



What are the match requirements in the CoC Program?

Date Published: July 2014

ShareThis



Match is actual cash or in-kind resources contributed to the grant. All costs paid for with matching funds must be for activities that are eligible under the CoC Program, even if the recipient is not receiving CoC Program grant funds for that activity. All grant funds must be matched with an amount no less than 25% of the awarded grant amount (excluding the amount awarded to the leasing budget line item) with cash or in-kind resources. Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources.

According to section 578.73 of the **CoC Program Interim Rule** (<https://www.onecpd.info/resource/2033/hearth-coc-program-interim-rule/>), in CoCs where there is more than one recipient, the recipient must provide match on a grant-by-grant basis. In CoCs in which there is a UFA or a sole recipient for the Continuum, matching funds may be provided by the recipient on a Continuum-wide basis.

Examples A and B are calculations of match with and without a leasing budget line item.

EXAMPLE A

Total amount requested from HUD (without leasing)

- Rental Assistance funding = \$95,000
- Project Administration funding = \$5,000
- Total amount requested = \$100,000

Total amount requested from HUD x .25 = Minimum Match Requirement

- \$100,000 x .25 = \$25,000

EXAMPLE B

Total amount requested from HUD (with leasing)

- Leasing funding = \$40,000

- Supportive Services funding = \$55,000
- Project Administration funding = \$5,000
- Total amount requested = \$100,000

Total amount requested from HUD, excluding amount requested for leasing

- \$100,000 (Total Amount Requested) - \$40,000 (Leasing Funding) = \$60,000

Total amount requested from HUD x .25 = Minimum Match Requirement

- \$60,000 x .25 = \$15,000

()

Tags: CoC Program Requirements - Match

Links in This FAQ

CoC Program Interim Rule (<https://www.onecpd.info/resource/2033/hearth-coc-program-interim-rule/>)

FAQ ID:

1552

CoC FAQ



What is cash match?

Date Published: July 2014

ShareThis



Cash match is actual cash contributed to a CoC Program grant provided that the cash contribution is spent on eligible CoC Program costs outlined in Subpart D of the interim rule (see Section 578.73(b) for more information) in accordance with the requirements of the **CoC Program Interim Rule** (<https://www.onecpd.info/resource/2033/hearth-coc-program-interim-rule/>).

For more information on the documentation requirements for cash match in the CoC Program, review the CoC 2.0 podcast titled *The Importance of Documenting Match Under the CoC Program* (<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>).

()

Tags:

CoC

Program Requirements - Match

Links in This FAQ

CoC Program Interim Rule (<https://www.onecpd.info/resource/2033/hearth-coc-program-interim-rule/>)

The Importance of Documenting Match Under the CoC Program
(<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>)

FAQ ID:

1555



What is in-kind match?

Date Published: July 2014

ShareThis



In-kind match is the value of any real property, equipment, goods, or services contributed to a CoC Program grant that would have been eligible costs under the CoC Program if the recipient/subrecipient was required to pay for such costs with CoC Program grant funds.

For more information on the documentation requirements for in-kind match in the CoC Program, review the CoC 2.0 podcast titled *The Importance of Documenting Match Under the CoC Program* (<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>).

()

Tags:

CoC

Program Requirements - Match

Links in This FAQ

The Importance of Documenting Match Under the CoC Program

(<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>)

FAQ ID:

1554

CoC FAQ



What are allowable sources of cash match in the CoC Program?

Date Published: July 2014

[ShareThis](#)



Recipients/subrecipients may use funds from any source, including any other federal sources (excluding Continuum of Care Program funds), as well as state, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match. The recipient must ensure that any funds used to satisfy the cash match requirements are not prohibited from being used as a match under the laws governing those funds.

In general, program participant mainstream benefits are not considered match in the CoC Program because the benefits are not committed to the recipient/subrecipient for the activities funded through the project. Instead, benefits are provided to the program participant and are based on program participant eligibility for that program.

()

Tags:

CoC

Program Requirements - Match

FAQ ID:

1557

CoC FAQ



What are allowable sources of in-kind match in the CoC Program?

