

**FOOD & BEVERAGE COSTS  
POLICY-STANDARD  
PROCEDURE**

<p>Title: Illinois Department of Human Services Home Visiting (DHS-HV) Use of Funds on Food and Beverage Costs in DHS Home Visiting Programs and Services and MIECHV Coordinated Intake Programs</p>	<p>Date Issued: April 14, 2021</p>
<p>Area: Use of Funds on Food and Beverage Costs</p>	

**PURPOSE.** The purpose of this policy is to establish what food and beverage costs can be funded with funds from MIECHV and HFI by DHS-HV sites, including MIECHV Coordinated Intake programs.

**SCOPE.** MIECHV and HFI Home Visiting Programs (Herein referred to as DHS-HV) and Coordinated Intake programs.

**POLICY.** DHS-HV sites implementing home visiting and MIECHV Coordinated Intake programs (“CI programs”), shall only use DHS funds on allowable food and beverage costs as described herein.

Under the Grant Accountability and Transparency Act (GATA), the federal requirements in the Uniform Guidance apply to the DHS-HV Programs. According to federal requirements, there are only certain circumstances when the use of DHS-HV funds on the cost of food and beverages is allowable.

**The use of DHS-HV funds on food and beverage costs is allowable under the following circumstances:**

1. During a conference, meeting, retreat, seminar, symposium, workshop or event whose *primary purpose is the dissemination of technical information* beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award.<sup>1</sup> According to HRSA guidance<sup>2</sup>, the following are additional requirements:
  - a. Provide a speaker/program at a working lunch or dinner (a working breakfast is not allowable).
  - b. Provide a formal agenda of the event.
  - c. Make the event mandatory for all participants.
  - d. No alcohol can be available at the event.
  - e. Provide appropriate break foods, such as coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips, or muffins.
  - f. Provide several hours of substantive information both before and after food and/or beverages are served.

<sup>1</sup> 45 CFR 75.432

<sup>2</sup> Guidance from HRSA (Janene Dyson) via electronic communication on April 27, 2018.

- g. Do not end events with a meal and/or break.
  - h. Keep costs reasonable.
2. Additional circumstances when meals and food are allowable:
- a. Subjects and patients under study.
  - b. Where *specifically approved as part of the project or program activity*, eg, in programs providing children’s services.
  - c. When an organization customarily provides meals to employees working beyond the normal workday, as a part of a formal compensation arrangement.
  - d. As part of a per diem or subsistence allowance provided in conjunction with allowable travel.<sup>3</sup>

**As indicated above, food and beverage costs for working meetings that are project-related or Home Visiting conferences, may be charged to DHS-HV funds as long as the related expenses are reasonable, allocable, and allowable.<sup>4</sup>**

However, meals that would be considered “entertainment” would be unallowable. Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget.<sup>5</sup>

### **Examples**

- The costs of refreshments and snacks for enrolled individuals/families participating in group activities that are an integral component of the home visiting program (eg, parenting groups that are a part of the home visiting model requirements) or DHS-HV program evaluation are **allowable** to be paid from DHS-HV funds.
- The costs of water and light refreshments (eg, granola bars) provided to home visitors or CI staff at a mandatory 3-hour training are **allowable** to be paid from DHS-HV funds.

Please note that the requirement described above only addresses what DHS-HV funds (or other applicable federal funds) can be used for. Therefore, it may be permissible for an DHS-HV or CI site staff to use its **non-MIECHV or non-HFI funds** (or other non-federal funds) to purchase food/beverages that are not allowable as described above, as long as such purchase is in compliance with the agency’s internal requirements and applicable state law.

### **\*Special Update for Allowances in Times of Uncertainty**

During times of uncertainty, extenuating circumstances will occur; the DHS-HV programs will offer enhanced flexibility for purchases and expenditures. Please contact the DHS-HV team to evaluate allowances on a case by case basis. Also refer to the DHS-HV Participant Incentives Policy.

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<sup>3</sup> Guidance from HRSA (Janene Dyson) via electronic communication on April 27, 2018.

<sup>4</sup> Guidance from HRSA (Janene Dyson) via electronic communication on April 27, 2018.

<sup>5</sup> 45 CFR 75.438