

Optional Duplication of Benefit (DOB) Analysis Worksheet

for CDBG-DR Housing Rehabilitation and Reconstruction

Updated April 2024

INTRODUCTION

This optional worksheet can be used to complete a duplication of benefit (DOB) analysis for Community Development Block Grant Disaster Recovery (CDBG-DR) Housing Rehabilitation and Reconstruction programs.

In the context of CDBG-DR, a duplication of benefits occurs when the total financial assistance received from more than one source for the same purpose as the CDBG-DR assistance is greater than the applicant's total need. CDBG-DR funds are one of multiple federal sources of disaster recovery assistance, and because CDBG-DR funds are typically the last federal source of funding, funds are often used for the same purposes as other federal funding sources. For this reason, CDBG-DR appropriations acts usually require grantees to have adequate policies in place to prevent a DOB when carrying out eligible activities. HUD created this optional worksheet to assist grantees with DOB calculations. This worksheet walks a CDBG-DR grantee through many of the necessary steps and considerations related to an individual DOB analysis¹.

The basic *DOB calculation framework* consists of five main steps:

1. Assessing an applicant's total 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.

In addition to the DOB calculation framework, the following requirements apply to all CDBG-DR grantees and can also alter the CDBG-DR award amount when completing a DOB analysis.

- ***Order of Assistance***
 - 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 U.S. Army Corps of Engineers. 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 the 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.
- ***"Necessary and Reasonable" Cost Principles***
 - Grantees must follow the "necessary and reasonable" cost principles at 2 CFR 200.403 and 200.404. Grantees must consider factors described at 2 CFR 200.404(a) through (e) when determining which types and amounts of cost items are necessary and reasonable. The necessary and reasonable cost principles reinforce the DOB requirements because HUD generally

¹ This worksheet is a guidance document created by HUD staff but does not create any new requirements. Through this guidance, HUD seeks only to clarify existing requirements and provide best practices for grantees receiving CDBG-DR funds and completing DOB analyses.

presumes that if a cost has been paid by another source, charging it to the Federal award violates the necessary and reasonable standard unless grant requirements permit reimbursement.

INSTRUCTIONS

The above DOB calculation framework is captured in this worksheet, and each step includes questions and prompts to help grantees arrive at the final CDBG-DR award amount after accounting for DOB requirements.

Grantees are encouraged to complete this optional worksheet for each applicant applying for CDBG-DR assistance prior to awarding CDBG-DR funds. Using this tool can improve a grantee’s knowledge and comprehension of HUD’s DOB framework and support its individualized review of each applicant to determine that the amount of CDBG-DR assistance provided will not cause a duplication of benefit.

The table below highlights several key terms and concepts that are used to complete a DOB analysis. This list of terms is provided to help a grantee understand the terms used throughout the worksheet.

DOB Terms & Concepts	Description
Funds provided for a different purpose than the CDBG-DR assistance	Financial assistance that is provided from another source other than the CDBG-DR funds for a different purpose than the CDBG-DR funds or a general, non-specific purpose (e.g., “disaster relief/recovery”), as long as the assistance is not used for the same costs as the CDBG-DR funds.
Funds provided for the same purpose but a different allowable use	Financial assistance that is provided from another source other than the CDBG-DR funds for the same purpose (e.g. housing rehabilitation) as the CDBG-DR funds but used for a different allowable use than the CDBG-DR funds (e.g. interior vs. exterior rehabilitation). This is determined by looking at the actual, specific use of the financial assistance.
Purpose of the Assistance	The “purpose” means the purpose for which the funds were provided by the entity that provided the financial assistance. A grantee must identify the purpose of the assistance for which the funds were provided, not the purpose for which they were used. Insurance proceeds for damage or destruction of a building are for the same purpose as CDBG-DR assistance to rehabilitate or reconstruct that building. The CDBG-DR grantee can look to the award letter to determine if the use of the funds was for a particular purpose. The purpose of the assistance is often simply the CDBG eligible activity, e.g., housing rehabilitation, acquisition (including buyout). In some cases, a CDBG eligible activity is too broad to identify the purpose of the financial assistance. For example, a public service activity to provide temporary rental assistance under a CDBG-DR waiver and alternative requirement is a different purpose than providing a public service for legal assistance.

