




**Planning & Development Division**  
*Planning & Economic Development Department*

Room 160  
411 West First Street  
Duluth, Minnesota 55802

 218-730-5580

 [planning@duluthmn.gov](mailto:planning@duluthmn.gov)

**City of Duluth**  
**Planning & Development Division**

## **Policy on Duplication of Benefits**

The Planning & Development Division (P&D) must certify that program funds follow all duplication of benefits requirements from the U.S. Department of Housing and Urban Development (HUD). P&D is required to ensure that the city prevent any duplication of benefits when it is providing financial assistance with CDBG-CV, ESG-CV, and other funds provided by HUD.

### **PURPOSE OF POLICY**

The purpose of the Policy on Duplication of Benefits is to ensure that the City of Duluth is not providing grant funds to pay for particular costs where there is another source of financial assistance that is available to pay for that same cost and to identify specific processes that will assist in ensuring this. The processes that this policy applies to, include:

- Acceptance (or application) of funds
- Identification of community needs
- Proposal review and award of funds
- Contract management

### **APPLICABILITY**

This policy pertains specifically to the funds provided by the CARES Act signed into law on March 27, 2020 and all of the city's processes related to the acceptance, prioritization and spending of these funds.

A duplication of benefits occurs when a person, household, business, government, 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.

### **ENSURING COMPLIANCE**

#### **Stage 1. At Initial HUD Award (City of Duluth)**

At the award and acceptance of funds from HUD, the City of Duluth will ensure the funds are not duplicative for any activity by completing the following steps:

1. Review the award notice and information that identifies the purpose of the funds.
2. Analyze other sources that have been received, anticipated, or that are available and determine if they could be used for the same sources.


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3. Conduct ongoing research to understand new funding assistance that becomes available and evaluate as needed. This research can be conducted through reviewing news, following federal updates, attending webinars, and connecting with local, regional, state, and federal partners on available assistance opportunities.

Documentation of compliance: City staff will review and file guidance from HUD or other programs/resources that are available. City staff will document attendance, save materials from webinars, and share it with community partners when necessary.

### **Stage 2. At Identification of Community Needs (City of Duluth)**

When conducting community needs analysis, the city of Duluth will work to:

1. Review the award notice and information that identifies the purpose of the funds.
2. Analyze other sources that have been received, anticipated, or that are available and determine if they could be used for the same sources.
3. Conduct ongoing research to understand new funding assistance that becomes available and evaluate as needed. This research can be conducted through reviewing news, following federal updates, attending webinars, and connecting with local, regional, state, and federal partners on available assistance opportunities.

Documentation of compliance: Summaries of community input sessions/public hearings and scoring criteria used to evaluate project proposals will be developed. Coordination with local partners including St Louis County will happen at regular coordination meetings like the Affordable Housing Coalition, Heading Home Governance Board, and Duluth Funders Alliance meetings.

### **Stage 3. At Proposal Review (City of Duluth)**

1. All proposals/applications that are being considered for funds provided by the CARES Act shall be considered by how it addresses a community need and what other resources are available for the same need.
2. No proposals that duplicate a benefit at the time of funding will be recommended for approval. An analysis of funding available and current unmet need will be conducted prior to finalizing agreements.
3. City staff will consult with community members, professional partners, and other agencies when reviewing proposals to ensure there are not alternative funding sources available.

Documentation of compliance: Eligible Activities Worksheet, Project Proposal, and summary of composite scores for all proposals


### **Stage 4. Project Implementation (Sub-recipients, City of Duluth)**

1. Agreements with sub-recipients to implement projects that were awarded funding will ensure sub-recipients are aware of the need to actively analyze program and new funding opportunities for duplication of benefits.



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2. When implementing projects, sub-recipients will be required to ensure individuals understand the need to avoid the duplication of benefits. Sub-recipients are responsible for identifying duplication of benefits and ensuring that funding is not provided in instances where it would create a duplication of benefits.
3. If a sub-recipient is notified of a potential/actual duplication of benefits, they are to let the City of Duluth know within seven (7) days. The City of Duluth will ensure that funding assistance is not provided to a program/person where similar assistance is available.

Documentation of compliance: DOB will be required in sub-recipient agreements and applicable sub-recipients will work with participants to complete DOB certification forms.

## 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 Duluth will terminate the agreement and no further disbursement of funds for the duplicated activities. The City of Duluth will then explore whether funding needs to be returned to the city. The City may update this policy as additional guidance is received by HUD.

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