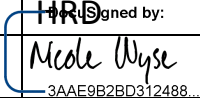




Community Development Block Grant
Coronavirus (CDBG-CV) and Disaster Recovery (CDBG-DR)
Duplication of Benefits (DOB) Policy

City of Detroit
Housing & Revitalization Department

Division(s)	Department Wide
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Other COD Depts Affected (include contact name)	
Approved By	Nicole Wyse, Chief Operations Officer, HRD
Signature	 3AAE9B2BD312488...
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Next Review Date	3-13-2026

Purpose:

This purpose of this policy on Duplication of Benefits (DOB), is to ensure the City of Detroit (the City) is not providing federal funds to pay for particular costs where there is another source of federal financial assistance that has paid for the same cost. The City of Detroit, Housing and Revitalization Department (HRD), who administers the Community Development Block Grant Coronavirus (CDBG-CV) and the Community Development Block Grant Disaster Recovery (CDBG-DR) programs awarded from the U.S. Department of Housing and Urban Development (HUD), is responsible for oversight of DOB compliance.

Applicability:

This policy pertains specifically to funds provided through the CDBG-CV and CDBG-DR programs. The City of Detroit was awarded CDBG-CV funds allocated under the 2020 CARES Act and governed by the Federal Register Notice [FR-6218-N-01-CDBG-CV](#), dated August 7, 2020.

In addition, in response to the Flooding events occurring June 25-26, 2021, the City of Detroit was awarded disaster recovery assistance through HUD's CDBG-DR program. The CDBG-DR funds were allocated under the Disaster Relief Supplemental Appropriations Act 2022 and governed by the [Federal Register Notice FR-6326-N-01](#), dated May 24, 2022, and the [Federal Register Notice FR-6368-N-01](#) dated January 18, 2023.

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) requires that recipients of both the coronavirus funding and federal disaster recovery funding must develop procedures to prevent any Duplication of Benefits (DOB).

Policy:

As a HUD grantee, the City is required to develop and maintain adequate procedures to prevent a DOB that address (individually or collectively) each activity, project or program. HRD's policies and procedures must include, at a minimum: (1) a requirement that any person or entity

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

It is the City's policy to uphold, enforce and document conformance with the DOB requirements which cover use of its CDBG-CV and CDBG-DR funds. All grantees are bound by Section 312 of the Stafford Act, as amended by the Disaster Recovery Reform Act (DRRA), and the OMB Cost Principles within 2 CFR § 200 that requires all costs to be "necessary and reasonable" for the performance of the Federal award.

The City is required to complete a DOB analysis for CDBG-DR/CDBG-CV assisted activities to demonstrate that no other financial assistance has been received or is available to pay costs charged to a CDBG-CV or CDBG-DR grant. To comply with this requirement, the City 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.

The federal regulation pertaining to the City policy and procedure for identifying DOB for CDBG-DR and CDBG-CV is found in [Federal Register/Vol.84, No. 119/June 20, 2019](#), which should be reviewed as part of determining DOB. This guidance will be incorporated into all the policy and procedures for each CDBG-DR and CDBG-CV funded program, as applicable.

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. *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. For example, if a local government seeks CDBG–DR assistance to fund part of a project that also has been awarded FEMA Hazard Mitigation Grant Program (HMGP) assistance, the entire HMGP award must be included in the calculation of total assistance even if FEMA obligates the first award increment for the project, but subsequent increments remain unfunded until certain project milestones are met. Another example, if a non-profit organization such as the Red Cross provided funding for basement cleanup, then the City cannot use CDBG-DR/CDBG-CV to also pay for basement cleanup.

City of Detroit Duplication of Benefits Process

All persons or entities (including but not limited to individuals, businesses, governments, subrecipients) making request for financial assistance from the City for any activity or program is required to complete a Duplication of Benefits Affidavit as part of the application process. This affidavit acknowledges the City’s requirement that any person or entity receiving CDBG-CV and

CDBG-DR assistance must agree to repay assistance that is determined to be duplicative. An applicant must provide detailed information about all sources of recovery assistance received, or available to be received.

To meet HUD's requirements, the City has developed a method of assessing whether the use of CDBG-CV and CDBG-DR funds will duplicate financial assistance that is already received or is likely to be received by acting reasonably in evaluating need and the resources available to meet that need. The City will develop a list of all other sources of funds that may trigger a DOB. The City will use the best and most recent available data from FEMA, the Small Business Administration (SBA), insurers and any other sources of local, State and Federal sources of funding to prevent the duplication of benefits.

