

Nutrition Projects: Implementation Guide

This Q&A guide provides practical guidance on meeting federal nutrition project requirements in real-world program operations.

Question and Answer Nutrition Project Guide

What is a nutrition project?

A nutrition project is an organization that provides a nutrition intervention that includes a meal and other services to older adults under a grant or contract with an area agency on aging (AAA) or state unit on aging (SUA). These projects are the backbone of the senior nutrition program and can look different depending on the communities they serve.

Who is eligible to participate in a nutrition project?

Adults 60 and older are eligible, with services tailored to each person's needs. Programs should also have options in place to serve a few other groups, including spouses of older adults, volunteers during mealtime hours, and individuals with disabilities who either live at home with an older adult or reside in housing where congregate services are offered.

How can nutrition projects meet all requirements by offering meals five or more days per week?

Start by getting to know your participants using the [whole-person strategy](#). Needs may be expressed directly, observed over time, or identified through conversation. Understanding each person's situation is the foundation for building a meal plan that works for them.

- Participants may benefit from a daily meal due to their inability, limited ability, or lack of support to shop for or prepare meals. Participants may also benefit from regular safety checks. Options could include receiving home-delivered meals (daily hot meals or periodic delivery of frozen meals) five or more days a week, or a combination of home-delivered meals and transportation to a congregate meal site, provided this does not conflict with state policy. This assumes participants are able and willing to participate.
- Some participants may already receive meals through Medicaid or another federally funded meal program, which should be considered when determining the appropriate frequency of meals to avoid duplicating services. For participants who rely on family members, volunteers, or other informal supports, the availability and reliability of those supports should be assessed on an

individual basis and should not be assumed based solely on their presence. The appropriate frequency of meal services should reflect each participant's individual needs and circumstances.

Can nutrition projects offer both congregate and home-delivered meals?

Yes, unless the state's policy specifies otherwise. Nutrition projects may operate congregate meals, home-delivered meals, or both, allowing them to reach older adults with different needs and circumstances. For example, a participant may need home-delivered meals three days a week due to dialysis appointments and may also want and be able to attend congregate meals on the other two days.

How much flexibility exists in how and where meals are offered?

While the five-or-more-days-a-week requirement is firm, the law allows flexibility in how and where those meals are delivered.

Congregate meals may be served in a variety of settings, including traditional meal sites, multigenerational meal sites, restaurants, food trucks, and, where permitted, adult care facilities. They may also include voucher programs that allow participants to eat at a partnering restaurant or grocery store. Regardless of the setting, congregate nutrition services must meet all Older Americans Act (OAA) requirements, including being available to all eligible participants and avoiding duplication of other funding sources. For congregate meal sites, choosing locations that are convenient and accessible to all eligible participants 60 and older can help reduce barriers to participation. This does not apply to home-delivered meals, which are delivered directly to the participant's home.

A congregate nutrition project's offerings five or more days per week might include:

- Sit-down meals at a senior center
- Meals served through a restaurant or food truck partnership
- Meal voucher programs redeemable at restaurants, grocery stores, or farmers' markets
- Non-traditional settings, such as meals served at schools, churches, faith-based facilities, or senior housing complexes

Home-delivered meals may be hot, cold, frozen, shelf-stable, or fresh and can be delivered via grab-and-go or other delivery schedules that fit the program's needs. If a project offers grab-and-go meals, they are available only for a limited time based on participants' needs, and are accompanied by strategies that support other service requirements as well as opportunities for social connection. Nutrition projects can combine these formats based on the needs of those they serve and the resources available to them. For more regarding the different types of service, including food truck innovations and grab-and-go requirements, visit the [Nutrition and Aging Resource Center](#) to find more information on:

- [Creativity and Innovation](#)
- [OAA Nutrition Basics Guidance](#)
- [Grab and Go 101: Quick Guide for Aging Nutrition Programs](#)
- [Grab and Go Decision Tree](#)

Are participants required to attend or receive meals every day the program operates?

No. Participants who only need or want meals two or three days a week are not required to participate more frequently. The key requirement is that meals are available five or more days a week. The flexibility lies in the format and setting, not in how often any individual participant must attend.

What other nutrition services can eligible participants receive beyond meals, nutrition education, or counseling?

