



## National Association OF State Head Injury Administrators

### **Federal TBI Act State Grant Program: Position Paper on State Match Requirements**

The National Association of State Head Injury Administrators (NASHA) strongly endorses the Traumatic Brain Injury (TBI) Act reauthorization legislation that eliminates state match requirements for grants administered by the US Department of Health and Human Services, Health Resources and Services Administration (HRSA), Maternal and Child Health's Federal Traumatic Brain Injury (TBI) Program. The 50% matching requirement makes it difficult for states to apply for grant funds due to their inability to meet the matching requirements.

The Federal TBI Program is the only federal program providing financial assistance to states to improve service delivery and access for individuals with traumatic brain injury and their families. Since 1997, HRSA has awarded time limited grants to those states which could meet the criteria for the grants, including state match. The TBI Act of 1996 required states to match federal dollars with non-federal funds in the amount that was not less than \$1 for each \$2 in federal funds provided under the grant. Recognizing the difficulties for states in being able to meet the match requirements, the 2000 amendments to the Act allowed states to use "in-kind" match, in lieu of state dollar match.

While the allowance of "in-kind" match has helped some states, other states still find that requirement difficult to meet. The "lead state agency" that is eligible to apply for the TBI grant may also administer an array of federal programs that require state match. Some states are finding that they are already committed to the maximum matching requirements for all grants combined and administered by the state agency.

Should the appropriation for the HRSA Federal TBI Program be increased in the future, as NASHA strongly supports, then the matching requirements will be increased accordingly. Thus, a \$200,000 grant will mean the state will need to be able to demonstrate a \$100,000 match, making it even more difficult for states to meet the requirement.

In reviewing other federal grant programs that the "lead agencies" for TBI are likely to be administering, NASHA finds that these programs have lesser state match requirements. These programs range from requiring no match to a maximum of 25 percent match (National Family Caregiver Support Program). These include:

- **Aging and Disability Resource Center Grant Initiative (AoA/CMS)** -- Grantees are required to make a non-financial or cash recipient contribution (match) of no less than five percent (5%) of the total grant award.
- **Child Care and Development Block Grant** – The block grants are available to states, territories, Indian Tribes and Tribal Organizations, and do not require any state match.
- **DD Act** --State Councils on Developmental Disabilities are funded through formula grants authorized under Subtitle B of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act). The federal share of projects supported under the state plan may not exceed 75 percent, except for projects whose activities or products target individuals with developmental

disabilities who live in urban or rural poverty areas, which may not exceed 90 percent of the aggregate necessary costs of such project activities, and in the case of projects or activities undertaken by the council or council staff to implement state plan priority, activities may be up to 100 percent of the aggregate necessary cost of such activities. No match is required for Protection and Advocacy allotments.

- **Older Americans Act (various programs)** -- The state/local match for the National Family Caregiver Support Program is 25%. A match of 15% is maintained for other Title III services, as is the 25% match requirement for state and local administrative activities.
- **Real Choice Systems Change Grants (CMS)** -- Grantees are required to make a non-financial contribution of five (5) percent of the total grant award (including all direct and indirect costs). Non-financial contributions may include the value of goods and/or services contributed by the grantee (e.g., salary and fringe benefits of staff devoting a percentage of their time to the grant not otherwise included in the budget or derived from federal funds).
- **Social Services Block Grant (formerly known as Title XX)** -- Funds are allocated to the 51 states as block grants and states are not required to match the funds they receive.
- **VR State Grants**-- Funds are distributed on the basis of a formula that takes into account population and per capita income. The basic funding mechanism for the program requires a state match of 21.3 percent.

In summary, in order to assist states in developing, increasing or improving state service delivery systems and access to services for individuals with traumatic brain injury and their families NASHIA recommends that the TBI Act Reauthorization reduce eliminate the requirement for state match. Eliminating the required state match will make it attractive for states to apply, rather than being a deterrent to improving brain injury services. . As the HRSA Federal TBI Program is the only federal program that specifically helps states to better serve individuals with traumatic brain injury and their families, NASHIA believes the legislation authorizing the program should be as flexible as possible.

1/13/06