

Government of the District of Columbia



Office of Advisory Neighborhood Commissions  
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Washington, DC 20004  
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**MEMORANDUM**

TO: ANC 4D  
FR: Denise Wiktor, General Counsel  
DT: 3/23/2026  
RE: Truesdell FTO International Night grant application

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The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the Truesdell Family Teacher Organization regarding a grant for their International night. In a follow up email that Applicant indicated that this would be a closed event, only for the school community.

The applicant is requesting a grant amount of \$2,000.

I have reviewed the application sent to OANC and have found that the request is an **impermissible** expenditure of ANC monies. The application is for an event that is closed to the public and secondly, the primary expense is for books for children to take home and does not meet two of the grant criteria as explained below.

Additionally, once a grant has been voted on by the ANC *the purpose of the grant cannot be changed without an additional vote by the ANC.*

**Analysis**

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>. These are, respectively:

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<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.”

1. **Public Purpose:** ANC grants must be for “public purposes within the Commission area.”<sup>3</sup> 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.”<sup>4</sup> FTOs frequently apply for grants for supplies or fixtures that DCPS does not provide, however those items remain in the school and are used from year to year. Books to be given to individuals do not satisfy the public purpose requirement in that the primary beneficiary is the recipient of the book. FTO events at schools have also been allowed when they are open to the community such as festivals or involve multiple schools such as science fairs.
2. **Local Benefit:** A grant must “benefit persons who work or reside in the Commission area.”<sup>5</sup> This does not mean the grant may only benefit Commission residents; it simply means the grant’s benefits should be focused on those residents.<sup>6</sup> This grant would have a local benefit but without the public purpose prong it is not permissible.
3. **Proposed Project:** A grant must be for a proposed project.<sup>7</sup> This is a discrete single event, with a proposed beginning date and end date.
4. **Organization:** A grant must be to an “organization,” not an individual or a government entity,<sup>8</sup> although the organization need not be incorporated<sup>9</sup>. Truesdell FTO is an organization as defined by the Code for ANC grants.
5. **Non-Duplication:** A grant cannot duplicate any services offered by the District of Columbia government.<sup>10</sup> This grant is not duplicative of any service or program provided by the District government.
6. **Overhead:** Overhead cannot exceed 15% of the grant amount.<sup>11</sup> None of the grant monies would be used here for overhead costs.

## **Conclusion**

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

<sup>4</sup> *Id.*

<sup>5</sup> D.C. Official Code § 1-309.13(m)(1).

<sup>6</sup> 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).

<sup>7</sup> D.C. Official Code § 1-309.13(m)(2)(A).

<sup>8</sup> 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>.

<sup>9</sup> 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”).

<sup>10</sup> D.C. Official Code § 1-309.13(m)(1).

<sup>11</sup> D.C. Official Code § 1-309.13(m)(1)(2)(D).

For the reasons stated above, this grant is an **impermissible** expenditure of ANC funds.