

Use of federal funds for food should be 'rare'

Federal grants should only rarely be used to pay for food and beverages at meetings and conferences sponsored by grantees.

That's according to a May 2013 document from the Education Department that addresses, in addition to food, the appropriateness of federally funded face-to-face meetings and conferences, the use of ED's imprimatur, and travel expenditures.

"Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks," according to the ED document, *Frequently Asked Questions to Assist U.S. Department of Education Grantees to Appropriately Use Federal Funds for Conferences and Meetings*.

Specifically, ED offers the following guidelines with respect to food purchases:

- **Never purchase food for "networking" activities.** "In virtually all cases," the FAQ reads, "using grant funds to pay for food and beverages for receptions and 'networking' sessions is not justified because participation in such activities is rarely necessary to achieve the purpose of the meeting or conference."

- **Don't accept food/beverage costs embedded into a venue's contract.** Insist that food costs be "backed out" of a vendor's contract, and adjust the price accordingly. If food is "complimentary," ensure that the cost is not actually absorbed into another area of the contract.

Seek alternatives to face-to-face meetings

In its May 2013 guidance, *Frequently Asked Questions to Assist U.S. Department of Education Grantees to Appropriately Use Federal Funds for Conferences and Meetings*, the Education Department urges state and local grantees to consider whether a meeting or conference is necessarily the most cost efficient way to deliver information to staff, "and whether there are alternatives, such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting." ■

- **Food is not an indirect cost.** Food, in the rare allowable circumstances, should be charged directly to the federal grant.

- **Never pay for alcohol.** Use of federal funds for alcoholic beverages is strictly prohibited in all circumstances.

- **Note any state- or locally funded food.** If state or local funds are used to pay for food at a meeting or conference, be sure to make that clear "through a written disclaimer or announcement (e.g., a note on the agenda for the meeting) that Federal grant funds were not used to pay for the cost of the food or beverages," according to ED FAQ.

- **Offer food to participants for purchase.** "Grantees may offer meeting participants the option of paying for food (such as lunch, breakfast, or snacks) and beverages, and arrange for these items to be available at the meeting," the FAQ states.

Read ED's FAQ at www2.ed.gov/policy/fund/guid/gposbul/faqs-grantee-conferences-may-2013.doc. ■

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