yet.” Another vendor said that “implementing the guidelines is not the problem, but if [products] sit on the shelf and people don’t buy [them], at what point do you say that guidelines are guidelines but we are not selling these products so we are not selling [them] at all?”

Other concerns were related to the cost of organic products; the increased labor associated with providing locally produced items; the ongoing costs associated with updating and printing nutrition materials; and a lack of local composting facilities in some areas. Several vendors noted that they expected the guidelines would have an impact on their menu offerings, by limiting the types of beverages they could offer and by reducing the variety of dry cereal products (i.e., cereals must have at least 3 grams of fiber and less than 10 grams total sugars per serving).

Key Facilitators

Vendors identified several factors that have facilitated (or are expected to facilitate) successful implementation of the guidelines.

Leadership and commitment at all levels. Vendors reported that leadership and commitment at every level of the vendor organization are important facilitators of the successful implementation of the guidelines. One vendor noted that it was important for upper level management to be supportive of the guidelines and flexible. Their managers and chefs are often evaluated based on cost—specifically, the cost of the food that they are producing. This vendor found that implementing the guidelines is associated with a higher cost, and therefore their management “needs to be more flexible” in evaluating their profit/loss ratio. Other vendors found that because of the specialized nature of some of the guidelines, it is helpful to have a dietitian on staff to interpret the guidelines and plan menu offerings: “Companies will need to work with a dietitian or food service wellness professional to maintain the standards and create a menu that reflects these standards.” Finally, vendors noted that other important players were team members that are experienced in sourcing products within the supply chain, a designated person to oversee the operation, and a creative culinary group that can implement the guidelines on a day-to-day basis.

“The company needs to be behind the [Health and Sustainability Guidelines] one hundred percent. We have been incorporating these types of guidelines for a long time...you have to be willing to embrace it as a vendor and a company. It is complex. You have to have a commitment to it.”

- Vendor representative

Education. Vendors also found that the process of implementing the guidelines must begin with education. Specifically, vendors found that they needed to educate both their own staff as well as consumers about the guidelines: “The education component is so important. That means educating the customers but also educating the employees. It really is important that everybody knows what is going on.”

“We have had to be vigilant in [the] education component. We have had to be quite aggressive in helping people understand why [composting and recycling] are important and how to do it. It has been a challenge and although our customer base is very positively inclined towards the program, it’s a process and it can be a slow process to bring them on board.”

- Vendor representative

Education was described as a particularly important strategy when transitioning to composting. For example, one vendor commented that they spent time educating consumers about how to separate compostable items into various bins, and also

educated their back-of-house staff so that they were able to separate the products to prepare for composting. Another vendor discussed their efforts to educate consumers about the value of agricultural best practices. The education piece was thought to be as critical as offering healthier and more sustainable products. Through education and marketing, vendors found that they were able to help consumers to make healthier choices.

Size of Business. Some vendors found that the size of their company would contribute to their ability to implement the guidelines. Larger companies were thought to have the ability to “shift and adjust” to accommodate the guidelines. A couple of vendors commented that smaller operations may not be able to offer the same range of product offerings as a larger company because of cost: “The size of the [cafeteria] may make it more difficult for smaller businesses to implement the sustainability guidelines because they do not have the same resources [as a larger business].”

Part V: Discussion and Lessons Learned from Translating the *Health and Sustainability Guidelines* into a Request for Proposal

Developing and implementing the *Health and Sustainability Guidelines* was a transformative process for the participating agencies and the Humphrey Building Cafeteria vendor that piloted the guidelines. In the past, GSA worked with vendors to incorporate the *Dietary Guidelines for Americans* into food service contracts, though specific recommendations for translating these guidelines into menu practice were not available. The *Health and Sustainability Guidelines* represent the first effort to translate the best available nutrition science and sustainability initiatives into guidance for food service vendors and provide them with tools to create an environment that is conducive to wellness. They can help interested agencies and other entities to introduce healthier and more sustainable options into their food service operations. Further, the guidelines support vendors in helping consumers to make more informed decisions about their food.

