



Cost Share Manual

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Introduction

GEAR UP Utah Goals and Objectives

GEAR UP is an acronym for Gaining Early Awareness and Readiness for Undergraduate Programs. It is a seven-year federal grant program that provides services and assistance for low-income students to help them successfully graduate from high school and prepare for college.

The goals and objectives for GEAR UP Utah are as follows:

- Increase academic performance and preparation for post-secondary education for GEAR UP students.
- Increase the rate of high school graduation and enrollment in post-secondary education for GEAR UP students.
- Increase GEAR UP students' and their families' knowledge of post-secondary education options, preparations, and financing.
- Increase GEAR UP students' success in their first year of attendance at an institution of higher education.

GEAR UP Utah Policies and Procedures

Policy:

It is the stated policy of GEAR UP Utah to operate at the highest levels of integrity in the documentation of cost share to meet the obligations of the grant. Furthermore, the program will comply with the Office of Management and Budget (OMB) OMB A-110, OMB A-21, and other applicable Department of Education guidance in the collection of cost share. The Department of Education guidance includes department sponsored workshops and other communications with the GEAR UP program the Utah Statewide GEAR UP program administration and fiscal manager will provide all documentation templates and policy for the proper documentation of actual or "in-kind" contributions. All contributions to the program will support the GEAR UP objectives and services approved in the grant. The terms cost share and match are used interchangeably.

The statewide director, school administrators, counselors, partner directors, higher education partners, and other designated staff and administrators are responsible for facilitating and collecting all evidence and signatures to document cost share as directed by the program fiscal administration within the scope of their responsibility. Partner Regions will also be responsible for assigning appropriate value to all in kind contributions and submitting signed match reports and supporting evidence to the program administration on an annual basis or as otherwise directed.

These reports will be submitted via CoBro Compass the GEAR UP Utah online data management and evaluation tool at <https://www.cobrocompass.com/Home/Home/?#!/Home>

***For Access to CoBro Compass, please contact the GEAR UP Utah Statewide Director responsible for Match.**

The guidelines for acceptable cost share for donated items are the same as you would follow for expenses, namely applicable cost principles outlined in EDGAR and OMB circulars [\[MS4\]](#) and

elaborated on in the GEAR UP . The general guidelines for matching donated items are as follows:

1. The donation would be allowable as an expense under OMB guidelines. General guidelines can be referenced on page 9 of OMB-21 and on page 18 of OMB-110.
2. Volunteer time is in direct support of gear up objectives and activities.
3. The donation would be necessary and reasonable for proper and efficient accomplishment of program objectives.
4. The donation was not paid for by federally provided funds.
5. The donation or volunteer time is verifiable from the recipient's records.
6. The donation is supplementing and not supplanting the school program.

Procedures:

7. Designated GEAR UP Utah employees and administration i.e. regional coordinators site directors higher education partners coordinators school administrators counselors etc. will ensure the input online and local physical collection and filing of all completed and signed effort turnaround reports (ETR1, ETR2, ETR3) or other cost share report forms such as donated supplies or equipment on a monthly basis as directed by GEAR UP Utah Administrative Office at Utah valley State College.
8. Counselors and Partner Directors will validate the accurate input of all online database input from records submitted by teachers, counselors, administrative and other volunteer personal cost share donations into their designated areas in CoBro as they are collected with deadlines for End of Year Match reporting to be completed no later than October 31 each year and Beginning of Year Match reporting to be completed no later than December 31 each year. Counselors, Partner Directors, and other staff with Match responsibilities are responsible for assigning value as appropriate to each type of contribution:
 - a. Teacher staff and administration wages and benefits will be documented from the respective business office of the college, school or district via the completion of an annual GEAR UP Utah Cost Share Budget forecast. GEAR UP Utah Counselors and Partner Directors are responsible for maintaining an updated roster of staff and schedule of wages and benefits as may be provided by local District Administration or Principals.
 - b. Outside volunteer wages and benefits will be established directly by the volunteer or indirectly with fair market value using the U.S. Department of Labor Bureau of Labor statistics www.bls.gov/oes/current/oes_nat.htm or compatible business institutional wage scales for similar positions.
 - c. The value of donated supplies, equipment or facilities will be established by the school and/or actual receipts or fair market value when applicable. For equipment donations, provide documentation such as catalog page, original receipt, or website pricing as a reference to value. All GEAR UP provided equipment placed in schools or other service locations should be inventoried and maintained by a referenced serial number.
 - d. Acceptance of cash donations will be authorized in advance by the GEAR UP Fiscal Administration in order to ensure proper documentation and appropriation of the funds according to Utah State Education Policy and Federal guidelines.

