# Duplication of Benefits (DOB) Letter

As the State of Nebraska’s Department of Economic Development (DED) has been awarded Community Development Block Grant – Disaster Recovery (CDBG-DR) dollars by the Department of Housing and Urban Development (HUD), they and awardees are required by the Stafford Act and the Federal Register Notice to establish and follow policies and procedures to ensure that Duplication of Benefits (DOB) does not occur.

A DOB occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose within the same time period, and the total assistance received for that purpose is more than the total need for assistance. Within the CDBG-DR program, all recipients are bound by [**Section 312 of the Stafford Act**](https://www.govinfo.gov/content/pkg/COMPS-2977/pdf/COMPS-2977.pdf#page=24), as amended by the Disaster Recovery Reform Act, and the Office of Management and Budget (OMB) Cost Principles within [**2 CFR Part 200**](https://www.govinfo.gov/content/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200.pdf) that require all costs to be necessary and reasonable for the performance of the Federal award.

To comply with DOB requirements, the DED and awardees are required to establish and follow policies and procedures to ensure that DOB does not occur. The DED is working to establish processes to effectively identify and prevent DOB as it is critical for you to manage the multiple funding streams related to disaster response.

Each applicant will have a completed DOB review and check at the initial stage of the award and prior to closeout as a result of receiving CDBG-DR from the DED.

HUD provides that the Secretary shall ensure there are adequate procedures in place to prevent any DOB as required by Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 USC § 5155), as amended by Section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115–254; 132 Stat. 3442). Applicants must disclose all financial assistance awarded or received in response to the disaster. The DOB series of forms attached to this email go into further detail on funding sources. Below are a few examples:

* Federal Emergency Management Agency (FEMA);
* Private insurance;
* Private or nonprofit organizations or donations; and
* Other State, local, or Federal programs.

The DED also encourages you to visit their website for further program guidance and future policies and procedures.