

## A Discussion of Match and Leveraged Resources

**Match** is defined in the Uniform Administrative Requirements applicable to ETA grant programs at 29 CFR 97.24 and 29 CFR 95.23. Match is defined as *additional non-Federal resources expended to further the grant objectives, if required either by statute or within the grant agreement as a condition of funding*. All matching funds must be spent on allowable grant activities and in accordance with the cost principles. The grantee cannot claim a cost as both an allowable cost (to be reimbursed from grant revenue) and as a match expenditure.

There are two types of match expenditures: cash and in-kind contributions. *Cash* match reflects additional funds or services (allowable costs) provided and paid for by the grantee and/or any subrecipient from non-Federal funds that are in support of grant objectives and outcomes. *Cash* match includes unreimbursed allowable indirect costs. The value of the cash match is the actual costs incurred as reflected in the grantee's accounting system. *In-kind contributions* are the products, space or services provided by a third party organization, and not paid for by the grantee or a subrecipient, but which would represent allowable costs if paid for with grant funds. Again, these contributions must support allowable grant activity and outcomes. The rules that apply to determining the value of such services are found in the regulations at 29 CFR 97.24(b)(7) and 95.23(c-h). Examples of in-kind contributions would be personal services provided by volunteers or paid non-grantee staff, equipment and supplies, or space provided by another organization at no cost to the grant.

In order to qualify as match, the costs cannot have been paid from Federal funds, been charged to program income or used to match other Federal match requirements, nor have been for costs that are unallowable under grant regulations. Records must be maintained that support the cash match costs within the grantee or subrecipient accounting system and be available for audit and review. For third party contributions, the support for the value, including the methods used to determine the value, must be verifiable from the records of the contributing organization or be maintained by the grantee.

For ETA programs, match may be required by statute (as in the former Welfare to Work program) or as a condition of funding (reflected in the grant agreement). If match is required, it will be reflected on the SF-424A Budget and must be reported on line 10.k. of the ETA-9130 Quarterly Financial Report.

**Leveraged Resources** are not defined in regulation or any related administrative requirements. However, most Federal agencies use the term "leveraged resources," and for ETA programs, the term has been defined to mean *all resources used by the grantee to support grant activity and outcomes, whether or not those resources meet the standards required for match*. So for ETA programs, leveraged resources means both allowable match and other costs that do not rise to the requirements of the match regulations, but which support the outcomes of grant activity. All leveraged resources must be expended on costs that are allowable under the Circulars and used to further grant activity and outcomes. The costs of leveraged resources may be paid for with either Federal or non-Federal funds. Examples of costs that would be considered as leveraged resources are the costs of services provided to grant participants that are funded by another Federal program such as the WIA formula grant program, and the purchase or construction of a structure that will house grant activity which is paid for by the organization using non-Federal resources.

ETA requires that all leveraged resources be reported in the quarterly program narrative report. In addition, some leveraged resources are to be reported on the ETA-9130 Quarterly Financial Report. Include on line 10.k. of the report all costs of the grant recipient and/or subrecipients as well as all third party in-kind contributions that would qualify as match but are in excess of the match requirement which could be zero (\$0.00) dollars. Include on line 11.a. of the report all allowable costs for goods and services provided to grant participants or in support of the grant program which are paid for by the grant recipient and/or subrecipients using other Federal grant funds. Do not include on line 11.a. the allowable costs for goods and services provided to grant participants or in support of the grant program which are paid for by grant partner organizations which are not also subrecipients under the grant.

Also note that all costs that could count as match incurred in support of the grant program still represent the recipient share of the grant costs and must be reported on the quarterly ETA-9130 even when there is no match or leveraged resources requirement.

## Leveraged Resources

### Non-Match

- Reported on the Performance Report
- Portion reported on the ETA 9130

#### Examples:

Other federal program costs  
Match above requirements

### Allowable Match

- Reported on the ETA 9130 as recipient share
- Reported on the Performance Report as well
- Examples:

Unclaimed Indirect Costs  
Donated Space Costs  
Grantee & subgrantee