3. GEAR UP Utah Counselors and Partner Directors will submit all Year Begin/Year End Match forms via CoBro annually. Signed hard copies of all reports and submissions will be maintained locally at GEAR UP school forms were acquired from or in counselor/partner director office. Documentation will be audited via CoBro by GEAR UP Utah administration at counselors/partner directors are expected to contact the GEAR UP Utah fiscal manager prior to the deadline and agree to discuss the issue.
4. Cashier reports for major multidistrict priority student or parent events will follow the guidelines and processes detailed elsewhere in this section to document volunteer time and other donations. The GEAR UP Utah central administration office or regional directors coordinators will be responsible for processing cost share reports for these multi location events which occur in their service area. The site coordinator or counselor assigned to work with these students will be responsible for processing cost share reports for cohort schools or priority student schools for locally coordinated events
5. All physical match reports and supporting documentation will be archived at the school or service location. GEAR UP Utah requires all original signed reports to be uploaded to CoBro Compass. Match forms and other supporting cost share documentation uploaded to CoBro Compass, are considered by GEAR UP Utah, to have been validated for accuracy and truth by the counselor/partner director.
6. A standard set of approved cost share report, budget forecast and other required forms are available GEAR UP Utah Cost Share in a shared drive for ease of use in producing and saving written reports locally. These same reports will be saved digitally and archived in the CoBro Compass. The link to these forms can be found under the Match Collection section. For access to these forms please contact the GEAR UP Utah Statewide Assistant Director of Program Planning and Evaluation.
7. The counselors/directors, or designated cost share employee from each region will ensure that a copy of signed year beginning and year end match forms (ETR1, ETR2, ETR3, Large/Small In-Kind Donation, and Budget Forecast Form) are uploaded to CoBro Compass no later than October 31 for Year End and December 31st for Year Begin, each year.
8. Updates, improvements, changes/ revisions in the CoBro Compass the GEAR UP Utah online data management and evaluation tool at <https://www.cobrocompass.com/Home/Home/?#!/Home>

online cost share reporting system will be made from time to time. Users and participants can report problems to the GEAR UP Utah Statewide Assistant Director of Program Planning and Evaluation.

Match Defined

What is Match?

The term Match (cost share) refers to goods, services, or cash donated to the GEAR UP Utah program.

Think of match as what the school or community puts into the program that will help our schools meet the GEAR UP Utah goals and objectives. Schools partnering with GEAR UP Utah are required to contribute a specific match amount for every GEAR UP federal dollar they receive. This rule is set by The U.S. Department of Education (USDE).

There are different kinds of match, such as, contribution of goods, volunteer and in kind.

For Example:

- A classroom volunteer can contribute to match if their service is directly related to the GEAR UP Utah goals and objectives.
- Goods, such as t-shirts, are allowable if the program is being supported by GEAR UP Utah funds.
- Staying after contract hours can be counted as match if you are working with GEAR UP students, attending a GEAR UP activities/event, or meetings directly related to planning GEAR UP activities/events, like tutoring or a Free Application for Federal Student Aid (FAFSA) workshop with parents and students.

Why is Match Important?

As a federally funded program, match should be sustainable not just an isolated effort. Collecting match from teachers, school administrators, higher education partners, locally owned businesses, non-profit organizations, and other youth development organizations will help the students in your school pursue education and training to help them reach career and life goals. Through match, GEAR UP helps sustain a college going culture among GEAR UP students even after the grant ends.

Although the GEAR UP grant runs for seven years, match is counted over the whole grant period. Therefore, we must report on our progress towards match each year. Remember, match commitments are subject to audit that is why we watch each school's progress toward their individual match goals.

What Counts as Match?

Match can come from state, local, institutional, or private funds. You cannot count other federal dollars as match.

