COMMONWEALTH CORPORATION

WCTF Guidance on Allowable Match Sources and Federal Funds Restrictions

This document helps grantees meet the 30% non-state match requirement under the Workforce Competitiveness Trust Fund (WCTF). It provides clear guidance on allowable match sources, restrictions related to the use of federal funds, and documentation expectations.

The intent is to ensure:

- **Consistency** across all WCTF programs
- **Compliance** with state and federal requirements
- **Transparency** in how match contributions are documented, valued, and reported

This guidance aligns with:

- **Massachusetts General Law (M.G.L.) Chapter 29, §2WWW**, which establishes WCTF requirements; and
- **Federal Uniform Guidance (2 CFR §200.306)** regarding cost sharing or matching contributions.

Core Match Requirement

All WCTF grantees must provide a minimum 30% non-state match, which may consist of cash and/or in-kind contributions from eligible sources.

Match Contributions Must Be:

- Necessary and reasonable to support the WCTF-funded project
- Allocable to WCTF participants and activities
- Verifiable through appropriate documentation or valuation
- Not funded by the Commonwealth of Massachusetts or any other state appropriations

Federal Funds Restriction

In accordance with **2 CFR §200.306(b)(5)** and WCTF policy:

- Federal funds may not be used as match for WCTF unless the federal program's authorizing statute or grant terms explicitly allow such use
- Most federal programs cannot be used as match (e.g., WIOA, Perkins, SNAP E&T, TANF, VR&E).
- Federal pass-through funds (e.g., ARPA or EDA funds administered by a municipality) may qualify only if they have been legally reclassified as local funds and are free of federal restrictions.
- Any proposed federal match must include written verification from the awarding or pass-through entity confirming its eligibility.

Acceptable and Unacceptable Match Sources

Category	Examples	Allowable?	Documentation Required
Employer Contributions	Wages paid to incumbent workers during training; supervisory time; donated equipment or facilities	**Yes**	Payroll records or signed attestation; fair market value (FMV) documentation
Educational Partners	Waived tuition; donated instructor time; use of lab or classroom space	**Yes**	MOUs, timesheets, or valuation documentation
Community Partners	Case management or outreach staff time; donated space or materials	**Yes**	Signed MOU and log of hours or valuation
Municipal / Philanthropic Funds	ARPA funds reclassified as local; foundation grants; employer-sponsored foundations	**Conditional**	Proof that funds are **non-state** and **non-federal** at point of award
Private Donations or Services	Cash gifts, volunteer time, donated goods	**Yes**	Receipts or FMV documentation
Federal Formula Funds	WIOA, Perkins, SNAP E&T, TANF, VR&E	**No**	Federal regulations prohibit use as match
Other Federal Competitive Grants	DOL H-1B, EDA, SBA, DoD	**Case-by-case**	Written authorization from federal awarding agency required
State-Funded Programs	CTI, YouthWorks, MassCEC, other state appropriations	**No**	State statute prohibits use of state funds as match

Valuation and Recordkeeping Standards

To ensure consistency and audit readiness, all match contributions must be:

- Valued at fair market rate, using benchmarks such as:
  - Current rental or service rates
  - Independent Sector volunteer rate
  - Bureau of Labor Statistics (BLS) occupational wage data
- Documented with:
  - Payroll or accounting records
  - Signed MOUs or attestation letters
  - Invoices or receipts for donated materials
- Tracked in a dedicated match ledger parallel to program fiscal reports
- Incurred during the WCTF grant period

“Outside-the-Box” Match Opportunities

Match can come from creative sources, as long as it meets the requirements above. Examples include:

- Employer-provided mentoring or supervision during training

- Donated tools, scrubs, or consumables used in instruction
- Volunteer mock interview panels or advisory board service
- Reduced or waived tuition from college partners
- Donated community space for training or recruitment events
- Employer-paid industry credentials, certification exams, or licensing fees
- Community-provided childcare or transportation support

Tips for Planning and Tracking Match

1. **Plan Early**
   Identify match sources while developing your proposal, and update them throughout implementation.
2. **Confirm Eligibility**
   Make sure each match source is non-state and non-federal, or has written authorization for use as match.
3. **Keep Records as You Go**
   Maintain a match tracking ledger that aligns with your quarterly fiscal reporting, with documentation of valuation, timing, and allocation to the WCTF project.
4. **Get Decisions in Writing**
   If a match source requires interpretation, check with CommCorp before counting it, and keep the written confirmation with your grant records.

Summary Guidance for Grantees

- All WCTF match must be non-state, non-federal, and directly tied to workforce training outcomes.
- Federal funds can only count as match if the funding agency explicitly authorizes it in writing.
- When uncertain, grantees should prioritize employer, municipal, or private contributions as primary match sources.
- Match documentation must be verifiable, auditable, and aligned with program fiscal reporting.