Massachusetts Emergency Management Agency
Match Policy

September 2015

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. Subrecipients may include as match only costs that are necessary and reasonable for accomplishment of the project or emergency management program objectives, must expend match within the approved federal grant period, and are required to account for and verify match expenditures in the same manner as grant-funded expenditures. 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). 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: includes subrecipient non-Federal funding spent for project-related costs, according to the program guidance. Allowable cash match must only include those costs which are allowable with Federal funds in compliance with the program regulations.

Soft Match: includes, but is not limited to, volunteer time, donated goods, or the valuation of "in-kind" services. In-kind is the value of something received or provided that does not have a purchase cost associated with it. For example, the value of donated services could be used to comply with the match requirement.

III Regulations

2 CFR Part 200.306: *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*

IV Basic Guidelines

a) For costs to be eligible to meet matching requirements, the costs must first be allowable under the grant program.

b) The costs must also be in compliance with all Federal requirements and regulations (i.e., 2 CFR Part 200).

c) The costs must be reasonable, allowable, allocable, and necessary in the accomplishment of the project or emergency management program objectives.

d) Records for all expenditures relating to cost sharing or matching must be kept in the same manner as those for the grant funds.

e) The following documentation is required for third-party cash and in-kind contributions:
   - Record of donor;
   - Dates of donation;
   - Rates for staffing, equipment or usage, supplies, etc.;
   - Amounts of donation; and
   - Deposit slips for cash contributions.

f) Except as provided by Federal statute, a cost sharing or matching requirement may not be met by costs borne by another Federal grant.

g) The source of the match funds must be identified in the grant application.

h) Every item must be verifiable (i.e., tracked and documented).

i) Any claimed cost share expense can only be counted once.

V MEMA Requirements

Application: When submitting an application to MEMA under a grant program that requires a match, the application must contain the following:

a) match amount: match amount must equal grant-funded amount
b) type of match: Cash or Soft
c) specific match source: sub-recipient match may not be met using federal funds
d) match availability: statement that this match is available during the project period.
e) documentation: brief description of how the match will be tracked and documented by the sub-recipient
f) if salary is to be used as a cash match, the sub-recipient would need to provide:
    - confirmation that federal funds are not used towards this salary (but if so what percentage);
    - whether the entire salary amount would be used as a match or a percentage; and
    - whether the salary is used as a match for any other grant program.

Reimbursement: To ensure accurate accounting of match, MEMA recommends and prefers that sub-recipients provide all match documentation at the time of reimbursement request. In no case shall match be expended after the approved federal grant period.

VI Examples of Frequent Match and Documentation

Match back-up documentation is similar to back-up documentation required for reimbursement requests as we require 'proof of costs' (cash match) and/or 'proof of item/service' (soft match). The following examples of match are provided for guidance purposes and are not exhaustive.

Cash (Hard) Match: **as an example**, if the Local EMD receives a salary from the community this may be used to provide the match. **For match back-up documentation**, the community would provide similar documentation as it would for reimbursement for municipal salary expenses. See MEMA's Reimbursement Policy and below:

- copy of final, approved payroll warrant;
- brief explanation of tasks completed;
- signed employee time sheets that indicates related work done (this may be 'coded' or stated on the time sheet);
- hourly rate and total paid to each individual;
- individual's full name; and
- number of hours worked during the period (if paid hourly).

Cost-Share: this is a type of cash match. **As an example**: a community procures a generator for $3,000, using $1,500 from its federal grant award from MEMA, and $1,500 from its municipal budget. **For match back-up documentation**, the community would provide similar documentation as it would for reimbursement for an equipment expense (see MEMA's Reimbursement Policy and below:

- Vendor invoice;
- Copy of cancelled check from City/Town to vendor, OR final, approved warrant, OR copy of invoice (purchase orders are not accepted) that is marked paid and signed by the City/Town Fiscal Office as paid.

Soft Match: **as an example**, Volunteer time (including volunteer EMDs, firefighters, community members, etc.) and/or related training may be used to meet the match.. **For match back-up documentation**, the community would provide similar documentation as it would for reimbursement for municipal salary expenses (less payroll documents and in lieu of time sheets, sign-in sheets should be submitted). 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 and below:

- brief explanation of tasks completed;
- sign-in sheets that indicates related work done (this may be 'coded' or stated on the time sheet);
- hourly rate and total "paid" to each individual;
- documentation of how hourly rate was determined;
- individual's full name; and
- number of hours worked during the period.