Government of the District of Columbia

Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: ANC 7B
FR: Denise Wiktor, General Counsel
DT: 12/18/2025
RE: Unity Boat Club Grant Application

The Office of Advisory Neighborhood Commissions ("OANC") has received a copy of a grant request and received supplemental information from the Unity Boat Club regarding a grant for a Learn to Row class for the youth in ANC 7B. The applicant states that the program would be for youth ages 10-17 and would be open to any person in that age group from the ANC until the class is filled.

The applicant is requesting a grant amount of $5000.

I have reviewed the application sent to OANC and have found that the request is a **partially permissible and partially impermissible** expenditure of ANC monies, as outlined below. One impermissible item is the expense for website design and maintenance. That amount is unknown as it is not itemized in my copy of the budget. There are personnel costs, also not itemized. Grant funds **cannot not be used to pay individuals**. They can be paid to a company. It is unclear how the staff will be paid.

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[1], 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

[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.

overhead[2]. These are, respectively:

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."[4] There is a public purpose to providing opportunities to teach young people a new skill. While the class is small, the fact that it is equally open of all youth of 7B presumably on a first come first served basis is what overcomes that small size.

2. **Local Benefit**: A grant must "benefit persons who work or reside in the Commission area."[5] This does not mean the grant may only benefit Commission residents; it simply means the grant's benefits should be focused on those residents.[6] The grant applications states that the class will be filled with youth from ANC 7B.

3. **Proposed Project:** A grant must be for a proposed project.[7] 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,[8] although the organization need not be incorporated[9]. Unity Boat Club 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.[10] 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.[11] The grant does not exceed the overhead requirement as defined.

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[2] 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."
[3] D.C. Official Code § 1-309.13(l)(1).
[4] *Id.*
[5] D.C. Official Code § 1-309.13(m)(1).
[6] 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).
[7] D.C. Official Code § 1-309.13(m)(2)(A).
[8] 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.
[9] 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").
[10] D.C. Official Code § 1-309.13(m)(1).
[11] D.C. Official Code § 1-309.13(m)(1)(2)(D).

Conclusion

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