Insurance	Homeowner’s insurance pays for losses and damage to your property if something unexpected happens. Insurance payouts must be considered as a source of assistance. Additionally, when homeowners have other insurance coverage (e.g., NFIP or other types of insurance coverage for earthquakes or fire) any payouts made would also be considered a source of assistance.
FEMA Funds	Typical FEMA funds that CDBG-DR grantees should account for are FEMA Individuals and Households Program (IHP), Public Assistance Program (PA), Hazard Mitigation Grant Program (HMGP), and Building Resilient Infrastructure and Communities (BRIC). For purposes of this worksheet, the National Flood Insurance Program is considered “insurance” and not “FEMA funds,” but it still must be considered as a source of assistance.
Order of Assistance	The statutory order of assistance is a standard provision in CDBG-DR appropriations acts which specifies 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.
Cost Principles	A cost allocated to the grant must “be necessary and reasonable for the performance of the Federal award...” and otherwise comply with cost principles (see, e.g., 2 CFR 200.403(a); 2 CFR 200.404; and 2 CFR 200.405)
Total Need	Total need is calculated based on need estimates at a point in time and represents the applicant’s current need at the time the DOB is calculated. For rehabilitation, reconstruction, or new construction activities, the total need is normally equivalent to construction cost estimates.
Unmet Need	When total need for eligible activities is more than total assistance for the same purpose, the difference between these amounts is an “unmet need.” Grantees must limit their assistance to “unmet needs” for eligible activities to prevent a DOB.
Private Loan	A loan that is not provided by or guaranteed by a governmental entity, and that requires the CDBG-DR applicant (the borrower) to repay the full amount of the loan (principal and interest) under typical commercial lending terms, e.g., the loan is not forgivable.
Subsidized Loan	Subsidized loans (including forgivable loans) are loans other than private loans. Both SBA and FEMA provide subsidized loans for disaster recovery.
Declined Loan	Loan amounts that were approved or offered by a lender in response to a loan application, but were turned down by the applicant, meaning the applicant never signed loan documents to receive the loan proceeds.

Cancelled Loan	The borrower has entered a loan agreement, but for a variety of reasons, all or a portion of the loan amount was not disbursed and is no longer available to the applicant.
DRRA Loan Exception	For DRRA qualifying disasters, i.e., major disasters or emergencies declared between January 1, 2016, and December 31, 2021, a subsidized loan is not a DOB when it is awarded before October 5, 2023, provided that all Federal assistance is used toward a loss suffered as a result of a major disaster or emergency.

When completing the DOB analysis, the following cover sheet and worksheet can be detached from the introduction and instructions provided above, but please keep in mind that the hyperlinks throughout the document to the DOB Terms and Concepts will no longer function as intended.

DOB ANALYSIS COVER SHEET – HOUSING REHABILITATION AND RECONSTRUCTION

CDBG-DR Activity/Program:

Applicant Name:

Applicant ID Number:

Case Manager Name(s):

Date Completed:

DOB ANALYSIS WORKSHEET – HOUSING REHABILITATION AND RECONSTRUCTION

Step 1: Assessing the Applicant’s Total Need	Response
<p>What is the applicant’s total need? Please list the total need in the space provided to the right.</p> <p><i>Grantees are encouraged to determine the applicant’s total need and complete this worksheet at the point in time in which the grantee awards CDBG-DR funds to the applicant as the applicant’s total need (e.g., construction cost estimates) can change over time.</i></p> <p>NOTE: If a grantee’s approved CDBG-DR Action Plan permits reimbursement to beneficiaries, eligible costs of the CDBG-DR activity paid by the applicant should be calculated and awarded separately before calculating the total need for housing rehabilitation or reconstruction. For example, an applicant has incurred \$5,000 of eligible rehabilitation expenses. In addition, the applicant has \$130,000 of remaining need based on current construction cost estimates to finish rehabilitating the home. In this case, the applicant is eligible to receive a CDBG-DR reimbursement award of \$5,000, and the grantee must follow the DOB framework to calculate the CDBG-DR award for the remaining rehabilitation needs.</p>	<p>\$ _____</p>

