

# Allowability of Food Costs on NEH Awards



## Purpose

This guidance clarifies the circumstances under which NEH grant and cooperative agreement funds may be used to provide food, the requirements needed to authorize those costs, and any restrictions that would apply.

## Applicability

This policy is applicable to all NEH grants and cooperative agreements, including subawards, and awards to the State and Jurisdictional Humanities Councils.

## NEH Policy

Food costs are not permitted on NEH awards unless authorized by the Office of Grant Management (OGM) as either: 1) part of the authorized application budget, or 2) a prior approval request submitted via eGMS Reach.

Food costs associated with receptions, social gatherings and events, lobbying, entertainment, and networking are not allowable. Alcohol is not permitted under NEH awards.

Food costs must be fundamental to the project and indispensable for carrying out the scope of the work. Costs must be reasonable and a necessary business expense to carry out the programmatic purposes of the award.

Charges for food and beverages under a NEH grant or cooperative agreement provided during a meeting, conference, seminar, or event (hereafter referred to as a meeting) may be allowable costs under [2 CFR § 200.432](#) when:

- a) allowing participants to get their own meals would negatively impact their attendance at the meeting (i.e. due to the length of the event, it is impractical for attendees to seek food elsewhere),
- b) the meeting takes place in an area that precludes the participants from getting their own meals, or
- c) the meeting involves Indian tribes, children, and/or the elderly. In the circumstance where an organization indicates that providing food is a customary cultural tradition, it must be tied to a meeting. For example, an NEH recipient holds a meeting with tribal elders and other project stakeholders to elicit knowledge about the history of a boarding school and provides a meal.

Beverages and refreshments such as coffee/tea, pastries, and fruit may be provided when the event has several hours of instruction. A full meal may be provided if there is substantive instruction both before and after the meal is served. Substantive instruction includes

dissemination of research, advancements in the humanities, discussion programs, presentations, and training and development.

Recipients may serve a meal while a presentation is being given. Recipients may not begin an event or end an event with a full meal.

Example 1: A full day conference from 8 am to 4:30 pm that complies with a and b above and includes a lunchtime speaker. The recipient may request to provide refreshments and a meal.

Example 2: An afternoon seminar from 1 pm to 4 pm. The recipient may request to provide refreshments. It is unallowable to provide lunch before or dinner afterward.

If approved, the recipient must have a formal agenda for the event that provides a list of all activities occurring and must specify the times for which food will be provided.

### **Participant Support Costs**

Food costs associated with participant support costs may be allowable when it is in connection with conferences or training projects, similar to the policies above. OGM will consider the allowability of such exceptions on a case-by-case basis, per 2 CFR § 200.432.

### **Documentation and prior approval**

The cost of food must be included in the proposed budget, identified in the budget justification, and tied to specific programmatic purpose. The budget justification must detail why the food is necessary to complete the programmatic purpose of the project and clearly explain how it is reasonable and necessary to meet the goals and objectives of the project using the criteria described above.

For example:

- A recipient is providing a training seminar. Providing beverages and refreshments during a break after several hours of instruction would be allowable.
- A recipient is conducting a conference. Lunch will include presentations that are relevant to the NEH supported grant.

Providing food in these instances is reasonable and necessary because attendees would miss important information and would not be able to fully participate in the training if they went off-site to obtain food.

If the cost of food was not approved in the original budget, the recipient must submit a request via eGMS Reach for prior approval with the information described in this section.

### **Unallowable costs**

Charges for receptions, social gatherings, lobbying, networking or entertainment (provided merely for the pleasure or convenience of the attendees) are unallowable (see 2 CFR §

200.438). In addition, recipients cannot charge alcoholic beverages to an award (see 2 CFR § 200.423).

### **Food costs and travel per diem**

If food is approved by NEH, recipients must advise participants to reduce their per diem appropriately.

If project participants receive incidental food items and/or meals at no charge during meetings, conferences, training, or other events they attend while on travel, the recipient must reduce the per diem it charges to the award for that travel accordingly.