- Match must be allocable, allowable, consistent, compliant, and reasonable.
- If you are not allowed to buy something with GEAR UP federal funds, then the same purchase is not allowed as match.

Anything that could be paid for with GEAR UP funds and goes above and beyond what the school would offer without GEAR UP, can be used as match. The value of anything allowable, donated, counts as match, such as:

- Time and money spent on gear up activities.
- Money donated to purchase materials, supplies, or services for the GEAR UP program.
- Donated items like healthy snacks and classroom supplies.

Match Requirements

What are the Match Requirements for GEAR UP?

Dollar-for-dollar match: Section 404C(b) of the Higher Education Act requires that at least 50 percent of the total cost of a GEAR UP project to be paid with State, local, institutional, or

private funds (i.e., for each dollar of Federal funds received, at least one dollar of State or private funds must be contributed). Matching contributions can be in the form of cash or documented in-kind contributions.

Contributions that exceed the statutory minimum: Some GEAR UP grantees proposed in their applications matching contributions exceeding the statutory minimum. Under the GEAR UP regulations at 34 CFR 694.7(a)(2), a grantee is obligated to contribute the entire amount of match stated in its application, even if the amount exceeds the statutory requirement.

Timing of contributions: Grantees are required by the GEAR UP regulations at 34 CFR 694.7(a)(2) to comply with the matching percentage stated in their applications for each individual year of the grant. In other words, grantees must make their matching contributions in the year designated in their applications. Federal grants are subject to audit at any time during the grant period, and auditors may look at matching contributions before the end of the grant period. Accordingly, grantees cannot fail to make matching contributions in the early years of a grant and then “catch up” in the final year or two of the grant.

What are the consequences for failure to provide matching dollars as proposed in the application?

Consequences: Failure to provide the level of cost sharing reflected in the approved award budget may result in the reduction of the Federal award amount, a refund of Federal funds to the Department of Education, or possible termination of the award.

Audits: Cost sharing commitments are subject to audit, including audit by the Inspector General’s office.

What types of matching contributions count toward the GEAR UP matching requirement?

Types of matching: The following three types of matching are authorized specifically by Section 404C(c) of the Higher Education Act:

- Financial assistance: The amount of financial assistance paid to students from State, local, institutional, or private funds.
- Waivers: The amount of tuition, fees, room, or board waived or reduced for GEAR UP students;
- Early intervention activities: The amount expended on documented, targeted, long-term mentoring and counseling provided by volunteers or paid staff of non-school organizations, including businesses, religious organizations, community groups, postsecondary educational organizations, nonprofit and philanthropic organizations, and other organizations.

Applicable cost principles: Any items that would be allowable under the applicable cost principles if charged directly to the grant may be included as match for the grantee’s cost sharing requirement. Please review OMB circulars that apply to your type of organization.¹

Requirements from these circulars, such as requirements that costs be reasonable, allocable, and consistent, apply to matching as well as direct costs.

Indirect costs: A GEAR UP grantee may charge indirect costs of eight percent or the grantee's negotiated indirect cost rate (whichever is less) of allowable Federal direct costs and of allowable matching contributions. Indirect costs cannot be charged for scholarship components of grants. The grantee must have an approved indirect cost rate agreement in order to charge indirect cost to its project. However, unrecovered indirect costs cannot be counted as matching funds. For example, if a grantee has a negotiated indirect cost rate of 40 percent, the grantee may charge up to eight percent of the Federal direct costs and matching costs (excluding scholarship funds) to the grant as indirect costs.

Are there any limitations with respect to matching contributions?

Matching contributions can be counted only one time: A matching contribution may be counted as cost sharing towards only one Federal project. If a grantee has multiple Federal grants, the same contributions cannot be counted as cost sharing for two or more Federal grants (including multiple GEAR UP grants).

Matching contributions must be incurred solely to advance the GEAR UP project: If matching contributions benefit both a GEAR UP project and another project or entity, the matching contribution must be credited in the proportion that it benefits the GEAR UP project. For example, if a GEAR UP partner hires a tutor to work with GEAR UP students and students that are not in the GEAR UP program only the time that the tutor spends with GEAR UP students may be counted as match. Also, please note that if a GEAR UP project staff member divides his or her time between a GEAR UP project and another activity (including another GEAR UP project), time and effort reports must reflect the percentage of time devoted to the GEAR UP project.

