



FAST FACTS

Use of Federal Funds for Food and Beverages at Meetings

Historically, districts have requested to use federal Title funds for food and beverage purchases, most often when sponsoring professional development. A change in policy at the federal level now strongly discourages the use of federal Title funds for food and beverages. In May 2013, the U. S. Department of Education issued *Frequently Asked Questions to Assist U. S. Department of Education Grantees to Appropriately Use Federal Funds for Conferences and Meetings* (FAQs) which can be accessed at www2.ed.gov/policy/fund/guid/gposbul/gposbul.html.

As a general rule, there is a very high burden of proof to show that paying for food and beverages with federal Title funds is necessary. Only in unique circumstances could a compelling case be made that food and beverage purchased with federal funds are justifiable. This burden of proof lies with the district or grantee.

To evaluate the appropriateness of using Federal funds for a working lunch, a district should consider the following:

- 1. Is a working lunch necessary?**
 - A working lunch is only appropriate when all key items on the agenda could not be accomplished without working through lunch.
 - Districts should not determine that a working lunch is desired and then construct an agenda to justify that decision.

- 2. Is the portion of the agenda to be carried out during lunch substantive and integral to the overall purpose of the conference or meeting?**
 - Inspirational talks, award ceremonies, networking, or informal discussions among attendees would not be appropriate agenda items for a working lunch.
 - If a working lunch is not justifiable, a district might offer attendees the opportunity to reimburse the district for a lunch that the district purchases with its general funds and delivers to the meeting site.
 - Alternatively, the district could deduct the cost of lunch from any per diem paid to attendees.
 - These options are generally only available if there are not opportunities near the meeting site to purchase lunch. Consider access to food and beverages when planning a meeting, as this may be justification for providing food and beverages.

- 3. Is there a genuine time constraint that requires the working lunch?**
 - A working lunch is not permissible if lengthening the duration of the meeting would not unduly disrupt the attendees' schedule or make the day unreasonably long.
 - A working lunch may be appropriate if some participants must travel a considerable distance to attend, because, absent the working lunch, it would not be possible to cover the entire agenda and still provide participants sufficient time to return home in order to avoid the additional costs of lodging.

- 4. If a working lunch is necessary, is the cost of the working lunch reasonable?**
 - A working lunch cannot contain extravagant items. It is suggested that districts follow state rates or another established guideline.

- 5. Has the district carefully documented that a working lunch is both reasonable and necessary?**
 - The district must document its justification for using Federal funds or other federal Title funds, for the purpose of a working lunch, including any cost savings that result from working through lunch.

It is allowable to pay the travel expenses of those attending a conference or meeting that is necessary to carry out its federal Title programs and include a per diem for food.

These guidelines are not applicable to Title I parent and family engagement activities. For example, food and beverages can still be purchased with Title I funds for family parental involvement events to increase parent participation.

If you have questions regarding this issue, please contact the Division of Student Support & Innovation at (888) 605-1951.