

# 2021 WSFR National Virtual Federal Aid Coordinators Meeting

## Questions and Answers (Q&A)

**Topic/Speaker:** WSFR Accountability Initiative Part 1 - In-Kind Match: Scott Knight, Financial Assistance Support & Oversight Division Manager

**1. Amber Burns: Can you give an example of unrecovered allocable indirect costs?**

Unrecovered allocable indirect costs means the difference between the amount of indirect costs charged to the Federal grant and the amount which could have been charged to the Federal grant under the non-Federal entity's approved negotiated indirect cost rate. The difference between what was charged vs what could have been charged may be used as match. Please see 2 CFR 200.306(c).

**2. Lori Polasek: Thanks Ryan - would you mind showing the list of types of 3rd party match. The ones with the check marks (prior to the stop sign)**

Please feel free to download the PowerPoint presentation to review the information presented on the slides.

**3. Gordon Batcheller: Beyond in-kind match issues: Does WSFR have regularly scheduled training events to educate state agency personnel (e.g., project leaders) to ensure that diversions or loss of control are not occurring? That is, training to ensure that everyone understands the fundamental legal requirements of WSFR, etc.**

Yes. The WSFR Systems & Training Branch teaches a suite of classes to include Project Leaders, Basic Grants Management, Advanced Grants Management, and Land Grants Management classes. We also offer an online Project Leaders course and several online virtual learning series videos. You can review our training options by visiting the WSFR Training Portal site (<https://wsfrtraining.fws.gov/>).

**4. Rose Stefani: Can third-party in-kind STAFF match count as pre-award match to plan a project (as opposed to third-party in-kind VOLUNTEER match that must occur during the POP)?**

Recipient staff time charged to an award can be match, but it is not considered third-party in-kind match. It is allowable as pre-award costs if approved by the Federal awarding agency.

**5. Walter Lane: Can volunteer mileage AND time both be used as match or is it an either/or?**

Yes, both may be used.

**6. Kate Pipkin: Can we accept electronic signatures?**

Yes. 2 CFR 200.306(j) says that, "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." If your agency allows the use of electronic signatures, then this is allowable. Again, we encourage State FW agencies have policies and procedures in place that speak to how your agency will handle and accept volunteer time documentation.

**7. Peggy Butcher: minimum data elements, is this required if not claiming for in kind match?**

If you are not applying third-party in-kind match (to include volunteer time) to your WSFR grants, then there is no requirement to document these minimum data elements.

**8. Linda Braithwaite: will we have access to each of the PowerPoints used in this conference?**

Yes, all presentations will be posted publicly after the meeting.

**9. Karen Dill: can you also send the volunteer sheet with the errors?**

The all the presentations from the national meeting will be posted publicly. You are free to download and use the information.

**10. James Guthrie: for supervisor signature, does the supervisor have to be on site for the full extent of volunteer labor to approve the time? or does agency acceptance mean that our local staff can agree that the number of volunteers and the time worked (based on the documentation such as time sheets) is accurate?**

2 CFR 200.306(j) says that 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. It is not required by regulation that the supervisor must be on site for the full extent of each third-party in-kind donation. However, it is highly advised to have in place a policy/procedure that documents your agencies internal control mechanisms to ensure that third-party in-kind services are true and accurate. For third-party in-kind (volunteer) hours used as donations, it is best to try and mirror your agencies time accounting process. Volunteer hours works must meet all the requirements of 2 CFR 200.306(b)(1-7) in order to be applied as match to a WSFR grant.

**11. Sara Dawes: I may have missed this earlier as I lost connection briefly but is there a mini training session for subrecipient requirements similar to the In-kind you plan to develop?**

Currently there is not a stand-alone training just focusing on subrecipient requirements. However, we do go over subawards vs contracts and the federal regulations governing subawards in the Advanced Grants Management (AGM) class. Please come join us at the AGM in the near future once we begin hosting in-person classes.