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OFFICE OF INSPECTOR GENERAL

# ANTI-FRAUD ADVISORY

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## WHAT IS MATCH?

Match funding serves a crucial role in addressing both national and local challenges. Through this mechanism, federal investments are leveraged to increase the resources contributed by states, localities, businesses, and philanthropic organizations. Match funding also represents a tangible commitment from the community to engage in and support local programs. It is a vital means through which communities actively participate in the essential work undertaken by these projects, reinforcing the collaborative spirit essential for meaningful progress.

## DID YOU KNOW?

To be claimed as match, costs must meet all the same criteria for eligible expenses as Federal expenses detailed in the Uniform Guidance. This includes:

- Reasonableness
- Allowability
- Allocability
- Documentation

## WHAT DOES MATCH FUNDING HAVE TO DO WITH FRAUD?

-  Intentionally or recklessly indicating incorrect sources or amounts of match funds on your grant application is fraud.
-  Falsifying sources or amounts of match funds in your financial reports (FFRs) is fraud.
-  Creating false documentation to support inaccurate values of in-kind contributions and match is fraud.
-  Mischaracterizing match costs where the use of those funds is not an allowable grant expense is fraud.

Over the course of 4 years, AmeriCorps OIG reported over \$1 million in questioned costs related to match and in-kind contributions. These findings can result in cost disallowance, reduction in federal funds awarded, and other consequences for grantees.

# Different kinds of match? Different kinds of documentation.

## CASH

For cash received as match, grantees must use the same level of documentation as they use for Federal funds received, including how the funds were spent.

## IN-KIND (NON-CASH)

In-kind is referred to as goods, services, or transactions not involving cash, which must be documented based on type. For example donated office space requires different documentation than donated training supplies.

How do you avoid match fraud? Document your match and report it accurately.

The recommendations below can also help your program avoid common documentation pitfalls.

### DO'S...

- ✓ Notify AmeriCorps as soon as you become aware that you may not be able to meet your match requirements.
- ✓ Record your match expenses separately from your Federal expenses in your accounting systems' general ledger.
- ✓ Make sure agreements with third parties are documented.

### DON'TS...

- ✗ Claim in-kind match contributions where the value is not properly supported/documented.
- ✗ Claim match expenses based on the budget (rather than actuals).
- ✗ Claim other Federal sources as match.\*
- ✗ Rely on only the completion of a form without attaching underlying support documents.

*\*Certain exceptions may apply.*

## MORE ON SALARY AND WAGE MATCH

**Question:** If part or all of my salary is being included in my grant as match, how do I record that on my timesheet?

**Answer:** Depending on your accounting system, you may need to record salary funded by match separately, or you may include it as a line on your regular timesheet. This is something to discuss with your organization's financial point of contact.

## POP QUIZ: IS IT DOCUMENTED?



Look at the examples below and decide if you think the documentation is sufficient or insufficient.

Note: the examples should not be considered complete and comprehensive.

Answers are included at the bottom of this page.

1

A donation form without details of the fair market value of the item.

2

Receipts for training supplies donated paired with attendance logs of who attended the event.

3

An annual estimate of staff hours spent on a grant.

4

Official request for the space including size or square footage and time period of usage and independent appraisal.

5

Donated supplies used by the organization but not necessary to achieve the grant's objectives.

6

Receipts for donated recognition award items without a log tracking who received the awards.

2 and 4 are examples of possibly sufficient in-kind or match documentation.

Pop Quiz Answers:



## WHAT CAN BE MATCH?

This may include office, program, or classroom space necessary to achieve the outcomes of the grant.

### SPACE



### SERVICES, SUPERVISION, & LABOR

This may include use of third party volunteer services, direct supervision, or labor not otherwise available within the organization necessary to achieve the outcomes of the grant.

When salaries and wages are used as match they can include grantee staff time used on activities necessary to the grant but that is paid by the grantee or by funding sources other than the AmeriCorps grant.

### SALARIES & WAGES



### SUPPLIES

Supplies received as match may include items donated to the grantee that are necessary to achieve the grant outcomes.

Training as a match contribution may include content delivered to grant staff, members, or volunteers that is necessary to achieve the grant outcomes.