Matching contributions cannot be shifted from one project to another: Grantees that have more than one Federal grant, including more than one GEAR UP grant, must document match separately for each grant. Matching contributions cannot be shifted from one project to another.

Matching contributions must be obligated during the grant period: Matching contributions must be obligated during the grant period. In the case of scholarship money that will not be awarded until after the grant period, matching contributions should be placed in a trust fund or otherwise set aside for the benefit of the GEAR UP Utah program during the grant period.

Are there any exceptions to the minimum statutory match?

Reduced matching: In a limited number of cases, some grantees may be eligible for an exemption from part of the statutory matching requirement. Partnerships that meet the eligibility requirements under the GEAR UP regulations at 34 CFR 694.7(b)(2) may request waivers in their applications for funding, and their budgets must reflect the reduced cost share levels. As with all grantees, GEAR UP grantees that are eligible for this waiver are held to the amount of match indicated in their applications.

Match Contributors

What are appropriate sources of matching contributions?

Sources of matching contributions: Matching contributions may be made from any non-Federal source, including non-Federal grants. (Under the Education Department General Administrative Regulations "EDGAR" 34 CFR 80.24, matching or cost sharing requirements may be satisfied

by (1) allowable costs incurred by the grantee and/or (2) the value of third party in-kind contributions.)

Changes in the source of matching contributions: If a grantee finds that one or more of the partners in its original grant application is not meeting commitments to the GEAR UP project, the grantee may find a new partner to provide additional resources. In such cases, the grantee's project officer should be notified.

Common Match Sources in GEAR UP- NCCEP

Considering Match? It's a Matter of What and How.

As you consider if a potential match source is viable or not, you must determine its allowability and how you will verify key facts about the match contribution. We suggest a two-step process:

Step One: Is it Legit?

- Matching funds behave like federal funds in that they must be allowable, necessary, reasonable, and allocable (see Uniform Guidance Part 200.302; 200.400 - 200.475).
- Can only come from a non-federal source, be counted once, and assigned to a single grant. Step Two: Is it Verifiable?
- Uniform Guidance specifies what the basic expectations are for documentation, valuation, and internal controls.
- Clearly document: *Who* provided the match, *what* was the contribution, *when* did the contribution take place, *where* was the contribution made, and *how* you arrived at the match value.

Further complicating the matter is the reality that the "supplement, not supplant" provisions of GEAR UP apply to both federal and matching funds, unless specified by legislation. Your documentation must provide support that matching funds are not supplanting existing efforts and are uniquely tied to advancing the goals of the GEAR UP program. Lastly, a frequently overlooked aspect of the match is that you are required to notify the U.S. Department of Education (ED) in writing about changes in partners/match sources, so alert ED when a partner from your application is no longer participating and/or submit a "Partner Identification Form and Cost Share Worksheet" when new partners and match sources come on board.

Common In-Kind Match Sources & Issues

Salaries, Wages, and Fringe Benefits

- As the principal source of in-kind match in GEAR UP, the contributions made by educators in partner/participating schools or institutions of higher education present valuation and documentation challenges.
- For match purposes, an educator's time and effort is valued at their regular hourly rate of pay plus fringe benefits.
- Documentation must capture actual hours contributed (not on a percentage basis) and what specific work/activities the individual contributed.
- To qualify, match must be accrued outside of the individual's regular duties (so have job descriptions on file for school-based staff), and preferably, out of their regular hours.
- ED generally disallows teachers as a source and generally, can only be approved after extensive engagement with ED.
- School and district leaders can also be problematic, given their expansive job duties.

