

**St. Clair County, IL
CDBG-DR
Duplication of Benefits
Policies and Procedures**



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BACKGROUND

The St. Clair County Intergovernmental Grants Department (IGD) is in receipt of Community Development Block Grant Disaster Recovery ([CDBG-DR](#)) funds from the Department of Housing and Urban Development ([HUD](#)). IGD will use these funds to carry out activities to address the long-term recovery needs resulting from the flood in 2022 and 2024. These activities include projects and programs that may provide housing, infrastructure, economic development and planning resources to households, governments and businesses impacted by the disaster. These activities are carried out in partnership with other state/local agencies through the implementation of a number of CDBG-DR funded programs.

Sec. 312 of the [Stafford Act](#) (42 U.S.C. 5155) directs Federal agencies that provide disaster assistance to assure that people, businesses, or other entities do not receive financial assistance that duplicates any part of their disaster loss covered by insurance or another source (42 U.S.C. 5155(a)). HUD provides specific guidance for CDBG-DR funding through “Clarification of Duplication of Benefits Requirements” ([76 FR 71060](#)) under the Stafford Act for CDBG-DR Grantees. That guidance was further updated with “Updates to Duplication of Benefits Requirements Under the Stafford Act for CDBG-DR Grantees” ([84 FR 28836](#)). This policy and procedure document reinforces those requirements and establishes applicability and responsibility in the implementation of St. Clair County’s CDBG-DR grant.

Definition of Duplication of Benefits:

A [Duplication of Benefits](#) (DOB) occurs when a person, household, business, government, or other entity (such as a Subrecipient) receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. For purposes of DOB analysis, “applicant” includes individuals, households, businesses, and entities that apply for or use CDBG-DR assistance, including departments or agencies administering funds without submitting a formal application. *A simple example of a DOB would be where the City provides assistance to a household for repairs to a roof, but then the applicant also submits an insurance claim for the same costs.*

DOB occurs when federal financial assistance is provided to a person or entity through a program to address losses that the person or entity has received (or would receive, by acting reasonably to obtain available assistance – i.e. the assisted household had homeowners insurance at the time of a disaster, but failed act to submit a claim) financial assistance for the same costs from any other source (Including, but not limited to: Insurance, Federal Emergency Management Agency (FEMA), Small Business Administration (SBA)), and the total amount received exceeds the total need for those costs.

A DOB occurs when assistance from multiple sources = **Total Assistance > Need for that Type Assistance**

Total assistance includes assistance that is available if an applicant:

- 1) took the practical steps toward funding recovery as would disaster survivors faced with the same situation (i.e. submit insurance claims, apply to widely publicized programs like FEMA/PPP Loans); or
- 2) has received the assistance and has legal control over it.

Available assistance also includes reasonably anticipated assistance that has been awarded and accepted but has not yet been received.

Examples

A local government seeks CDBG-DR assistance to fund part of a recovery project that also has been awarded FEMA Hazard Mitigation Grant Program (HMGP) assistance. To ensure there is no DOB, the entire HMGP award must be included in the calculation of total assistance even if FEMA obligates the first award increment for the project while subsequent increments remain unfunded until certain project milestones are met

A nonprofit organization provided homeowners with funding for basement cleanup. The City then launches its own basement cleanup grant program. When conducting intake, the City must determine if applicants have already received funding from the nonprofit program to clean up their basements and ensure CDBG-DR funding doesn't duplicate those funds.

SCOPE OF IGD CDBG-DR POLICY

This policy is applicable to all State/federal/local Partner Agencies and organizations, Subgrantees and Subrecipients responsible for the implementation of programs and projects funded under St. Clair County's CDBG-DR grants.

Policy

All CDBG-DR funded programs and projects are required to ensure appropriate procedures are in place to prevent Duplication of Benefit (DOB). Subgrantees/Projects must ensure that DOB prevention is specifically addressed in their policies and procedures, and all agreements and/or contracts must pass that responsibility down to subrecipients. Additionally, subrecipients and partners must comply with all IGD policies and procedures related to CDBG-DR funding, including those outlined in this DOB Policy.

