

Government of the District of Columbia



Office of Advisory Neighborhood Commissions  
1350 Pennsylvania Avenue, NW  
Suite 11  
Washington, DC 20004  
(202) 727-9945

**MEMORANDUM**

TO: ANC 8C  
FR: Denise Wiktor, General Counsel  
DT: 11/14/2025  
RE: FSEA Food Basket grant request

---

The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the Friendship Southeast Academy for a grant to distribute food baskets. The applicant notes that while there are SNAP benefits and community pantries, they do not address the food insecurity around meaningful holiday meals and proposes to address this issue by delivery holiday meal baskets directly to families.

The applicant is requesting a grant amount of \$520 to purchase food supplies such as turkeys, vegetables and other meal related items to deliver to families. They also intend to purchase plastic cutlery, lanyards and wagons for delivery.

I have reviewed the application sent to OANC and have found that the request is an **impermissible** expenditure of ANC monies because it is delivering food directly to families. The OANC delayed addressing this request waiting to see if there would be an additional legislative session this month where emergency legislation would be introduced to allow ANCs to provide food relief. There is an additional session but there is no relevant bill on the agenda and the deadline to get things on the agenda has passed. Nevertheless, should a bill be introduced, the OANC will revisit this memo.

There are five prongs a grant must meet to be a permissible expense<sup>1</sup>, and there is also a sixth requirement of the D.C. Official Code that limits the amount of a grant that can be spent on overhead<sup>2</sup>. This request meets most of the purposes except the public purpose requirement where the. “A public purpose shall be a purpose that includes a significant benefit for the

---

<sup>1</sup> See *Letter to Schanette Grant on Seasoned Settlers and Grants Generally*, April 14, 2022, found at <https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-.pdf>.

<sup>2</sup> D.C. Official Code 1-309.13(m)(2)(D) provides that “[n]o Commission shall provide a grant for which the grantee estimates that the overhead costs would exceed 15% of the entire grant amount.”

community and is not done for the primary purpose of benefitting a private entity.”<sup>3</sup> Food baskets, by their nature benefit private individuals in that the food is for them to consume privately in their home. We do not have to reach the issue of whether there is “significant benefit” based upon how many persons will be served.

For this reason, this grant is deemed an impermissible use of ANC funds.

---

<sup>3</sup> D.C. Official Code § 1-309.13(l)(1)