



Transportation & Marketing
Program

Grants Division

PANEL REVIEWER MANUAL

REGIONAL FOOD SYSTEM PARTNERSHIPS PROGRAM

Fiscal Year 2025

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PART I - BACKGROUND

Applications submitted to the U.S. Department of Agriculture's (USDA), Agricultural Marketing Service (AMS), Regional Food System Partnerships Program (RFSP) are evaluated by a panel of external reviewers to ensure that they receive full and uniform consideration, and that the selected proposals merit receipt of Federal funds. As a reviewer, you play a very important role to evaluate the applications fairly, competently, and objectively. This manual provides instructions and guidance on activities associated with this review.

The USDA - AMS is working in collaboration with the Grant Solutions to use their online Application Review Module (ARM) for conducting the competitive review process.

PART II - PROGRAM PURPOSE AND DESCRIPTION

The Agriculture Improvement Act of 2018 (the 2018 Farm Bill) created the Local Agriculture Market Program (LAMP). LAMP encompasses three Federal grant programs: the Farmers Market and Local Food Promotion Program (FMLFPP), the Value-Added Producer Grants (VAPG) program, and RFSP.

RFSP supports partnerships that connect public and private resources to plan and develop local or regional food systems. RFSP focuses on building and strengthening local or regional food economy viability and resilience by alleviating unnecessary administrative and technical barriers for participating partners.

The program offers three project types, Planning & Design, Implementation & Expansion, and Farm to Institution.

Project Type	Amount	Duration	Project Examples
Planning & Design	\$100,000-\$250,000	24 Months (2 Years)	<ul style="list-style-type: none">• Convening established and potential partners to define the regional food system scope and structure.• Creating and conducting feasibility studies.• Market analysis and planning.• Connecting food value chain entities with partners and funders to engage in activities that strengthen the regional food system.• Partner recruitment and outreach.
Implementation & Expansion	\$250,000-\$1,000,000	36 Months (3 Years)	<ul style="list-style-type: none">• Prioritizing strategies to fill food systems gaps.• Institutionalizing processes for ongoing community and business engagement.• Technical assistance for advertising and promotion of locally and regionally produced agricultural products.

			<ul style="list-style-type: none"> • Supporting food system efforts to analyze capital needs. • Fostering partnerships with a commitment to shared operational values and social mission goals.
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Note: For detailed information about program purpose, eligibility, description of the different project types, and evaluation criteria please review the Request for Applications (RFA) located on our program's [application website](#).

PART III. OVERVIEW OF THE PANEL REVIEW PROCESS

Reviewers are required to commit approximately 4 weeks to the review process. Panels are organized into teams of 3 members, each of whom brings local and regional food expertise to the evaluation process.

AMS designates one reviewer from each team as the Panel Chair. Each individual team member (including the Chair) will evaluate the strengths and weaknesses of the applications against standard evaluation criteria (see RFA). The Panel Chair will coordinate and lead consensus review discussion(s) via teleconference to develop consensus scores, rankings, and comments for each application. Chairs are responsible for compiling the team's consensus results into a Panel Summary Report (PRS) in ARM before submitting to AMS. Applicants will receive a copy of the PRS. Thus, comments in the final PRS should provide substantive and constructive feedback to help applicants improve their application if they choose to apply again.

AMS will fund applications that are not only technically sound, but also have the potential for significant impact and a reasonable probability to succeed. **Remember that a project may be innovative, a great idea, or be a good cause with intended targets, but it must meet the purpose of the grant program which is to support partnerships that connect public and private resources to plan and develop local or regional food systems.**

Each panel may be assigned up to 8 applications to review. Panels may decide how best to organize their work in completing the individual reviews and consensus discussions to meet the established deadlines. However, to spread the effort throughout the review period, we strongly recommend following the timeline found here: [link to website](#).

AMS will review Panel Summary Reports as they are submitted in ARM and return reports to the Panel Chair for editing as needed. Any returned reports will include notes on what specifically needs to be changed. **Ensuring from the start that comments included in the Panel Summary Reports are written per the guidelines in this document will help reduce the amount of back and forth in this process.**

PART IV - PRE-REVIEW ACTIVITIES

A. REVIEWER ORIENTATION

Reviewers and Panel Chairs are **required** to attend an orientation webinar. The orientation will

provide an overview of the ARM system, RFSP program and scoring criteria, and the reviewer responsibilities, policies, and procedures. If you are unable to attend the orientation due to an extenuating circumstance, you must notify us in advance by emailing USDAReview@grantreview.org. More information regarding the orientation will be provided via email.