This assessment process is as follows:

1. Upon receipt of the completed request or application for CDBG-CV/CDBG-DR funds, the City or its designated representative reviews the Duplication of Benefits Affidavit to determine if the person or entity making application has reported receiving any potentially duplicative assistance.
2. If so, the City or its designated representative may request additional information from the applicant, including:
 - a. Dates funds were received
 - b. Specific uses of funds received, including receipts and dates as appropriate.
3. Based on a review of this information, the City or its designated representative may:
 - a. Determine that there is no duplication and proceed with consideration of the application for the full amount requested.
 - b. Determine that there is a partial duplication and proceed with consideration of the application for an amount that reduces the request by the DOB amount
 - i. Amount Requested – Amount of DOB = Eligible Amount
 - c. Determine that there is a complete duplication and deny the application

4. In the event that an application is approved in part, the City or its designated representative will also include in the funding documents specific information around what the funds may be spent on so as to avoid duplication of benefits.
5. The City or its designated representative will require all person or entities that are successful applicants to provide documentation as to how funds are expended and will review this documentation to ensure no duplication has taken place.

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 City 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/CV award.

The following example represents the basic framework for DOB verification in all CDBG-DR/CV 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.

Statutory Order of Assistance (CDBG-DR ONLY)

CDBG-DR appropriations acts 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.

Procedures for Verifying Matched FEMA Data and Contesting Benefit Determinations (CDBG – DR ONLY)

To accurately document the amount of other assistance provided to the applicant, the City of Detroit will enter into computer matching agreement with HUD to obtain data from FEMA’s Individuals and Households Program (IHP) to prevent the duplication of benefits. Housing and Revitalization Department (HRD) staff will request data from HUD on an as-needed basis to determine eligibility and prevent the duplication of benefits. This matching program is not the sole basis through which a beneficiary’s eligibility for the Federal Programs may be determined. The Computer Match Agreement requires grantees procedures to independently verify information produced by computer matching system (CMS).

A. Verification Procedures

- a. HRD will be responsible for independently verifying the results of the match.
- b. HRD may not deny, terminate, or make a final decision of any benefit to an individual or take other adverse action against such individual solely as the result of the information produced by this matching program until HRD has independently verified such information.
- c. This independent verification includes: (1) giving the applicant the opportunity to present evidence of eligibility, (2) comparing automated data with manual

files to verify applicant or identification, and (3) analyzing the confirmed information.

- d. Denial of benefits will not be predicated on the result of an initial match between systems. Denial of benefits will be made upon an independent verification made by HRD employee.

B. Notice and Opportunity to Contest

- a. HRD will not terminate, suspend, reduce, deny, or take other adverse action against an applicant for CDBG-DR based on data disclosed from CMS records until the information has been verified as provided in B., above, and the individual has been notified in writing of the potential adverse action, and provided an opportunity to contest the findings and planned action. "Adverse action" means any action resulting in a termination, suspension, reduction, or final denial of eligibility, payment, or benefit.
- b. HRD will provide such notices in writing, and such notices will:
 - i. Inform the individual of the match findings and the opportunity to contest the findings;
 - ii. Give the individual an opportunity to submit, within 30 days, to the HRD documentation to contest the findings and proposed actions before HRD makes a final determination. The time to contest begins on the date on which notice is mailed or otherwise provided to the individual to respond; and
 - iii. State clearly that, unless the individual responds to the notice in the required time period, HRD will conclude that the matched data is correct and will effectuate the threatened action or otherwise make the necessary adjustment to the individual's benefit.

Confirmation of Duplication of Benefits

In instances where a potential/actual duplication of benefits is identified after the award of funds and the execution of an agreement, the City of Detroit will terminate the agreement and no further disbursement of funds for the duplicated activities. The City may update this policy

as additional guidance is received by HUD. If a duplication of benefits arises in the duration of the agreement, the City of Detroit will adhere to the guidelines set forth in the Stafford Act (chapter 37 of title 31) for the recapturing of funds.

Documentation of compliance: The city will document instances when duplication of benefits is confirmed and related correspondence in the project files.

Treatment of Loans in a DOB analysis

Private Loans (Never a DOB) - 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 Loans (Might Be a DOB –It depends) - Subsidized loans (including forgivable loans) are loans other than private loans. Both SBA and FEMA provide subsidized loans for disaster recovery.

Declined Loans (Never a DOB –documentation might be required) - Declined loan amounts are 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 Loans (Never a DOB –documentation required) - 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. (must document) - The loan cancellation may be due to default of the borrower, agreement by both parties to cancel the undisbursed portion of the loan, or expiration of the term for which the loan was available for disbursement.

