

Summary of Updates and Applicability of Updates to Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees

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What is in this document?

This document provides a user-friendly summary and guide for HUD grantees with Disaster Recovery Community Development Block Grant (CDBG-DR) allocations for disaster events occurring between **January 1, 2015 and December 31, 2021** related to how they can apply the *Updates and Applicability of Updates to Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees* (collectively, the 2019 DOB Notice) to their programs. This document is limited to providing a summary of how grantees may choose to amend or develop their homeowner programs where CDBG-DR applicants also applied for SBA loans. This document does not include a comprehensive review of every component of the 2019 DOB Notice, and grantees should read the two documents for additional guidance.

Glossary of Terms Helpful for Understanding the 2019 DOB Notice

Action Plan and Action Plan Amendment (APA): A grantee's plan for using CDBG-DR funds that is made available to the public for input and comment and submitted to HUD for

their review and approval. The Action Plan and subsequent amendments include an unmet needs assessment in the state or entitlement community's disaster-impacted area in such categories as housing, public infrastructure, economic development, and public services. The grantee must develop programs, prioritize funding and methods of distributing funding in a way that is directly tied to recovering from the qualifying disaster and must be based on the grantee's assessment of unmet need, as well as in a manner that is consistent with the CDBG-DR and other federal cross-cutting regulations, the criteria and limitations published by HUD in the applicable Federal Register Notices (FRN) and all expenditure requirements.

Available Loan: A subsidized loan is available when it is accepted, meaning that the borrower has signed a note.

Canceled Loan Amounts: Loans (or portions of loans) that were initially accepted, 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. The canceled loan amount is the amount that is no longer available. 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.

CDBG-DR: Disaster Recovery Community Development Block Grant

Declined Loan Amounts*: 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 or other loan document that allows the lender to advance loan proceeds. The term does not include undrawn loan amounts when the borrower has entered a loan agreement.

*Please note SBA Declined Loans are different from CDBG-DR Declined Loans. When SBA refers to Declined Loans in their data feed, those are the situations where SBA underwrote an applicant for a loan and determined the loan application should be declined. These are not loans that were declined by the applicant. Some reasons for SBA's decline include but are not limited to: lack of repayment ability; excessive amount of debt relative to net worth; unsatisfactory history on another federal/SBA obligation; unsatisfactory credit history; and no disaster-related damage.



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Disbursed Subsidized Loans: Loan amounts that are approved through an active loan agreement with a federal lender (e.g. SBA) and have been paid out to the borrower.

DOB: Duplication of Benefit: A duplication occurs when a person, household, business, or other entity receives disaster assistance from multiple sources for the same recovery purpose, and the total assistance received for that purpose is more than the total need. The amount of the DOB is the amount received in excess of the total need for the same purpose.

FR or FRN: Federal Register or Federal Register Notice.

Grantee: State or entitlement community responsible for the administration and oversight of the CDBG-DR allocation who enters into a grant agreement directly with HUD for CDBG-DR funds

HUD: US Department of Housing and Urban Development: federal agency that allocates and oversees CDBG-DR assistance awarded to eligible state or entitlement community grantees

Low- or Moderate- Income Expenditure Requirements: Grantees are required to spend a certain percentage of their grant on activities that benefit low- or moderate-income individuals and households. The majority of the 2016-2021 grantees are required to spend at least 70% of their grant on LMI activities.

Most Impacted or Distressed Area Expenditure Requirements: In the applicable Federal Register Notices,

HUD notifies grantees of the areas that are the “Most Impacted and Distressed.” Typically, HUD requires a minimum of 80% of the CDBG-DR allocation to be spent on activities that benefit households and individuals in those areas, with the remaining 20% being allowed to be spent in areas the grantee defines as most impacted and distressed.

