

Using Federal Education Funds for Food¹

Note: All grant expenditures, including those for food, beverages, or snacks, must be reasonable, necessary, allocable to the grant, and allowable. [Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR §§ 200.403 through 200.40].

Food Costs for Students

Local education agencies (LEAs) and schools may use federal education funding for food for students during school-based events if:

- There is a connection to a programmatic purpose and
- The cost is reasonable².

Examples of costs for students that are allowable include nutritional snacks for students in extended day (after-school) programs or children in childcare while families are participating in grant activities, and food necessary to conduct nutrition education programs for students.

Food Costs for Family Engagement Events

LEAs and schools may use federal education funds to purchase cost-effective and reasonable food items to provide meals or light refreshments/snacks as necessary. Food costs are allowable for parent and family engagement events if:

- There is a connection to a programmatic purpose;
- The cost is reasonable; *and*
- For meals, the event will occur at a typical mealtime; *or* the school/LEA has evidence that the absence of food would affect the meaningful outcome of the planned meeting.

Funding can pay for food for Title I meetings and other events funded with federal funds³ that support student and school achievement such as parent advisory councils, family math/reading/STEM training, family curriculum and assessment training, the annual Title I meeting, meetings to plan and discuss the Parent and Family Engagement Policy and/or the School-Parent Compact, etc.

Approval for food costs associated with parent and family engagement events must be obtained in the LEA's Consolidated Funding Application (CFA). Budgets should include the information needed for reviewers to determine that the purchase meets the criteria described above. Information should include details on the programmatic purpose of the event(s), the cost of the food being purchased, and either the time of the event(s), or other evidence that the absence of food would affect the meaningful outcome of the planned meeting(s). Additionally, LEAs and schools must maintain sufficient documentation including meeting invites, meeting agendas, sign-in sheets, etc. for all events funded with federal funds.

¹ Guidance based on Frequently Asked Questions (FAQs) to Assist U.S. Department of Education (ED) Grantees to Appropriately Use Federal Funds for Food, Conferences, and Meetings from August 2024. [Web](#).

² A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person in the conduct of competitive business (1 CFR § 100.12)

³ This may also include activities funded under Title IV, Part A and Title V, Part B.

When budgeting federal funds for family engagement events, LEAs/schools should ask themselves the following questions:

- 1) How does the event meet the programmatic purpose of the funding source?
- 2) Would a prudent person find the food purchase to be reasonable?
- 3) If meals are being purchased, is the event scheduled for a typical mealtime or does the LEA/school have evidence that the absence of food would affect the meaningful outcome of the planned meeting?
- 4) After the food purchases, is there still enough funding to conduct outreach and other activities to help families support student and school achievement, including activities required under Title I, Part A?
- 5) Has the LEA/school carefully documented that the purchase is reasonable and necessary?

Food Costs for Staff

It is not allowable to use federal education funding for food for staff professional development. Federal funds may not pay for food, meals, and snacks for professional development including onsite training or offsite conferences and workshops, except in rare instances where you can prove that, paying for food and beverages with federal funds is necessary to meet the goals and objectives of a federal grant.

Use these following questions to determine if using federal education funds to pay for lunch for professionals is an allowable expense.

- 1) Is a working lunch necessary? The information must be critical to the overall agenda. The agenda must state this is a working lunch.
- 2) Is the lunch portion of the agenda a critical, substantive discussion?
- 3) Is there a genuine time constraint to get lunch due to a topic-packed agenda prohibiting time for lunch? In very rare cases, are there no meal places within a couple of hours' access?
- 4) Would a prudent person find the food purchase to be reasonable?
- 5) Has the LEA carefully documented that the purchase is reasonable and necessary?

Have questions?

Additional information about using federal education funds for food, conferences, and meetings can be found [here](#). Questions can be directed to the LEA's assigned [ESEA Divisional Coordinator](#) or Brinn.Obermiller@tn.gov.