



Using Groceries and Other Nutritional Services to Meet the Needs of Senior Nutrition Program Participants

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The Senior Nutrition Program (SNP) of the Older Americans Act (OAA) is a unique federal program for older adults that offers nutritious meals, social opportunities of friendship, companionship, volunteerism, civic engagement, health promotion/disease prevention activities, and access to community services that allow older adults to remain healthy and independent at home in their community.

Senior Nutrition Program (SNP) Purpose

OAA Title III-C Section 330 states the purposes of the SNP, which are to promote nutritional status, general health and well-being of older individuals. The services are intended to:

- Reduce hunger, malnutrition, and food insecurity,
- Promote socialization, and
- Delay the onset of adverse health conditions through access to nutrition and health promotion/disease prevention services.¹

OAA Sections 305, 601 and 614 respectively place responsibility to administer OAA services on the State Unit on Aging (SUA) or the Tribal Organization. The SUA is to determine policies and procedures for SNP implementation². The Tribal Organization is to deliver nutrition services to older Indians that are “substantially in compliance with the provisions of part C of title III.”³

Congress places significant emphasis in the OAA on the **provision of meals** to older adults. Sections 331 and 336 state specifically that meals are the primary nutrition service. Section 339 details the nutrient content of the meals. Title VI Sections 601 and 614 authorize the provision of nutrition services for Native Americans that are comparable to those provided by Title III.

However, the SNP is not limited to meals or to food alone. To meet the nutrition needs of a diverse community of older adults and to assist older adults to remain healthy in the community, OAA Sections 331 and 336 allow for “. . . nutrition education, nutrition counseling, and other nutrition services, as appropriate, based on the needs of **meal recipients**.”⁴ As a result, limited other nutrition services are available. Other nutrition services can be things like liquid nutritional supplements (e.g., Ensure, Boost, etc.), weighed utensils, or groceries.

¹ [OAA, Section 330](#)

² [OAA, Section 305\(a\)\(1\)\(C\)](#)

³ [OAA, Section 601, 614\(a\)\(8\)](#)

⁴ [OAA Sections 331\(3\) and 336\(2\)](#)

As stated OAA Title III-C Section 330 and supported by numerous studies, the SNP is more than food provision. The Administration for Community Living (ACL), Administration on Aging's (AoA) nutrition evaluation reports^{5 6 7}and budget justifications⁸ demonstrate how the congregate and home delivered nutrition services programs, including meals, meet the OAA's intent of addressing nutrition, health and socialization needs. In addition, SUA/Area Agency on Aging (AAA)/Local Service Provider (LSP) and Tribal Organization policies and procedures should clearly reflect how the purposes of the SNP will be implemented and monitored to assure adherence to the OAA requirements.

Allowable Title III-C Other Nutrition Services

As indicated in the section above, in addition to meals, other nutritional services may be provided to meal recipients. In general, limited resources often result in SNP network organizations being able to provide few, if any other nutritional services. This is important to consider, as at the time of publication, funding levels have expanded through September 30, 2021 (related to a national pandemic), but these increases are unlikely to continue into future years. Because of the limited funding, coupled with existing plus new increases in food insecurity, malnutrition and hunger, and the fact that SNP meals alone may not meet all needs, Congress allows flexibility based on the needs of meal recipients.

The SUA/AAA/LSP and/or Tribal Organization should establish policies and procedures to determine availability and eligibility of Title III-C and Title VI nutrition services as well as access to other nutrition services in alignment with the OAA intent (see SNP Purpose section).

Delivering high quality food and nutrition services is a paramount concern as our network has a newly expanded base of participants and a growing number of eligible persons, based on population estimates. The network should utilize tools and develop relationships with key stakeholders to meet the growing and changing needs of their clientele.

