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 5A
FR: Denise Wiktor, General Counsel
DT: 02/19/2026
RE: QCCA 2026 grant application

The Office of Advisory Neighborhood Commissions (OANC) has received a copy of a grant request from the Queens Chapel Civic Association for a grant to fund the 2026 Queens Chapel Civic Association Community Day on September 12, 2026.

The applicant is requesting a grant amount of $5966.00. This is for a moon bounce, rental of table, chairs and tents, posters and food.

I have reviewed the application sent to OANC and have found that the request is a **permissible** expenditure of ANC monies, as outlined below. Please note that the OANC only reviews grants for the permissibility of the use of the funds. The ANC will make the final determination on whether to award the grant and the amount of the award based upon their budget and spending priorities. A previous award of a grant does not guarantee a future grant.

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 expense[1], 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[2]. These are, respectively:

[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."

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 event is free and open to all members of the ANC and will help to build community and neighborhood cohesion.

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] This event is located in ANC 5A and the primary beneficiaries are residents of ANC 5A.

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.

4. **Organization:** A grant must be to an "organization," not an individual or a government entity,[8] although the organization need not be incorporated[9]. The Queens Chapel Civic Association is an organization as defined by the Code for ANC grants. It is listed in the IRS TEOS system as a private foundation in good standing.

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.

---

[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").

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

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