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**To:** [Crawford, Tonya \(SMD 8A01\)](#); [Clark, Barbara \(SMD 8A02\)](#); [Muhammad, Holly \(SMD 8A03\)](#); [Moore, Laneice \(SMD 8A04\)](#); [White, Jamila \(SMD 8A05\)](#); [McKinney, Robin \(SMD 8A06\)](#); [Glenn, Laverne \(SMD 8A07\)](#)  
**Cc:** [selina@thestandfoundation.org](mailto:selina@thestandfoundation.org); [Boese, Kent \(OANC\)](#); [Wiktor, Denise \(OANC\)](#); [Dickerson, Dawn \(OANC\)](#)  
**Subject:** Response to ANC 8A Request for Equestrian Everything Spring Fling Wellness Retreat  
**Date:** Tuesday, January 23, 2024 3:58:24 PM

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Good afternoon, Commissioners.

Thank you for your application for a grant for The Stand Foundation to conduct an "Equestrian Everything Spring Fling Wellness Retreat." Denise Wiktor referred this grant request to me for evaluation and consideration.

As with a previous proposal, this is to advise that, among other things, the inspired vision of The Stand's working "with humans and horses for healing purposes" is certainly evidence of a worthy cause. Based upon the December 2020 Winter Wellness retreat, each participant was successfully provided with an opportunity to freely experience a "life transform[ing]" experience amid the backdrop of Massanutten Resort in Virginia.

Yet, the OANC explained in a November 14, 2023 memorandum to Chairperson Jamila White and Treasurer Laverne Glenn that "[e]ach proposed ANC grant must be carefully scrutinized to ensure that it will benefit a significant part of the public, not just a few individuals." That grant benefitted 6-8 individuals; it was denied.

The current proposal, wherein the use of, among other tools, the "round robin" manner, to introduce the participants to the various program goals, is new and creative. Unfortunately, it, too, is not authorized primarily for the same reason.

### Grant Requirements

Advisory Neighborhood Commission (ANC) 8A -- like all ANCs -- is narrowly restricted by DC Council mandated statutory provisions in its consideration and issuance of grants. See DC Official Code sections 1-207.38 and 1-309.13(m). As such, the OANC is required to review the application in

accordance therewith. In other words, each and every grant proposal is always carefully and meticulously reviewed pursuant to the guidelines below.

DC Official Code 1-309.13(m) specifies six (6) conditions for ANC grants. Each of the following conditions must be met.

First, the grant must be for "public purposes within the Commissioner area." The public purpose must be one "that benefits the community as a whole and is not done for the primary purpose of benefitting a private entity." In other words, the "public" must be the grant's primary beneficiary.

Second, the grant must "benefit persons who work or reside in the Commission area." In other words, the benefits of the grant must be focused solely on those residents of the affected ANC.

Third, the grant must be for a "proposed project" indicating a specific undertaking.

Fourth, the grant must issue to an organization; it may not issue to an individual or a government entity.

Fifth, a grant must be for services that are not "duplicative of any that are already performed by the District government."

Sixth, a grant cannot issue when estimated overhead costs would exceed 15% of the entire grant amount or when general ANC expenditure limits are ignored, e.g., a grant may not be used for fundraising, per DC Official Code section 1-309.10(l).

See also:

<https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-.pdf>

### Application Omissions

This grant does not qualify for funding because it fails to present the following:

A public purpose within the Commission area;

The benefit to persons within the Commission area; and,

Estimated overhead costs which would not exceed 15% of the entire grant amount.

### Discussion

**The grant must focus on a public purpose in ANC 8A.** In the "Statement of Community Benefit," it is written that The Stand focuses "on helping individuals feel better about themselves mentally, emotionally, physically and socially. [The] programs are designed to offer alternatives to making certain decisions that may end up with a negative effect." Based upon the grant's application, the program does not offer a "public purpose" for ANC 8A; it proposes a grant to benefit the well being of certain individuals. In fact, on page eight (8) of the application, it is specifically stated that "[t]his will present opportunities for individuals to remove their armor and allow change to occur."

On page one (1) of your completed application, "public purpose" is defined "as one that benefits the community as a whole." Regardless of how amazing the experience of the Spring Fling Wellness Retreat, it will primarily and ONLY benefit up to "50 participants," as noted above. For clarification, each ANC grant must be geared to wholly benefit each of its employees and residents. ANC 8A has a total of about 14,282 residents alone. By allocating this grant to The Stand for about 50 participants, ANC 8A would be personally serving one-third (1/3rd) of 1% of this base.

Grant monies – District government funds -- must provide an undeviating

and express benefit to a significant part of ANC 8A; these funds cannot benefit a few individuals. See:

<https://oag.dc.gov/sites/default/files/2018-02/ANC-4-C-June-30-2017-Block-Grants-and-Public-Purpose-Requirement.pdf>

**The grant must be put to good use for the persons who work or reside in ANC 8A.** In other words, the benefits of the grant must be fixated solely on those employees and residents of ANC 8A. There is nothing to suggest in the disclosures above that the grant is primarily for the purposes of the residents of ANC 8A. Throughout the application, The Stand speaks of "participants" and not "ANC 8A employees or residents."

The grant does not wholly benefit the persons within ANC 8A.

**The overhead costs exceed 15% of the entire grant amount.** The requested grant amount totals \$5,000. On page six (6), for "Amount of Overhead Costs," it is listed thereon "\$1,000" for same. That amount equals 20% of the grant request.

The \$1,000 would exceed thr 15% allowable for overhead expenses.

### Decision

For the reasons cited, the OANC finds that the grant is not a permissible use for of ANC funds.

Sincerely. Kathy.

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