B. CONFLICT OF INTEREST/CONFIDENTIALITY

All reviewers are required to follow the AMS [Conflict of Interest & Confidentiality Policy](#) which should have already been signed and submitted during the reviewer recruitment process. **If you did not sign and submit your conflict-of-interest form when registering, please email USDAReview@grantreview.org immediately.** By signing this form, you are certifying that you will inform AMS if you discover a conflict of interest and that the contents of each application and all panel discussions will remain confidential. Failure to comply with the Conflict of Interest and Confidentiality policies may subject you to the removal from the current review and/or disqualify you from future review of grant applications.

1. CONFLICT OF INTEREST

As soon as you gain access to your assigned applications, immediately review the applicants to determine if any potential conflicts of interest exist, including actual or perceived conflicts. **Reviewers should identify any conflicts of interest as early as possible to avoid compromising the integrity of the review.** Reviewers are required to inform the RFSP Review Team (see Part VI) if they discover a conflict of interest or suspect a potential conflict of interest with any of the assigned applications. If necessary, the RFSP Review Team will re-assign the conflicting application(s) or re-assign the reviewer(s).

2. CONFIDENTIALITY

All aspects of your review should remain confidential to protect both the reviewers and the applicants. Upon completion of the review process, any printed applications must be shredded, and any downloaded applications must be deleted from your computer.

At no time prior to, during, or after the review should reviewers discuss the applications, comments, recommendations, evaluations, scores, names of applicants, or names of other reviewers with anyone outside the review process. Questions regarding applications should be directed to the RFSP Review Team. **Direct contact or communication with applicants or associated persons is strictly prohibited.**

Note: An applicant (or other individual) may request review-related information via the Freedom of Information Act (FOIA). The Federal Government is required to release the names of all reviewers who participated in the RFSP program review. However, names of individual reviewers will NOT be associated with specific application review assignments.

C. REVIEWER RESPONSIBILITIES

1. INDIVIDUAL REVIEWERS

As a reviewer, you are responsible for evaluating each application assigned to you. You are expected to:

- Complete individual reviews (scores and comments) in the ARM system for assigned applications following guidance from this manual. **Do not speak with other team members about the proposals until the consensus review discussions.**
- Ensure that your comments correspond to how you score each section of the proposal. If the section receives a low score, the comments should reflect significant weaknesses, and vice versa.
- Ensure that comments are substantive, constructive, and helpful to the applicant. It is okay for a reviewer to offer suggestions on how to improve the proposal.

- Actively participate throughout the review process by providing individual reviews that meet program standards and actively discuss your opinion with fellow team members during the consensus review discussions.
- Maintain collegial dialogue in your discussions with fellow team members and provide constructive feedback to the applicants through your consensus comments.
- Meet deadlines established by the RFSP Review Team and your Panel Chair.
- If you discover a missing component of the proposal, make a note, and discuss it during the consensus review. It is okay to score an application lower if the applicant fails to answer all the questions in a section (with no apparent reason or explanation) or follow the instructions in the RFA.
- Inform the RFSP Review Team and your Panel Chair **immediately** of any conflicts of interest, or if you cannot meet the review requirements.

2. PANEL CHAIR

Panel Chairs perform the dual role of individual reviewer and Chair. Chairs are expected to:

- Keep the team on the established schedule.
- Ensure that team members' individual review scores and comments are completed in ARM prior to the consensus review discussions.
- Contact team members to schedule meeting(s) to conduct the consensus review.
- Facilitate the consensus review discussions and coordinate the completion of a consensus review for each application assigned to the team.
- Ensure substantive comments are entered that focus on strengths, weaknesses, and suggestions to improve, and that the comments have appropriate language to share with the applicant.
- Ensure all team members have a chance to freely present their views during the consensus review discussions.
- Complete the Summary Statement section of the report.

3. ALTERNATE REVIEWERS

Alternate reviewers that are on stand-by will be contacted if a panelist is unable to fulfill the required duties. If an alternate cannot be found, current reviewers may be assigned as alternates to another team and will be compensated accordingly.