While GSA, HHS, and other collaborators developed concise nutrition and sustainability criteria in the guidelines, there were challenges associated with translating some of the guidelines into practice. Finding the right products in the marketplace and identifying purveyors to supply products that meet the guidelines have been challenges. For example, vendors that serve federal facilities reported that identifying a range of lower-sodium products is a problem that has yet to be resolved. However, the guidelines also create a number of opportunities. Federal staff that participated in this process believe that the guidelines will not only increase food choices available to consumers, but in the long run, they may gradually improve the market for healthy and sustainable foods for everyone by impacting the production and manufacturing side of the food supply chain. The Humphrey Building Cafeteria vendor also found that the experience of implementing the guidelines has changed the way their company offers and markets foods—not only in their HHS contract, but in others as well. They attribute their success to a motivated team that looked upon the experience as an opportunity for their entire organization.

According to the federal staff that participated in this case study, the *Health and Sustainability Guidelines* have gained interest from other federal agencies, local and state governments, and vendors that are in the process of drafting their own food service laws and regulations. About twelve states are currently using the federal guidelines as a model for improving state level food service. Additionally, the guidelines are also viewed as an important model for implementing the first-ever National Prevention and Health Promotion Strategy (National Prevention Strategy), a critical component of the Patient Protection and Affordable Care Act, which is focused on improving the health of individuals, families, and communities through prevention. Healthy eating is one of the National Prevention Strategy's seven priority areas. Under the leadership of the Surgeon General, Dr. Regina Benjamin, the National Prevention, Health Promotion, and

Public Health Council that developed the National Prevention Strategy has made the following recommendations related to healthy eating: “implement organizational and programmatic nutrition standards and policies; improve the nutritional quality of the food supply; and help people recognize and make healthy food and beverage choices,” among others.³⁵ Furthermore, they state that “the Federal Government will work to ensure that foods purchased, distributed, or served in Federal programs and settings meet standards consistent with the *Dietary Guidelines for Americans*.”³⁶ The *Health and Sustainability Guidelines*, the RFP, and the Humphrey Building Cafeteria’s experience may inform the implementation of these recommendations.

HHS and other stakeholders continue to disseminate the guidelines at national meetings. Federal staff intend to update the guidelines to reflect changes to the *Dietary Guidelines for Americans*, sustainability best practices, and changes in the manufacturing industry. Modifications or updates will likely impact future RFPs, meaning that public and private stakeholders will need to track the guidelines. GSA and HHS are also working to develop toolkits and computer applications for vendors that will support the implementation of the guidelines. Toolkits will provide information on reading food labels, purchasing sustainable and healthy products, and the advantages associated with the guidelines from a profit/loss perspective, as well as general guidance on implementation.

Key stakeholders involved in developing the *Health and Sustainability Guidelines* and the RFP for the Humphrey Building Cafeteria, offer several valuable lessons learned for federal staff; food service vendors; and other public and private agencies that may consider implementing the guidelines in the future.

Lessons Learned for Government

Federal staff found that having a multi-disciplinary cross-agency partnership was instrumental to their success in developing the guidelines and translating them into an RFP. The Health and Sustainability Guidelines, and the resulting RFP that incorporated them, are products of a cross-agency, multi-disciplinary collaborative. Federal staff noted that the development of the guidelines, and translation of these guidelines into an RFP, was “a team issue, a team event” where their success was the result of “playing as a team, and using each other’s strengths.”

“The key facilitators were having the right people who believed in what they were doing. It takes tremendously dedicated leadership to continue to push the importance of [the guidelines].”

- Steering committee member

The steering committee that developed the guidelines was composed of “not just the right personalities, [but] the right stakeholders to get things done.” Additionally, bringing healthy and sustainable options to the federal workforce was “a main priority for the stakeholders for a long time.” Several stakeholders cited that collaboration across agencies to bring the best available nutrition science to vendors facilitated their success. Each stakeholder brought a different

perspective and subject matter expertise. Many of these stakeholders also participated in the development of the RFP and the review of proposals for the Humphrey Building Cafeteria. Having a multi-disciplinary team engaged in this process was particularly important to selecting the right vendor. Overall, the individuals involved were committed to developing guidelines that would introduce nutrition, wellness, and sustainability principles into future contracts: “We decided it was important to the American public, to [the participating agencies], and we wanted to be in a position to say, [vendors] do need to do this, and we are the experts here to help you to do this.”