Date Published: July 2014

ShareThis



Allowable in-kind match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources and may include the value of any real property, equipment, goods, or services contributed to the project. The recipient must ensure that any funds used to satisfy the in-kind matching requirements are eligible under the laws governing the services in order to be used as match for a grant awarded under the CoC Program.

In general, program participant mainstream benefits are not considered match in the CoC Program because the benefits are not committed to the recipient/subrecipient for the activities funded through the project. Instead, benefits are provided to the program participant and are based on program participant eligibility for that program.

()

Tags: CoC Program Requirements - Match

FAQ ID:
1558

CoC FAQ



What are the documentation requirements for cash match?

Date Published: July 2014

ShareThis



When the source is cash, written documentation should be provided on the source agency's letterhead, signed and dated by an authorized representative, and, at a minimum, should include the following:

1. Amount of cash to be provided to the recipient for the project;
2. Specific date the cash will be made available;
3. The actual grant and fiscal year to which the cash match will be contributed;
4. Time period during which funding will be available; and
5. Allowable activities to be funded by the cash match.

Recipients/subrecipients must provide HUD with match documentation prior to grant agreement execution. For more information on the documentation requirements for match in the CoC Program, review the CoC 2.0 podcast titled *The Importance of Documenting Match Under the CoC Program* (<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>).

()

Tags:

CoC

Program Requirements - Match



What are the documentation requirements for in-kind goods and equipment?

Date Published: July 2014

ShareThis



When the source of match is in-kind goods and/or equipment, written documentation must conform to the OMB Circular requirements in 24 CFR Parts 84 and 85 and the standards described below.

Written documentation of the donation of in-kind goods and/or equipment must be provided on the source agency's letterhead, signed and dated by an authorized representative of the source agency, and must, at a minimum, include the following:

1. Value of donated goods to be provided to the recipient for the project;
2. Specific date the goods will be made available;
3. The actual grant and fiscal year to which the match will be contributed;
4. Time period during which the donation will be available;
5. Allowable activities to be provided by the donation; and
6. Value of commitments of land, buildings, and equipment—the value of these items are one-time only and cannot be claimed by more than one project or by the same project in another year.

Documentation of match must be provided to HUD prior to grant agreement execution.

For more information on the documentation requirements for match in the CoC Program, review the CoC 2.0 podcast titled *The Importance of Documenting Match Under the CoC Program* (<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>).

()

Tags:

CoC

Program Requirements - Match



What are the documentation requirements for in-kind services as match?

Date Published: July 2014

[ShareThis](#)



Documentation of in-kind service match requires a different approach than documentation of in-kind goods and equipment. The recipient/subrecipient must enter into a formal memorandum of understanding (MOU) with the agency providing the in-kind service(s) and must establish a system to document the actual value of services provided during the term of the grant. A recipient or subrecipient may use a letter from the partner agency to document the commitment to provide the in-kind service in advance of executing a formal MOU, for instance, if the recipient/subrecipient opts to wait to execute an MOU upon receipt of notification of award from HUD. The MOU may be between a recipient or a subrecipient and another agency, but the terms must be described in the MOU.

If match is provided to multiple recipients by a third-party service provider, the CoC may consider documenting standardized rate information for all local recipients to use as part of in-kind service match documentation. Service providers may use these pre-set rates for their match calculations. For instance, match documentation resources could include preventive medical service fees or free medical services made available to a recipient's/subrecipient's program participants by an area health care provider, or the salary of a maintenance worker provided to the recipient for the property.

Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's/subrecipient's organization. If the recipient/subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market. Therefore, recipients/subrecipients must document standardized local rates for specific types of services as a basis for match commitments. Common in-kind services include outpatient mental health visits, medications, alcohol and substance abuse therapeutic sessions, and employment training/day programs.

Recipients/subrecipients should periodically check with providers of in-kind match, not only

to ensure that they are providing adequate documentation, but also to determine it:

1. Their fee structure and/or standardized pricing has changed; and/or
2. The type(s) of services provided to program participants has changed.

