



**FOOD AND BEVERAGE GUIDANCE  
FOR OJJDP GRANTS AND  
COOPERATIVE AGREEMENTS**

**OJJDP**

November 2023

**OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION  
FOOD AND BEVERAGE GUIDANCE  
FOR OJJDP GRANTS AND COOPERATIVE AGREEMENTS**

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## I. Purpose

To provide guidance for Office of Juvenile Justice and Delinquency Prevention (OJJDP) grantees and cooperative agreement recipients regarding the use of OJJDP funds to provide food and/or beverages (also referred to as meals and refreshments) for participating youth.

Generally, Office of Justice Programs (OJP) policy prohibits the use of federal funds to provide food and/or beverages at events; however, federal funds **may** be used to cover food and/or beverage costs when such refreshments are necessary to effectively carry out the goals and objectives of proposed programmatic activities, particularly when program youth and/or families are involved in those activities. OJJDP encourages award recipients to seek other resources to provide food and/or beverages prior to seeking approval to utilize OJJDP funds.

OJJDP **does not require** that federal or match funds be allocated or expended to provide food and/or beverages at federally funded meetings, conferences, and events. This Guidance simply sets out the circumstances under which food and/or beverages may be provided, and the limitations that apply to those expenditures. It should be used to assist award recipients' decisionmaking in the context of planning programmatic activities that involve youth and/or families. Budgetary considerations should be evaluated when planning such activities to determine the feasibility and prudence of expending federal funds to pay for food and/or beverages.

This Food and Beverage Guidance for OJJDP Grants and Cooperative Agreements is designed to complement other federal rules, regulations, and agency guidelines that govern various aspects of conferences, meetings, and similar events. The U.S. Department of Agriculture (USDA), a member agency of the Coordinating Council on Juvenile Justice and Delinquency Prevention, has several programs that are available for feeding children and youth in community programs. OJJDP recognizes the need for food security for youth and families, and the critical role it plays in youth development and long-term positive outcomes. Award recipients are encouraged to access the resources below.

### **Summer Food Service Program Food and Nutrition Service**

USDA's Summer Food Service Program (SFSP) is a federally funded, state-administered program that reimburses program operators who serve free healthy meals and snacks to children and teens in low-income areas. To find an SFSP location in your area, use the Summer Meal Site Finder mapping tool and text "Summer Meals" to 914-342-7744 or call 866-348-6479 to find a convenient site. Locations that wish to become SFSP sites can also use the website to find out if they are in an area that is eligible to provide a site. Visit their website for more information:

<https://www.fns.usda.gov/sfsp/summer-food-service-program>.

### **Child and Adult Care Food Program | Food and Nutrition Service**

The Child and Adult Food Care Program (CACFP) provides reimbursement for meals served to children and youth participating in afterschool care programs, and children residing in emergency shelters. Visit their website for more information:

<https://www.fns.usda.gov/cacfp>.

### **National Institute of Food and Agriculture**

USDA's National Institute of Food and Agriculture (NIFA) addresses critical issues about agriculture, food, the environment, and communities. Through NIFA's Cooperative Extension System, key partners such as land-grant colleges and universities bring vital, practical information to agricultural producers, small business owners, consumers, families, and young people. Visit their website for more information on NIFA and its resources: <https://www.nifa.usda.gov/>.

## **II. Use of Funds To Provide Food and/or Beverages**

Award recipients may use OJJDP funds to provide food and/or beverages for federally funded OJJDP programs when it is necessary to successfully carry out the goals and objectives of programmatic activities, and when those activities substantially involve the participation of program youth and/or families.

Examples of eligible programmatic activities include, but are not limited to:

- Mentoring activities
- Counseling sessions
- Group and individual tutoring
- Family strengthening activities
- Training events for youth and/or families
- State Advisory Group meetings and convenings

For specific questions about eligibility, award recipients should contact their [OJJDP Program Manager](#) to discuss whether the activity proposed would fall under this Guidance.

### III. Requirements for Award Recipients To Provide Food and/or Beverages

*Except as provided in this Guidance, funds administered by OJJDP are not to be used to provide food and/or beverages.*

- All proposed food and/or beverage costs must be approved by OJJDP in advance of the activity.
- Award recipients must justify, in writing, why food and/or beverage costs are necessary to successfully carry out the goals and objectives proposed in their OJJDP-funded award.
- All food and/or beverage costs must be reasonable, allocable to, and necessary for the performance of the federal award.
- The food and/or beverages provided are **not** exclusively for entertainment and/or social events, nor are they to be provided merely for the convenience of the participants.

This Guidance also applies to the use of federal funds by subrecipients, whose compliance is monitored directly by the grantee or cooperative agreement recipient; the agency, in turn, monitors its grantees and cooperative agreement recipients to ensure compliance with this Guidance. Detailed receipts for food and/or beverages must be retained with the federal award file.