PART V. REVIEW ACTIVITIES

A. REQUEST FOR APPLICATIONS (RFA)

Familiarize yourself with the [RFSP RFA](#) before beginning your review of the proposals. Use the RFA throughout the review to understand the application requirements. Pay special attention to the

Funding Opportunity Description (section 3.0), the Eligibility Information (section 2.0), and the Project Evaluation Criteria (section 6.2).

B. ACCESSING THE APPLICATIONS (Application Review Model (ARM))

Each reviewer will receive an email with their individual ARM username and password in order to access the grant applications assigned to their team. Once you are logged in you will open the appropriate session, indicate if you have a conflict of interest by checking a box and go to the panel list screens to access the applications. Please refer to the ARM - Reviewer User Manual for more details.

C. EVALUATION CRITERIA

Each application needs to be reviewed competitively using the evaluation criteria and respective scoring as mentioned in the RFA (Section 6.2). Each evaluation criterion's full description is provided in the ARM system as well as the RFA.

D. INDIVIDUAL SCORE AND COMMENT

1. REVIEWER COMMENTS

Reviewers should identify and clearly state strengths and weaknesses for **EACH** evaluation criterion. In certain circumstances you may find it difficult to write comments for each evaluation criterion. If this occurs, consider listing 2-3 commendable features, and/or instances where the criteria elements are not met, for each of the evaluation criteria. **Comments must be written in complete sentences.**

- **A strength** is a response that clearly meets or substantially exceeds requirements set forth in a review criterion.
- **A weakness** is a response that falls short of meeting requirements set forth in a review criterion.

Statements should be constructive and absent of bias or outside information.

2. REVIEWER SCORES

Individual scores should reflect the comments made for each evaluation criterion. Please make substantive scoring differentiations between proposals that will result in a reasonable distribution of numerical scores. A proposal with many negative comments should not receive a high score, and vice versa. Each proposal must meet basic requirements. If the application is incomplete or if the applicant has not fully addressed the required elements, note the discrepancies in your comments and score accordingly.

- As a Reviewer you can only see your own scores and comments.

- You must enter a score before you can enter a comment.
- ARM automatically totals your overall evaluation score as you enter your individual criterion scores.
- You cannot submit your evaluation to the Panel Chair unless you have entered scores for all scoring criteria.

[APPENDIX A – GUIDELINES FOR WRITING STRENGTHS AND WEAKNESSES](#) contains guidance on writing strengths and weaknesses and for scoring each proposal.

Note: To assist AMS on final selection **no two applications from your team should have the same score.**

E. CONSENSUS MEETINGS, SCORING AND COMMENT WORKBOOK

1. THE CONSENSUS REVIEW PROCESS

Consensus requires working together as a team to determine scores, rankings, and comments for all applications. It is based on compromise, and the ability to find common ground. Everyone should be satisfied with the outcome.

To make the best use of the team's time, we suggest not spending too much time where there is general agreement about an aspect of the proposal. Instead, focus the discussion on significant differences of opinion or wide variance between individual scores for a section.

Teams may use whichever business communication technology is most appropriate (such as Zoom or Microsoft Teams) to conduct their consensus discussions, provided access is available to all team members.

2. PANEL CHAIR FACILITATION

The Panel Chair should facilitate the discussion and draft comments by:

- Considering each proposal in turn, beginning with a brief overview of the proposal:
 - Name of the applicant organization
 - Title of the application
 - Goals and Objectives
 - Who benefits, and
 - How the project will be implemented
- Leading the discussion about the applications' strengths and weaknesses, placing specific emphasis on the evaluation criteria. AMS will fund projects that are not only technically sound, but also have the potential for significant impact and a reasonable probability to succeed. Discuss what may be gained if the project is selected and is successful.

- Ensuring substantive and constructive comments for each criterion per proposal. Comments must be written as complete sentences and are required for **EACH** criterion.
- Reminding team members that the consensus comments and scores will be shared with applicants and become a part of the application file (public record). For that reason, the tone of the comments should focus on strengths, weaknesses, and suggestions to improve. Again, comments should be constructive, not harsh or inflammatory. Be honest in your evaluation, but also acknowledge specific proposal strengths where appropriate.
- Ensure that all comments reflect a consensus viewpoint, not that of just one individual. Panel Chairs may use individual review comments as guides but should not simply cut/paste all individual review comments together to form one “consensus” review response.

