

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: ANC 4B
FR: Denise Wiktor, General Counsel
DT: 03/23/2026
RE: Riggs Park Day

The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the Friends of Riggs-LaSalle Recreation Center regarding a grant for Riggs Park Day. The applicant states that this will be an opportunity to bring together neighbors, families, local community organizations and businesses for a day of fellowship, entertainment and community engagement. It will help create neighborhood pride and highlight local partnerships. On March 23, the Applicant submitted a revised budget.

The applicant is requesting a grant amount of \$2525.00. This would be for rental tents, fitness and dance lessons, moon bounce rental, a DC and a children’s musician.

I have reviewed the application sent to OANC and have found that the request is a **permissible** expenditure of ANC monies with a **caveat**. All of the expenses are permissible so long as no checks are made out to individuals. The OANC, when reviewing receipts often finds that payments to bands, face painters and DJs are made to individuals. The Auditor established as a fiscal control over ten years ago that it is not permissible to make checks to individuals and these will be disallowed.

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 expense¹, 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 overhead². 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 A community event within the ANC meets the public purpose test. It will be open and free to all members of the ANC and such events help with community cohesiveness which helps prevent crime.
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 As mentioned above this is within the ANC and open and free to all residents of the ANC.
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 incorporated⁹. Friends of Riggs-LaSalle Recreation Center 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.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(1)(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).