Subrecipients and Subgrantees providing direct benefits to beneficiaries must utilize procedures in accordance with HUD guidance as outlined below. As a HUD grantee, the County is required to develop, implement, and maintain written procedures, such as this DOB Policy, to prevent Duplication of Benefits. These policies must address (individually or collectively) each activity, project, or program. Policies and procedures must include, at a minimum:

- 1) a requirement that any person or entity receiving CDBG-DR assistance must agree to repay assistance that is determined by IGD or its program partners to be duplicative; and
- 2) a method of assessing whether the use of CDBG-DR funds will duplicate financial assistance that is already received or is likely to be received (i.e. insurance proceeds) by acting reasonably, evaluating need and the resources available to meet that need.

It is the IGD’s policy to uphold, enforce and document conformance with the DOB requirements which cover use of its CDBG-DR funds. All subrecipients and/ or program partners are bound by Section 312 of the Stafford Act, as amended by the [Disaster Recovery Reform Act of 2018 \(DRRA\)](#), and the OMB Cost Principles within [2 CFR Part 200](#) that requires all costs to be “necessary and reasonable” for the performance of the Federal award.

Applicants for CDBG-DR funded programs are required to undergo a DOB analysis to demonstrate that no other financial assistance has been received or is available to pay costs charged to a CDBG-DR grant. To comply with this requirement, the applicant and each person assisted, or entity assisted with these funds will demonstrate that no other funds are available for an activity by maintaining records of compliance with mandatory duplication of benefits requirements. Third party verification of assistance is required, and every attempt to obtain verifications should be undertaken.

Procedures for Direct Beneficiary Programs

Applicants must sign Duplication of Benefits Affidavit.

The procedures provided below are consistent with St. Clair County’s Certifications to HUD and [FR Vol 88 No. 96, May 18, 2023](#) and HUD’s Universal Notice ([Appendix C: Duplication of Benefits Calculation Framework](#)). In addition to the procedures below, all grant agreements must contain language indicating that any duplication of benefit received post-award will require repayment. Procedures are as follows:

1. Prior to assistance
 - a. Assess Applicant’s Total Need
 - i. Determine the specific purpose for the CDBG-DR request
 - ii. Total need will be determined by project type (e.g. homeowner rehabilitation cost estimate, infrastructure reconstruction cost estimate). The total need must be documented. In-kind donations of materials or services (e.g., donated labor, equipment, or supplies) that are known at the time of the DOB analysis will be considered in the total need calculation and may reduce the CDBG–DR award amount accordingly. These donations are not considered financial assistance but must be documented in the project file.
 - iii. All costs included in total need must be reasonable and necessary.
 - b. Identify Toal Assistance Received or Anticipated
 - i. For families and individuals as well as entities, the application for assistance will require documentation for all sources of funding received or reasonably anticipated, and certification that all assistance is reported.
 - Includes all sources of funding received or reasonably anticipated for the same purpose. Examples: FEMA, SBA, insurance, NFIP, other federal/state/local/private sources. *Private loans*—defined as loans not provided or guaranteed by a government entity and requiring full repayment under typical commercial terms—are not considered financial assistance and are excluded from DOB calculations. However,

subsidized loans, including forgivable loans, are considered financial assistance and must be included unless an exception applies.

- c. Exclude Non-Duplicative Amounts
 - i. Recording the information in the DOB Calculation Worksheet
 - Funds for a different purpose (e.g., unrelated disaster recovery needs). Must be documented and justified.
 - Funds for the same purpose but with a different allowable use (e.g., elevation vs. repair). Must be documented and justified.
 - d. Identify DOB Amount and Calculate CDBG-DR Award
 - i. Determine the amount of assistance that is duplicative of the CDBG-DR request.
 - ii. Deduct duplicative assistance from total need.
 - iii. Apply program cap, if applicable
 - iv. The resulting unmet need becomes the basis for calculating the maximum DR assistance award amount
 - e. Reassess Unmet Need When Necessary
 - i. If new information arises (e.g., additional funds received), reassess the unmet need and adjust the award accordingly.
 - f. Execute grant/loan agreement with recipient/beneficiary
 - i. Agreements must include a provision that all additional funds received will be reported to IGD within 15 calendar days (subrogation agreement).
 - ii. If the additional funds are determined to be duplicative, the award will be reduced and/or the recipient/beneficiary will be required to repay any disbursed duplicative benefit.
2. Upon completion of activity for which funds were awarded:
- i. Require recipient/beneficiary to report and certify whether additional funds were received for disaster-related expenses, the amount, and when funds were received.
 - ii. If additional funds were received that are determined to be duplicative, require repayment.