There is a need for more industry education about the guidelines, and specifically, the flexibility associated with implementing the guidelines. GSA’s contract with the Humphrey Building Cafeteria vendor contains flexible terms about the implementation of the guidelines. For example, the current Humphrey Building Cafeteria vendor must ensure that 40 percent of their product offerings meet the guidelines. Discussions with other federal cafeteria vendors suggested that they are not aware of the flexibility associated with implementing the guidelines. Additionally, discussions with vendors also revealed that they are not familiar with the standard criteria for some of the guidelines. For example, one vendor commented that “they cannot come close to the 40 to 50 percent of local produce that the guidelines call for; it would not only be cost-prohibitive but also impossible to find.” However, the guidelines’ standard criterion for general food indicates that 25% of the vendor’s product line must be organically, locally or documented sustainably grown (e.g., integrated pest management, pesticide free, other labeling programs, etc.).³⁷ Additionally, some vendors were not aware of the flexibility in the timing of the implementation of the guidelines. For example, vendors recommended that agencies “build flexibility into the guidelines;” “flexibility in what percentages are and what they might look like over time;” and “flexibility in terms of how a vendor should go about implementing [the guidelines].” A federal official expressed that it is important to communicate this flexibility: “Up front, we could have stressed the flexibility of it. If you could implement three of the five or ten guidelines within the first few months, great, and then get all ten within the first year.” As the guidelines are implemented more broadly within state, local and private organizations, more direct-to-new vendor education may be needed about the standard criteria and the possibility of a flexible implementation strategy.

Lessons Learned for Food Service Vendors

Industry experts provided valuable feedback on the feasibility of implementing some of the Health and Sustainability Guidelines, which impacted the content of the RFP. Another key lesson learned was the importance of soliciting industry feedback. In addition to consulting nutrition and sustainability experts from across the federal government, GSA solicited feedback from current federal cafeteria vendors to determine the feasibility of the guidelines. Federal stakeholders commented on the transparent nature of this process. Vendor feedback confirmed the expectations of federal staff about the challenges associated with the guidelines, such as

requesting specific products from food service distributors or developing a composting program. Recognizing the limitations of the marketplace, and also that some guidelines would take more time to implement than others, GSA developed an RFP that can be easily adapted to different agencies in different locations with different priorities.

Lessons Learned for Other Public and Private Agencies or Organizations

Consumers played a major role in the successful implementation of the Health and Sustainability Guidelines at HHS. Another lesson learned was the importance of support from HHS cafeteria patrons. Prior to the implementation of the guidelines, HHS employees expressed a desire for healthier and more sustainable food choices and practices, making the Humphrey Building Cafeteria an ideal location to pilot the guidelines. The HHS Café Patrons Committee garnered feedback from employees, and found that patrons were willing to invest more in healthier options and greener products. Federal stakeholders commented that cafeteria patrons’ awareness of the importance of sustainable practices and their commitment to making healthier choices contributed to a smooth transition to the guidelines.

The successful implementation of the guidelines at HHS can be attributed, in part, to effective education and marketing efforts about health, wellness and sustainability. Federal stakeholders commented that customer education about healthier products and sustainability practices contributed greatly to the success of the implementation of the guidelines. When the guidelines were piloted at the Humphrey Building, HHS collaborated with the vendor to communicate the value of the initiative and other important changes to consumers. Key strategies included marketing through interactive menu boards, promotions of healthier meals, and information about specific changes such as composting and sustainable coffee. Federal staff commented that their educational efforts were important in creating this policy change. Federal stakeholders reported that agencies or other entities that wish to implement the guidelines may achieve better outcomes if they collaborate with their vendor to provide education about nutrition and sustainability, and changes to product offerings and pricing.

“The customer is excited about all of this and they are willing to buy [the products] and spend the extra few cents. But that doesn’t happen unless the customer is in tune and is accepting of the fact that they will need to pay more for a better product. And that is driven by marketing, promotions, information, education—all these elements that will hopefully lead to a successful end.”

- Steering committee member

Federal staff offered guidance to other public and private entities developing a similar RFP based on the Health and Sustainability Guidelines. Federal staff responded to a final and important question: “If another public or private entity were to develop a similar RFP based on *Health and Sustainability Guidelines*, what advice would you give them?” Overall, there were a few categories of responses. First, federal operations staff said that it is important to appoint a person to oversee the implementation of the guidelines in the facility and hold the vendor

accountable to meeting the standards. Federal staff explained that health, wellness, and sustainability are hallmarks of HHS' business and mission, and this contributed to a smooth implementation of the guidelines. Other public agencies and private entities that are implementing the guidelines must be involved in the implementation process and frequently on site to ensure that the products being provided are healthy and sustainable.