Step 2: Identifying Total Assistance Available	Response
<p>1. Is insurance available to the applicant but not awarded (e.g., applicant is insured but has not submitted a claim, or insurer and applicant are in a dispute over the claim)? If the answer to this question is yes, complete the sub-question below. If the applicant received insurance proceeds, select “N/A” and continue to the next question.</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A </p>
<p>a. If known, list how much insurance is available to the applicant in the space provided to the right.</p>	<p>\$ _____</p>
<p>2. Did the applicant receive insurance proceeds? If yes, answer the sub-questions below. If the applicant did not receive insurance proceeds, select “no” and continue to the next question.</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> Yes No </p>
<p>a. How much insurance is provided? List the amount of insurance in the space provided to the right.</p>	<p>\$ _____</p>
<p>b. What was the purpose(s) of the insurance? List the purpose(s) and the amount provided for each purpose below (e.g., structure, contents, temporary housing).</p>	
<p>3. Did the applicant receive FEMA funds or are FEMA funds available? If yes, answer the sub-questions below:</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> Yes No </p>
<p>a. How much financial assistance is provided or available? List the amount of financial assistance in the space provided to the right.</p>	<p>\$ _____</p>

<p>b. What was the purpose(s) of the financial assistance? List the purpose(s) and the amount provided or available for each purpose below (e.g., temporary housing assistance, repair or replacement of owner-occupied homes).</p>	
<p>4. Did the applicant receive an SBA loan award or other subsidized loan? If yes, answer the sub-questions below:</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>
<p>a. Was the loan declined? If yes, do <u>not</u> include the amount of the loan in this section as available assistance and only attach a written certification from the applicant that the loan was declined if FEMA, SBA, or other sources of data do not indicate that the applicant declined the loan. If no, continue to the next question.</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>b. Was the loan cancelled? If yes, do <u>not</u> include any undisbursed portion of the loan in this section as available assistance and attach written communication from the applicant’s lender or a legally binding agreement with the applicant demonstrating that the loan is cancelled and no longer available. If no, continue to the next question.</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>c. For disbursed portions of a loan that is for a DRRA-covered disaster (2016-2021 disasters), did the loan documents get signed before the DRRA loan exception sunset (October 5, 2023)? If the loan is not for a DRRA-covered disaster, select “N/A” and continue to question 4.d.</p> <p>NOTE: If a beneficiary received a subsidized loan for a DRRA-covered disaster, only those households that have entered into an agreement for assistance (signed by the homeowner and the lender, e.g., grantee, SBA, etc.) before October 5, 2023, are not a DOB under the DRRA loan exception, if the funds were used for a disaster-related purpose. For more information on the DRRA loan exception, see FAQ.</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>i. If yes, did the applicant use the loan and all other Federal assistance for a disaster-related purpose? If the applicant used the disbursed portions of the loan and all Federal assistance for a disaster-related purpose, the disbursed portion of the loan is not a DOB. Attach applicant documentation showing how the funds were used and do <u>not</u> include this amount in this section as available assistance.</p> <p>If the answer is “no” to either question 4.c. or 4.c.i., complete the following sub-questions below:</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>
<p>▪ If the loan documents were signed after the DRRA loan exception sunset (October 5, 2023) or the applicant did not use the loan for a disaster-related purpose, list the total subsidized loan proceeds that were provided to the applicant in the space to the right.</p> <p>NOTE: This amount should normally <u>not</u> include disbursed declined loans and cancelled loans unless the applicant cannot provide sufficient documentation. Without the</p>	<p>\$ _____</p>

required documentation (as outlined above), all subsidized loans should be treated as available assistance.	
<ul style="list-style-type: none"> What was the purpose(s) of the loan? List the purpose(s) and the amount provided for each purpose below. 	
<p>d. For disasters 2015 or earlier, or 2022 or later, for disbursed portions of a loan that would not be for a DRRA-covered disaster, list the total subsidized loan proceeds provided to the applicant in the space to the right. Continue to question 5 if the loan(s) is for a DRRA-covered disaster.</p> <p><u>NOTE:</u> This amount should normally <u>not</u> include disbursed declined loans and cancelled loans unless the applicant cannot provide sufficient documentation. Without the required documentation (as outlined above), all subsidized loans should be treated as available assistance.</p>	\$ _____
<p>i. What was the purpose(s) of the loan? List the purpose(s) and the amount provided for each purpose below.</p>	
<p>5. Did the applicant receive other cash awards or forms of financial assistance or are any other sources available (e.g., financial assistance from a state program, local program, non-profits)? If yes, answer the sub-questions below:</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>a. How much financial assistance is provided or available? List the financial assistance in the space provided to the right.</p>	\$ _____
<p>b. What was the purpose(s) of the financial assistance? List the purpose(s) and the amount provided or available for each purpose below.</p>	
<p>Total Assistance:</p> <p><i>This value is the <u>sum</u> of all reasonably identifiable financial assistance provided or available to the applicant.</i></p>	= \$ _____