### TRAINING



## RELATED REGULATIONS

- [2 CFR Section 200.306](#): Cost sharing or matching
- [2 CFR Section 200.403](#): Factors affecting allowability of costs
- [2 CFR 200 Appendix XI](#): OMB Compliance Supplement

## CASE STUDIES

### OIG INVESTIGATES AMERICORPS PROGRAM THAT CLAIMED STAFF SALARIES AND OTHER ITEMS AS MATCH

An AmeriCorps OIG audit and investigation determined that a state service commission submitted false claims to AmeriCorps related to salaries, baseball tickets, and state fair tickets that the commission reported as match on Federal Financial Reports (FFRs).

The commission intended to distribute donated tickets from a local baseball team to AmeriCorps participants to promote volunteerism in the state. The commission reported the value of the distributed tickets as in-kind contributions on its FFRs. However, the commission was found to have distributed them to a range of unallowable recipients or failed to maintain documentation of the distribution. The commission also reported the salaries of multiple employees as match, but failed to maintain time and effort records supporting the amount of the employees' time that was allocable to the AmeriCorps grant.

The commission ultimately entered into a civil settlement and paid over \$600,000 to resolve the match-related allegations as well as an allegation that its internal accounting records did not support figures reported on its FFRs.

### AMERICORPS GRANTEE MAY HAVE FEDERAL SHARE REDUCED AFTER OIG PERFORMANCE AUDIT

The performance audit of AmeriCorps grants awarded to an AmeriCorps grantee and three of its 16 subgrantees identified approximately \$1.7 million of questioned Federal and match costs covering three consecutive calendar years. The questioned costs included amounts claimed by the grantee and subgrantees with inadequate documentation for personnel expenses, inadequate support for in-kind match, inadequate accounting records, inadequate criminal history checks, and insufficient internal controls that resulted in under or excess reporting of costs.

For in-kind match, the grantee claimed \$277,950 match expenditures on its FFR for the first two program years of the grant. These match costs included security, utilities, and maintenance costs for their office space, and volunteer donated services. The grantee was unable to support that the in-kind match costs claimed were allowable, reasonable, and allocable costs for their grant. Since the grant has a regulatory requirement of providing match costs relative to the Federal costs incurred, this lack of documentation and support put them at risk of not meeting the match requirement for the Federal costs claimed for that same period. These findings may also put the grantee at risk of having the unmatched Federal share of their AmeriCorps grant reduced.

### Additional Match Cases:

- [Evaluation of AmeriCorps' grants awarded to State Commission and Subgrantees](#)
- [Audit of AmeriCorps' grants awarded to Commission including \\$625,446 in questioned costs](#)

# CAN YOU MATCH THE MATCH?

Draw a line from each type of match funding to the documents necessary to document it.



Space



Services,  
Supervision,  
& Labor



Salary  
& Wages



Supplies



Training

**A.** Presentation or agenda

**B.** Certified timesheets with time allocation

**C.** Documentation to support usage (days, time, etc.) of meeting room

**D.** Receipts or invoices including date and recipient

**E.** Justification for pay rate

**F.** Agreement with service rate calculation

**G.** Justification of cost/rate relative to the industry

**H.** Attendance/time logs with volunteer assignment

**I.** Attendance log or completion certificate

**J.** Fair market/rental valuation

**K.** System generated records of pay rate plus benefits

**L.** Independent appraisal of classroom fair market value

Additional examples of fair value documentation for real estate/space include:

- Professional appraisal certification with comparable and contemporaneous data
- Fair/market/rental value assessment, such as the rental fee schedule
- Letter of acknowledgement from the donor to include size or square footage and time period of usage. All space regardless of usage must be appraised or provide the fair rental value

## WANT TO LEARN MORE?

For additional resources on this topic including LITMOS training courses, sample statements, and links to guidance documents, and to access the electronic version of this document use the QR code below:



## KEEP IN TOUCH

Check out the library of Anti-Fraud Advisories on our website.

Report suspected instances of fraud, waste, and abuse to the Office of Inspector General's hotline by using this QR code:



Did you know whistleblowers are protected under federal law? To find out more about your rights as a whistleblower, [click here](#).

Match Answers:  
Space: C, J, L Services, Supervision, & Labor: B, F, G, H Salary & Wages: B, E, K Supplies: D Training: A, I