

Duplication of Benefits Guide

Background

This document is an informational guide to assist a grantee in conducting a Duplication of Benefits analysis. Because every grantee and program are different, entities will need to adjust the analysis that needs to be conducted. Entities should conduct thorough research and to understand federal, local and other requirements.

American Rescue Plan Act (ARPA) requires that grantees avoid a duplication of benefits. A duplication of benefits occurs when the amount of the assistance to a beneficiary exceeds the total allowable assistance to that beneficiary. Grantees should conduct an analysis to determine whether the beneficiary could receive assistance from other sources and should pay only for needs not met by other sources.

Best Practices/Administrative Steps

1. Identify potential assistance from federal and state government, County agencies, and private or nonprofit charity organizations (covered assistance) that could be received by a beneficiary of ARPA assistance.
2. Require that all applicants for assistance with ARPA funds identify their other sources and amounts of covered assistance (sources and uses), and to certify that the ARPA assistance requested does not duplicate covered assistance that has been received or is reasonably expected to be received from other sources.
3. In any application for ARPA assistance, require beneficiaries to agree to repay ARPA funds received that duplicate funds that beneficiaries later receive for the same purpose from other sources.
4. In conjunction with its actions to prevent fraud, waste, and abuse; employ data systems, data sharing, and data matching to identify duplication of benefits. Enter into data-sharing agreements with relevant federal and state agencies and other entities, as appropriate.
5. Include duplication of benefits among review criteria in monitoring for compliance with applicable laws, regulations, and other authorities.

Conducting the Duplication of Benefits Analysis



1. **Overall Program Analysis** - A grantee can complete a duplication of benefits analysis by developing an overall budget for COVID-19 preparation, prevention and response that demonstrates the funding needed for the activity and the funding reasonably anticipated. This analysis can be used for a particular program or geographic area where the sources of funding can be identified and the benefit need can be reasonably estimated. This has been described as similar to a “sources and uses” analysis for a housing or economic development project.

The sources budget should include all Federal and non-Federal funding, including in-kind donations. If the budget shows that the estimated need is greater than the funding sources, there is no duplication of benefits.

Sources and Uses Calculation

- a) Identify total need prior to assistance (the need of an applicant or a city/county).
- b) Identify potentially duplicative assistance. Are other agencies or government entities receiving ARPA funds? If so, will funds be used for a different purpose?
- c) Subtract all assistance found to be duplicative, resulting in the maximum potential award amount, or unmet need. See example below:

Duplication of Benefit Check

To check for duplication of benefit, provide funding amounts received for the following:

- a) Enter sum of all funding sources:
- b) Enter sum of all insurance proceeds:
- c) Enter sum of all charitable contributions:
- d) Enter sum of all non-profit contributions:
- e) Enter sum of all other funding sources (list each individually):
- f) Total of funds received:
- g) Funding needed for project:
- h) Funding source less need*:

** If the total is positive, then there is a potential duplication of benefit, and the grantee should conduct an individual assistance analysis. If the total is negative, then the need*



exceeds the funding and there is no overall duplication of benefits and less risk that there is individual duplication of benefits.

- 2. Individual Assistance Analysis** - A grantee may conduct an individual assistance analysis by entering into data-sharing agreements with relevant federal and state agencies and other entities. Grantee would conduct a statistical sample of the population and select beneficiaries from that sample for further review. This review would include adding all the benefits received from all funding sources for this program for a selected beneficiary with the eligible benefit level for this program. If the benefits received exceed the eligible benefits, then there is a duplication of benefits. The grantee should collect the amount of duplication of benefits and allocate this amount to the grantee and other relevant agencies as provided in the date-sharing agreement.



Statutory and Legislative References

- PL 116-94, December 20, 2019, 133 Stat 2534 - Division A,
- Title V PL 116-93, December 20, 2019, 133 Stat 2317 - Division C,
- Title VII Section 601(d) of the Social Security Act, as added by section 5001 of the CARES Act
- Uniform Guidance 2 C.F.R. §200
- 45 CFR Part 75 effective December 26, 2014 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Health and Human Service awards
- U.S. Department of the Treasury Coronavirus State and Local Fiscal Recovery Funds Interim Final Rule, 31 CFR Part 35 RIN 1505-AC77, §35.6
- The Stafford Act, 42 U.S.C. § 5121 at § 312
- 44 CFR § 206.191

Note: For additional and detailed guidance see the [KPMG Presentation- Understanding, Tracking & Avoiding Duplication of Benefits in Leveraging Multiple COVID-19 Funds](#)

