

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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TO: Allison Brooks, Chairperson ANC 4B
FR: Wiktor, General Counsel *W*
DT: 10/31/2023
RE: South Manor Neighborhood Association Grant

The South Manor Neighborhood Association has applied to ANC 4B for a grant “to build and maintain a website.” The attached budget details that the grant would be used for website hosting, website build, domain registration, website support and AV equipment “if needed to approach the \$3,000.” This grant, like the August application from the Lamond Riggs Citizen Association for website work, does not meet the “public purpose” requirement outlined in the D.C. Official Code as discussed below.

ANC grants must be for “public purposes within the Commission area.”¹ A public purpose is one “that benefits the community as a whole and is not done for the primary purpose of benefitting a private entity.”² A private entity may receive a benefit of the grant, but it cannot be the primary purpose of the grant.³ In this case the benefit is entirely for the private entity which will own the website. Even if the website build were a permissible grant, a little under 50% of the monies from this grant would be spent on the domain name, maintenance, and website hosting which are considered overhead costs. This would exceed the 15% allowable for overhead costs in an ANC grant. This grant is not for a public project of the Association but to support the internal operations of the organization, and to purchase AV equipment. This grant request primarily benefits the organization, not the residents and business of the ANC and it is for that reason not a permissible use of ANC funds.⁴

¹ D.C. Official Code § 1-309.13(l)(1).

² *Id.*

³ See *Seasoned Settlers Grant and Grants Generally* available at See *Seasoned Settlers Grant and Grants Generally* available at <https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-.pdf>

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