

Government of the District of Columbia



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

**MEMORANDUM**

TO: ANC 6C  
FR: Denise Wiktor, General Counsel  
DT: 9/8/2025  
RE: H3 Project Grant Application

---

The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the H3 Project (Social Good Fund) regarding a grant for training unhoused and housed residents in a variety of issues in the area around Union Station. The applicant states they seek to train 300-500 individuals in 5 different areas including Narcan Administration, violence emergency response training, best practices in engaging individuals experience homelessness, management of aggressive behavior and CPR, first aid and AED. The classes are centered around Union Station and are open to anyone in the community to attend on a first come first serve basis.

The applicant is requesting a grant amount of \$5,000. The OANC reviewed the budget and found that the \$849.00 for the organization to subscribe to the Homeless Academy Training is not a permissible expense because it benefits the organization and not the community. The OANC contacted the applicant on August 29 to see if there was another expense they wanted to put in there instead but did not receive a response. That leaves a permissible expense of \$4151.00 unless the organization has an alternative expenditure that benefits the community.

I have reviewed the application sent to OANC and have found that the request is a **partially permissible** expenditure of ANC monies, as outlined 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:

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> The grant will benefit the ANC 6C community in a number of ways. It will place first aid and Narcan trained individuals in the community as well as training residents and unhoused individuals in areas that will improve the quality of life. The \$849 expense for the Home Academy Training is deemed a benefit to a private entity, the applicant.
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 training is geared towards person residing in the 6C area or those frequenting the 6C area but ultimate ANC 6C is the primary beneficiary.
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>. The H3 Project is an organization as defined by the Code for ANC grants. The EIN number on the application belongs to the Social Good Fund which is an IRS recognized 501(c)(3) organization.

---

<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.”

<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”).

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**

For the reasons stated above, this grant is **permissible** expenditure of ANC funds as long as the \$849.00 is excluded.

---

<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).