

GLOW Workforce Development Board (WDB) Policy

Under the Workforce Innovation and Opportunity Act (WIOA)

Name of Policy: GLOW WDB Match and Leverage Resources

Approval Date: ~~3/16/21~~, 3/17/26

Effective Date: ~~3/16/21~~ 3/18/26

Background:

Definition section per: 2 CFR 200.1

Cost sharing means the portion of project costs not paid by Federal funds or contributions (unless authorized by Federal statute). This term includes matching, which refers to required levels of cost share that must be provided. See § 200.306.

Third-party in-kind contributions means the value of non-cash contributions (meaning, property or services) that: (1) Benefit a project or program funded by a Federal award; and (2) Are contributed by non-Federal third parties, without charge, to a recipient or subrecipient under a Federal award.

Voluntary committed cost sharing means cost sharing specifically pledged voluntarily in the proposal's budget on the part of the recipient or subrecipient, which becomes a binding requirement of the Federal award. See § 200.306.

Match - direct financial contribution (cash contribution), or direct in-kind contribution in the form of donated goods or services, the source of which is a non-federal source, can be valued and verified in the contributors records, can be verified to have been an exclusive contribution to the grant it has been designated to match, and for which the contribution is allowable (necessary and reasonable) to fulfill the purpose of the grant.

Leveraged resource - parallel resource that enhances the scope, reach or effectiveness of the grant, which is not a condition of the grant but through its independent and parallel existence, increases the opportunity for the grant to realize successful outcomes. Recognition of a resource as leverage requires the associated cost of the leveraged resource to be an allowable cost under the Uniform Guidance cost principles for federal awards, but is not required to be an allowable cost to the federal award it is identified as providing a leveraging benefit to. When assessing the cost-benefit of a grant funded investment, the benefit provided by leveraged resources must also be considered to the extent the leveraged resources enhance successful grant outcomes. An example of a leverage resource is a partner agency operating a complementary program to support individuals with barriers to employment and training, which provides additional support to customers in WIOA Title I training. Braiding of these resources ensures each funding source retains its identity when funding expenses, ensuring that only necessary and reasonable costs to support the individual are funded under each respective program, however, because the funding sources are working together, the benefit realized by the individual being served increases the opportunity for the individual to be successful in the grant funded program.

Braided funding - multiple independent funding streams coming together to fund a single, unified or complementary outcome. These funding streams or "braid strands" never lose their identity and

grantees report to both participating agencies (funding sources) regarding how specific funds are spent. The component expense for the funded service (or services) is clearly traced back to one singular funding source.

Policy and Procedures:

Voluntary committed cost sharing (VCCS) is not expected. It cannot be used as a factor during the merit review of applications or proposals but may be considered if it is both in accordance with GLOW WDB regulations and specified in a notice of funding opportunity. Criteria for considering voluntary committed cost sharing and any other program policy factors that may be used to determine who may receive an award must be explicitly described in the notice of funding opportunity. See also §§ [200.414](#), [200.203](#), and Appendix I to Part [200](#). Any shared costs or matching funds and all contributions such as third-party in-kind contributions, must be accepted as part of the contractor's cost sharing or matching when such contributions meet all of the following criteria:

- (1) Are verifiable from the contractor's records;
- (2) Are not included as contributions for any other federal award;
- (3) Are necessary and reasonable for accomplishment of project or program objectives;
- (4) Are allowable as described below;
- (5) Are 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 other federal programs;
- (6) Are provided for in the approved budget when required by the GLOW WDB; and
- (7) Conform to other provisions, as applicable.

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 the contractor. In those instances, in which the required skills are not found in the contractor's organization, rates must be consistent with those paid for similar work in the labor market in which the contractor competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.

When the contractor 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, provided these services employ the same skill(s) for which the employee is normally paid.

For third-party in-kind contributions, the fair market value of goods and services must be documented, and to the extent feasible, supported by the same methods used internally by the non-federal entity.