Refer to the examples in [APPENDIX B – EXAMPLE SUMMARY OF CONSENSUS COMMENTS](#) when considering how to write consensus comments.

F. CLARIFICATION ON ELIGIBLE AND INELIGIBLE PROJECTS AND ACTIVITIES

It is very important that applications are complete according to the RFSP RFA requirements. Upon reading the application materials, a reviewer may determine that an application does not fully meet the RFA requirements, is missing required documents or that the proposal contains a budget discrepancy or unallowable cost. Those applications should be scored accordingly.

Reviewers should individually score applications according to the evaluation criteria and add comments that can be discussed during the consensus review. If the team questions the overall eligibility of an application, the Panel Chair should contact the RFSP Review Team before making a final decision.

Reviewers should review and note if budget expenses seem appropriate, low or unreasonably high and if the budget is consistent with the size and scope of the project. For detailed information on how to review the budget, see [APPENDIX C – REVIEWING THE APPLICATION BUDGET](#). Although we do not expect reviewers to decide whether costs are allowable or not, we ask reviewers to comment whether a cost is necessary and reasonable to accomplish the project or if there are any discrepancies between what is described in the proposal’s narrative (Work Plan, Project Management Plan, Partners List, etc.) and what is requested in the Budget section.

For your reference, please see [APPENDIX D – ALLOWABLE AND UNALLOWABLE COSTS](#) for some common allowable/unallowable project costs.

PART VI - RFSP REVIEW TEAM

ARM Questions:

USDA Grant Review Team

Email: USDAReview@grantreview.org

Programmatic Questions:

IPP Grants Team (the team that manages RFSP)

Email: IPPGGrants@usda.gov

APPENDIX A – GUIDELINES FOR WRITING STRENGTHS AND WEAKNESSES

The following are guidelines and examples to help you describe strengths and weaknesses.

FOCUS ON THE PROJECT EVALUATION CRITERIA (SECTION 6.2 OF THE RFA)

Use only the evaluation review criteria for all assigned applications. Do not consider factors outside the scope of any review criterion. Only consider what is written in the proposal. Don't make assumptions or judgements based on what you know about any prior work completed or the reputation of the organizations or people involved. In fact, if you have prior knowledge, this may be a conflict of interest that merits notifying AMS staff.

Remember that each application should be evaluated on its own merit. The evaluation should reflect a clear, objective, explicit, and justified assessment of the application. The reviewer should write the strengths and weaknesses based on how well the applicant develops the proposed project and the extent to which the project is responsive to the published criteria.

Be constructive and directly address each criterion. Reference the review criteria, but do not repeat it back to the applicant word-for-word.

WRITE CLEAR AND CONCISE

Provide information that helps the applicant understand why a particular statement or recommendation was made.

Use complete declarative sentences with language that presents ideas fully. **Incomplete sentences and fragments will be returned to the Panel Chair and will delay the completion of your team's review.**

Make clear, definitive assertions. For example, instead of "*The application appears to not have included objectives,*" write "*The application does not include objectives.*" Use phrases like "*it would have been strengthened by...*"

If using acronyms, write out the entire name followed by the acronym in parenthesis the first time the acronym is used.

PROVIDE AN EVEN-HANDED REVIEW

Depersonalize your comments. When describing a weakness, always refer to the *application's* weaknesses, **NOT** the *applicant's* weaknesses. Use of the term "applicant organization" is also preferred over "applicant." Avoid using phrases like "fails to" and other negative statements. Also, include an example, where possible. For instance, instead of stating "*The applicant organization fails to demonstrate the issue or need the project addresses,*" write "*The applicant organization does not clearly demonstrate the issue or need being addressed through this proposed project.*" For example,

they mention demand for a neighborhood mobile market but do not explain who is requesting the service and why.” The difference is subtle but significant.

Write in the third person (i.e., “*The applicant organization plans to...*”) rather than the first or second person, (i.e., “*This reviewer feels...*” or “In the opinion of this reviewer...”). The final consensus needs to be the combined opinions of all reviewers. Use page numbers in lieu of lengthy passages of text when examples are too lengthy to include, but specific to the statement.

Avoid comparing one application’s content, process, or budget to other assigned applications. Each application should be reviewed independently and be assessed and analyzed based on the facts presented within the application.