Grantees may use CDBG-DR funds to reimburse individuals and businesses for some costs of CDBG-DR eligible activities paid with subsidized loans, in accordance with the 2019 Notice:

Must prioritize assistance to LMI persons, consistent with title I of the HCDA

- Serve persons 80% LMI and below before serving those > 80 % AMI but below 120% AMI
- Allow for hardship exceptions for those over 120% AMI. Hardship exception requires financial necessity

After Assistance Monitoring

While the type of assistance proposed to be provided through the City of Detroit's CDBG-CV and CDBG-DR programs has minimal risk for duplication of benefits due to limited scope, there is still a risk. HRD will assess the funding available to the City for recovery activities on a regular basis to ensure that a duplication of benefits does not occur after assistance has been delivered. This assessment will be documented in the program files and includes understanding assistance provided by other federal entities such as FEMA, Army Corps of Engineers, and SBA and what the timelines are for accessing this assistance by the City, its partners or residents. If other potential sources remain during this assessment, HRD will evaluate whether these sources provide assistance within the scope proposed by HRD and pose an issue with DOB. In addition HRD will perform after assistance checks on a sample of beneficiary's and partners no more than a year after assistance was provided.

Acronyms

DOB - Duplication of Benefits

FEMA – Federal Emergency Management Agency

HUD – U.S. Department of Housing and Urban Development

CDBG-DR – Community Development Block Grant, Disaster Recovery

CDBG-CV – Community Development Block Grant, Coronavirus

HRD – City of Detroit, Housing and Revitalization Department

Resources

[June 2019 Duplication of Benefits Notice](#)

[HUD CDBG-CV Toolkit for Duplication of Benefits](#)

[CDBG-DR Policy Bulletin – Guidance on 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 D: Update Summary

APPENDIX E: Distribution & Training Plan

APPENDIX A

Duplication of Benefits Project Affidavit (“Affidavit”)

I/We, (*person or entity* acting as the applicant) _____

affirm and attest the following:

1. I/We is/are executing this Affidavit in connection with assistance that we are receiving to help us prevent, prepare for, or respond to the Coronavirus in the form of a loan, grant or other type of financial assistance (**“Type of Assistance”**) for the purpose of addressing conditions caused directly or indirectly by the related pandemic (**“Need”**) in the amount of (**“Amount of Assistance or Total Need”**) from the City of Detroit or its designated agent (**“Organization”**) through a CDBG-CV program administered by the City of Detroit with funding from the U.S. Department of Housing and Urban Development.
2. The **Organization** and I/We believe the **Amount of Assistance/Total Need** is _____.
3. In addition, I/We have received or will receive the following amounts and types of assistance from the sources listed below (“Duplicative Assistance”):

(a) Source of Funds #1

Lender/Grant Provider Name		
Purpose		
Amount		
☐ Government Loan	☐ Government Grant	☐ Government Forgivable Loan
☐ Nonprofit Grant	☐ Nonprofit Loan	☐ Nonprofit Forgivable Loan
☐ Private Loan	☐ Other: _____	

(b) Source of Funds #2

Lender/Grant Provider Name		
Purpose		
Amount		
☐ Government Loan	☐ Government Grant	☐ Government Forgivable Loan
☐ Nonprofit Grant	☐ Nonprofit Loan	☐ Nonprofit Forgivable Loan
☐ Private Loan	☐ Other: _____	

(c) Source of Funds #3

Lender/Grant Provider Name		
Purpose		
Amount		
☐ Government Loan	☐ Government Grant	☐ Government Forgivable Loan
☐ Nonprofit Grant	☐ Nonprofit Loan	☐ Nonprofit Forgivable Loan
☐ Private Loan	☐ Other: _____	

(d) Source of Funds #4

Lender/Grant Provider Name		
Purpose		
Amount		
☐ Government Loan	☐ Government Grant	☐ Government Forgivable Loan
☐ Nonprofit Grant	☐ Nonprofit Loan	☐ Nonprofit Forgivable Loan
☐ Private Loan	☐ Other: _____	

(e) Source of Funds #5

Lender/Grant Provider Name		
Purpose		
Amount		
☐ Government Loan	☐ Government Grant	☐ Government Forgivable Loan
☐ Nonprofit Grant	☐ Nonprofit Loan	☐ Nonprofit Forgivable Loan
☐ Private Loan	☐ Other: _____	

4. Total Unmet Need (2- (3(a)+3(b)+3(c)+3(d)+3(e))) \$_____.
5. I/We have received no other assistance funds for the **Need** listed in Paragraph 1 other than that set forth above in paragraph 3.
6. Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5155), as amended by section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115–2 254; 132 Stat. 3442). prohibits federal agencies from providing assistance to any person for “any part of such loss” as to which he has received financial assistance under any other program or from insurance or any other source (such as, FEMA, SBA, the Red Cross, the City, State or owner’s Insurance, etc.).
7. I/We understand that the amount of assistance received by I/We from the **Organization** must be reduced by the amount of Duplicative Assistance received or that will be received for the Need, from other sources (such as, FEMA, SBA, the Red Cross, the City, the State or owner’s insurance, etc.) for the same purpose.

