Responsibility
Grant Managers are responsible for compliance with the following procedures.

1) Food Costs - Based on guidance from the U.S. Department of Education (USDE) and the Maryland State Department of Education (MSDE), the following applies to the purchase of food, beverages, or snacks (food) with grant funds:

   a. Grant funds may not be used to purchase food. This includes grants through MSDE as well as federal direct grants.
      i. Exception - If the terms of the grant specifically allow for food, the costs are allowable. This is a rare occurrence and requires specific documentation and justification. An example of this could be an after school or weekend program which requires provision of food for the students participating in the program.
      ii. Exception - Based on specific guidance from MSDE, food/refreshments for parents at Title I meetings to facilitate parental involvement are allowable.

   b. If grant funds are being used to pay for a facility or meeting space for professional development/meetings or other events (e.g. a hotel/conference center), the cost of the facility may not include food.

   c. If food is to be provided for an event and is to be paid for from other than grant funds, the responsible manager must comply with the BCPS Food Parameters (attached).

   d. If community/business partners provide food for an event they should be acknowledged on the agenda.

   e. The agenda for the event should clearly state that no grant funds were used to pay for the cost of food.

2) Overnight Travel – If a grant is paying for overnight travel to a conference or other event, and the attendance of the staff at the event is an allowable cost under the terms of the grant, then the cost of per diems for food is also allowable.

3) Meetings and Conferences – When considering whether to pay for meetings or conferences with grant funds, the grant manager must consider the following:

   a. Whether a face-to-face meeting or attendance at a conference is the most effective or efficient way to achieve the desired results,
b. Whether there are alternatives such as webinars or video conferences that would be equally or similarly effective,

c. Public perception of the use of the grant funds to pay the costs – is it a good use of taxpayer funds,

d. How many staff are necessary to attend the meeting or conference,

e. Are the costs reasonable, and

f. How the meeting or conference will help to achieve the goals and objectives of the grant.

4) **Documentation** – Grant managers must ensure that the use of grant funds for any allowable and approved food, travel, meeting, or conferences is adequately documented. Documentation should include an explanation of the purpose, why it is necessary, participants/attendees, agendas, alternatives considered if applicable, and how it helps to achieve the goals and objectives of the grant.

Effective date: September 1, 2013
Responsibility

Principals, Department/Office Heads, Account Managers responsible for budgets, and holders of BCPS Procurement cards.

Parameters for the Purchases of Food

The purchase of food with operating, grant, or school activity funds (BCPS funds) must be made to further school system goals. The following questions should be considered before making purchases:

1. Does the purchase of food or beverages assist in meeting the goals of the school system?
2. Is the purchase of food or beverages during the work day necessary due to the length of the meeting, the location, or the number of outside visitors included in the meeting?
3. Is the purchase of food or beverage during the evening hours necessary due to the time of the meeting, the location, the number of outside visitors, or due to the employee working an extended work day in accordance with Superintendent Rule 3126 are allowable?
4. Could the meeting be scheduled at a different time to avoid a conflict with lunch or dinner times?
5. If the food is a reward for students, is there a more appropriate educationally-related reward available?
6. If the food is for students, is the food/snacks/candy of minimal nutritional value (as defined by the Secretary of the U.S. Department of Agriculture) for students? See Superintendent Rule 3310.
7. Is the food for food/culinary instructional programs?

Documentation Requirements

Documentation for all food purchases shall include the following and must be attached with the corresponding receipts/invoices to the procurement card statements/check reimbursement requests/purchase requisition:

1. Written explanation of the purpose of the meeting/event and the need for food to be included
2. Location of the meeting/event
3. Agenda for the meeting/event
4. List of attendees
5. Detail of items purchased
6. If purchase of food or reimbursement for a meal is related to an extended work day as described above, include a written explanation of the requirement for the extended day
7. Documentation for culinary program purchases should include teacher, class, date(s)