Volunteer Time

For the purposes of volunteer time, we mean specifically individuals who are not directly employed by the education system. For these individuals, the value of a volunteer's contribution in time and effort depends in part, on the nature of their work. For example:

- If a web programmer volunteers their services to build a GEAR UP website, you can value their contribution based on their market rate.
- If a web programmer volunteers to serve as a student mentor, you would value their contribution based on the rate for similar work. ED has generally accepted several methods for valuing this type of volunteerism, but most common hourly valuations are based either on (1) your local rates for similar work; (2) or a national analysis

Rules for Documenting Match Contribution

Capture cost sharing by individual projects

Match funds counted toward other federal grant programs cannot also be counted in GEAR UP

- Best practice is to capture match on the front end—it should be part of the planning process

Provide adequate source documentation for all cost sharing claimed, and include:

Description of the item (or service) received—include manufacturer's serial number and model number of the product, if applicable

Name of the person or entity making donated contribution

- Date of donation received or service provided

Provide clear valuation of in-kind documentation

The costs and third party in-kind contributions must be verified from the records of the grantee and must show how the value of third- party contributions was derived. (EDGAR 34 CFR 80.24 (a)(6).

- See EDGAR, 34 CFR 74.23 and 80.24 for information on valuing volunteer services and donated supplies, equipment, buildings and land.

Provide support of cost sharing by grant partners

Provide appropriate tools and establish procedures to report match—document match as often and thoroughly as expenditures.

Are there any limitations with respect to matching contributions?

Matching contributions can be counted only one time: A matching contribution may be counted as cost sharing towards only one Federal project. If a grantee has multiple Federal grants, the same contributions cannot be counted as cost sharing for two or more Federal grants (including multiple GEAR UP grants).

Matching contributions must be incurred solely to advance the GEAR UP project: If matching contributions benefit both a GEAR UP project and another project or entity, the matching contribution must be credited in the proportion that it benefits the GEAR UP project. For example, if a GEAR UP partner hires a tutor to work with GEAR UP students and students that are not in the GEAR UP cohort, only the time that the tutor spends with GEAR UP students may be counted as match. Also, please note that if a GEAR UP project staff member divides his or her time between a GEAR UP project and another activity (including another GEAR UP project), time and effort reports must reflect the percentage of time devoted to the GEAR UP project.

Matching contributions cannot be shifted from one project to another: Grantees that have more than one Federal grant, including more than one GEAR UP grant, must document match separately for each grant. Matching contributions cannot be shifted from one project to another. Matching contributions must be obligated during the grant period: Matching contributions must be obligated during the grant period. In the case of scholarship money that will not be awarded until after the grant period, matching contributions should be placed in a trust fund or otherwise set aside for the benefit of the GEAR UP cohort during the grant period.

Match Collection

ETR Forms

Teachers- <https://uvu.box.com/s/7srvl8czfoeor0ovwdfvme3ubj6rz50v>

Admins- <https://uvu.box.com/s/tzqtqklrfrlv2m6xz8146zg81ohyk3m3>

Volunteers- <https://uvu.box.com/s/hwfgs01zceengw4qnn90d2h30eyunwy0>

Qualtrics Links to ETR Forms

GEAR UP Utah: Teacher Time & Effort Estimate (ETR1):

Anonymous Link: https://uvu.qualtrics.com/jfe/form/SV_1Mlt89M2K29jmiW

GEAR UP Utah: Administrative Time & Effort Estimate (ETR2):

Anonymous Link: https://uvu.qualtrics.com/jfe/form/SV_d50hOzeU9Uxk55I

Match Reporting

How should grantees document matching contributions?

To avoid potential audit findings, documentation of match should:

- Capture the cost sharing identified with a particular project.
- Contain adequate source documentation for claimed cost sharing.
- Provide clear valuation of in-kind documentation.
- Provide support of cost sharing by grant partners.

Fiscal agent: The fiscal agent of a GEAR UP project is responsible for documentation of all matching contributions for the entire grant – even matching provided by its partners. If a grantee is audited, documentation of the match should be housed with the fiscal agent. (See EDGAR, 34 CFR 75.730).

Valuation of in-kind contributions: Costs and third-party in-kind contributions counting toward a matching requirement must be verifiable from the records of the grantee and must show how the value of third-party contributions was derived. (See EDGAR 34 CFR 80.24(a)(6).) Note: Please

review applicable OMB circulars and EDGAR for details regarding how to value in-kind contributions. Requirements vary by type of organization, and by whether the donation came from the grantee or a third party. In most cases, grantees are required to value in-kind contributions of facilities and equipment using depreciation or use allowance rather than fair market value.

References