

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: ANC 3B
FR: Denise Wiktor, General Counsel
DT: 4/4/2025
RE: Grant Request from Glover Park Village

The OANC has received a copy of a grant request from Glover Park Village to print brochures to distribute to 3B residents to increase awareness of their programming. I have reviewed the application and the addendum sent to the OANC and have found that the request is a **permissible** expenditure of ANC monies as outlined below.

There are five prongs a grant must meet to be a permissible expense¹ and a 6th requirement of the D.C. Official Code that limits the amount of a grant that can be spent on overhead². They are:

1. **Public Purpose:** ANC grants must be for “public purposes within the Commission area.”³ A public purpose is one “that includes a significant benefit for the community and is not done for the primary purpose of benefitting a private entity. Glover Park Village is a non-profit organization that coordinates volunteers to assist others. They also have programs and events that are open to the public. The population of people served is largely from ANC 3B. The increase in awareness of their services is a public purpose within the meaning of the D.C. Code.
2. **Local Benefit:** A grant must “benefit persons who work or reside in the Commission area.”⁴ This does not mean the grant may only benefit Commission residents; it simply means the grant’s benefits should be focused on those residents.⁵

¹ 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>

² D.C. Official Code 1-309.13(m)(2)(D) “No Commission shall provide a grant for which the grantee estimates that the overhead costs would exceed 15% of the entire grant amount.”

³ D.C. Official Code § 1-309.13(l)(1).

⁴ D.C. Official Code § 1-309.13(m)(1).

⁵ See *Letter to Deborah K. Nichols*, Nov. 9, 2006, at 2 n.2 found at [Letter-to-Deborah-Nichols-Re-Whether-an-ANC-may-approve-a-grant-to-commission-plans-and-drawings-.pdf](#) (ANC 4C grant was permissible where the “[b]enefit to other ANCs would be incidental to the benefit conferred on ANC 4C residents,” because a grant’s benefits need not “be exclusive to the ANC that gives the grant funds”); see *Letter to Comm’r Fletcher*, Mar. 15, 2022, at 2, available at <https://oag.dc.gov/sites/default/files/2022-03/ANC-7E-Letter-to-Commissioner-Fletcher-RePublic-Purposes-Within-the-Commission-Area-.pdf> making the same point with respect to the public-purpose requirement).

The activities of the Glover Park Village are focused on those who live in ANC 3B.

3. **Proposed Project.** A grant must be for a proposed project.⁶ This is a discrete single event.
4. **Organization.** A grant must be to an “organization,” not an individual or a government entity,⁷ although the organization need not be incorporated.⁸ Glover Park Village is an organization within the meaning of the code.
5. **Non-Duplication.** A grant cannot duplicate any services offered by the D.C. government.⁹
6. **Overhead.** Overhead cannot exceed 15% of the grant amount.¹⁰ None of the grant monies will be used for overhead as the Code defines it.

Conclusion

For the reasons stated above this grant is a **permissible** expenditure of ANC funds.

⁶D.C. Official Code § 1-309.13(m)(2)(A).

⁷ D.C. Official Code § 1-309.13(m)(1); see also *Letter to Deborah K. Nichols*, Jan. 14, 2010, at 4, available at <https://oag.dc.gov/sites/default/files/2018-02/ANC-January-14-2010-Guidelines-for-Use-of-ANC-Funds.pdf>

⁸ See *Letter to Deborah K. Nichols*, Aug., 4, 2000 at 3, available at <https://oag.dc.gov/sites/default/files/201802/ANC-August-4-2000-Grants-by-ANCs-Public-Purpose-and-Corporate-Status-of-Recipients.pdf> (“The plain meaning of the term ‘organization’ includes unincorporated associations”).

⁹ D.C. Official Code § 1-309.13(m)(1).

¹⁰ D.C. Official Code §1-309.13(m)(1)(2)(D).