



Other Nutrition Services

As Specified by the Older Americans Act (OAA)

Introduction

The OAA states that meals are the primary nutrition service of the Senior Nutrition Program (SNP). However, 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 include "... nutrition education, nutrition counseling, and other nutrition services as appropriate, based on the needs of meal recipients." This tip sheet explains requirements and flexibilities related to "other nutrition services" available to state units on aging (SUAs), area agencies on aging (AAAs), and local service providers (LSPs).

About Other Nutrition Services

Other nutrition services include materials or supports that meet the OAA Title III, parts C1 or C2 nutrition service program intents other than, or in addition to, meals, nutrition education, or nutrition counseling. Eligible persons, including meal and non-meal participants, may receive these services. OAA sections 305 and 307 give authority to SUAs to determine policies and procedures for SNP implementation. AAAs may have policies and procedures aligned with SUA policies that provide more specifics related to other nutrition services in their area. This means these services may be handled differently across states, territories, and regions. The range of other nutrition services is defined by the needs of individuals, but the ones most commonly funded by Title III-C include:

- Supplemental foods*
- Groceries**
- Weighted utensils and other adaptive eating equipment
- Health and nutrition assessment and screening
- Virtual and telephonic interactions

*Supplemental foods mean foods that assist with maintaining health, but do not alone constitute a meal. Supplemental foods include oral nutrition supplements or enhancements to a meal, such as additional beverage or food items, and may be specified by SUA policies and procedures. Supplemental foods may be provided with a meal, or separately, to older adults who participate in either congregate or home-delivered meal services. [OAA Final Rule of 2024](#)

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

Funding Other Nutrition Services

The main purpose of the SNP is to provide meals to eligible older adults in the greatest social and economic need. Title III-C funding must be prioritized across all authorized services (i.e., meals, nutrition education, nutrition counseling, and other nutrition services according to SUA and AAA policies).

SUAs, AAAs, and LSPs will need to establish criteria for frequency, length of service, evaluation, and prioritization of other nutrition services used in the SNP. Issues to consider include:

- Other nutrition services can negatively impact Nutrition Services Incentive Program (NSIP) meal counts and funding.
 - NSIP funding is used to purchase domestically produced food for meals. Other nutrition services are not categorized or reported as meals; therefore, cannot be credited toward NSIP meal counts.
- Other OAA Title-III programs are also authorized to provide other nutrition services. Coordination and collaboration with those Title-III programs can help maximize resources.
 - Title III-B, Supportive Services: Other nutrition services can be covered if their use complies with state and local policies and funds are available. Other nutrition services are considered “other services as necessary for the general welfare,” as indicated in OAA section 321(26).
 - Title III-E, Caregiver: These funds can be used for supplemental services on a limited basis to complement the care provided by caregivers under OAA section 373(b)(5). The care recipient must have impairments in two or three activities of daily living to be considered eligible for supplemental services.
- Grants, fundraising, private donations, and business partnerships are potential funding streams for these services.

- Coordinating and referring to federal and state nutrition assistance programs can further help to address hunger and food insecurity. Programs include:
 - Supplemental Nutrition Assistance Program (SNAP)
 - Seniors Farmers Market Nutrition Program (SFMNP)
 - The Emergency Food Assistance Program (TEFAP)
 - Commodity Supplemental Food Program (CSFP)
 - Food Distribution Program on Indian Reservations (FDPIR)
 - Local food banks and food pantries

Other Considerations

Understanding the SUA and AAA policies and procedures related to other nutrition services is an important step in planning the services your program will provide.

Factors to consider include:

- Are there other community resources that can provide the service through referral?
 - Coordination with community health services, medical organizations, and other community-based organizations can help meet the need for other nutrition services.
- Prioritization tools can assist in ensuring those in greatest social and economic need receive services.
- What other nutrition services have been provided in the past? Were any lessons learned or collaborations built to provide this service?
- Does the program have a standard frequency, length of service, or evaluation of benefit for each service offered?
- Does the program have standard criteria for individuals to receive other nutrition services? For example,
 - Oral nutrition supplements: Is an order by a medical professional required, which medical professionals are acceptable, does the order need to be renewed every six or 12 months, how is success of the service measured?
 - Stated food allergies or other dietary restrictions: how is this confirmed before using funds for other nutrition services?
 - Groceries: does the consumer have the ability or support to retrieve them, open packages, and safely store uneaten portions? Are there other programs available to provide this service (e.g., SNAP, food pantry)? Is this a short-term service, and if so, how will longer-term needs be met?

A note on disabilities

- The Americans with Disabilities Act (ADA) requires institutions to provide reasonable accommodation to qualified individuals with disabilities, unless doing so would impose an undue hardship. In many cases, people with disabilities can be accommodated with little extra expense or difficulty. Reasonable accommodation may be allowable for other nutrition services in your region, state, or territory.
- Dietary preference, as distinguished from dietary need, can be accommodated through incorporating participant preferences into meal planning on a regular basis.

Reporting Requirements

The State Performance Report (SPR) provides a broad definition and includes service domains for SUAs to develop policies and procedures.

- Other nutrition services definition: “A service provided using OAA funds under Titles III-B or III-C in whole or in part, which do not fall into the previously defined service categories.”
- Service Domains (examples appropriate for other nutrition services):
 - Adaptive eating equipment (built up handle utensils or specialized cups) reported as assistive technology/durable equipment
 - Oral nutrition supplements reported as consumable supplies
- Funds spent on other nutrition services will be broken out by Title III program. The following fields will be required:
 - Other Services Title III-B Expenditures
 - Other Services Title III-C1 Expenditures
 - Other Services Title III-C2 Expenditures
- Reporting Unit: There is a wide array of services that fall under the other nutrition services definition. States must report a “service domain,” such as, consumable supplies (e.g., oral nutrition supplements), a service unit description (e.g., 8-ounce carton), and the service units provided. Check with your SUA or AAA for specific reporting requirements.

Resources

[Understanding Title III-C Flexibilities](#)

Frequently asked questions on flexibilities around Dietary Guidelines for Americans (DGAs), Dietary Reference Intakes (DRIs), grab-and-go, groceries, and more.

[Oral Nutrition Supplements](#)

Tips for offering, funding, and reporting meals that include these supplements

[State Performance Report \(SPR\) Appendix A: Data Element Definitions](#)

Provides details on data requirements and service definitions.