Documentation

Each beneficiary or project file must contain the following:

1. Duplication of Benefit calculation worksheet form to include:
 - a. Identification of unmet need
 - b. Identification of all sources of assistance provided to applicant
 - c. Identification of those sources that are duplicative (with comments as needed) d. Final award calculation
2. Any required 3rd party verifications of assistance and/or certifications as follows:
 - a. FEMA programs: letter/s from FEMA and/or data provided by FEMA

- b. Insurance: letter from insurance company and/or data if available
 - c. SBA: letter/s from SBA and/or data provided by SBA
 - d. Other program documentation
3. Certification that no additional benefits have been received. This can be a signed affidavit from the beneficiary or other form as created by the program.
 4. A signed subrogation agreement from the recipient *Note: Items (c) and (d) can be on the same form*
 5. Documentation of Declined or Cancelled Subsidized Loans
 - a. If data indicates the applicant was offered a subsidized loan (e.g., SBA), and it is unclear whether the loan was declined, the file must include a written certification from the applicant stating they did not accept or receive the loan.
 - b. If a subsidized loan was cancelled after acceptance, documentation must include either:
 - A written communication from the lender confirming cancellation and that undisbursed amounts are no longer available; or
 - A legally binding agreement between the applicant and IGD stating that the loan period has expired and the applicant agrees not to reinstate or draw undisbursed funds.
 - c. For cancelled SBA loans, IGD must notify SBA that the applicant has agreed not to reinstate or draw additional loan funds.

Additionally, at the program level, each implementing agency must have the following:

1. A description/definition of Duplication of Benefit and likely sources within their program guidelines or in their application and
2. Recapture policies and procedures

Required Verification By Program Area

Source	Housing	Infra-structure	Ec. Dev	Planning
Insurance	X	X	X	
NFIP	X		X	
SBA	X	X*	X	
FEMA IA	X			
FEMA PA		X		
FSA (USDA)				
FHA/CDOT		X		
EWP/CWC B				X
Other**	X	X	X	X

*Applies to private households or businesses (i.e. acquisitions and buyouts)

**Includes charitable resources, local government programs donations of easements or land, other federal funds (CDBG/HOME), or State programs such as Impact grants or Disaster Emergency Fund, etc.

Basic DOB Verification

The total DOB is calculated by subtracting non-duplicative exclusions from total assistance.

Therefore, to calculate the total maximum amount of the CDBG–DR award, the applicant must:

1. Identify total need;
2. Identify total assistance;
3. Subtract exclusions from total assistance to determine the amount of the DOB; and
4. Subtract the amount of the DOB from the amount of the total need to determine the maximum amount of the CDBG–DR award.

The following represents the basic framework for DOB verification in all CDBG-DR programs.

1. Identify Applicant’s Total Need	\$ 100,000
2. Identify All Potentially Duplicative Assistance	\$ 35,000
3. Deduct Assistance Determined to be Duplicative	\$ 30,000
4. Unmet Need (Item 1 less Item 3)	\$ 70,000
5. Program Cap (if applicable)	\$ 50,000
6. Calculate Final Award (lesser of Items 4 and 5)	\$ 50,000

All application documents, including the Affidavit and Subrogation Agreement, shall be retained in compliance with HUD’s record retention requirements.

Example: Mr. Jones is applying to receive CDBG-DR funding to repair his roof that was damaged during a storm. Mr. Jones reported that he submitted a claim to his insurance company for the damage and received \$12,000. The City requested additional information from Mr. Jones and identified that the \$12,000 received was for the roof damage (\$10,000) and a few broken windows (\$2,000). The City has inspected Mr. Jones roof and has identified the total need as \$50,000. After further review, the City has identified that Mr. Jones received \$10,000 of duplicative assistance (assistance for the same scope of work he is requesting from the City), and that his final CDBG-DR award will need to be reduced in order to avoid a DOB.

