

Government of the District of Columbia



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TO: Dawn Dickerson, Program Analyst
FR: Denise Wiktor, General Counsel *DW*
DT: 9/30/2023
RE: South Manor Neighborhood Association Grant

The South Manor Neighborhood Association has applied to ANC 4B for a grant for a neighborhood beautification effort and for books for incarcerated youth.

To answer your question, I went to the well-reasoned opinion of the Office of Attorney General on [Seasoned Settlers and Grants Generally](#) . It outlines the D.C. Code requirements that all grants should meet. The prize would be treated the same as a grant in that it is an award of money that is not in exchange for goods or services. The OAG summarizes the grant provisions in the DC Code as requiring a grant to:

1. Have a Public Purpose that benefits the community as a whole; and
2. Have a local benefit in that it benefits those who reside or work in the ANC; and
3. Be a proposed project in that it is for a specific purpose; and
4. Be granted to an organization and not an individual; and
5. Not be duplicative of any services already performed by the District government.

This application combines two very different projects into one grant application. This is prohibited as grants are to be for “a proposed project.”¹ This is for two projects and should be denied for that reason. However, for purposes of reapplication, examination of whether each project meets the guidelines is called for.

The first project is for a neighborhood cleanup. This meets most of the grant requirements in that it has a public purpose, is for a local benefit and is to an organization.² There is an issue that it duplicates a service the D.C. Government already provides in that a portion of the grant will be used to purchase tools. The Department of Parks and Recreation (DPR) has a tool library that

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

² See <https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-.pdf>

citizens can borrow for cleanups.³ I would recommend if the grant were resubmitted that it not includes tools or state that it will purchase tools not otherwise provided by the DPR library.

The second request in the grant is for the purchase of books for incarcerated youth. This results in a benefit to specific individuals and not the community at large and is not permissible use of ANC funds.⁴ This is no different than the ANC grant request to give IONA senior services money to buy gift cards for food.⁵ Ultimately the benefit is to a particular individual.

³ <https://dpr.dc.gov/service/garden-tool-share-program>

⁴ D.C. Official Code § 1-309.13(m)(1)

⁵ <https://oag.dc.gov/sites/default/files/2018-02/ANC-3-B-04-September-20-2016-Grant-to-Iona-Senior-Services.pdf>