

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: Dawn Dickerson, Program Manager
FR: Denise Wiktor, General Counsel
DT: September 5, 2023
RE: ANC 4B grant to Whittier PTO

You requested an opinion on whether ANC 4B proposed grant to the PTO at Whittier Elementary for STEM supplies was a permissible use of ANC grant monies. It is not a permissible expenditure allowed for an ANC under the D.C. Code.

At one time such grants were permissible meeting the public purpose requirement under the D.C. Official Code.¹ However, a change in the law in 2016 required that a “A public purpose shall be a purpose that benefits the community as a whole...”² The Office of Attorney General discussed the change related to public purpose in *Seasoned Settlers and Grants Generally*³ where it found that a grant that only “students of a specific age group at a specific school”⁴ does not benefit the wider community.

This grant will not benefit the community as a whole and therefore is not a permissible use of ANC funds. Please remind the ANC that the use of funds not in accordance with the D.C. Code

cc: Kent Boese, Executive Director

¹ See *Letter to Deborah K. Nichols* found at [Guidelines for Use of ANC Funds to Purchase School Supplies and Support School Activities \(dc.gov\)](#)

² D.C. Official Code § 1-309.13(l)(1)

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

⁴ *Id.* at p. 6.