Eligible participants (meal and non-meal participants) may receive [other nutrition services](#) including materials or support that meet the OAA nutrition services program intents other than or in addition to meals, nutrition education or nutrition counseling.

While the range of other nutrition services is defined by the needs of the individuals, examples of ones more commonly funded by Title III-C include but are not limited to:

- Supplemental foods¹ (e.g., food items, food boxes, liquid nutrition supplements)
- Groceries²
- Weighted utensils
- Health and nutrition assessment and screenings
- Virtual and telephonic nutrition services implementation

What nutrition standards must project meals meet?

Meals must meet OAA nutrition standards, with room to design menus that participants will enjoy.

Registered Dietitian Nutritionists should be involved to help meet these standards. If one isn't available, states can use staff with equivalent training or expertise. Projects also need to follow state and local food safety rules.

How can nutrition projects collaborate with other community-based organizations and other nutrition services to support whole-person health strategies?

To help fill nutrition-related gaps for eligible individuals, nutrition projects should build partnerships with other community-based organizations and provide or refer individuals to available resources, offering reasonable opportunities to meet their varied needs. Resources may include:

- Nutrition education, nutrition counseling, and other nutrition services such as adaptive utensils, supplemental foods, and virtual interactions.

¹ Supplemental foods may be provided with a meal, or separately, to older adults who participate in either congregate or home-delivered meal services. Supplemental foods are nutrition-related items used to maintain health or nutritional status and do not alone meet the requirements of a meal under the OAA.

² Groceries cannot be counted as a meal, even when grocery items can be assembled to prepare a meal. Groceries should be offered sparingly, since other resources exist to address food needs.

- Referrals to home- and community-based services, such as friendly visiting, telephone reassurance, and virtual or in-person evidence-based programs.
- [Benefits access](#), such as Supplemental Nutrition Assistance Program (SNAP), State Health Insurance Assistance Program (SHIP), Commodity Supplemental Food Program (CSFP), or Senior Farmers Market Nutrition Program (SFMNP).

Additional community partnerships using a [systems approach](#) focused on nutrition, social isolation, and health/wellness (e.g., food pantry, health clinic) can help address individual situations. In addition, partnering with local food producers is another great way to bring fresh, locally grown foods into meal programs.

How can staff support a whole-person health priority in a congregate setting if there is no formal assessment?

Even when a formal assessment is not required, staff can still apply whole-person health through everyday interactions with participants.

Appropriate training is essential for senior nutrition program staff. [Staffing and Training](#) resources help build specific skills that let staff notice and respond to a participant's needs across physical, emotional, and social well-being. For example:

- Recognizing elder abuse: protecting participants' physical and emotional safety
- Recognizing food insecurity, social isolation, and malnutrition: noticing signs that a participant may be struggling beyond what's visible at the meal table
- Service referral skills: connecting participants to health, social, or community supports beyond the meal itself
- Conflict resolution: maintaining a safe, respectful social environment at the congregate site

These resources are designed to help programs build staff knowledge and skills to meet participants' needs effectively.

How can states and providers meet the federal minimum requirements despite differing policies?

State policies may require that home-delivered meals be prioritized for homebound adults 60 years and older, but the OAA does not mandate homebound status for meal eligibility. Programs may also receive funding from non-OAA sources, which can establish different eligibility requirements and policies. For example, serving individuals under 60 years with disabilities or certain chronic conditions. However, providers must ensure that OAA funds are used only for eligible people as defined by OAA guidelines. While blending or braiding funding streams is permitted and can expand service options, it is essential that providers maintain accurate records and policies to clearly document which participants are served with OAA funds versus other funding sources. Careful tracking helps ensure compliance and accountability with federal requirements.

States and AAAs with questions about implementation should contact their SUA.

Additional Notes

Rural Exceptions: Five or more days a week may not be feasible due to locations being in a rural area (as defined in OAA regulations). Less than five days must be approved by the state agency.

This document provides interpretive technical assistance to help the aging network understand and apply federal guidance, summarizing ACL guidance and technical assistance. It is not official federal policy, does not create new legal requirements, and does not replace SUA policies. When in doubt about a specific topic, confirm with the SUA or ACL.