

Government of the District of Columbia



Office of Advisory Neighborhood Commissions  
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Washington, DC 20004  
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**MEMORANDUM**

TO: ANC 3B  
FR: Denise Wiktor, General Counsel  
DT: 3/25/2026  
RE: Glover Park Day grant request

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The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the Glover Park Citizens Association regarding a grant for Glover Park Day 2026.

The applicant is requesting a grant amount of \$5,000 to be used for the rental of a stage, tables and chairs.

I have reviewed the application sent to OANC and have found that the request is a **permissible** expenditure of ANC monies so long as the tables are not part of booths that a fee is paid to use. It is noted that 100 tables are being rented and while some of those are probably for the public and booths that are let out for free, it is unclear if any of them will be sold as part of a booth use fee. The total cost of the rental is \$8,000 so the OANC recognizes that the amount of the ANC grant will not be used for booths for which a fee is charged.

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:

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<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.”

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> This is an annual festival for the Glover Park Community that is free and open to all the residents of the ANC. Events such as these encourage neighborhood cohesion and pride.
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> The festival will take place within ANC 3B and while others may attend it is most easily accessible to residents of ANC 3B who will have the primary benefit. Additionally, the event will have Community and District organizations that provide services to the residents of Glover Park.
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 Glover Park Citizen’s Association is an organization as defined by the Code for ANC grants.
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

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<sup>3</sup> D.C. Official Code § 1-309.13(1)(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”).

<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).

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