Purpose: The reason for which assistance was provided to an applicant of federal funds or the reason for which insurance or other proceeds are provided to a person or business. Examples include but are not limited to: repairs or reconstruction; personal property; interim housing assistance; contents; mitigation; and elevation requirements. Grantees should consider the allowable use(s) of all reasonably identifiable assistance available to the applicant when determining if other assistance was provided for the same purpose as the CDBG-DR eligible costs.

Private loan: A loan not provided or guaranteed by a governmental entity, and that requires the CDBG-DR applicant (i.e. the borrower) to repay the full amount of the loan under typical commercial lending terms; not deemed “financial assistance” and therefore not considered in the DOB calculation.

Reimbursement: Payment of eligible costs incurred by an applicant before the date they applied for CDBG-DR assistance.

SBA: Small Business Administration: federal agency that underwrites, performs inspections, awards, and administers low-interest, long-term disaster loans to homeowners and businesses.

Subsidized Loan: Subsidized loans (including forgivable loans) are loans other than private loans. Both SBA and FEMA provide subsidized loans for disaster recovery. Subsidized loans may also be available from other sources. Subsidized loans are assistance that must be included in the DOB analysis, unless an exception applies.

Undisbursed subsidized loans: Loan amounts that are approved through an active loan agreement with the federal lender (e.g. SBA) but have not yet been paid out to the borrower.

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.”



A. 2019 DOB Main Notice in a Chart: Subsidized (including SBA) Loans

	Applicability to Year of Federal Disaster?			Grantee Requirement to Submit to HUD for Review and Approval?		Different from 2011 DOB Notice?	What does it mean?
	2015	2016 - 2017	2018 - 2021	DOB Policy Revision	Substantial APA		
<p>Declined and Canceled Loans</p> <p><i>Declined Loans:</i> SBA approved the loan to the applicant, but the applicant never signed the loan agreement</p> <p><i>Canceled Loans:</i> SBA approved the loan, the applicant signed the loan, the loan has since been canceled, and the remaining balance is no longer available to the applicant</p>	X	X	X	Yes	If revised DOB policy is inconsistent with language in current Action Plan	Yes	<p>Grantees must:</p> <ul style="list-style-type: none"> Stop counting declined or canceled loans as a DOB when calculating an eligible CDBG-DR award, subject to additional HUD review, procedural, and documentation requirements. Grantees may choose to account for this assistance through other processes (e.g. file underwriting) even if not counting the declined or canceled SBA loans as a DOB.
<p>Undisbursed and Disbursed Loans</p> <p><i>Undisbursed Loans:</i> Loan amounts that are approved through an active loan agreement but have not yet been paid out to the borrower.</p> <p><i>Disbursed Loans:</i> Loan amounts that are approved through an active loan agreement and have been paid out to the borrower.</p>		X	X	Yes, if grantee chooses to use CDBG-DR funds for this purpose	To understand what grantees must do to implement a revised Undisbursed and Disbursed Loan Policy, see D. Steps to Implement Revised Undisbursed and Disbursed Loan Policy	Yes	<p>Grantees may choose or choose not to:</p> <ul style="list-style-type: none"> Stop counting unpaid (undisbursed) or paid (disbursed) portions of active SBA loans as a DOB when calculating an eligible CDBG-DR award, subject to additional HUD review, procedural, and documentation requirements. Additional HUD reviews, limitations, prioritization steps, reporting, and requirements apply if grantees choose to use CDBG-DR funds to repay SBA loans for households with incomes greater than 120% AMI.