**Note:** Award recipients should follow their own state/local agency policies and procedures for using federal and nonfederal (match) resources to pay for food and/or beverages, including policies and procedures for accepting gifts or in-kind contributions from third parties (e.g., corporate sponsorships, community partners, local businesses, and/or civic organizations). Award recipients should also make sure that any food or beverages provided with nonfederal (match) funds are appropriate for the activity and do not detract from its purpose.

#### **IV. How To Obtain Pre-Approval for Food and/or Beverage Costs**

**Award recipients must receive written approval from OJJDP for all food and/or beverage costs allocated to their programs, in advance of the proposed activity.**

OJJDP may grant approval to grantees and cooperative agreement recipients in the following ways:

- Pre-Award Budget Clearance
- Post-Award Grant Award Modification

##### Pre-Award Budget Clearance

When developing a program budget to submit with the OJJDP federal funding application, if an applicant anticipates allocating food and/or beverage costs to their youth- and/or family-involved program, those costs must be included on the proposed [budget detail worksheet](#) that is submitted with the initial application.

Applicants must explain why food and/or beverage costs are essential to carry out the goals and objectives proposed in their OJJDP-funded program and justify that those costs are reasonable and necessary for the performance of the federal award. Activities where food and/or beverages will be provided must be specifically outlined in the budget detail worksheet with a supporting narrative justification that includes the following:

- Date of event(s) and/or activity(ies), if known
- Type of event(s) and/or activity(ies)

- Estimated number of youth and/or family members involved in the event and/or activity(ies)
- Type of food and/or beverages to be provided at the activity(ies)
- Estimated cost of food and/or beverages to be provided

The food and/or beverage request will be reviewed and may be approved as part of the pre-award budget clearance process.

**Note:** Award recipients will be required to submit additional details regarding the proposed use of food and/or beverages post-award. This information will be submitted as a programmatic Grant Award Modification (GAM).

### Post-Award Grant Award Modification (GAM)

A GAM is a request to modify details of the approved award. There are two types of GAMs that award recipients may be required to submit to request OJJDP approval for food and/or beverage costs: a financial GAM or a programmatic GAM. Recipients are limited to specific types of GAM submissions depending upon their award type (formula or discretionary). The following section outlines when the award recipient should initiate a programmatic GAM or financial GAM for costs associated with this Food and Beverage Guidance.

- Financial GAM

**Discretionary** award recipients must submit a **financial GAM** for budget modification to request approval to modify their budgets to include food and/or beverages costs if:

- a. Food and/or beverage costs were **not** included and approved in the OJJDP funding application.
- b. The inclusion of food and/or beverage costs allocates funds into another budget category.
- c. The proposed cumulative budget change is greater than 10% of the total award amount (the 10% rule does not apply to an award of less than \$250,000).

**Note: Formula grant** award recipients must submit a **programmatic GAM** to modify their approved budget to reallocate funds to cover food and/or beverage costs, as well as to receive program office approval for the use of food and/or beverages at the specific project activity(ies).

- Programmatic GAM

Award recipients must submit a **programmatic GAM** to request program office approval to modify their budgets to include food and/or beverage costs if:

- a. The inclusion of food and/or beverage costs does **not** reallocate funds into another budget category.
- b. The proposed cumulative budget change is less than 10% of the total award amount.
- c. The recipient is a formula grants award recipient.

**All award recipients must submit a programmatic GAM to request program office approval for the use of food and/or beverages prior to the specific event(s) and/or activity(ies).**

When submitting a GAM for approval to allocate OJJDP funds for food and/or beverages, award recipients must explain why food and/or beverage costs are essential to carry out the goals and objectives proposed in their OJJDP-funded program and justify that those costs are reasonable and necessary for the performance of the federal award. Events and/or activities where food and/or beverages will be served must be specifically outlined with a supporting narrative justification that includes the following:

- Date of event(s) and/or activity(ies)
- Type of event(s) and/or activity(ies)
- Estimated number of youth and/or family members involved in the event and/or activity(ies)
- Type of food and/or beverages to be provided at the activity(ies)
- Estimated cost of food and/or beverages to be provided



- Justification that details why the food and/or beverages are necessary for the successful implementation of the proposed activity(ies)

All GAMs must be submitted electronically through JustGrants. To confirm which type of GAM to submit, please contact your [OJJDP Program Manager](#).

## **V. Other Considerations**

Award recipients must consider that food and beverage costs are often subjected to scrutiny. All entities using federal funds to provide food and/or beverages must ensure that food and/or beverage costs do not appear to be lavish or wasteful.

Retroactive approval of food and/or beverage requests will be considered only in extenuating circumstances, and on a case-by-case basis.

## **VI. Questions**

If you have any questions regarding how to interpret this Guidance or apply it to costs incurred under a grant or cooperative agreement, please contact your [OJJDP Program Manager](#).

For additional guidance regarding when federal funds can be used for food and/or beverages, please refer to the [OJP Food and Beverages Policy](#) or the [DOJ Grants Financial Guide](#).