When Groceries Might be Appropriate

The following examples list situations when, under usual OAA authority, offering groceries may be appropriate to purchase and provide as Title III-C other nutrition service:

1. Groceries might be offered to an individual who has severe dietary restrictions and cannot consume the congregate or home delivered prepared meals, but who

⁵ [Mathematica Policy Research. 2015. Process Evaluation of Older Americans Act Title III-C Nutrition Services Program.](#)

⁶ [Mathematica Policy Research. 2017. Evaluation of the Effect of the Older Americans Act Title III-C Nutrition Services Program on Participants' Food Security, Socialization, and Diet Quality.](#)

⁷ [Mathematica Policy Research. 2018. Evaluation of the Effect of the Older Americans Act Title III-C Nutrition Services Program on Participants' Health Care Utilization.](#)

⁸ [Department of Health and Human Services Fiscal Year 2021 Administration for Community Living Justification of Estimates for Appropriations Committees.](#)

participates in OAA-funded nutrition education programs or is otherwise eligible for OAA services.

2. Liquid nutrition supplements (eg, Ensure, Boost, etc.) may be offered in addition to a meal for a person with, or at high risk for, malnutrition, in order to enhance the protein, vitamins and minerals provided by the SNP meal.
3. Specialized one-on-one or group nutrition education might be offered to caregivers to assist them in meeting the specialized nutrition needs of individuals with dementia who may no longer feed themselves or who may suffer additional health complications.
4. Addressing local, state or national emergencies – when meals may not be available, staffing shortages, seniors capable of cooking, groceries may be a viable, but limited, option.

Please note: Items such as groceries or liquid nutrition supplements provided as other nutrition services are not counted as a meal and cannot be counted toward meal counts or NSIP meals for reporting purposes.

Addressing Food Insecurity

Some older adults may need more than one meal daily to meet food basic needs. The OAA does not prohibit SNP ability to serve multiple meals per day, or providing combinations of frozen, shelf-stable and fresh foods, and/or sending more than one meal for a day (eg, breakfast and lunch). Prioritizing systems and food/nutrition screening tools can assist in determining which clients require higher levels or types of meals and related nutrition services. Please see the *Senior Nutrition Program Meal Services Elements for Sustainability: Guide to Prioritizing Clients* for further information.

Furthermore, in alignment with the basic purposes of the SNP, one of which is to reduce food insecurity, SNPs should consider appropriate referrals, application assistance and/or partnerships to ensure prudent use of limited OAA funds. Several federal programs target food insecurity by providing food or supplemental assistance.⁹ Other resources including SNAP benefits, Food Distribution on Indian Reservations or food banks/pantries can be leveraged to meet food needs. SUAs/AAAs/LSPs or Tribal Organizations can develop and/or continue new partnerships that provide access to groceries/shopping assistance via referrals to food pantries, hospital food prescriptions, Senior Farmers Market Programs, faith-based organizations etc.

Other federal programs such as United States Department of Agriculture (USDA) programs [such as the Supplemental Food Assistance Program (SNAP) or the Commodity Supplemental Food Program (CSFP)] offer food assistance designed supplement the diets of older adults only and are not designed to help decrease social isolation or keep older adults independent at home. As a result, the SNP addresses social determinants of health (SDOH) in a more

⁹ [Federal Nutrition Programs and Emergency Food Referral Chart for Older Adults](#). Food Research and Action Center. 2021.

comprehensive way than does USDA programs that provide food alone. SDOH include access to affordable, healthy food; availability of community resources; transportation; and social support¹⁰—all of which are available through the Senior Nutrition Program. Studies indicate that addressing SDOH are related to improved health outcomes.¹¹

Provision of Groceries During Emergencies

Periodic Emergencies

During, or in preparation for, emergent weather, natural disasters or localized events (eg, loss of power to an individual meal site), in order to assist with providing nutritious meals when home deliveries or group meal service is not feasible or safe groceries may be an option.

Major Disaster Declaration

During COVID-19 Major Disaster Declaration (MDD), groceries and other services have been widespread and assisted with meeting the nutritional and other basic household supply needs of older adults who were encouraged to shelter in place. Significant and unprecedented additional funding and transfer flexibility between OAA Title III Parts B, C1 and C2 and service flexibility in Title VI has enabled the aging services network to address the escalating food insecurity, socialization and health needs of eligible populations resulting from physical distancing requirements.

