



# Department of Education

Townsend Building  
401 Federal Street Suite 2  
Dover, Delaware 19901-3639  
[education.delaware.gov](http://education.delaware.gov)

**Cynthia Marten**  
Secretary of Education  
302-735-4000  
302-739-4654 (fax)

February 19, 2026

## MEMORANDUM

**TO:** Directors of Residential Child Care Institutions  
Other Appropriate Personnel

**FROM:** Aimee F. Beam, MS, RD *AB*  
Director, Nutrition Programs

**RE:** **SY 2025-2026 Operational Memo #15**  
**Reimbursement for Off-Site Meal Consumption**

On July 1, 2025, the USDA Food and Nutrition Service issued a memorandum to Child Nutrition Program Regional Offices and State Agency Directors: *SP 17-2025: "Reimbursement for Off-Site Meal Consumption."* This memorandum updates guidance on reimbursement for school meals that are served or consumed off-site, including clarifying that children participating in off-site extracurricular activities during the breakfast or lunch period can bring reimbursable meals from school with them to the activity. This guidance allows schools to think creatively about how to ensure eligible children maintain access to healthy school meals if they are offsite during the meal service.

This memorandum supersedes FNS Instruction 786-8 REV. 1, *Reimbursement for Off-Site Meal Consumption*

Attachment: SP 17-2025

Cc: DDOE Nutrition Team



## Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

**Date:** July 1, 2025

**Memo code:** SP 17-2025

**Subject:** Reimbursement for Off-Site Meal Consumption

**To:** Regional Directors, Child Nutrition Programs, All Regions  
State Directors, Child Nutrition Programs, All States

### Purpose

The purpose of this memorandum is to provide clarification to State agencies and school food authorities (SFAs) operating the National School Lunch Program (NSLP) and School Breakfast Program (SBP) on reimbursement for meals consumed or served off site. This clarification supports the guiding principles regarding nutrition programs identified by USDA Secretary Brooke Rollins, which include commitments to clarify statutory, regulatory, and administrative requirements and to infuse each nutrition program with new energy and vision. This memorandum supersedes FNS Instruction 786-8 REV. 1, *Reimbursement for Off-Site Meal Consumption*.

### Background

The Richard B. Russell National School Lunch Act (NSLA), ([42 U.S.C. 1753\(b\)\(1\)\(A\)](#)), and the Child Nutrition Act of 1966 (CNA), ([42 U.S.C. 1773\(b\)\(1\)\(A\)](#)) require that meals reimbursed under the programs are to be served in school or school-related premises. FNS Instruction 786-8 REV. 1, *Reimbursement for Off-Site Meal Consumption* stated that meals served or consumed off site could only be reimbursed if children were participating in school functions that are part of the curriculum, as defined by the State education agency, and could not be reimbursed if children were off site for extracurricular events.

### **Providing Meals to be Consumed Off-Site**

Children who attend an NSLP/SBP participating school but leave for part of the day to participate in school functions or extracurricular activities may be provided meals to be consumed off site. This could include, but is not limited to, off-site functions such as field trips, dual credit classes at a local college, work study, extracurricular activities, or release time religious education programs.

Schools have the option to provide meals for children who will be off site during the breakfast or lunch period, since SFAs are only required to make meals available to students who are present during the meal service period. SFAs may only provide meals if the off-site function occurs during typical meal times ([7 CFR 210.10\(l\)\(1\)](#), [7 CFR 220.8\(l\)\(1\)](#)). For example, a SFA may not provide meals to students who are off site at the end of the school day if that falls outside of the typical lunch period. Additionally, SFAs may not provide meals to all students to be taken off site due to early dismissal since there will be no meal service that day. Instead, this clarification applies only to individual students or groups of students who would normally be on site for the regularly scheduled meal service but are participating in an off-site school function or extracurricular activity and will return back to school. Meals taken off site must meet the meal pattern requirements and should be subject to especially stringent sanitary and precautionary measures to avoid contamination and spoilage.

### **Serving Meals to Children in Work-Study Programs**

If children attend a work-study program at a non-participating or ineligible school or site, meals provided by the work-study program to the children are not eligible for Federal reimbursement. However, as explained above, these students may be provided with reimbursable meals from their home-base school to take with them to the work-study program.

In the event that children attend another NSLP/SBP participating school for work-study, either the home-base or work-study school may serve the children and claim the meals, but

the schools should coordinate to ensure that the student receives only one breakfast and one lunch per day. For example, if the student's home-base school provides the student lunch to take to the work-study site, the student should not receive another lunch at the work-study site. Students applying for free or reduced price meals should do so through their home-base school since that school would be more familiar with their individual circumstances. If the work-study school is serving and claiming the meals, it should obtain, for its records, a copy of the eligibility determination (i.e., free and reduced price meal application or direct certification documentation) for students. In all cases, care must be taken to ensure that accurate detailed records are maintained, including meal counts for free, reduced price, and paid categories.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should direct questions to the appropriate FNS Regional Office.

**TINA NAMIAN**  
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Tina Namian  
Deputy Associate Administrator  
Child Nutrition Programs