

WSD Guidance for Purchasing Food for Events and Meetings



Purpose

This guidance outlines when and how to use federal Title funds (e.g., Title I-A, I-C, III, CSI/TSI) to purchase food in compliance with federal regulations and Oregon Department of Education (ODE) expectations. [ESSA Quick Reference Brief: Purchasing Food with Federal Funds](#).

While this document specifically references food purchased with federal funds, the purchase of food using any district funds must support a clear educational or operational purpose and align with all applicable state and federal requirements. Food purchases should be limited, reasonable, and necessary to accomplish the purpose of the meeting or event.

General Rule

Food purchases using federal funds must be:

- **Reasonable** (cost is appropriate and not excessive - less than \$10 per person)
- **Necessary** (essential to achieving the program's educational purpose)
- **Allocable** (directly tied to the objectives of the federal program)

Food is not a routine expense and requires clear justification. Federal funds are not used to purchase food for staff. There are some exceptions such as pre-approved travel using federal funds.

Allowable Uses of Food Purchases

1. Family Engagement Activities

Food may be purchased to support participation in activities that improve student achievement, such as:

- Family engagement meetings
- FamU
- Literacy and math nights
- Parent advisory councils or school improvement discussions

Light refreshments are allowable and preferred for most events, including items such as coffee, juice, fruit, granola bars, trail mix, pan, cookies or similar snacks.

2. Meals (Limited Use)

Meals may be provided only when necessary to ensure participation (e.g., evening events during dinner hours).

- Food should be ordered for the number of anticipated participants to avoid leftover food to the extent possible
- Cost should generally **not exceed \$10 per person**
- Total food costs should remain **minimal relative to program spending** (e.g., not exceeding ~10% of school's allocation)

3. Special Circumstances

In certain programs (e.g., support for students in McKinney Vento Program), food may be allowable if it is necessary for students to access educational services and not otherwise available, once other funding sources have been exhausted. See [ESSA Quick Reference Brief: Purchasing Food with Federal Funds](#) for more information.

Unallowable Uses

Federal Title funds **may not** be used for:

- Entertainment or purely social events (e.g., celebrations, banquets)
- Staff meetings/trainings or non-program activities
- Food without a clear educational purpose as outlined in your school improvement plan and budget narrative
- Site Council Meetings

Documentation Requirements

Documentation demonstrating compliance must be retained, including:

- Agenda showing educational purpose
- Participant sign-in sheets (amount of food ordered should be reasonable for the number of participants)
- Itemized receipts
- Written justification explaining why food was necessary and if excess food was ordered

Key Considerations for Approval

Before approving food purchases, administrators should ask:

- Does this directly support student learning or family engagement?
- Is food necessary to achieve participation?
- Is the cost reasonable and limited?
- Is documentation sufficient to justify the expense?
- Is this expense in my approved budget narrative?

Summary

Food purchases with federal Title funds are allowable only in limited, well-justified situations—primarily to support meaningful family engagement and access to educational opportunities. Administrators must ensure all purchases are necessary, reasonable, and properly documented to remain compliant with district, federal and state requirements.