

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: ANC 5F
FR: Denise Wiktor, General Counsel
DT: 2/25/2026
RE: Lee Montessori FTA grant application for A School for Everyone

The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the FTA of Lee Montessori regarding a grant for a program they are calling “A School for Everyone.” The applicant states that they will host a community-open evening that focuses on students with disabilities and diverse learning needs. They will explore disability affirm books, build shared strategies for supporting children’s social and emotional needs at home and school. This is a community open event. They will disseminate information through a homeowner’s association and at the Brookland farmers market, the local library and neighborhood social media. Qualified childcare will be provided using the teachers at the school. The teachers will be paid through the school so no checks will go to individuals.

The applicant is requesting a grant amount of \$2500.00 to cover books, event supplies and caregivers for the children of attending parents.

I have reviewed the application sent to OANC and have found that the request is a **permissible** expenditure of ANC monies, as outlined below. The books will be referred to during the evening and made available to all persons who attend. Excess books will be placed in the Little Free Libraries. The books are more substantive than normal workshop supplies but thought to be permissible if the persons who receive them are instructed that when they are through with them, they should pass them on, place them in a Little Free Library or return them to the school so that they could continue to benefit the public in ANC 5F.

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*. Checks for grant expenditures should never be made out to individuals.

Analysis

There are five prongs a grant must meet to be a permissible expense¹, 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 overhead². 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 This is an open event serving a community need that is underserved in the city.
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 event is focused on the residents of ANC 5F who are equally entitled to attend though it will likely be on a first-come first-served basis.
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. The start date of the project is March 1, 2026, but runs through June. Please note that the grant cannot be used for expenditures that occur before the ANC vote. The next meeting is not until March 17, 2026, so the start date may need to be pushed back.
4. **Organization:** A grant must be to an “organization,” not an individual or a government entity,⁸ although the organization need not be incorporated⁹. The Lee Montessori Family Teacher Association is an organization as defined by the Code for ANC grants. It is also a 501(c)(3) organization in good standing as reflected in the IRS TEOS system.

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>.

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”).

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 None of the grant monies would be used here for overhead costs.

Conclusion

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

¹⁰ D.C. Official Code § 1-309.13(m)(1).

¹¹ D.C. Official Code § 1-309.13(m)(1)(2)(D).