

# MEETING FEDERAL MATCH REQUIREMENTS

## FREQUENTLY ASKED QUESTIONS

How will you meet the federal match requirements in this unprecedented time where volunteers can't report to volunteering sites and victims can't always be offered services face-to-face? A panel of experts with the Office for Victims of Crime (OVC) Human Trafficking Capacity Building Center hosted a discussion on April 9, 2020 to address this and other related questions and offer real-time suggestions.

Participants asked the following questions during the webinar discussion, and the information below is offered as example material to help you think through options for meeting match for your federal award. Always check with your federal grant manager to ensure your specific plans work with the program through which you receive your grant funding. In general, changes in how your organization proposes to meet its match requirement must be reviewed and approved through a Grant Adjustment Notice (GAN).

### **Where can I find more information on the match requirement?**

Official government regulation and guidance on the federal match requirement is available in the [2 CFR § 200.306 on cost sharing or matching](#); the [Electronic Code of Federal Regulations](#); and the [Department of Justice Grants Financial Guide](#). The match requirements vary depending on the grant program solicitation. Please review the grant program solicitation under which your organization was funded and contact your grant manager for questions on your specific grant.

### **Can funding from the CARES Act be counted toward a federal match?**

Yes. Funding from the CARES Act—which stands for Coronavirus Aid, Relief, and Economic Security Act—can be counted as a match contribution. There are many aspects of this bill that might support your organization including loan programs, reimbursements, and tax credits. Please view [this link](#) to learn more about eligibility.

**Are there any circumstances in which OVC can entertain a waiver of the match for a human trafficking grant?**

No. By statute, all OVC human trafficking grants funded under the [Victims of Trafficking and Violence Protection Act of 2000](#) require a 25 percent match. Because it is a law, OVC has NO authority to issue a waiver. Please note: the match requirement may be different for other non-OVC human trafficking federal grants. Please contact your grant manager with questions on specific grant requirements.

**How long do we have to meet match, and does that include a grant extension?**

You have until the end of your grant period, including the time during which an extension has been applied, to meet your match requirement. All match contributions must have taken place during the project period. A donation received before the grant began cannot be used as a cash match for a current project.

**Do organizations need to document or do anything differently for remote volunteers to meet the match requirement?**

Remote volunteers do not require special documentation for in-kind match. The important thing to remember is to maintain records of all in-kind donations, such as volunteer hours, remote or on-site. Document *what* the volunteers are doing, *when* they do it, and what that work would *cost* in your area if you paid them.

**What are some innovative ways in which organizations are utilizing volunteers remotely?**

Organizations are using volunteers in many capacities including—

- Conducting research or resource review;
- Conducting virtual client sessions;
- Contributing content for social media/website;
- Creating wish lists to meet client or business needs;
- Delivering a webinar or virtual training
- Developing policies and procedures;
- Developing or updating a volunteer handbook;

- Drafting program collateral;
- Performing data cleaning and analysis; and
- Setting up a file organization system.

Reach out to local universities or students as they may have people available to assist remotely during this time. Please note: a volunteer's time may not be counted as match for more than one grant at a time.

**Does providing facility space and administrative support by volunteers count towards an in-kind match? Would I need to submit a revised budget?**

Yes. In-kind match derives from the monetary value of non-cash contributions that support project work. This is typically in the form of personnel, goods, and services, including donated facility space and administrative support by volunteers. If you are altering the means in which you will meet your match requirement, please work with your grant manager to determine if you need to submit a revised budget. Accurate records of the matching must be kept and reported during the period of the award.

**Any tips for reaching out to new partners?**

Draft a plan of organizations, specific contacts at those organizations, services, items, or opportunities you are requesting, and the benefits your organization brings to the partnership. Having a plan can make it easier to reach out and ask. Think of expanding your organizational partnerships to include agencies such as universities; nonprofits; other tribal, state, or local governmental departments; or community stakeholders. These organizations may create opportunities for donations, volunteers, research, fundraising, and more.

**Can you utilize state funding for a federal grant match?**

Yes. Organizations can utilize city, county, state, or tribal funding for a federal grant match, as long as those funds are not subgrants of federally funds awarded to a state or tribe to administer through a subgrant program. See question and answer below.

**Can you utilize state pass through funding (state funding that has originated from the federal government) for federal grant match?**

No. Federal funds cannot be used as a match under OVC human trafficking funding, even if they come to your organization as a grant from the state.

**Can we utilize multiple different types of match funding? If we change the type of match our organization is using, do we need to submit a Grant Adjustment Notice? In other words, if I only have salaries in my approved OVC budget can I only use in-kind salaries as my match?**

Yes. You may utilize various types of cash and/or in-kind match to meet your organization's requirement. However, match must be included in the OVC-approved budget and must be compliant with other federal rules on how to determine contribution value. If you are altering the means by which you will meet your match requirement, please work with your grant manager to determine if you need to submit a Grant Adjustment Notice (GAN).

**How do you determine the value of volunteer time?**

Volunteers contributing their professional expertise count toward an in-kind match contribution. Determine the value of volunteer time by using the rates consistent with those ordinarily paid by other employees for similar work in the same labor market. You can seek wage rate information at [www.bls.gov](http://www.bls.gov) or by consulting other non-profits in your region. Further, consultants and other individuals may provide their services to a program at a reduced rate. The difference between this reduced rate and the amount normally charged by the individual may be used as in-kind match. A volunteer trainer whose industry pay— if employed—would be \$25 an hour, and the person devotes 100 hours a year, then the estimated value of the volunteer labor is \$2,500.00. If the training takes place in donated office or large meeting space, the market value of renting that space may also be counted.

**Can board members be considered volunteers for in-kind match?**

Yes. If board members are volunteers, their wages may be included as an in-kind match, as long as their contribution are allocable to the specific grant-funded project. Rates for volunteer services shall be consistent with those paid for similar work performed. You can seek wage rate information at [www.bls.gov](http://www.bls.gov) or by consulting other non-profits in your region.

**Can law-enforcement time be used for volunteer match?**

It depends on the program. It is important to review the scope and program-specific information for the grant program under which the match is to be applied. Law enforcement time might be an allowable use for in-kind match, if the time is used to engage in an activity that is otherwise allowable under the specific program, and can be allocated specifically to the grant program.

**If employees of our organization (who are not funded through the grant) volunteer for grant funded activities, can they be included as volunteer match?**

The value of donated employee time can be used only in specific circumstances and only when the employee's time is given freely. Donated employee time can be used as in-kind only if the employee is not being compensated through salary, overtime or compensatory time, and if the service and time donated are not in the scope of the employee's paid employment. The salary and fringe benefit associated with an employee who is not covered under the federal grant, but who does work a portion of their time on grant activities does count towards match as an in-kind agency contribution.

*Additional Information*

Contact the Office for Victims of Crime, Human Trafficking Capacity Building Center at [contact@ovc-htcbc.org](mailto:contact@ovc-htcbc.org) or 1-844-682-0411.