1. Identify Applicant’s Total Need	\$ 50,000
2. Identify All Potentially Duplicative Assistance	\$ 12,000
3. Deduct Assistance Determined to be Duplicative	\$ 10,000
4. Unmet Need (Item 1 less Item 3)	\$ 40,000
5. Program Cap (if applicable)	\$ 50,000
6. Calculate Final Award (lesser of Items 4 and 5)	\$ 40,000

Based on the DOB review, Mr. Jones will only receive \$40,000 in CDBG-DR assistance. The City would require Mr. Jones to provide the difference between the total need and the amount of assistance prior to commencement of work.

Special Considerations

Multiple Disasters and Self-Certification

In cases of multiple disasters, if documentation from prior assistance is unavailable due to destruction or expired retention periods, IGD may accept a self-certification from the applicant. The applicant must be informed of civil and criminal penalties for false claims, and IGD must verify that the stated need is consistent with known damage data.

Procedures for Economic Development and Infrastructure Programs

For economic development programs, DOB analysis must include all financial assistance used to cover liabilities addressed by CDBG–DR. For infrastructure projects, DOB analysis must include local funds unless documentation shows they are no longer available (e.g., not in capital improvement plans). Projects must ensure CDBG-DR funds do not create a duplication with FEMA PA funds received.

Subsidized Loans and Exceptions

Subsidized loans, including forgivable loans, are considered financial assistance and must be included in the DOB analysis unless an exception applies. A loan is considered available once the applicant signs the loan agreement and the lender is authorized to disburse funds.

Grantees must include the full amount of any subsidized loan in the DOB calculation unless documentation supports an applicable exception. Exceptions may include:

- **Declined loans:** If the applicant never signed loan documents, the loan is not considered duplicative. Documentation must confirm the loan was declined.
- **Cancelled loans:** If a loan was accepted but later cancelled (in whole or in part), the undisbursed portion may be excluded if:
 - The lender confirms cancellation and that funds are no longer available, or
 - The applicant signs a binding agreement not to reinstate or draw undisbursed funds.

For SBA loans, the grantee must notify SBA if the applicant agrees not to reinstate or draw additional funds.

Statutory Order of Assistance (CDBG-DR ONLY)

CDBG–DR appropriations generally include a statutory order of assistance for Federal agencies. Although the language may vary among appropriations, the statutory order of assistance typically provides that CDBG–DR funds may not be used for activities reimbursable by or for which funds are made available by FEMA or the Army Corps. This means that grantees must verify whether

FEMA or Army Corps funds are available for an activity (i.e. the application period is open) or the costs are reimbursable by FEMA or Army Corps (i.e., the grantee will receive FEMA or Army Corps assistance to reimburse the costs of the activity) before awarding CDBG–DR assistance for costs of carrying out the same activity. If FEMA or Army Corps are accepting applications for the activity, the applicant must seek assistance from those sources before receiving CDBG–DR assistance. If the applicant’s costs for the activity will be reimbursed by FEMA or the Army Corps, the grantee cannot provide the CDBG–DR assistance for those costs.

In the event that FEMA or Army Corps assistance is awarded after the CDBG–DR to pay the same costs, it is the CDBG–DR grantee’s responsibility to recapture CDBG–DR assistance that duplicates assistance from FEMA or the Army Corps. Under the Stafford Act, a federal agency that provides duplicative assistance must collect that assistance. For CDBG–DR grants, the CDBG–DR grantee must collect duplicative assistance it provides. FEMA regulations at [44 CFR 206.191](#) set forth a delivery sequence that establishes which source of assistance is duplicative for certain programs. CDBG–DR assistance is not listed in FEMA’s sequence, but as a practical matter, CDBG–DR assistance duplicates other sources received before the CDBG–DR for the same purpose and portion of need. Any amount received from other sources before the CDBG–DR assistance that is determined to be duplicative must be collected by the grantee. The mandatory agreement to repay can be used to prevent duplication by assistance that is available, but not yet received. If the duplicative assistance is received after CDBG–DR, the grantee must collect the DOB or contact HUD if it has questions about whether another Federal agency is responsible for collecting the duplication.