Second, other stakeholders talked about the importance of the relationship between GSA, the tenant agency, and the vendor. This relationship is particularly important because these parties are best suited for creating a process to work within the constraints of the supply chain to maximize the guidelines and push beyond them. The agency and vendor, in particular, must collaborate to show the consumer the benefits of supporting healthier and more sustainable options—both for their own lives and for the food system. As another stakeholder noted: “The marketing and education...you cannot underestimate the importance of those pieces.” A high level of buy-in and commitment from all parties was found to be critical.

A final theme was that responsibility of the tenant agency to demonstrate their commitment to health and wellness programs and communicate that commitment to employees before they ever enter the cafeteria. One stakeholder commented that “one of the things that we have learned is that vendors say that they will give you whatever you want, but if your people don't want it, they will go back to selling what makes money.” The tenant agency needs to be involved in driving the changes that they have asked for in the RFP.

Stakeholders believe that the *Health and Sustainability Guidelines* and the RFP developed as part of this process will help agencies and vendors to customize their offerings based on the targeted consumer base while still driving improvements.

Future research should track the long-term impacts of the guidelines on consumer demand, the food supply chain, and the hospitality and manufacturing industries, more generally. Additionally, future studies on the guidelines could incorporate customer feedback about whether they select healthier menu offerings and why. Based on this study, GSA may consider developing a mechanism for documenting vendors' progress over time; identifying challenges and opportunities; and sharing best practices that would be of interest to other food service operations that are implementing the *Health and Sustainability Guidelines*.

Endnotes

- ¹ “Healthier Food at Federal Worksites: *Health and Sustainability Guidelines* for Federal Concessions and Vending Operations.” General Services Administration. Accessed February 20, 2012, <http://www.gsa.gov/portal/content/104429>
- ² *Health and Sustainability Guidelines*.
- ³ *Health and Sustainability Guidelines*.
- ⁴ U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans*, 2010. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010. Accessed March 21, 2012, <http://www.cnpp.usda.gov/dietaryguidelines.htm>
- ⁵ *Health and Sustainability Guidelines*.
- ⁶ *Health and Sustainability Guidelines*.
- ⁷ Wellness and Sustainability Focus Areas. General Services Administration, accessed March 1, 2012, http://www.gsa.gov/graphics/pbs/Practices_for_Concessions_Operations.pdf
- ⁸ General Services Administration, Solicitation number: GS-11P-10-YE-C-0174, accessed February 10, 2012, https://www.fbo.gov/index?s=opportunity&mode=form&id=c476cdfc1213cdf23fecea3a92e61b94&tab=core&_cvview=1
- ⁹ Joel Kimmons, “Improving the Food Environment at Worksites and Schools Through Health and Sustainability Guidelines and Farm to Institution Strategies” (paper presented at Experimental Biology, Washington, DC, April 9, 2011).
- ¹⁰ Holly McPeak, Joel Kimmons, “Health and Sustainability Guidelines for Federal Concessions and Vending Operations” (paper presented at Experimental Biology, Washington, DC, April 9, 2011).
- ¹¹ Barry Loberfeld, “The Healthier Humphrey Café: Facility Profile,” accessed March 1, 2012, http://www.ebmpubs.com/GFS_pdfs/gfs0711_FacilityProfile.pdf
- ¹² “Wellness and Sustainability Focus Areas.” General Services Administration, accessed March 10, 2012, http://www.gsa.gov/graphics/pbs/Practices_for_Concessions_Operations.pdf
- ¹³ Joel Kimmons and Arlin Wasserman, “Improving the Food Environment at Worksites and Schools through Sustainable and Healthy Food Procurement and Farm to Institution Strategies.” (symposia description for Experimental Biology, Washington, DC, April 9-13, 2011).
- ¹⁴ *Dietary Guidelines for Americans, 2010*.
- ¹⁵ *Dietary Guidelines for Americans, 2010*.
- ¹⁶ *Dietary Guidelines for Americans, 2010*.
- ¹⁷ *Health and Sustainability Guidelines*.
- ¹⁸ *Dietary Guidelines for Americans, 2010*.
- ¹⁸ *Dietary Guidelines for Americans, 2010*
- ¹⁹ *Dietary Guidelines for Americans, 2010*.
- ¹⁹ *Dietary Guidelines for Americans, 2010*
- ²⁰ Patient Protection and Affordable Care Act of 2010, S. 4205, 111 Cong., 1st Sess.
- ²¹ *Health and Sustainability Guidelines*.