Step 3: Excluding Non-Duplicative Assistance	Response
<p>1. For any financial assistance identified in Step 2: Identifying Total Assistance Available, list the applicable amount of assistance that can be excluded by reviewing the sub-questions below. A grantee can exclude financial assistance for any “yes” responses:</p>	<input type="checkbox"/> N/A
<p>a. Was the assistance provided or available for a different purpose than the CDBG-DR funds and not used for the same purpose as the CDBG-DR funds?</p> <p><u>NOTE:</u> The grantee must document compliance with DOB requirements. Grantees are encouraged to document compliance by attaching applicant documentation to this worksheet that shows all assistance provided or available to the applicant and the purpose of the assistance.</p>	<input type="checkbox"/> <input type="checkbox"/> Yes No

<p>i. If the insurance proceeds were provided or available for a different purpose, list the total amount that can be excluded in the space provided to the right.</p>	<p>\$ _____</p>
<p>▪ When applicable, list the different purpose(s) and amount(s) provided or available for each purpose below.</p>	
<p>ii. If the FEMA assistance was provided or available for a different purpose, list the total amount that can be excluded in the space provided to the right.</p>	<p>\$ _____</p>
<p>▪ When applicable, list the different purpose(s) and amount(s) provided or available for each purpose below.</p>	
<p>iii. For any SBA or other subsidized loan proceeds included as available assistance in Step 2, list any amount that was provided for a different purpose and can be excluded in the space provided to the right.</p>	<p>\$ _____</p>
<p>▪ When applicable, list the different purpose(s) and amount(s) provided for each purpose below.</p>	
<p>iv. If any other assistance was provided or available for a different purpose, list the total amount that can be excluded in the space provided to the right.</p>	<p>\$ _____</p>
<p>▪ When applicable, list the different purpose(s) and amount(s) provided or available for each purpose below.</p>	
<p>b. Was the assistance provided for the same purpose as the CDBG-DR funds but used for a different allowable use?</p> <p>NOTE: Assistance provided for the same purpose as the CDBG-DR purpose (the CDBG-DR eligible activity) must be excluded when calculating the amount of the DOB if the applicant can document that the actual specific use of the assistance was an allowable use of that assistance and was different than the use (cost) of the CDBG-DR assistance. Therefore, the grantee must document compliance with DOB requirements. Grantees are encouraged to document compliance by attaching applicant documentation to this worksheet that shows all assistance provided or available to the applicant, the purpose of the assistance, and how/if the assistance was used by the applicant. If an applicant received assistance for the same purpose as the CDBG-DR funds but did not use the assistance for its intended purpose, the assistance is generally considered a DOB and is not excluded.</p>	<p><input type="checkbox"/> <input type="checkbox"/></p> <p>Yes No</p>
<p>i. If the insurance proceeds were used for a different allowable use, list the total amount that can be excluded in the space provided to the right.</p>	<p>\$ _____</p>
<p>▪ When applicable, list the different allowable uses(s) and the amount spent on each allowable use below.</p>	

ii. If the FEMA assistance was used for a different allowable use, list the total amount that can be excluded in the space provided to the right.	\$ _____
<ul style="list-style-type: none"> When applicable, list the different allowable use(s) and the amount spent on each allowable use below. 	
iii. For any SBA or other subsidized loan proceeds included as available assistance in Step 2, list any amount that was used for a different allowable use and can be excluded in the space provided to the right.	\$ _____
<ul style="list-style-type: none"> When applicable, list the different allowable use(s) and the amount spent on each allowable use below. 	
iv. If any other assistance was used for a different allowable use, list the total amount that can be excluded in the space provided to the right.	\$ _____
<ul style="list-style-type: none"> When applicable, list the different allowable use(s) and the amount spent on each allowable use below. 	
<p>Total Exclusions (non-duplicative assistance):</p> <p><i>This value is the <u>sum</u> of all assistance provided or available for a different purpose than the CDBG-DR funds and assistance provided for the same purpose as the CDBG-DR funds but used for a different allowable use.</i></p>	= \$ _____