ADMINISTRATION AND RESPONSIBILITY

The St. Clair County IGD CDBG-DR Director or his/her designee is responsible for ensuring that duplication policies and procedures are available for all CDBG-DR funded programs.

Subgrantees and Subrecipients are responsible for ensuring that DOB procedures are followed and DOB calculations and certifications are available on file for all beneficiaries. All subgrantees and subrecipients must have recapture procedures in place and in writing within all grant agreements in accordance with [31 USC Chapter 37](#) for the return of any identified Duplication of Benefit.

The St. Clair County IGD CDBG-DR Director is responsible for the administration, revision, interpretation, and application of this policy. This policy will be reviewed annually and revised as needed to address State and Federal requirements.

Compliance Monitoring

Compliance monitoring will be conducted by the administering agency and designated staff to evaluate general administration, program operations, and adherence to applicable requirements. This process is designed to assess how programs implement established guidelines and to identify areas that may require additional resources, technical assistance, or training to ensure compliance with federal regulations, local Policies and Procedures, Written Standards, and best practices.

Monitoring activities will also include a review of compliance with the CDBG-DR Duplication of Benefits (DOB) policy, ensuring that assistance is not provided in excess of need and that all

sources of funding are properly documented and accounted for in accordance with federal disaster recovery requirements.

The primary goals of monitoring are to:

- Ensure compliance with applicable laws, regulations, and program requirements;
- Identify and prevent deficiencies;
- Recommend and support corrective actions to improve or strengthen program performance.

The administering agency and staff will regularly review and discuss program performance to ensure that the monitoring process remains comprehensive, transparent, and aligned with the goals of the CDBG-DR program.

RESOURCES

[CDBG-DR Policy Bulletin 2025- Duplication of Benefits](#)

[APPENDIX A: Duplication of Benefits Project Affidavit](#)

[APPENDIX B: Duplication of Benefits and Additional Certification Sample Form for Beneficiary's](#)

[APPENDIX C: Duplication of Benefits Certification Sample for Subrecipient Contracts](#)

APPENDIX A
CDBG-DR (Disaster Recovery)
Duplication of Benefits Certification Form

The County of St. Clair shall ensure there are adequate procedures in place to prevent any duplication of benefits as required by section 312 of the [Robert T. Stafford Disaster Relief and Emergency Assistance Act](#) (42 U.S.C. 5155).

Duplication of Benefits occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The Stafford Act requires a fact- specific inquiry into assistance received by each person, household, or entity.

- I/We, _____, affirm (Click or tap here to enter text.) DID NOT receive benefit from any other federal disaster relief/recovery programs (i.e. FEMA, SBA, Insurance). (NO FURTHER ACTION)
- I/We, _____, affirm (Click or tap here to enter text.) DID NOT receive benefit from any other federal disaster relief/recovery programs (i.e. FEMA, SBA, Insurance) for the exact SAME expenses being requested from the County of St. Clair or its Subrecipients.

By executing this Certification, Applicant(s) acknowledge and understand that [Title 18 United States Code Section 1001](#) : (1) makes it a violation of federal law for a person to knowingly and willfully (a) falsify, conceal, or cover up a material fact; (b) make any materially false, fictitious, or fraudulent statement or representation; OR (c) make or use any false writing or document knowing it contains a materially false, fictitious, or fraudulent statement or representation, to any branch of the United States Government; and (2) requires a fine, imprisonment for not more than five (5) years, or both, which may be ruled a felony, for any violation of such Section.

Applicant Signature

Date

Co-Applicant Signature

Date

APPENDIX B Duplication of Benefits Analysis

Introduction

The CDBG-DR funds which are being used to assist eligible applicants are subject to a Federal law which requires that the Program confirm that applicants have not already received financial assistance from other sources for the same activities for which the Program is providing assistance. The purpose of this form is to verify the amounts paid by insurance, government entities, and other funding sources to assure that assistance disbursed in this Program is not a Duplication of Benefits (DOB) the applicant received from other sources.

The basic DOB calculation framework consists of five main steps:

1. Assessing an applicant's unmet need,
2. Identifying total assistance available to the applicant,
3. Excluding non-duplicative amounts of financial assistance,
4. Identifying the DOB amount, and
5. Calculating the total CDBG-DR Award.