MAKE SURE THAT THE APPLICATION SCORE REFLECTS THE REVIEW COMMENTS

Think in terms of a rating scale when scoring proposals, such as high, above average, average, below average, or low; or a grading scale such as A, B, C, D, or F. Once you have broadly defined the rating, select a more specific numeric score that best reflects the evaluation.

Be sure that the consensus review scoresheets are complete regarding any absence of information in the application.

OTHER TECHNICAL ITEMS TO CONSIDER

Use basic formatting when writing your comments, avoiding any bold or underlining or using numbers and/or bullets.

APPENDIX B – EXAMPLE SUMMARY OF CONSENSUS COMMENTS

EXAMPLES OF INADEQUATE COMMENTS

STRENGTH

Reviewer Comment	Problem
The budget as presented is reasonable.	This statement doesn't explain why the budget is reasonable. There should be support language justifying this finding.

WEAKNESS

Reviewer Comment	Problem
The applicant fails to present numbers of its beneficiaries with whom it reaches with its project. It fails to present short-term and long-term impacts to the beneficiaries.	Use "the application" or "the applicant organization" instead of "the applicant." Avoid using words such as "fails to present," in case the point is indeed addressed somewhere in the application. Change to "does not adequately present."

EXAMPLE OF ADEQUATE COMMENTS

STRENGTH

Reviewer Comment
The application presents compelling background data for deriving the initial and final sales dollar amount and a plausible evaluation plan for collecting the sales data by the end of the grant.
The applicant organization provides a targeted customer count increase and percent change performance indicator and a clear summary of anticipated challenges that are predicted to contribute to and restrict progress toward the indicator, including action steps for addressing identified restricting factors.
The applicant organization thoroughly describes the extent of the short-term and long-term impacts of the partnership's proposed promotion and training program to the project beneficiaries.
The work plan details the activities necessary to facilitate implementation to the regional producers in a fully integrated statewide network.
The applicant organization clearly describes the objectives to increase access to local foods and outreach strategies to inform the target population of available services.

The applicant organization documents collaboration and coordination with formal letters of commitment from partner organizations with whom have key roles in project implementation. It also outlines clear and realistic plans for assessing the need and feasibility of a county-wide food hub.

WEAKNESS

Reviewer Comment
The application provides documented baseline information on how the initial sales dollars were derived but does not adequately present background information for how the initial customer count number was derived.
The application does not clearly describe the expertise of project partners (in particular, the training coordinators) regarding conducting an evaluation of the technical assistance being offered to seafood producers in the defined region.
The work plan did not present a clear scope of work and it was difficult to tell how the activities, specifically relating to the purchase of equipment, related to the project objectives.
The timeline in the work plan included many activities and was too ambitious. For example, at the start of the project, training was conducted with farmers to sell produce at the market and develop business plans and by the end of the one-year project, equipment was being purchased to assist farmers in establishing a business to process the produce.
The application does not provide enough information to demonstrate how the budget is appropriate given the number of beneficiaries to be served.
The application does not describe a plan to disseminate results or communicate to stakeholders.

APPENDIX C – REVIEWING THE APPLICATION BUDGET

While reviewers are evaluating the proposals based on the project evaluation criteria mentioned in section 6.2 of the RFA, they are strongly encouraged to evaluate the requested budget to determine whether it is **realistic** for the proposed project by using their experience and judgment. This includes assessing direct costs such as proposed labor costs and hours, supplies and equipment, travel, and other programmatic details. While reviewers' budget recommendations are advisory, this advice is encouraged and taken into consideration in making award selections. Be as concrete and definitive as possible.

AMS EXPECTATIONS WHEN REVIEWING THE BUDGET OF AN APPLICATION

Review the *entire* application, including the budget and justification. Advice regarding budgets should be the result of panel consensus.

AMS does not expect reviewers to be accountants. We ask that you review the budget in order to make a reasonable judgment about whether proposed budgets are reasonable and necessary for performing the proposed projects.

Any feedback to the applicant should be precise. Expressions of vague discomfort that stop short of a quantitative recommendation are not enough. For example, "This budget is too high for the proposed project." The applicant needs to know what the reviewer thought was "too high" in order to correctly act on the comment.

