Match and Leverage Policy

Policy Number: F-2012, Rev. 1

Release Date: January 19, 2023

Supersedes: Match and Leverage Policy # F-1012, effective June 30, 2016

PURPOSE

This policy communicates WorkForce Central’s requirements for reporting match and leverage costs utilized to accomplish federally funded project or program objectives.

This policy is revised to:
- Add the methodology for determining cost sharing or matching for third party-donated equipment, buildings and land for which title passes to WorkForce Central.
- Update the signature line to the WorkForce Central CEO.
- Other non-substantial formatting for clarity purposes.

BACKGROUND


POLICY

WorkForce Central’s federal grant match and leverage costs must be:

- Verifiable from WorkForce Central’s records.
- Not included as contributions for any other federal awards.
- Necessary and reasonable for accomplishment of the project or program objectives.
- Allowable under 2 CFR 200 Subpart E – Cost Principles.
- Not paid by the federal government under another federal award, except where the federal statute authorizing a program specifically provides that federal funds made available for such program can be applied to matching or cost sharing requirements of another federal program.
- Are provided for in the approved budget when required by the federal awarding agency.
- Conform to other provisions, as applicable.

WorkForce Central will engage available resources as leverage for federal projects or programs. Leveraged resources must be expended on allowable costs and used to further grant activity and outcomes.

Reporting Requirements

WorkForce Central will:
• Record matching, cost sharing contributions (cash and in-kind), and leveraged resources in its records.
• Include matching, cost sharing, and leveraged resources in ESD quarterly reports.

Value of Contributions

• Unrecovered indirect costs, including indirect costs on sharing or matching may be included as part of cost sharing or matching only with prior approval of the federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the federal award and the amount which could have been to the federal award under WorkForce Central’s approved negotiated indirect cost rate.
• Values for contributions of services and property must be established in accordance with 2 CFR 200 Subpart E – Cost Principles.
• Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by WorkForce Central or those paid for similar work in the labor market. Paid fringe benefits that are reasonable, necessary, allocable and otherwise allowable may be included in the valuation.
• When a third-party organization furnishes the services of an employee, these services must be valued at the employee’s regular rate of pay plus an amount of fringe benefits that is reasonable, necessary, allocable, and otherwise allowable, and indirect costs at either the third-party organization’s approved federally-negotiated indirect cost rate, or a rate in accordance with 200.414(d) provided these services employ the same skill(s) for which the employee is normally paid.
• Donated property from a third party may include such items as equipment, office supplies, laboratory supplies, or workshop and classroom supplies. Valuation of such donated properties must not exceed the fair market value of the property at the time of donation.
• The method used for determining cost sharing or matching for third party-donated equipment, buildings and land for which title passes to WorkForce Central may differ according to the purpose of the Federal award, if one of the following applies:
  o If the purpose of the Federal award is to assist WorkForce Central in the acquisition of equipment, buildings or land, the aggregate value of the donated property may be claimed as cost sharing or matching.
  o If the purpose of the Federal award is to support activities that require the use of equipment, buildings or land, normally only depreciation charges for equipment and buildings may be made. However, the fair market value of equipment or other capital assets and fair rental charges for land may be allowed, provided that the Federal awarding agency has approved the charges. See also § 200.420.
• The value of donated property must be determined in accordance with the usual accounting policies of WorkForce Central with the following qualifications:
  o The value of donated land and buildings must not exceed its fair market value at the time of donation as established by an independent appraiser and certified by authorized WorkForce Central staff.
  o The value of donated equipment must not exceed the fair market value of equipment of the same age and condition at the time of donation.
  o The value of donated space must not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.
  o The value of loaned equipment must not exceed its fair rental value.
• For third-party in-kind contributions, the fair market value of goods and services must be documented and to the extend feasible supported by the same methods used by WorkForce Central.
REFERENCES

- 2 CFR 200.306 – Cost Sharing or Matching
- 29 CFR 97.24
- 29 CFR 95.23

REVISION APPROVED

Katie Condit (Jan 20, 2023 09:37 PST)                      Jan 20, 2023
Katie Condit, WorkForce Central CEO                  Date

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