Instructions

Who Completes What

- Applicants complete Step 1 and Step 2
- Program staff complete Steps 3 through 5

General Guidance

- Responses must be accurate and supported by documentation where applicable.
- If assistance was received, staff will verify whether it is duplicative or can be excluded

For Step 2, Identifying Total Assistance Available (Applicant Section):

- For each type of assistance listed (e.g., insurance, FEMA, SBA loans, other sources):
 - **Select "Yes"** if the applicant received this type of assistance. Provide the amount and purpose.
 - **Select "No"** if the applicant did not receive this type of assistance.
 - **Select "N/A"** if the assistance type was not available to the applicant.

Only assistance marked "Yes" will be reviewed further in Step 3.

For Step 3, Excluding Non-duplicative Assistance (Staff Section):

- For each type of assistance identified in Step 2:
 - **Select "Yes"** if the assistance was used correctly, for a different purpose, or for a different allowable use. These amounts may be excluded from the DOB calculation.
 - **Select "No"** if the assistance was unused, misused, or duplicative. These amounts may be considered a DOB.
 - **Select "N/A"** if the question does not apply to the applicant's situation.

- Staff must verify responses and apply necessary and reasonable cost principles where applicable.
- Certain types of assistance may be excluded from the DOB calculation based on HUD guidance. Staff should refer to HUD’s CDBG-DR DOB Exclusion List and [CDBG-DR-Policy-Bulletin-2025-01](#) for examples of non-duplicative funds, including:
 - Assistance used for a different purpose than the CDBG-DR award
 - Non-federal match funds used appropriately
 - Undisbursed or cancelled loans
 - Federal assistance for LMI persons, if the grantee adopts the relevant policy
 - Special circumstances, such as:
 - Deceased beneficiaries
 - Foreclosure on assisted property
 - Bankruptcy

Staff must document and justify any exclusions in the applicant’s file.

Documentation Reminder

Supporting documentation may be required to verify:

- Assistance received
- Use of funds
- Loan status (e.g., declined, cancelled)
- Disaster-related eligibility

Program staff should retain all documentation in the applicant’s file.

DUPLICATION OF BENEFITS ANALYSIS

APPLICANT NAME:

Step 1: Total Need for Project/Activity (to be completed by Applicant)	Response
What is the applicant's unmet recovery need? Note, unmet need is determined at a point in time.	\$
Step 2: Identifying Total Assistance Available (to be completed by Applicant)	
1. Did the applicant receive insurance proceeds? If yes, answer the sub-questions below:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
a. How much assistance is provided?	\$
b. What was the purpose(s) of the assistance? List the purpose(s) of the assistance to the right.	Click or tap here to enter text.
2. Did the applicant receive FEMA funds? If yes, answer the sub-questions below:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
a. How much assistance is provided?	\$
b. What was the purpose(s) of the assistance? List the purpose(s) of the assistance to the right.	Click or tap here to enter text.
3. Did the applicant receive an SBA loan or other subsidized loan? If yes, answer the sub-questions below:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
a. How much is the loan for?	\$
b. What was the purpose(s) of the loan? List the purpose(s) of the loan to the right.	Click or tap here to enter text.

4. Did the applicant receive other cash awards or major forms of assistance (e.g., funds from a state program, local program, non-profits)? If yes, answer the sub-questions below:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
c. How much assistance is provided?	\$ <input type="text"/>
d. What was the purpose(s) of the assistance? List the purpose(s) of the assistance to the right.	Click or tap here to enter text.
Total Assistance: <i>This value should be the sum of all assistance provided.</i>	\$ <input type="text"/>
Step 3: Excluding Non-Duplicative Assistance (to be completed by IGD staff)	Response
1. For any insurance proceeds, FEMA assistance, or other major forms of assistance:	<input type="checkbox"/> N/A
a. Did the applicant use all the assistance provided? Note, the grantee must verify the applicant's response and may need to apply the necessary and reasonable cost principles to reduce the CDBG-DR award if any of the assistance is unused.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i. If applicable, list the portion of unused insurance proceeds to the right	\$ <input type="text"/>
ii. If applicable, list the portion of unused FEMA assistance to the right	\$ <input type="text"/>
iii. If applicable, list the portion of the other unused assistance to the right.	\$ <input type="text"/>
b. Did the applicant use the assistance for its intended purpose? Note, the grantee must verify the applicant's response. If the applicant did NOT use the assistance for its intended purpose this amount is a DOB.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i. List the amount of the insurance proceeds used to the right.	\$ <input type="text"/>
ii. List the amount of the FEMA assistance used to the right	\$ <input type="text"/>
iii. List the amount of the other major assistance used to the right.	\$ <input type="text"/>