²² “Federal Energy Management Program.” U.S. Department of Energy, accessed February 11, 2012, <http://www1.eere.energy.gov/femp/regulations/eo13423.html>

²³ “Federal Leadership in Environmental, Energy, and Economic Performance,” *Federal Register* 2009 74(194): 52117-52127, accessed March 21, 2012, <http://edocket.access.gpo.gov/2009/pdf/E9-24518.pdf>

²⁴ “Organic Labeling and Marketing Information,” U.S. Department of Agriculture National Organic Program, April 2008, accessed March 21, 2012, <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELDEV3004446>.

²⁵ “2011 Food and Health Survey,” International Food Information Council Foundation, May 5, 2011, accessed March 21, 2012, <http://www.foodinsight.org/Content/3840/2011%20IFIC%20FDTN%20Food%20and%20Health%20Survey.pdf>.

²⁶ *Health and Sustainability Guidelines.*

²⁷ *Health and Sustainability Guidelines.*

²⁸ “Hubert H. Humphrey Building,” U.S. Department of Health and Human Services, accessed March 21, 2012, <http://www.hhs.gov/about/hhh.html>

²⁹ “Smart Brief. Special Report: Menu Development, Part 4,” Culinary Institute of America, January 26, 2012, accessed March 14, 2012, <http://www.smartbrief.com>.

³⁰ Loberfeld, “The Healthier Humphrey Café: Facility Profile.”

³¹ *Health and Sustainability Guidelines.*

³² Loberfeld, “The Healthier Humphrey Café: Facility Profile.”

³³ Loberfeld, “The Healthier Humphrey Café: Facility Profile.”

³⁴ *Health and Sustainability Guidelines.*

³⁵ National Prevention Council, National Prevention Strategy, Washington, DC: U.S. Department of Health and Human Services, Office of the Surgeon General, 2011, accessed, March 21, 2011.

³⁶ National Prevention Council, National Prevention Strategy, Washington, DC: U.S. Department of Health and Human Services, Office of the Surgeon General, 2011, accessed, March 21, 2011.

³⁷ *Health and Sustainability Guidelines.*

Appendix A: Timeline of the Development and Implementation of the Health and Sustainability Guidelines

- October 2008 – December 2010** U.S. Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) convened to develop the *Dietary Guidelines for Americans, 2010*. In the first stage, the Dietary Guidelines Advisory Committee reviewed the evidence and prepared a report summarizing its findings. In the second stage, the USDA and HHS developed a policy document. In the third and final stage, USDA and HHS developed messages and materials communicating the *Dietary Guidelines* to the general public.
- May 2009** Office of Personnel Management (OPM) and Office of Management and Budget (OMB) began developing wellness best practices and a plan for the federal workforce. GSA led this effort.
- October 2009** President Obama signed Executive Order 13514, requiring federal agencies to purchase and operate in a more sustainable manner.
- GSA released a request for information to determine the Hospitality Industry’s ability to provide contracted concession services, specifically commercial cafeterias, with a strong emphasis on wellness and sustainability, to government agencies.
- November 2009** Deadline for responses to GSA’s RFI. A total of 25 vendors responded to the Request for Information.
- February 2010** GSA released the Wellness and Sustainability Requirements for Contracts at Federal Facilities.
- Press release announcing that the U.S. Department of State’s cafeteria will use the GSA’s *Wellness and Sustainability Requirements for Contracts at Federal Facilities*. The U.S. Department of State’s cafeteria was the first to adopt GSA’s *Wellness and Sustainability Requirements*.
- GSA, HHS and collaborators initiated the development of the *Health and Sustainability Guidelines*.
- March – July 2010** GSA and HHS developed the request for proposal (RFP) for the Humphrey Building Cafeteria, which was the first building to use the *Health and Sustainability Guidelines*. This period of time includes writing, revising and finalizing the RFP.
- July 2010** GSA and HHS received clearance for the draft *Health and Sustainability*

Guidelines to be used in the Humphrey Building Cafeteria RFP.

