

Massachusetts Emergency Management Agency
Match Policy

2016

I Policy

All sub-recipients of MEMA grants requiring match must identify the manner in which match will be met and the expected funding source(s) at the time of application in accordance with guidance provided below. Subrecipients may include as match only costs that:

- are allowable under the grant program.
- are in compliance with all Federal requirements and regulations (i.e., 2 CFR Part 200).
- are reasonable, allowable, allocable, and necessary in the accomplishment of the project or program objectives.
- are recorded and accounted for in the same manner as those for the grant funds.
- except as provided by Federal statute, are not met by costs borne by another Federal grant.
- are identified by specific funding source in the grant application.
- can be verifiable (i.e., tracked and documented).
- are counted as match for any federal grant only once.

MEMA's match policy has been developed in accordance with the federal regulations governing match (2 CFR 200.306). Match is only a sub-recipient requirement for certain federal grant programs (e.g., EMPG).

All MEMA grants are issued on a reimbursement basis. As such, costs must be incurred by the sub-recipient prior to a request to MEMA for grant funding payment. Based on the definitions and guidance below, MEMA will reimburse according to the match requirements of the particular grant program. Reimbursement requests that do not document match, or that demonstrate that match was used in violation of this policy, will not be processed. Match expenditures must follow this Match Policy and the Reimbursement Policy.

II Definitions

Cash Match: Subrecipient non-Federal funding spent for program-related costs, according to the applicable grant program guidance. Allowable cash match must only include those costs which would be allowable with Federal funds in compliance with the program regulations.

Types of Cash Match include:

Cost Share: The sub-recipient expends and accounts for approved project costs from non-federal funds sources per the required match percentage

Matching Funds: The sub-recipient expends and accounts for other subrecipient costs not directly related to the project that are allowable under a grant in amounts equal to the approved match percentages. Not all MEMA programs allow the use of Matching Funds.

In-kind Match: Non-cash contributions made by the sub-recipient or a third party in support of project-related activities, according to the program guidance. Allowable in-kind match must only include those costs which are allowable with Federal funds in compliance with the program regulations.

Types of In-kind Match include:

Sub-recipient In-kind: The sub-recipient makes non-cash contributions to the project or program that come from sub-recipient resources provided at no cost, including but not limited to labor and equipment.

Third-party In-kind: The sub-recipient accepts non-cash contributions to the project or program from an entity other than the grant sub-recipient

III Regulations

2 CFR 200 , *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*

815 CMR 2.00, *State Grants, Federal Grant Awards, Federal Subgrants and Subsidies*

Program Guidance and/or Program Regulations

IV MEMA Requirements

Application: When submitting an application to MEMA under a grant program that requires a match, the application must contain the following information for MEMA review under this match policy prior to awarding of grant funds:

- a) Match amount: match amount required by program
- b) Type of match: Cash or In-kind
- c) Non-federal match source: sub-recipient match may not be met using federal funds
- d) Match availability: statement that this match is available during the period of performance.
- e) Match Accounting: brief description of how the match will be tracked and accounted for by the sub-recipient

Documentation: Sub-recipient match must be documented in the same manner as non-match funds. For additional information, please see the MEMA Reimbursement Policy. If Third-party In-kind match is used, the following documentation is required:

- Record of donor;
- Dates of donation;
- Rates for staffing and the method used for determining and applying rates;
- Costs for equipment or usage, supplies, etc.;
- Amounts of donation; and
- Deposit slips for cash contributions.

V Frequent Sub-recipient Match Scenarios

The following examples of match are provided for guidance purposes and are not exhaustive.

1. Cash Match (Cost Share): A sub-recipient pays the full cost for the purchase of equipment, for a contractor's work, or for consultant services approved under a grant using sub-recipient's own funding source. When a reimbursement request is submitted to MEMA, a portion of the full cost will be reimbursed based on the match percentage.

For example: an EMPG sub-recipient has a finalized grant contract for a \$3,000 EMPG award. The sub-recipient procures a generator for \$6,000 and submits a reimbursement request for \$3,000 along with back-up match documentation that it used \$3,000 – in non-federal funds – to supplement this purchase.

2. Cash Match (Matching Funds): The sub-recipient sets aside its own, non-federal funding for allowable purposes under the grant program. Work or purchases under an approved grant is undertaken. The sub-recipient seeks reimbursement from MEMA for the work done under the grant. Sub-recipient, non-federal funds expended for other allowable purposes are submitted and accounted for as Matching funds.

For example, under the EMPG program, the salary of an EMD may be used to provide the match to approved grant funding for a program or project. Because the funding for the salary comes from the Sub-recipient, it is Matching Funds to the funding coming from MEMA grants.

Most MEMA grants do not allow the use of Matching Funds. Check with your program contact at MEMA if considering this method for Mitigation or Public Assistance grants.

3. In-kind Match (Sub-recipient): The sub-recipient provides land, materials, or other resources to a project that are already owned by the sub-recipient or provides labor from its existing unpaid volunteers (EMDs, Commission members, etc.). The value of these resources can be used as In-kind Match with proper documentation of the determination of value.

For example, if a community uses volunteer EMDs, firefighters, or others in support of an approved grant, their time may be used to meet match requirements for some grants. For example, a planning team is made up of all unpaid volunteers for the development of the plan. Their hours spent on the development of the plan can be documented as match.

The rate assigned to each volunteer must be consistent with similar rates set by the subrecipient for similar activities. If there are no applicable corresponding rates, a rate that is consistent with those paid for similar activities in the local region/labor market must be used. One resource on estimating the value of volunteer time is the Independent Sector Coalition: <http://independentsector.org>. See MEMA's Reimbursement Policy.

4. In-kind Match (Third-party Resources): When a third-party, such as a neighboring municipality or a local business provides its employees in support of a project, but does not charge the project for their time. If the work done by the employees was the same as their regular work, their normal salary rate would be used as the match value. If the work done by the employees was different from their regular work, then the match value of their time would be a rate that is consistent with those paid for similar activities in the local region/labor market. One resource on estimating the value of volunteer time is the Independent Sector Coalition: <http://independentsector.org>.

For example, a regional planning committee is holding a meeting and municipal staff from member communities attends and participate in the meeting. The value of the paid staff at their regular pay will be used as match.