8. Therefore, I/We understand that if I/We receive assistance from a source other than the **Organization** (such as, FEMA, SBA, the Red Cross, the City, homeowner's insurance, etc.) for the Need for the same purpose, I/We must repay the assistance received from the **Organization**.
9. I/We certify under State and Federal penalties for perjury and fraud that the information provided above is true and accurate and acknowledge that repayment of all assistance received from the **Organization**, payment of fines and/or imprisonment may be required in the event that I/We provide false, incomplete or misleading information in this Affidavit or during the rest of this process.

By executing this Affidavit, 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.

Warning: Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18.U.S.C.2,287,1001 and 31 U.S.C. 3729.

Person or Entity (Applicant) _____

Signature of Applicant _____ Date _____

ORGANIZATION Representative _____

Signature of Representative _____ Date _____

APPENDIX B

Instructions for Completing the Duplication of Benefits Certification Form

The CDBG 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.

1. Column 1 List the Sources of Funding received by type (Federal Emergency Management Agency (FEMA), Paycheck Protection Program (PPP), Economic Injury Disaster Loan (EIDL), Small Business Association (SBA), Insurance, etc.). For insurance, list the name of each company and policy number.
2. Column 2 Indicate the amount of funding specified from each program received on the appropriate line in the second column. You may add as many additional lines as required.
3. Column 3 Indicate what the funds for each awarded program (mentioned in Column 1) and where Funds were expended.
4. Column 4 Indicate by checkmark (✓) that you have attached a copy of the corresponding documentation of the funds received (letter from funding source, copy of check, etc.)
5. Column 5 Indicate by checkmark (✓) that you have attached documentation of how the received funding was used (receipts)
6. Column 6 List the amount expended from each source.

Total all funding received (column 2). Subtract the total of all receipts for services or products directly related to those funds (Column 5). Any remaining funds will be considered Duplication of Benefits and will be subtracted from the program amount for which the applicant is eligible. The applicant(s) must sign and date the form at the bottom of the page

City of Detroit
Housing and Revitalization Department
CDBG-CV (CARES) Duplication of Benefits Certification Form
SAMPLE

As cited in the 2020 CARES Act, "that, notwithstanding section 105(a)(8) of the Housing and Community Development Act of 1974 (42 U.S.C. 5305(a)(8)), the Secretary 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 1 Act (42 U.S.C. 5155) and in accordance with section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115–254; 132 Stat. 3442), which amended 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 (insert business name/applicant name) DID NOT receive benefit from any other federal COVID 19 relief programs (i.e. Paycheck Protection Program (PPP), Economic Injury Disaster Loan (EIDL), SBA Relief Program, CARES Act unemployment benefit). (NO FURTHER ACTION)

☐ I/We, _____, affirm (insert business name/applicant name) DID NOT receive benefit from any other federal COVID 19 relief programs (i.e. Paycheck Protection Program (PPP), Economic Injury Disaster Loan (EIDL), SBA Relief Program, CARES Act unemployment benefit) for the exact SAME expenses being requested from the City of Detroit or its Subrecipients.

I/We, _____, affirm the following dated this the _____ day of _____, 20_____:

I/We have received the following COVID 19 assistance funds from (List program(s):

1 Source of Funding	2 Amount Awarded (\$)	3 Use of Funds	4 Verification of Award (✓) or (X)	5 Documentation of Expenditure (✓) or (X)	6 Amount Expended
a. Paycheck Protection Program					
b. Small Business Administration CARES Relief (SBA) Loan					
b. EIDL					
c. Private Funds					
d. _____					
Total					
Duplication of Benefits Total From Column 2 \$_____:				NOTES:	

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

In addition, if applying for Small Business Relief, Additionally, I/We, _____, affirm (insert business name):

- ☐ Certify the Business has no outstanding city, county, or federal debt
- ☐ Certify the Business has not been Debarred

_____ Applicant Signature	_____ Date
_____ Co-Applicant Signature	_____ Date

City of Detroit
Housing and Revitalization Department
CDBG-DR (Disaster Recovery) Duplication of Benefits Certification Form

