

Nutrition Projects: Realistic Implementation

What is a nutrition project?

A nutrition project is an organization that provides meals and nutrition services under a formal grant or contract with an area agency on aging (AAA) or state unit on aging (SUA).

What are the requirements of a nutrition project?

Nutrition projects must operate using a person-centered and trauma-informed approach while following state and federal requirements (e.g. Older Americans Act [OAA], applicable federal legislation and regulations, state administrative codes, etc.). An individual's participation is determined by an evaluation of person-centered needs and the organization's capacity to assess and respond to those needs.

Meal Service Delivery

[Congregate Meals](#) shall be offered at least five days a week, unless frequency is not feasible.ⁱ Nutrition projects shall:

- Provide at least one hot or other appropriate meal per day and any additional meals the nutrition project may decide to offer.
- Provide meals in congregate settings, which include adult day care facilities and multigenerational meal sites.
- Provide [nutrition education](#), [nutrition counseling](#), and [other nutrition services](#) as appropriate, based on the needs of meal participants.

[Home-Delivered Meals](#) shall be offered at least five days a week, unless frequency is not feasible.

Nutrition projects shall:

- Provide at least one home-delivered meal per day, which may consist of hot, cold, frozen, dried, canned, fresh, supplemental food, and any additional meals the provider may decide to offer.
- Provide nutrition education, nutrition counseling, and other nutrition services as appropriate, based on the needs of meal participants.

Offer a combination of both congregate and home-delivered meals. Flexibility in settings is provided for meals to include traditional meal sites, adult day care facilities, multigenerational meal sites, restaurants, delivery to the home, grab-and-go, frozen, shelf-stable, food trucks, and more.

Nutrition Standards

- [Nutrition Requirements of the Older Americans Act \(OAA\)](#).
- Registered Dietitian Nutritionists (RDNs) shall be involved to provide expertise to meet OAA nutrition standards. If an RDN is not available, states have the option to define and utilize individuals with equivalent education, training, and expertise (education and training in nutrition science, expertise in planning of nutritional services).
- Nutrition project meals must meet OAA nutrition standards. Nutrition projects must also be given flexibility to design meals that appeal to participants and still meet the OAA Title III-C [nutrition intents](#).
- Meals are the primary nutrition service of the senior nutrition program. They should be provided in locations that are as close in proximity to the majority of eligible individuals' residences as possible (excluding in-home meals).
- [Nutrition services](#) may be included in the form of nutrition education, groceries,ⁱⁱ liquid supplements, etc.
- Nutrition projects must comply with state and local laws regarding the safety and sanitary handling of food, equipment, and supplies used in the storage, preparation, service, and delivery of meals to older individuals.

Each AAA must have procedures to show that there are options to offer meals and nutrition services to:

- Older individuals and their spouses at all locations
- Individuals who volunteer during mealtime hours
- Individuals with disabilities who live at home with older individuals
- Individuals with disabilities who are not older individuals but who reside in housing facilities where older individuals live and where congregate nutrition services are provided

Partnerships with local food producers are encouraged to incorporate and offer locally grown foods in all meal programs.

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

Get to know your participants using [person-centered and trauma-informed approaches](#). Older individuals may communicate their needs in a variety of ways throughout conversation or observation. Based on the findings of participant needs, plan to offer a variety of services five or more days per week.

- Participants may benefit from a daily meal due to their inability, or limited ability or support, to shop for or prepare meals. Participants would also benefit from regular safety checks. Options could include having home-delivered meals (daily, hot meals/periodic delivery of frozen meals) five days per week or a combination of home-delivered meals and transportation to a congregate meal site. This is assuming participants can and are willing to participate.
- Participants may have established support through family, volunteers, or Medicaid meals; therefore, receiving a meal five days per week would not be needed or appropriate.

- Eligible participants (meal and non-meal participants) may receive other nutrition services. [Other nutrition services](#) include materials or support that meet the OAA nutrition services program intents, other than or in addition to meals, nutrition education, or nutrition counseling.
 - Examples include but are not limited to supplemental foodsⁱⁱⁱ (food items, food boxes, liquid nutrition supplements), weighted utensils, health and nutrition assessment and screenings, virtual and telephonic nutrition services implementation, mealtime socialization, and health promotion.

How can nutrition projects collaborate with community-based organizations and other services to support person-centered, trauma-informed needs?

To help fill in nutrition-related gaps for eligible individuals, nutrition projects should provide or refer individuals to available resources (see below for ideas). The goal of providing available resources is to offer reasonable opportunities to meet the varied needs of individuals. Resources may include:

- Other nutrition services such as nutrition counseling and education, adaptive utensils, or groceries.
- Supplemental foods or nutrition-related items; may include additional beverage or food items and may be specific by state agency policies and procedures.
- Referrals to home and community-based services, such as friendly visiting, telephone reassurance, 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 services with a [systems approach](#) that focus on nutrition, social isolation and health/wellness (e.g., food pantry, health clinic) may be offered to address individual situations.

How do you use a trauma-informed approach in a congregate setting where there is no assessment?

[Trauma-informed training](#) is essential for SNP staff. Staff should learn what trauma-informed means, how to identify trauma, and the approach taken to address trauma, if applicable.

- For example, in the congregate setting, staff get to know the participants through observation and personal connections. These ongoing relationships help staff identify areas to address with participants.

How can states and providers meet the federal minimum requirements even if they differ on policies?

Depending on the state, state policy may require that home-delivered meals be prioritized for homebound adults 60 and older. However, the OAA does not require individuals to be homebound to receive home-

delivered meals. Programs may be funded by non-OAA resources and may establish policies and procedures that are different and offer more variety than OAA-funded programs.

- For example, meal programs that are state-funded may have specific requirements, such as that individuals younger than 60 living with a disability or certain chronic conditions receive meals.

Additional Note

Policies and procedures must be developed to define a nutrition project and to state how it will provide meals and nutrition services five or more days per week in accordance with the Older Americans Act. Please refer to state and area plans describing support and consideration of the availability of resources and the community's need for nutrition services.

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ⁱ Five days a week may not be feasible due to the location being in a rural area (as defined by the Assistant Secretary by regulation. Less than five days must be approved by the state agency).

ⁱⁱ Groceries cannot be counted as a meal, even when grocery items can be assembled to prepare a meal.

ⁱⁱⁱ 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.