TO: Subrecipients of the State Unit on Aging  
FROM: Cynthia Brammeier, Administrator, State Unit on Aging  
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SUBJECT: Nutrition Program Menu Planning  
CONTENT: The Older Americans Act (OAA) under Section 205 (a)(1)(2)(A) establishes that the Assistant Secretary shall designate an employee who shall be responsible for the administration of nutrition services for the state. Section 205 (a)(2)(A)(viii) declares that state duties include improving the nutritional quality of meals including strategies for increasing the consumption of whole grains, low-fat dairy, fruits, and vegetables. Section 205 (a)(2)(A)(ix) states that developing and disseminating guidelines for conducting nutrient analysis of meals includes guidelines for averaging key nutrients over an appropriate period of time. The OAA states that a Registered Dietitian (RD) or other individual with equivalent education and training in nutrition science, if an RD is not available, may be utilized in the planning of nutritional services (OAA SEC. 339. Nutrition (1)).

The OAA ensures that nutrition programming will comply with the most recent Dietary Guidelines for Americans and provide each participant with the minimum percentage, per meal, of the Dietary Reference Intakes (DRIs) established by the Food and Nutrition Board of the Institute of Medicine of the National Academy of Sciences (OAA SEC. 339. Nutrition (2)(A)(i)(ii)(I)(II)(III)).

Menu planning for Senior Centers, Congregate Meal sites, and Home-Delivered Meal services require careful consideration, solicited input from meal participants, and the advice and expertise of an RD, or other individual described in Sec. 339. Nutrition (1) in the OAA. The use of a RD by Area Agencies on Aging for menu planning and approval is the highest standard for nutrition quality, and meeting the requirements set forth by the Dietary Guidelines for Americans as well as meeting the DRI’s.

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.
RD's registered with the Commission on Dietetic Registration (CDR), the credentialing agency for the Academy of Nutrition and Dietetics, are food and nutrition experts who have met the CDR's criteria to earn the RD credential. RD's may be employed in a variety of public and private settings including healthcare, business, government agencies, education, community, or education.

RD services may be acquired as direct agency employees, or through a vendor, private contract, healthcare facility, university, school district, business, or other government entity.

An individual with comparable expertise in the planning of Senior Center, Congregate meal sites, and Home-Delivered Meal menus may also include a Nutrition and Dietetics Technician, Registered (NDTRs). The Revised 2017 Scope of Practice for the Nutrition and Dietetics Technician, Registered, states that NDTRs may develop menus for populations serviced by foodservice operations and work in collaboration with a RD for special needs populations, including senior meal programs.

Other professionals with comparable expertise for menu planning include Medical Doctors, Doctors of Osteopathic Medicine, or a professional credentialed with the Board for Certification of Nutrition Specialists. Comparable expertise may also include a person with a master's in Dietetics and or at a minimum, a completion of a Bachelor's degree from an accredited Didactic Program in Dietetics (DPD) from the Accreditation Council for Education in Nutrition and Dietetics (ACEND).

The use of an individual's services who are of comparable expertise are for menu approvals only. Individuals will still need to assure that the Dietary Guidelines for Americans and the Dietary Reference Intakes are utilized for the development of Senior Center, Congregate meal sites and Home-Delivered Meal menus. Area Agencies on Aging utilizing an individual's service in menu planning will need to assure that these individuals are also familiar with the OAA requirements for nutrition services prior to working with menus.

To assure that Area Agencies nutrition programs offer advanced services for participants, the utilization of a RD must be a priority for menu planning.

If you have questions, please contact Erik at 402-471-4732 or Doug at 402-471-4797 or Attn: Erik or Doug at DHHS.aging@nebraska.gov.