B. 2019 DOB Implementation Notice in a Chart: Subsidized (including SBA) Loans

	Applicability to Year of Federal Disaster?			Grantee Requirement to Submit to HUD for Review and Approval?		Different from prior guidance?	What does it mean?
	2015	2016 - 2017	2018 - 2021	Policy Revision	Substantial APA		
Amendments to CPD 2015-7: Amend date for determining pre-award costs		X	Addressed in future applicable appropriation FRNs	Yes, if date of reimbursement in program is changed	If revised reimbursement policy is inconsistent with language in current Action Plan	Yes	If grantees choose to use CDBG-DR funds to reimburse for eligible pre-award costs covered by SBA loans, grantees must issue stop work orders to applicants. When determining the date of the stop work order, use the later date of either: <ul style="list-style-type: none"> ▪ The effective date of the APA; or ▪ The date the applicant applied for CDBG-DR assistance
Revision to Prior FRN: Replace reference to 2011 DOB Notice with 2019 DOB Notice	X	X		Yes, if grantee chooses to adopt provisions allowable under the 2019 DOB Notice		Yes	Except in the case of Declined and Canceled Loans, the 2011 Notice continues to apply by default, unless particular program policies and APA are amended to replace 2011 Notice provisions with 2019 Notice provisions
Revision to Prior FRN: Remove Prohibition of Using CDBG-DR funds to repay SBA Loans		X		Yes, if grantee chooses to use CDBG-DR funds to repay SBA loans		Yes	While certain grantees may use CDBG-DR funds to repay loans, additional steps are required, and grantees are not required to use CDBG-DR to repay SBA loans. For more information, see D. Steps to Implement Revised Undisbursed and Disbursed Loan Policy
Revision to Prior FRN: Waiver to add an eligible activity of any outstanding interest due on the portion of the principal of subsidized loans used to pay the costs eligible for reimbursement. CDBG-DR funds cannot be used to pay fees or the portion of interest attributable to activities that are ineligible for reimbursement.		X		Yes, if grantee chooses to use CDBG-DR to pay interest on principal paid on eligible costs		Yes	HUD created a new eligible activity to be able to pay for interest due on principal paid on eligible costs. While certain grantees may choose to pay for this new eligible activity, additional steps and limitations are required (see requirements around disbursed and undisbursed subsidized loans) and grantees are not required to use CDBG-DR to repay interest.

C. Steps to Implement Revised Declined and Canceled Loan Policy

		Declined and Canceled Loans: V.B.2	
		Areas of Consideration/No Go	Go
Step 1	What is the year of the Federal Disaster for which the grantee was allocated CDBG-DR funds?	If pre-2015 or post 2021, then STOP. The 2019 DOB Notice does not apply to the grantee, continue to calculate DOB based on the previous guidance.	If between 2015-2021, proceed to Step 2.
Step 2	<p>The grantee may consider additional reviews before adopting the provision in the notice that states “[t]he amount of a subsidized loan that is declined or canceled is not a DOB” (V.B.2(ii)). Before making this decision, the grantee should consider the following:</p> <ul style="list-style-type: none"> ■ What is the potential budget impact of a revised Declined and Canceled Loan policy? ■ Does the grantee have adequate funding available to cover the additional grant amounts? ■ How will providing the additional grant assistance impact the grantee’s overall LMI and MID expenditures? 	<p>The grantee must stop counting declined or canceled loans as a DOB yet may still consider this assistance when calculating the CDBG-DR award through another review, such as underwriting (V.B.2(ii)).</p> <p>However, if the analysis demonstrates the grantee does not have adequate funding to cover Declined and Canceled loans or if there are other limitations as to why the grantee cannot provide full or partial assistance for Declined or Canceled loans, then the grantee may add an additional review for applicants with Declined or Canceled loans and/or other policy revisions that ensures the grantee is able to meet all grant requirements.</p>	If the analysis demonstrates the grantee is able and willing to implement a policy that does not count Declined and Canceled loans as DOB and does not otherwise consider those loans in the application review process, then proceed to Step 3.
Step 3	Do the grantee’s current program policies and procedures address whether Declined and Canceled loans are considered a duplication of benefits, and include the additional documentation requirements necessary for Canceled loans? Confirm how the change will be made retroactively for previously processed applicants.	If not, update program policies and procedures to remove Declined and Canceled loans from the DOB calculation, for all eligible applicants, regardless of household income. Also include additional documentation requirements for applicants with Declined or Canceled loans, per section V.B.2(ii) of FR-6169-N-01. Review standing Action Plan to ensure it allows for revised Declined and Canceled DOB policy. If inconsistent or not allowable, Action Plan must be updated. Additional details for implementation of eligible disbursed and undisbursed loans are provided in V.B.2(iii).	Once complete, proceed to Step 4.
Step 4	Submit policy and Action Plan (if applicable) revisions to HUD for review and approval.	Once complete, proceed to Step 5.	
Step 5	<p>Review and amend past individual awards made for consistency with new Declined and Canceled loan policy and process new eligible applicants per updated Declined and Canceled loan policy. Ensure adequate documentation is collected and uploaded into individual applicant files.</p> <ul style="list-style-type: none"> ■ Declined Loans Additional Documentation Requirements: Grantee is only required to obtain additional documentation that the applicant declined the loan if the grantee cannot verify the status of the declined loan through the SBA data feed. ■ Additional Canceled Loan Documentation and Procedural Requirements: Grantee must require applicant to: <ul style="list-style-type: none"> (a) Submit a written communication from SBA confirming that the loan has been canceled and undisbursed amounts are no longer available to the applicant; OR (b) Obtain a legally binding agreement with the applicant that indicates that the period of availability of the loan has passed and the applicant agrees not to take actions to reinstate the loan or draw any additional undisbursed loan amounts; AND (c) Grantee must notify the SBA that the applicant has agreed to not take any actions to reinstate the canceled loan or draw any additional undisbursed loan amounts. 		