Step 4: Identifying the DOB	Response
1. List the applicant's Total Assistance from Step 2 in the space provided to the right.	\$ _____
2. List the applicant's Total Exclusions from Step 3 in the space provided to the right and <u>subtract</u> this non-duplicative assistance to determine the Total DOB.	- \$ _____
<p>Total DOB (duplicative assistance):</p> <p><i>When determining the CDBG-DR award amount, this value represents the amount of duplicative assistance that would be received by the applicant in excess of the applicant's total need. This amount may also include any assistance received by the applicant that was provided for the same purpose as the CDBG-DR activity but was not used for its intended purpose.</i></p>	= \$ _____

Step 5: Calculating the Total CDBG-DR Award	Response
1. List the applicant's <u>Total Need</u> from Step 1 in the space provided to the right.	\$ _____
2. List the <u>Total DOB</u> amount from Step 4 in the space provided to the right and <u>subtract</u> this duplicative assistance from the applicant's total need to determine the maximum CDBG-DR award.	- \$ _____
<p>Maximum CDBG-DR Award (before considering the award cap and exceptions)</p> <p><i>The maximum CDBG-DR award amount is equivalent to the applicant's <u>unmet need</u>, but the final CDBG-DR award may need to be adjusted to account for the program's award cap, repayment of duplicative assistance, additional unmet needs, and other exceptions as outlined below.</i></p>	= \$ _____
<p><i>If the answers to the following questions are "no," the Final CDBG-DR Award amount will be the <u>same</u> as the Maximum CDBG-DR Award amount listed above.</i></p>	
<p>1. Award Cap: Is the Maximum CDBG-DR Award amount listed above greater than the program's award cap outlined in the grantee's Action Plan?</p>	<input type="checkbox"/> <input type="checkbox"/> Yes No
<ul style="list-style-type: none"> If "yes," list the award cap in the space provided to the right, and the Final CDBG-DR Award amount below should be the <u>same</u> as the award cap (unless an exception applies). If "no," continue to the next question. 	\$ _____
<p>2. Exceptions: Grantees may find it necessary to provide exceptions on a case-by-case basis to the maximum amount of assistance and must follow the process that is described in its Action Plan to make such exceptions. A grantee must also make exceptions as necessary to comply with federal accessibility standards or to reasonably accommodate a person with disabilities.</p> <p>Was the applicant provided an exception? If "no," continue to the Final CDBG-DR Award.</p>	<input type="checkbox"/> <input type="checkbox"/> Yes No
<ul style="list-style-type: none"> If "yes," list the total increase in the award amount due to the exception in the space provided to the right and <u>add</u> this amount to determine the Final CDBG-DR Award amount. 	\$ _____
<ul style="list-style-type: none"> If an exception applies, describe the reason(s) for the exception(s) below. 	
<p>Final CDBG-DR Award*</p>	= \$ _____

***Important considerations before awarding CDBG-DR assistance** (continued – page 12)

- When necessary, grantees may need to reassess the applicant's unmet need.

- Although long-term recovery is a process, [total need](#) is calculated at points in time. As a result, a subsequent change in an applicant's circumstances can affect that applicant's remaining unmet need, meaning the need that was not met by CDBG-DR and other sources of assistance. Oftentimes, unmet need does not become apparent until after CDBG-DR assistance has been provided.
 - Examples may include: A subsequent disaster that causes further damage to a partially rehabilitated home or business; an increase in the cost of construction materials; vandalism; contractor fraud; or theft of materials.
- Unmet need may also change if other resources become available to pay for costs of the activity (such as FEMA or Army Corps), and reduce the need for CDBG-DR.
- To the extent that the original total need was not fully met or was exacerbated by factors beyond the control of the applicant, the grantee may provide additional CDBG-DR funds to meet the increased unmet need.
 - Grantees must be able to identify and document additional unmet need, for example, by completing a professional inspection to verify the revised estimate of costs to rehabilitate or reconstruct damaged property.
- [Statutory Order of Assistance](#)
 - In the event that FEMA or Army Corps assistance is awarded after the CDBG-DR funds are provided to the applicant 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.