c. Was the assistance provided for a different purpose than the CDBG-DR funds?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i. If the insurance proceeds were provided for a different purpose, list the total amount that can be excluded to the right. If the answer is no, continue to the next question to determine if this amount is a DOB.	\$ <input type="text"/>
ii. If the FEMA assistance was provided for a different purpose, list the total amount that can be excluded to the right. If the answer is no, continue to the next question to determine if this amount is a DOB.	\$ <input type="text"/>
iii. If the other assistance was provided for a different purpose, list the total amount that can be excluded to the right. If the answer is no, continue to the next question to determine if this amount is a DOB	\$ <input type="text"/>
d. Was the assistance provided for the same purpose as the CDBG-DR funds but used for a different allowable use?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i. If the insurance proceeds were provided for a different allowable use, list the total amount that can be excluded to the right. If the answer to this question and the question before is no, this amount is a DOB.	\$ <input type="text"/>
ii. If the FEMA assistance was provided for a different allowable use, list the total amount that can be excluded to the right. If the answer to this question and the question before is no, this amount is a DOB	\$ <input type="text"/>
iii. If the other assistance was provided for a different allowable use, list the total amount that can be excluded to the right. If the answer to this question and the question before is no, this amount is a DOB.	\$ <input type="text"/>
2. For any SBA loan or other subsidized loan	<input type="checkbox"/> N/A
a. Was the loan declined?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i. If yes, list the total amount of the loan that can be excluded to the right. Note, the grantee may need to	

collect documentation for the applicant’s file. If the answer is no, continue to the next question.	\$ _____
b. Was the loan cancelled?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i. If yes, list the total undisbursed portion of the loan to the right because this amount can be excluded. To determine if the disbursed portion is a DOB, continue to the next question. If the answer is no, continue to the next question. Note, the grantee may need to collect documentation for the applicant’s file.	\$ _____
Total Exclusions (non-duplicative funds): ii. <i>This value should be the sum of all the assistance with the answer “yes” in Step 3.</i>	\$ _____
Step 4: Identifying the DOB (to be completed by IGD staff)	Response
List the applicant’s total assistance from Step 2 to the right.	\$ _____
List the applicant’s total non-duplicative funds from Step 3 to the right.	\$ _____
Total DOB (Subtract the non-duplicative funds from the total assistance):	\$ _____
Step 5: Calculating the total CDBG-DR Award (to be completed by IGD staff)	Response
List the applicant’s total need from Step 1 to the right.	\$ _____
List the total DOB amount from Step 4 to the right.	\$ _____
Subtract the DOB from the applicant’s total need to identify the maximum CDBG-DR award	\$ _____
<ul style="list-style-type: none"> Apply the program cap, if applicable, to the maximum CDBG-DR award. 	\$ _____
<ul style="list-style-type: none"> Reduce the maximum CDBG-DR award based on necessary and reasonable cost principles, if applicable 	\$ _____
Final CDBG-DR Award	\$ _____

Applicant Statement and Signature

Under penalty of perjury, I/we certify that the information provided in this document is true and accurate to the best of my/our knowledge and belief. I/we understand that providing false, misleading, or incomplete information constitutes an act of fraud and may result in ineligibility to participate in this program or any other programs that rely on this document.

Additionally, if I/we receive future funding for the same purpose as the CDBG-DR assistance, I/we agree to repay any duplicated benefits.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under [18 USC 287](#) , [18 USC 1001](#), [31 USC 3729](#) and [31 USC 3729](#).

Applicant Name (print)

Applicant Signature

Date

IGD staff Name (print)

IGD staff signature

Date

Revision History

Revision Date	Description
7/18/2023	Adopted
November 2025	Revisions adopted