Under MDD authorities, all OAA Title III funding was permitted to be allocated to any of the OAA Title III Parts. States were allowed to use regular OAA funding, as well as Families First and CARES Act funds -- including those given under Title III-C -- for delivery, pick up, or other services necessary to grocery assistance. The CARES Act also included Title III-B funding which may be used for such services.

As common practice to help with meal shortages, staffing shortages, and to assist seniors who were encouraged to shelter in place who were capable of making their own meals, groceries were used to address these critical needs. This increase in funding will not be forever and thus the use of groceries should be evaluated.

Under disaster and non-disaster scenarios, the Title III-C funds cannot be used for grocery pick-up and delivery, but Title III-B funds could be used for that purpose.

Provision of Groceries and Nutrition Services Incentive Program (NSIP) Funding

Under regular OAA authorities, Title III-B funds ¹² can be used for groceries and grocery delivery services. In considering whether to continue offering groceries and grocery assistance, a SUA/AAA/LSP needs to consider how the purposes of the SNP found in Section 330 will be met,

¹⁰ [Social Determinants of Health. Healthy People 2020.](#)

¹¹ https://www.who.int/social_determinants/themes/en/

¹² Research Triangle International. 2007. [Draft Final Report for the Evaluation of Select Consumer, Program, and System Characteristics under the Supportive Services Program \(Title III-B\) of the Older Americans Act.](#)

the engagement of program participants, and the continued funding of the variety of services available through both congregate and home-delivered meals. Groceries, as distinguished from shelf-stable meals, cannot be structured in a way to count as a meal. In addition, groceries alone cannot be counted towards the Nutrition Services Incentive Program (NSIP) funding allocation. Use of Title III-C funding to purchase groceries may reduce NSIP meal counts and thus the amount of the NSIP allocation that a SUA receives.

When considering providing groceries via Title III-C funding as other nutrition services, the SUA/AAA/LSP may want to consider these factors in performing a cost-benefit analysis:

- Title III-C funding is not sufficient to provide services to all eligible individuals. Therefore, funding must be prioritized across all authorized services (eg, meals, nutrition education, nutrition counseling, other nutrition services)
- Groceries are not meals and not available to count as an NSIP meal:
 - NSIP meal counts are directly related to NSIP funding (payments based on NSIP meal counts will resume in federal fiscal year 2022; during FY20 and FY21 SUAs will be held harmless).
 - Spending Title III-C funds to support other nutrition services reduces the funding available for meals, potentially reducing the number of NSIP meals served. Therefore, funds devoted to groceries and other nutrition services may decrease the number of meals and/or persons who can receive meals.
 - Reductions in subsequent NSIP funds may result in serving fewer individuals with greatest need during a time when more seniors are facing food insecurity and malnutrition at higher rates than many populations.

Summary

The COVID-19 pandemic called for flexible service provision to ensure access to nutritious, adequate, safe food for older adults served by the OAA SNP. Congress appropriated significant funding to allow this flexible service to occur.

As service provision returns to the “new normal”, this additional funding will not be available. SUAs/AAAs/LSPs should carefully consider the benefits of offering groceries to a limited number of persons who may benefit from food provision versus serving a meal.

SUAs/AAAs/LSPs and Tribal Organizations should prepare to meet this new challenge by:

- continuing to provide quality meal service,
- developing and/or enhancing partnerships with food assistance organizations, and
- determining which flexible, innovative services to embed within their service structure to best capture the practices adopted and new audiences gained during the COVID-19 crisis.

A nutrition provider that is considering offering groceries should tread carefully. Providing food such as groceries might be considered duplicative of other federal food assistance programs,

which provide only food and be considered unnecessary by the Government Accountability Office. Policies and procedures should address how the other parts of the Act (ie. socialization and health and well-being are addressed). Because the OAA nutrition program provides more than food and it offers significant other benefits, Congress continues to value and fund this unique program.