**Working Lunches**

Per 2 CFR 200.432, meals are allowable, however the Federal government did release a letter February 20, 2014 outlining the high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant.

Therefore providing meals during a “working lunch” may be an allowable use of Federal funds in order to carry out a conference or meeting agenda with the time available but the local education agency (LEA) must make a compelling case for the cost.

The LEA should determine if it is possible to accomplish the agenda of the meeting or the conference without working through lunch, because the Federal grant funds may not be used to pay for a “working lunch” that is not necessary.

The Federal government did provide some guidance to help with reasonable and necessary when it comes to a “working lunch”. See questions below.

To evaluate the appropriateness of using federal funds for a working lunch, an SEA or LEA should consider the following guidelines:

1. Is a working lunch necessary?
2. Is the portion of the agenda to be carried out during lunch substantive and integral to the overall purpose of the conference or meeting?
3. Is there a genuine time constraint that requires the working lunch?
4. If a working lunch is necessary, is the cost of the working lunch reasonable?
5. Has the SEA or LEA carefully documented that a working lunch is both reasonable and necessary?

If you feel a “working lunch” is necessary then we encourage you to use the above five questions to guide you through the necessary documentation required to make this expense allowable. Please retain these five questions answered or any other matter that you wish to support this is an allowable expense. Retention regulations state that grant documents must be retained for 5 years.