The City of Detroit 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 1 Act (42 U.S.C. 5155) and in accordance with section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115–254; 132 Stat. 3442), which amended 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 (insert applicant name) DID NOT receive benefit from any other federal disaster relief/recovery programs (i.e. FEMA, SBA, Insurance). (NO FURTHER ACTION)

☐ I/We, _____, affirm (co-applicant name) 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 City of Detroit 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

I/We, _____, affirm the following dated this the ____ day of _____, 20____:

List amount and source for ALL Federal and/or State financial assistance received for disaster recovery or resiliency planning projects

I/We have received the following disaster recovery assistance funds from (List program(s)):

1 Source of Funding	2 Amount Awarded (\$)	3 Use of Funds	4 Verification of Award (✓) or (X)	5 Documentation of Expenditure (✓) or (X)	6 Amount Expended
a. FEMA					
b. Small Business Administration (SBA) Loan					
b. Insurance					
c. Private Funds					
d. _____					
Total					
Duplication of Benefits Total From Column 2 \$_____ : NOTES:					

APPENDIX C

**CITY OF DETROIT
HOUSING AND REVITALIZATION DEPARTMENT
DUPLICATION OF BENEFIT CERTIFICATION FOR SUBRECIPIENTS**

Background: The Coronavirus Aid, Relief, and Economic Security Act, Public Law 116-132, (CARES Act) makes available federal funds to supplement the Community Development Block Grant (CDBG) funding to prevent, prepare for, and respond to the coronavirus (CDBG-CV). The CARES Act provides that the Secretary of Housing for Urban Development (HUD) shall ensure there are adequate procedures in place to prevent duplication of benefits as required under section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, (42 U.S.C. 5155) as amended by section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115-254; 132 Stat. 3441). HUD is requiring that each grantee have procedures to prevent the duplication of benefits when it provides financial assistance with CDBG-CV funds.

Definition: Duplication of benefits occurs when any person, business or other entity 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, or when Federal financial assistance is provided to any person, business, or other entity through a program for any part of such loss to which financial assistance is received under any other program, insurance or any other source for the same costs, and the total amount exceeds the total need for those costs.

Certification:

I, _____ hereby certify that CDBG-CV funds, awarded by the City of Detroit through the CARES Act does not exceed the need for assistance, duplicate other assistance received by the Subrecipient for the same purpose, or duplicate any funds from the following sources:

- The Paycheck Protection Program
- Unemployment Compensation Benefits
- Insurance claims/proceeds
- Federal Emergency Management Agency (FEMA) funds
- Small Business Administration funds
- Other Federal, State or local funding
- Other Non-Profit, Private Sector or Charitable funding

This certification serves to acknowledge that the Subrecipient understands and agrees that the CDBG-CV funds must be repaid if it is determined that such assistance is duplicative.

Name of Organization: _____

Authorized Representative's Signature: _____

Printed Name: _____

Title: _____

Date: _____

APPENDIX D

Update Summary

The following lists the changes to this policy/procedure since the last approval:

Policy/Procedure Section	Change
APPENDIX A: Duplication of Benefits Project Affidavit	Warning: Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18.U.S.C.2,287,1001 and 31 U.S.C. 3729.”

☐ No changes – this is a new policy/procedure

APPENDIX E

Distribution & Training Plan

The following lists the Distribution & Training Plan for this policy/procedure:

Item	Description	
Implementation Leader	<i>Individual responsible for distribution and training of the P&P (likely the P&P Author).</i>	Gordon Pearson
Audience	<i>List of teams/roles/entities for which P&P applies; this includes HRD, OCFO, and other COD staff (e.g. Law), as well as external partners (e.g. subrecipients and contractors).</i>	CDBG-DR PSRP; Public Facility Rehab; Affordable Housing Development Program; DWSD; Public Housing Commission
Training Plan	<i>Distribution Method (likely Email):</i>	Email
	<i>Anticipated Distribution Date:</i>	The policy will be sent annually by email to existing employees who work CDBG-DR funding within 7 business days of the new approval date. New employees will receive the policy, and any related training, within 90 days of their start date.
	<i>Distribution Recipients:</i>	New and Existing Program Staff, subrecipients
	<i>Training Required (Yes/No):</i>	Yes
	<i>Training Method (Virtual, In-Person, All-Staff Meeting):</i>	Virtual or In-Person
	<i>Anticipated Training Date:</i>	New employees will receive any related training within 90 days of their start date. Existing employees who work with CDBG-DR funding will be trained within 7 business days of the new approval
	<i>Training Recipients:</i>	New and Existing Program Staff