D. Steps to Implement Revised Undisbursed and Disbursed Loan Policy

Undisbursed and Disbursed Loans: V.B.3			
	Step-By-Step Decision Points	Areas of Consideration/No Go	Go
Step 1	What is the year of the Federal Disaster for which the grantee was allocated CDBG-DR funds?	If pre-January 1, 2016 or post-December 31, 2021, then STOP. This portion of the 2019 DOB Notice does not apply to the grantee, continue to calculate DOB based on previous applicable guidance.	If between 2016-2021, proceed to Step 2.
Step 2	<p>Before making the decision whether a revised policy should be adopted for Undisbursed or Disbursed loans, a grantee should consider:</p> <ul style="list-style-type: none"> What is the potential budget impact of a revised Undisbursed and/or Disbursed Loan policy? Does the grantee have adequate funding available to cover the additional grant amounts as well as the outstanding unmet needs of other applicants who have not completed repairs or who have not been processed through the program? How will providing the additional grant assistance impact the grantee’s overall LMI and MID expenditures? How would paying for Undisbursed and/or Disbursed loans impact a grantee’s ability to address other recovery needs? 	If the analysis demonstrates the grantee does not have adequate funding to cover Undisbursed and/or Disbursed loans and/or that the policy change would adversely impact other recovery requirements, the grantee may choose to continue to account for Undisbursed and/or Disbursed loans as a duplication of benefit when calculating CDBG-DR awards.	If the analysis demonstrates there is adequate funding to cover partial or full Undisbursed and/or Disbursed loans, and the grantee will be able to meet all expenditure and recovery requirements, and the grantee chooses to allow for reimbursement of partial or full Undisbursed and/or Disbursed loans, then proceed to Step 3.
Step 3A	<p>Does the grantee want to fully or partially reimburse Undisbursed and/or Disbursed loans for households with incomes of:</p> <ul style="list-style-type: none"> Equal to or less than 80% AMI; and/or Equal to or less than 120% AMI 	<p>If no, STOP. The grantee will not amend the current DOB policy to remove full or partial Undisbursed and/or Disbursed loan amounts as a DOB in their CDBG-DR award calculation.</p> <p>If yes, the grantee must submit a substantial APA to HUD for partial or full reimbursement of SBA loans, including, per V.B.3(viii): an updated unmet housing needs assessment; identify the number of unserved eligible applicants and how grantee will address remaining unmet needs of housing applicants; grantee must reimburse LMI applicants before households with >80-120% AMI; demonstration how the total aggregate amount of reimbursements for loan-costs from applicants over 80% AMI will not reduce the overall LMI benefit applicable to the grant; grantees cannot reimburse applicants with incomes >120% without submitting a hardship exception to HUD.</p>	Once complete, proceed to Step 4.

