

WHAT ABOUT FOOD PURCHASES?

- **The PI/PD is responsible for ensuring that food purchases are allowable in the grant, contract, or other sponsored agreement.**
 - **If unsure, contact ORSP *before* you purchase food or food-related items using grant, contract, or other sponsored agreement funds.**
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The only allowable food charges for SFA personnel (faculty, staff, and students) are **per diem** meal costs associated with SFA-approved travel that is included in the project budget approved by the sponsor. Meals, beverages, and other food items cannot be purchased for speakers, consultants, or other individuals under contract with SFA as these costs are covered in their contracts.

State and federally funded grants and contracts have strict restrictions on non per diem food purchases. Purchase of alcoholic beverages is never allowed* (see below).

State-funded Awards

These restrictions apply to all awards originating from state of Texas funds. In addition, federal or private funds that pass through state agencies may have similar restrictions.

Non per diem food purchases for meetings, conferences, and workshops must be specifically detailed in the project budget approved by the sponsor. Otherwise, such costs are NOT ALLOWED.

Federally Funded Awards

According to federal OMB Circular A-21, costs of entertainment, including amusement, diversion, and social activities, and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities), are **UNALLOWABLE**.

For meetings, workshops, and conferences, if the primary purpose is to disseminate project information, food costs may be allowable. This includes costs of meals, rental of facilities, and other items incidental to such meetings, workshops, or conferences.

This is generally interpreted to mean the following:

- * Food costs do not include SFA staff or contractors who receive reimbursement for meal costs as part of their contracts. Food costs include meals/beverages for partners, participants, advisory committee members, etc.
 - * In general, working meals or grant-related meetings with refreshments are allowable (with agendas);
 - * Food/beverage costs must be necessary to accomplish the objectives of the grant program or sponsored project; and
 - * Food/beverages cannot be purchased for receptions or banquet-style meals.
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Food Purchases on Sponsored Projects

Food purchases not allowed on sponsored projects:

1. **Meals, beverages, and other food items cannot be purchased directly for SFA personnel (faculty, staff, or students).** The only allowable food charges for SFA personnel is **per diem** associated with SFA-approved travel that was detailed in the proposal/scope of work and budget/budget justification as approved by the sponsor.

Meals, beverages, and other food items cannot be purchased for speakers, consultants, or other individuals under contract with SFA. These costs are covered in their contracts; hence, the contractor's meals/beverages must be separate.

2. Grants funds cannot be used to pay for meals or refreshments for project staff or other SFA personnel who join grant-related guests (such as speakers, evaluators) at a local restaurant.
3. Alcoholic beverages.

Food purchases that may be allowable on sponsored projects:

This section applies to food purchases for non-SFA staff.

Non-travel related food/food item purchases may be a necessary expense to meet the goals and objectives of a project, but they must be specifically outlined in a sponsor-approved project narrative and/or budget/budget justification. Some sponsors have limitations on food purchases while others disallow ALL food purchases.

Sponsor approval of an activity or event does not automatically mean that food for the event is also approved. Language in the budget and proposal/scope of work that describes the use of food as part of the activity or event must be included. Food purchases are limited to **event participants**.

*Purchase of alcoholic beverages is never allowed unless part of a clinical trial or other required research protocol and only if allowed and specifically approved by the sponsor.

Definitions

- "Food" includes food, non-alcoholic beverages, meals, snacks, or any combination.
- "Food item" includes raw food materials and related items needed for demonstration, research or animal use.
- "Food supplies" includes items needed for the consumption of the food such as disposable items like napkins, paper plates, disposable cups, and plastic utensils.

Allowability

1. **State-funded Sponsored Projects**

Non-per diem food purchases for meetings, conferences, and workshops are only allowable if specifically provided for in the agreement, budget/budget justification, and/or proposal/scope of work.

2. Federally Sponsored Projects

Federal OMB Circular A-21 allows food purchases associated with meetings, conferences, and trainings when the primary purpose of the event is the dissemination of technical information or to meet project goals and objectives. Agendas are required.

OMB Circular A-21 does not allow costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities).

Specific Examples

1. Food and supplies for preparation and serving food for demonstration, instruction and/or outreach. Describe the activity and how food will be used.

Examples:

- Food and food items needed to prepare and serve food for consumption during the demonstration that vegan food lowers cholesterol.
 - Room rental fee \$200
 - Food purchase for demonstration \$500
- Light refreshments and non-alcoholic beverages will be provided for children and parents who attend the evening event to educate parents on the benefits of reading to their preschool children.
- A one-day training session on etiquette and professionalism will be held; including a dining tutorial where appropriate table etiquette will be explained.
 - Food and beverage breaks (morning and afternoon) \$100
 - Working meals (dining training experience) 120 participants x \$21 per meal = \$2,520
 - Working meals (dining training experience) for invited guests 10 x \$21 per meal = \$210

2. Food and supplies for research. Describe the activity and define whether food will or will not be consumed.

Examples:

- Food and food items intended for consumption but required to test the palatability of using molasses instead of sugar in food products.
- Grower diets will be fed as pellets from approximately day 19 to day 33 (4 lb/bird).
- Three focus groups will be held with research participants, one in the fall and two in the spring semesters. Each focus group will last approximately 2 hours and will be held from 11 am to 1 pm as research participants will attend on their lunch breaks from their jobs. Lunch and non-alcoholic beverages will be provided.
- 25 people will participate in the exercise study by running on the treadmill as outlined in the methodology section. Each participant will receive a bottle of water after each session.
 - 25 people x 4 sessions x \$1.25 per bottle = \$125

- 3. Food at conferences, trainings, retreats and workshops.** Such events may include food for attendees if the duration of the event warrants and the event has an agenda that includes a working meal. Describe the event including food and attendees.

Examples:

- Community volunteers will be invited to a training on 'Learning the roles of a Volunteer' which will include a tour of the center and a lunch for attendees.
- One conference will be held each fall and spring semester for public school teachers and each conference will include food and non-alcoholic beverages for meals and refreshment breaks.
- On-campus summer camp participants' room and board. SFA policy only allows for food purchased through Aramark.

- 4. Food for meetings.** A working meeting may include food if the meeting occurs during the meal. Describe the meeting, including food and attendees. An agenda must also be included as part of the documentation.

Examples:

- Teachers from across the county are attending a 6-hour training event that begins at 9 am and ends at 3 pm to allow return travel at reasonable hours. Lunch is provided as part of the agenda since lunch off-site would extend the length of the event by 1.5 hours.
- The advisory council comprised of one representative from each of the partner districts will be held once each year during the grant period to review the annual outreach plan and program accomplishments. The lunch meeting will include food and non alcoholic beverages.

- 5. Food for scholarship and other participants who receive a stipend.** Discuss how food is needed as part of the project.

Example:

- Hotel and meal allowances will be offered to each participant in the grant to support overnight stays for the on-campus meetings. Participants will receive \$65/night for hotel expenses and \$35/day for meals. In addition, \$1,000 per year is requested for participant snack and beverage expenses provided within the on-campus trainings as well as for special gatherings to build cohort cohesiveness.

Documentation

- Include receipts (per SFA policy 17.6, an original itemized receipt is required from restaurants and vendors).
- Include the food purchase verification form (food purchased for research or animals is exempt).
- Include agendas and invitations (if applicable) for events, workshops, conferences.
- Include list of attendees for events, workshops, conferences.