ITEMS TO CONSIDER WHEN REVIEWING AN APPLICATION'S BUDGET

CONSISTENCY, NECESSITY AND REASONABILITY

- Is the total proposed budget consistent with the objectives and scope of the project?
- Can the applicant organization realistically accomplish the project objectives with the amount of funds being requested?

INDIVIDUAL LINE ITEMS

- Do they logically link to the activities in the proposed project?
- Are they necessary or reasonable to support the project?

EXTRANEOUS ITEMS OR ACTIVITIES

- Are there items that do not appear necessary or reasonable in support of the proposed project?
- Do any individual line items appear inflated or under-funded compared to the overall scope or individual tasks proposed?
- Are there any line items that do not logically link to activities outlined in the project narrative?

INDIRECT COSTS AND PROGRAM INCOME

Reviewers do not need to comment on these sections of the Budget narrative unless the Team feels it is necessary to bring something to the attention of AMS. In that case, the Panel Chair may include comment(s) in the final consensus report.

BUDGET TERMS AND DEFINITIONS

Budget Term	Definition
<i>Allocable cost</i>	A cost whose relative benefits make it assignable to one or more of the cost objectives
<i>Allowable cost</i>	A cost that is reasonable, allocable, within accepted standards, or otherwise conforms to generally acceptable accounting principles, specific limitations or exclusions, or agreed-to terms. HRSA's Division of Grants Management Office (DGMO) makes these determinations.
<i>Direct cost</i>	Any cost that can be identified specifically with a particular final cost objective.
<i>Indirect cost</i>	Any cost that is not directly identified with a single, final cost objective, but identified with two or more final cost objectives or an intermediate cost objective.
<i>Indirect cost rate</i>	The percentage or dollar factor that expresses the ratio of indirect expense incurred in a given period to direct labor cost, manufacturing cost, or another appropriate base for the same period.
<i>Unallowable cost</i>	Any cost that, under the provisions of any pertinent law, regulation, or contract, cannot be included in prices, cost-reimbursements, or settlements under a government contract to which it is allocable.

APPENDIX D – ALLOWABLE AND UNALLOWABLE COSTS

Listed here are some of the more common activities and costs submitted on previous RFSP applications. AMS does not expect reviewers to comment on whether a cost is allowable or not, just whether the cost is necessary and reasonable to accomplish the project.

AMS will conduct an administrative review of each panel's high-ranking applications to determine if costs are allowable or not. The Panel Chair may inform AMS if their team identifies costs that are potentially unallowable.

Cost	Description
Production Costs and Activities	Projects that focus on starting or increasing production of a food item(s) or farm and gardening activities are ineligible. These include but are not limited to soil, seeds, gardening tools, greenhouses and hoop houses, and other related costs.
Construction Projects and/or Activities	Grant funds cannot be used to pay for construction projects or related activities. This includes rehabilitation of a building or structure or construction-related materials, which may include, but are not limited to the purchase of building materials, such as wood, nails, concrete, asphalt, roofing gravel, sand, paint, insulation, drywall, or plumbing.
Contributions or Donations	Grant funds may not be used to purchase food or services to donate to other entities and/or individuals.
Purchase of Vehicles	Grant funds may not be used to purchase a vehicle (including refrigerated trucks or vans). However, an applicant may use grant funds to rent or lease such a vehicle.
General Purpose Equipment	<p>Grant funds may not be used to purchase general purpose equipment. However, an applicant may use grant funds to rent or lease general purpose equipment. General purpose equipment refers to equipment that is not limited to technical activities, such as office equipment or furnishings, modular offices, telephone networks, most information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and general motor vehicles such as trucks, vans, and cars.</p> <p>Note: some IT equipment such as laptops or cell phones are considered "Supplies" and may be eligible.</p>
Special Purpose Equipment	Grant funds may be used to purchase special purpose equipment. Special purpose equipment is equipment used only for research or technical activities directly related to the project's objectives.
Participant Support Costs	Grant funds may be used for such items as stipends or subsistence allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with approved conferences, training projects, surveys, and focus groups.
Meals	<p>Unallowable for business meals when individuals go to lunch or dine together although no need exists for continuity of a meeting. Such activity is considered an entertainment cost.</p> <p>Allowable for lunch or dinner meals if the costs are reasonable, and a justification is provided that such activity maintains the continuity of the meeting and to do otherwise will impose arduous conditions on the meeting participants.</p>