Some of the *Health and Sustainability Guidelines* were implemented in the U.S. Department of the Interior Cafeteria.

Release of the RFP for Humphrey Building Cafeteria.

August 2010

Proposals due for the Humphrey Building Cafeteria.

**August –
November 2010**

GSA had conversations with vendors bidding on the Humphrey Building Cafeteria contract to determine the feasibility of implementing the guidelines.

November 2010

GSA and HHS awarded the Humphrey Building Cafeteria contract to a new vendor.

December 2010

GSA, HHS and collaborators incorporated cross-agency feedback into the *Health and Sustainability Guidelines*.

January 2011

USDA and HHS released the *Dietary Guidelines for Americans, 2010*.

February 2011

GSA, HHS and collaborators completed the final *Health and Sustainability Guidelines* based on cross-agency feedback and new guidance from the *Dietary Guidelines for Americans, 2010*.

March 2011

HHS and GSA released the *Health and Sustainability Guidelines*.

All new contracts use these guidelines.

GSA worked with concessions operators to progressively implement the guidelines in federal facilities as contracts expire, and as opportunities to enhance offerings emerge.

GSA and HHS publicly released the *Health and Sustainability Guidelines* at a ribbon cutting ceremony at the Humphrey Building Cafeteria.

Appendix B: Additional Detail on Case Study Methodology

Appendix B provides additional information on the case study methodology. The purpose of the case study was two-fold: 1) to document the collaborative process used by HHS, GSA, and other agencies to incorporate the newly released *Health and Sustainability Guidelines* into an RFP, so that other agencies and vendors may learn from this experience, and 2) to describe vendors' perspectives on the *Health and Sustainability Guidelines* and their ability to implement these guidelines in current and future cafeteria contracts. This is also the first case study to document the process used by HHS and GSA to develop the *Health and Sustainability Guidelines*.

Research Questions and Data Sources

The case study addressed four major research questions:

- ▶ How did GSA and HHS incorporate the *Health and Sustainability Guidelines* into the RFP for the Humphrey Building Cafeteria?
- ▶ What lessons can be learned from the RFP development process?
- ▶ To what extent will vendors who bid on federal food service contracts face new challenges or opportunities as a result of the implementation of the *Health and Sustainability Guidelines*?
- ▶ Based on the Humphrey Building Cafeteria vendor's experience—as well as feedback from other federal food service vendors—to what extent does adherence to the *Health and Sustainability Guidelines* impact cafeteria sales, menu offerings, and food delivery?

Case study methods included a document review on the *Health and Sustainability Guidelines* and interviews with federal staff and federal food service vendors. NORC also solicited feedback from a work group composed of federal staff. The NORC Institutional Review Board reviewed and approved the data collection procedures and study instruments under protocol 110802 on August 11, 2011.

Document Review. NORC reviewed the *Dietary Guidelines for Americans, 2010* and the *Health and Sustainability Guidelines* as well as other grey literature sources^{4,5,6,7,8} that describe the

⁴ Joel Kimmons, "Improving the Food Environment at Worksites and Schools Through Health and Sustainability Guidelines and Farm to Institution Strategies" (paper presented at Experimental Biology, Washington, DC, April 9, 2011).

⁵ Holly McPeak, Joel Kimmons, "Health and Sustainability Guidelines for Federal Concessions and Vending Operations" (paper presented at Experimental Biology, Washington, DC, April 9, 2011).

⁶ Barry Loberfeld, "The Healthier Humphrey Café: Facility Profile." Accessed March 1, 2012, http://www.ebmpubs.com/GFS_pdfs/gfs0711_FacilityProfile.pdf

Health and Sustainability Guidelines and their implementation at the Humphrey Building Cafeteria. NORC also reviewed the previous RFP for the Humphrey Building Cafeteria, and the new RFP that incorporates the guidelines. Additionally, NORC reviewed publicly available information on the food service vendors that were selected to participate in interviews; the purpose of this environmental scan was to identify whether the vendor uses the *Health and Sustainability Guidelines* or participates in other health, wellness or sustainability activities. NORC also reviewed preliminary sales and operations data for the Humphrey Building Cafeteria vendor, which were provided by GSA.

