



## FAQ - GROCERIES AND OAA PROGRAMS

This FAQ addresses common questions about providing groceries through Older Americans Act programs

(Updated 5/12/2020)

Food insecurity was an issue prior to COVID-19, but it is an even bigger issue during the COVID-19 crisis. Fortunately, all states now have major disaster declarations (MDD) and thus have the authority\* to exercise maximum flexibility to feed and support older adults, and ultimately help those at highest risk stay at home during the COVID-19 crisis.

A new resource detailing strategies the network is using to address food insecurity is coming soon. These strategies include things like the following, all of which are allowable for Older Americans Act programs, through those flexibilities.

1. Providing multiple kinds of meals, like combinations of frozen, shelf-stable, and fresh foods, and/or sending more than one meal for a day (breakfast and lunch).
2. Providing bags of groceries, in addition to meals.
3. Providing sample menus, along with groceries, to help older adults or their caregivers make meals (also a great way to meet the program's goal of providing nutrition education).
4. Using groceries instead of meals (this approach is recommended to be limited to providers that are unable to procure meals at this time).
5. Providing individual grocery items, like milk or fruit, to enhance a meal (for example, when shelf-stable meals are provided).
6. Providing nutritional supports, such as vitamins and meal supplements (such as Ensure).

ACL and the [National Resource Center on Nutrition and Aging](#) have developed [a number of resources](#) to assist the national aging nutrition network in this unprecedented time, including FAQs, tip sheets, and other materials, but we understand that some confusion still exists about groceries. This FAQ addresses the questions we are hearing most frequently.

*\* This [spreadsheet](#) provides additional details about the Older Americans Act and the four disaster authorities under which states are operating (Public Health, Major Disaster, Families First Act, and CARES Act)*

**Question:**

Do bags or boxes of groceries count as a meal?

**Answer:**

No, bags or boxes of groceries should not be counted as a meal.

Additional context:

*ACL determined early on that bags and boxes of groceries are not meals. This decision was based on feedback from many folks in the network who were scrambling trying to make meals out of groceries, i.e., counting meals and calories, trying to meet DRIs/DGAs, etc. That practice was proving burdensome and confusing so, for the purposes of program reporting, groceries should not be divided up and counted as individual meals.*

*Instead, both meals and groceries should be coded as “COVID-19” and “food,” and in the end we will show we fed X number of seniors. (Additional COVID-related programmatic reporting guidance can be found on [ACL’s COVID-19 web page](#).)*

*Bottom line: Grantees should not worry about how many meals you are serving, as long as you are providing food.*

**Question:**

Are SUAs allowed to use Title III C1 or III C2 funds for grocery pick-up, delivery, or other household items?

**Answer:**

Ordinarily, no. But when operating under MDD authorities, yes.

Additional context:

*Under regular OAA authorities, Title III-B funds can be used for such services, but Title III C funds cannot. However, under MDD authorities, all OAA funding may be allocated to any of the OAA titles.*

*The above explanation means that states may 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.*

**Question:**

Can SUAs allow local nutrition service providers to send bags/boxes of groceries to older adults rather than meals?

**Answer:**

Yes. Groceries can be provided as additional nutrition services, based on the meal participant's needs.

Additional context:

*Even under normal OAA authorities, groceries can be counted as nutritional supports under Title III-C. Things like milk or fresh fruit/vegetables can be used to enhance a meal. However, like vitamins and meal supplements (such as Ensure), they should not be reported as meals. Rather, they are additional supplemental services based on the needs of the meal participant.*

*ACL continues to encourage SUAs, AAAs, and local providers to provide food and meals that meet the DGAs and the DRIs as much as possible. When purchasing any food or meals for older adults, the nutritional needs of the individuals and the availability of healthy foods need to be considered.*

**Question:**

For the purposes of financial reporting, what services are authorized under OAA Title IIIC?

**Answer:**

Under regular OAA authorities, the following services are authorized to receive funding under Title III-C:

1. Congregate meals;
2. Home delivered meals;
3. Nutrition education;
4. Nutrition counseling;
5. Nutrition screening; and
6. Nutritional services as appropriate, based on the needs of meal participants (Section 331 and 336).

Additional context:

*We are sharing this information to understand where the funding originates. If exercising flexibilities under an MDD, all monies can be bucketed into any of the OAA Titles to be used for disaster relief, as needed. This explanation means that states may use regular OAA, Families First and CARES Act funds, including those given under Title III C authorities, for disaster relief efforts.*