For more information on the documentation requirements for match in the CoC Program, review the CoC 2.0 podcast titled *The Importance of Documenting Match Under the CoC Program* (<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>).

()

Tags:

CoC

Program Requirements - Match

Links in This FAQ

The Importance of Documenting Match Under the CoC Program

(<https://www.onecpd.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>)

FAQ ID:

1561



What are the minimum requirements of a Memorandum of Understanding (MOU) in the CoC Program for match documentation?

Date Published: July 2014

[ShareThis](#)



A memorandum of understanding (MOU) is a written document that must establish unconditional commitment, upon selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided. At a minimum, a MOU must be executed between a recipient and/or subrecipient and a third party service provider and include the following information:

1. Agency Information:
 - Recipient's/subrecipient's identifying information with point(s) of contact
 - Service provider's identifying information with point(s) of contact
2. Unconditional Commitment of Third Party Provider to Provide the Service
3. Description of Services to Be Provided
4. Scope of Services to Be Provided and by Whom
 - Specific contract to be matched
 - Length of time services provided/term of contract
 - Point-in-time number of clients receiving service
 - Total clients receiving service over grant term
 - Qualification of persons providing service
 - Estimated value of services provided (such as hourly rate)
5. Documentation of Services Match
 - Documentation requirements and responsibilities of service provider and recipient
 - Timeliness standards of service provider and recipient for providing services to individuals

A copy of the MOU must be provided to HUD prior to grant agreement execution to document the required match for the grant.



Under which circumstances can Medicaid be used as match in CoC Program-funded projects?

Date Published: August 2017

ShareThis



A Project Applicant can use the value of services reimbursed through Medicaid as match if the Medicaid services are contributed to the project directly (e.g., if the project has one or more staff persons who provide services to program participants and those services are funded through Medicaid). In order to count the value of such services as match the applicant must be able to demonstrate that the services are being contributed directly to the project. This can be done through a Memorandum of Understanding (MOU) or contract in place with a partner organization that provides services reimbursed through Medicaid to program participants.

If the Medicaid services are not being contributed to the project, meaning they are being provided directly to program participants regardless of their participation in the CoC Program project, or there is not an MOU or contract in place, then these Medicaid services cannot be considered match for the project.

There are several resources that provide general information on the match requirements and how in-kind services should be handled. Please refer to the following:

- Section 578.73(c)(1) of the CoC Program interim rule - "The recipient or subrecipient

may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under 578.71.”

- The Importance of Documenting Match Under the CoC Program Podcast (<https://www.hudexchange.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>). The podcast is available on the HUD Exchange in both audio or as a transcript.
- The FAQs on match, which can be found on the CoC FAQs page (<https://www.hudexchange.info/coc/faqs#?topic=Program%20Requirements&id=974BD5A2-AD49-AF68-7C417BAF64CAB483&subtopic=Match>) on the HUD Exchange by selecting Match from the dropdown menu under Program Requirements.

()

Tags:

CoC

Program Requirements - Match

Links in This FAQ

Importance of Documenting Match Under the CoC Program Podcast
(<https://www.hudexchange.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>)

CoC FAQs page (<https://www.hudexchange.info/coc/faqs#?topic=Program%20Requirements&id=974BD5A2-AD49-AF68-7C417BAF64CAB483&subtopic=Match>)

FAQ ID:

1612

CoC FAQ



Are mainstream benefits that are paid directly to program participants considered match in the CoC Program?

Date Published: July 2014

[ShareThis](#)



HUD does not consider mainstream benefits provided directly to program participants match in the CoC Program because the benefits are not committed to the recipient/subrecipient for the activities funded through the project. Generally, such benefits are provided to the program participant and are based on program participant eligibility for that respective program. However, if funds from mainstream resources (e.g., TANF or Medicaid) are provided directly to an organization for use in a CoC Program project, then the mainstream resources may be counted as match so long as the other funding source does not prohibit their funds from being used as match for the CoC Program.

()

Tags:

CoC

Program Requirements - Match

FAQ ID:
1563