Interviews. NORC conducted 16 interviews with three different types of individuals: federal staff who participated in the development of the *Health and Sustainability Guidelines* and/or the RFP for the Humphrey Building Cafeteria (n=9); representatives from the current Humphrey Building Cafeteria vendor (n=2); and representatives from other vendors that hold federal food services contracts (n=7). Table 1 displays the research questions and corresponding data sources.

Appendix Exhibit: Research Questions and Data Sources

Research Questions and Data Sources	Document Review	Federal Staff Interviews	Vendor Interviews
1) How did GSA and HHS incorporate the <i>Health and Sustainability Guidelines</i> into the RFP for the Humphrey Building Cafeteria?	◇	◇	
2) What lessons can be learned from the RFP development process?		◇	
3) To what extent will vendors who bid on federal food service contracts face new challenges or opportunities as a result of the implementation of the <i>Health and Sustainability Guidelines</i> ?		◇	◇
4) To what extent does adherence to the guidelines impact cafeteria sales, menu offerings, and food delivery?		◇	◇

⁷ “Wellness and Sustainability Focus Areas.” General Services Administration, accessed March 10, 2012, http://www.gsa.gov/graphics/pbs/Practices_for_Concessions_Operations.pdf

⁸ Joel Kimmons and Arlin Wasserman, “Improving the Food Environment at Worksites and Schools through Sustainable and Healthy Food Procurement and Farm to Institution Strategies.” (symposia description for Experimental Biology, Washington, DC, April 9-13, 2011).

Data Collection and Analysis

The data collection and analysis activities are described below.

Federal staff interviews. NORC conducted semi-structured telephone interviews with seven federal staff from HHS and GSA. The purpose of the federal official interviews was to gather detailed information about the development of the *Health and Sustainability Guidelines*, and the implementation of those guidelines in the Humphrey Building Cafeteria RFP. HHS and GSA collaborated with NORC to identify the appropriate federal staff to participate in the interviews. NORC recruited each individual by sending that individual an advance letter via email. The letter explained the purpose of the case study and requested participation in an interview. Topics for the interviews included:

- ▶ Process used to develop the *Health and Sustainability Guidelines*
- ▶ Process used to develop the RFP for the Humphrey Building Cafeteria
- ▶ Factors that facilitated the development of the RFP
- ▶ How the implementation of the guidelines may impact vendors
- ▶ Lessons learned

Telephone interviews with federal staff lasted between 45 and 60 minutes each, and were conducted between October and December 2011.

Vendor interviews. Interviews were conducted with nine representatives from seven different federal food service vendors that serve the Capital Region, including the current Humphrey Building Cafeteria vendor. The purpose of the interviews was to learn about federal food service vendors' perspectives on the *Health and Sustainability Guidelines* and possible implications for their business and/or the industry as a whole.

- Two representatives of the vendor that currently holds the Humphrey Building Cafeteria contract.
- Seven individuals that represented six other vendors (two individuals represented the same vendor organization). Four of the six vendors reported that they have implemented all or some of the *Health and Sustainability Guidelines*. Two vendor representatives were familiar with the *Health and Sustainability Guidelines*, but their organization has not yet implemented them.

GSA identified the company representatives for the vendor interviews from the food service industry to participate in the interviews. NORC developed an advance letter, and GSA sent the advance letter to each vendor via email to secure their participation. The advance letter explained the purpose of the case study and how the information would be used. Specifically, the advance

letter informed the individuals that their name and the name of their organization would not be used in the case study. However, NORC did not promise confidentiality given the limited number of vendors that serve federal food service contracts in the Capital Region. GSA also contacted a representative from each vendor to personally invite them to participate in the case study.

