

Government of the District of Columbia



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

TO: Dawn Dickerson
FR: Denise Wiktor, General Counsel
DT: 2/13//2024

DW

RE: ANC 4A Policy Allowing Grantees A Year to Complete the Grant

You asked whether it was permissible for an ANC to give a grant recipient a year to complete the grant. For the reasons below, there is nothing in the law that prohibits it, but depending on how that is executed, it could place the ANC out of compliance with Quarterly Financial Report (QFR) accounting requirements or present other issues.

D.C. Official Code 1-309.12(m)(3) provides:

Within 60 days following the issuance of a grant, and every 90 days thereafter during the life of the grant, the grant recipient shall forward to the Commission and the OANC a statement as to the use of the funds consistent with the grant application, complete with receipts that support the expenditures.

The plain language of the Code allows for grants that continue over a long period. The Office of the Attorney General in looking at the statute and legislative history found that there was no requirement that grant funds be spent within 60 days nor that a final accounting was due within 60 days.¹

When an ANC files its QFR several things need to be in place for a cancelled check to be deemed a permissible expense. Minutes showing the grant was approved², the grant application so that it can be determined if the expense was a permissible expense, the cancelled check(s), and receipts for expenditures³ by the grantee that match the amount of the grant. Additionally, expenditures made with grant money must be for a proposed project⁴ and not for the general support of the organization's operations.

¹ See, *Letter to ANC IB Whether ANC grants are limited to 60 days in duration and whether an ANC has the authority to request the return of unspent grant funds* found at:

<https://oag.dc.gov/sites/default/files/2018-02/ANC-1-B-July-27-2005-Grant-Funds.pdf>

² D.C. Official Code § 1-309.13(m)(1)

³ D.C. Official Code 1-309.13(j)(1)

⁴ See D.C. Official Code § 1-309.13(m)(2)(A)

A grant that is spread out over a year makes it difficult for the Office of Advisory Neighborhood Commissions to monitor and the District of Columbia Auditor to audit. A grant spread out over fiscal years adds another layer of complexity.

If a check is issued for the entirety of the grant upfront, but the organization spends it down over time, an ANC will not be able to comply with the requirements of the code in for matching receipts in its QFR submission and the expense will be disallowed. Grants that are spread out over a year with several checks will need all the matching paperwork (minutes, grant application, receipts, and cancelled check) with each QFR in which a check was issued.

Additionally, a grant that is spread out over a long period of time will begin to appear more like a grant for the organization's operations than for a specific project and could be subject to disallowance for that reason.