



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

OFFICE OF HEALTHY HOMES
AND LEAD HAZARD CONTROL

Policy Guidance Number: 2012-03	Date: October 19, 2012
Subject:	Eligibility of Units Counted as Match Contribution
Status:	Current
Applicability:	All Lead Hazard Control and Healthy Homes Production grantees
Related Guidance:	Program Notices of Funding Availability (NOFA), OMB Circulars
Comments:	

This policy guidance is being issued to clarify when a completed unit may be counted as “match” when using funds from sources other than OHHLHC grant funds (“nonfederal”).

In general, nonfederal match must:

- Directly benefit and be specifically identifiable to the project or program;
- Be verifiable from the grant recipient's records;
- Be allowable under cost principles defined in OMB Circulars (see OMB Circular A-87 (2 CFR 225) for cost principles for grants to state, tribal and local governments; OMB Circular A-21 (2 CFR 220) for cost principles for grants to institutions of higher education; or OMB Circular A-122 (2 CFR 230) for cost principles for grants to non-profit institutions); and
- NOT be paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost sharing or matching.

Therefore, the two key factors to consider are the source of the funds, and the use of those funds:

- Source - Matching resources must be from non-federal sources and may include any state or local government contributions, Community Development Block Grant funds (which are statutorily considered local funds), and private contributions. Federal sources, such as HUD’s HOME Investment Partnerships Program (HOME) funds and the U.S. Department of Energy’s Weatherization Assistance Program funds, are not allowed to satisfy matching requirements unless otherwise permitted by their governing statute or authorization.
- Use - Units that are completed using non-OHHLHC grant funds must be used only for allowable costs and meet all requirements of the respective program (i.e., income eligibility, occupancy, programmatic and technical requirements, hazard control activities, etc.).

If you are unsure about whether a completed unit may be counted as “match”, please contact your Government Technical Representative for clarification. It is recommended that grantees seek clarification prior to working on a unit in question.