The vendor representatives who participated in the interviews may or may not have submitted a response to the Humphrey Building Cafeteria RFP. Not all of the vendors that were selected to participate in interviews were implementing the *Health and Sustainability Guidelines* at the time of the interview. Prior to each interview, NORC sent each individual the following list of possible discussion topics:

- ▶ Familiarity with the *Health and Sustainability Guidelines*
- ▶ Implications of the guidelines for their business (e.g., profits versus costs, food delivery, product offerings, look and feel of the cafeteria, sustainability, green purchasing)
- ▶ Experience incorporating the guidelines, if applicable
- ▶ Types of challenges and opportunities that food service vendors may face as a result of the guidelines
- ▶ Factors that may facilitate the implementation of the guidelines by food service vendors

Positions held by vendor representatives included: president (1), vice president (3), communications director (1), wellness director (1), corporate chef (1), and purchasing manager (1). One vendor elected to invite a consultant who provides support to their organization on health and wellness topics to represent the vendor. Telephone interviews lasted between 45 and 60 minutes, and were conducted between December 2011 and January 2012.

Analysis. Data collected through the interviews were analyzed using traditional methods of qualitative data analysis, based on the discernment of themes and patterns in the data through a content analysis. Data collected through the interviews and the document review process were used to develop this case study.

Work Group. Prior to beginning this study, NORC convened a work group of federal staff that developed the *Health and Sustainability Guidelines* and the RFP for the Humphrey Building Cafeteria. The work group was first convened in the early stages of the project. Through several conference calls, and one in-person meeting, federal staff played a key role in framing the goals of this research, and provided feedback on the study design and data collection instruments at multiple points in the project. HHS and GSA were also involved in selecting the interviews for this study. As noted earlier, GSA also played a key role in recruiting the vendors for the interviews.

Appendix C: Glossary and Abbreviations

Glossary

Bird friendly coffee	The Smithsonian Migratory Bird Center of the National Zoo certifies "Bird Friendly" coffee as organic and shade-grown. Bird friendly coffee grows beneath a tree canopy that provides quality habitat for birds. Shade-grown coffee also plays a key role in conserving migratory birds. ⁹
Cage free eggs	Eggs from chickens that are not confined in cages.
Certified green seal chemical	"Green Seal Certification ensures that a product meets rigorous, science-based leadership standards. This gives manufacturers the assurance to back up their claims and purchasers confidence that certified products are better for human health and the environment." ¹⁰
Certified organic	"Organic is a labeling term that indicates that the food or other agricultural product has been produced through approved methods that integrate cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity. Synthetic fertilizers, sewage sludge, irradiation, and genetic engineering may not be used." ¹¹
Fair trade certified	The Fair Trade network certifies a range of products including coffee, tea and herbs, fruit and vegetables, sugar, beans and grains, among others. Fair Trade principles include: farmers receive a guaranteed minimum floor price and an additional premium for certified organic products; workers have safe working conditions and sustainable wages; and farmers have better access to compete in the global marketplace. ¹²

⁹ "Migratory Bird Center. Shade grown coffee plantations." Smithsonian Migratory Bird Center, accessed February 28, 2012, <http://nationalzoo.si.edu/scbi/migratorybirds/coffee/>

¹⁰ "Frequently asked questions." Green Seal, accessed February 28, 2012, <http://www.greenaseal.org/AboutGreenSeal/FrequentlyAskedQuestions.aspx>

¹¹ "Consumer Brochure," U.S. Department of Agriculture National Organic Program, accessed March 1, 2012, <http://www.ams.usda.gov/nop/Consumers/brochure.html>

¹² "Frequently asked questions." Fair Trade Resource Library, accessed: <http://www.fairtradeusa.org/resource-library/faq>

Sustainable food system A sustainable food system exists when production, processing, distribution, and consumption are integrated and related practices regenerate rather than degrade natural resources, are socially just and accessible, and support the development of local communities and economies.¹³

Abbreviations

ASA	Office of the Assistant Secretary for Administration
ASPE	Office of the Assistant Secretary for Planning and Evaluation
CDC	Centers for Disease Control and Prevention
FDA	U.S. Food and Drug Administration
GSA	General Services Administration
HHS	U.S. Department of Health and Human Services
NIH	National Institutes of Health
ODPHP	Office of Disease Prevention and Health Promotion
OMB	Office of Management and Budget
OPM	U.S. Office of Personnel Management
RFP	Request for Proposal
USDA	U.S. Department of Agriculture

¹³ American Dietetic Association. Position of the American Dietetic Association: Food and nutrition professionals can implement practices to conserve natural resources and support ecological sustainability. *Journal of the American Dietetic Association* 107 (2007):1033-43. Accessed February 20, 2012.