

Older Americans Act Nutrition Programs & Services:

Understanding Title III-C Flexibilities

- ▶ This information is to help the aging nutrition network better understand what flexibilities already exist within the Older Americans Act while delivering congregate and home-delivered meals in regards to nutrition guidelines and service delivery methods. In some cases, state and/or local regulations may have more strict regulations. It is best to be aware of those rules and regulations and to follow state and local mandates.

For specific questions or concerns, please consult with the appropriate entity (local providers can consult with the area agency on aging (AAA), AAA can consult with the state unit on aging (SUA), SUA can consult with ACL regional administrator (RA)).

How Do We Incorporate Nutrition Guidelines – Dietary Guidelines for Americans (DGA) & Daily Reference Intakes (DRI)?

Providing nutritious meals and utilizing the DGA/DRI is necessary for the aging nutrition network. Making that happen can be a challenge. These resources can aid in managing DGA and DRI for congregate and home-delivered meals.

- The [Nutrition Requirements of the Older Americans Act](#) (OAA) covers frequently asked questions regarding OAA and nutrition requirements.
- The [Senior Nutrition Program Webinar](#) provides an overview of the Dietary Guidelines for Americans and Dietary Reference Intakes, what they are, how much flexibility they offer, and how states and Area Agencies on Aging share ultimate discretion on establishing their own specific nutrition and menu policies to best meet their community's needs. ([slide deck](#))
- ACL's Senior Nutrition Program invited aging services network members from three states to share their experiences with the Dietary Guidelines for Americans and Dietary Reference Intakes. Through the [panel discussion](#) the network members share lessons learned, advice for peers, and more. ([takeaways sheet](#))





Can we provide Grab & Go/ dine-in/ food truck meals?

▶ Congregate and home-delivered meals can be served in innovative and creative ways. These varied delivery methods can make it a challenge to know what funding sources can be and should be utilized. The [decision tree](#) can help determine if the meals being served are reported as Title III-C 1 (congregate nutrition) funds or Title III-C 2 (home-delivered nutrition) funds.

Individuals receiving carry-out meals do not need to be homebound per the Older Americans Act. However, some states may include homebound as a requirement to receive III-C 2 meals.

What about groceries?

In some instances, providing groceries for participants may be appropriate and is allowable per the Older Americans Act. Groceries are foods that are ingredients for a meal and typically are not ready to consume as is and need further preparation. This would include ingredients in a meal box intended for the recipient to make the meal in their home. These groceries could be offered with a variety of funding sources as “other nutrition services.” This means that they would not be counted as a meal or toward meal count for Nutrition Services Incentive Program (NSIP). Instead, groceries are considered “material aid: consumable supplies” in regard to the State Program Report (SPR). OAA funding sources Title III-B and/or III-C (III-E funds when provided to caregivers) may be used in addition to other non-federal funding sources. States may have additional guidance on what is allowable.

The [Using Groceries and Other Nutrition Services to Meet Senior Needs](#) document provides guidance for when groceries may be appropriate, the provision of groceries during an emergency, and groceries in regard to NSIP.

- ▶ Does a participant need food or do they need meals? This [Food vs. Meals guide](#) can help decide.
- ▶ The [COVID-19 Triage Guidelines for Food and Meal Needs, Older Adults](#) is intended to help senior nutrition programs triage requests for service.
- ▶ This [step-by-step guide](#) provides guidance for working with restaurants and grocery stores for meals.

How can we utilize our nutrition funds to increase attendance?

As states move toward reopening congregate meal programs and other aging network activities, this [reopening considerations guide](#) offers considerations to help programs adapt once again.

The [senior nutrition program spending idea brief](#) offers a range of ideas that may help programs to brainstorm new and/or expanded ways to meet older adults’ nutrition, socialization, and wellness needs with Older Americans Act (OAA) funds.

Consider establishing a restaurant program by reviewing [No Reservations Establishing Restaurant Partnerships in the Age of COVID-19](#) or restaurant and Café approaches to providing congregate meals as demonstrated by [Innovations in Nutrition grantees](#).

The [funding flexibilities for senior nutrition programs](#) offers an overview of flexibilities allowed by both standard operating statute and emergency authorities.

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