<p>Step 3B</p>	<p>Does the grantee want to fully or partially reimburse Undisbursed and/or Disbursed loans for households with incomes of:</p> <ul style="list-style-type: none"> All income levels, including greater than 120% AMI 	<p>If no, skip Step 3B. If yes, in addition to the requirements in Step 3A, the grantee must submit a substantial APA to HUD outlining the hardship criteria the grantee will use when determining whether it will partially or fully reimburse SBA loans (V.B.3(viii)e.). The hardship criteria must include:</p> <ul style="list-style-type: none"> Demonstration of the applicant’s financial necessity for full or partial reimbursement of costs paid with SBA loans; A definition of financial necessity that is sufficient to distinguish between applicants with significant need for full or partial reimbursement to enable the applicant to pay for basic household or business expenses, and applicants who are not eligible for a hardship exception because they seek reimbursement for reasons other than financial necessity; and A requirement that the amount of the full or partial reimbursement shall not exceed the amount needed to address the applicant’s financial necessity. The grantee must also develop policies and procedures that identify the information the grantee will use to make the determination of financial necessity. <p>Please Note: Any future grantee request for a waiver of the overall benefit requirement applicable to a CDBG-DR grant will be evaluated by HUD in light of the amount of assistance the grantee has or plans to use to reimburse applicants with incomes in excess of 80% AMI for costs paid by SBA and other subsidized loans</p>	<p>Once complete, proceed to Step 4.</p>	
<p>Step 4</p>	<ul style="list-style-type: none"> Once substantial Action Plan Amendment has gone through all the public notice and citizen participation processes and is reviewed by HUD, update DOB policies 	<p>and procedures to reflect all applicable 2019 DOB Notice requirements for HUD review.</p>	<ul style="list-style-type: none"> Amend any APA content and/or any DOB policies and procedures that HUD determines to be inadequate. 	<ul style="list-style-type: none"> Once complete and approved by HUD, proceed to Step 5.
<p>Step 5</p>	<p>Review and amend past individual awards made for consistency with new DOB policy and process new eligible applicants per updated DOB policy. Ensure all required documentation is collected and uploaded into individual applicant files:</p> <ul style="list-style-type: none"> HUD will review hardship exception requests for applicants with household incomes greater than 120% AMI. HUD will issue additional guidance on the process for submitting applicant information for their review and approval; 	<ul style="list-style-type: none"> Documentation that all federal assistance (including CDBG-DR and SBA loan assistance) is used toward a loss suffered as a result of the major disaster or emergency (V.B.3(i)). Under the terms of the DRRRA amendments to the Stafford Act, if the SBA loan is used for a purpose other than disaster losses, the SBA loan still duplicates other sources provided for the same purpose; The grantee must meet all grant requirements for reimbursement of costs (including deadlines, eligible activities, etc.), which are imposed by Federal 	<p>Register notices that govern CDBG-DR grants (V.B.3(ii));</p> <ul style="list-style-type: none"> If the grantee has already received the application and completed an initial DOB analysis, the grantee must complete a revised DOB analysis that updates the applicant’s unmet needs and assistance from all sources, and excludes subsidized loans used for disaster losses and other nonduplicative assistance from the total assistance to calculate the revised DOB amount (V.B.3(iii)); 	<ul style="list-style-type: none"> The grantee must document that the reimbursed cost was for an activity that was a CDBG-DR eligible activity (V.B.3(iv)). Grantee cannot reimburse for costs that are ineligible under CDBG-DR or ineligible under the applicable reimbursement provisions; The grantee must notify the SBA of the reimbursement and issue a joint payment to the SBA and the applicant (V.B.3(v)); and The grantee must document compliance with environmental requirements at 24 CFR part 58 prior to reimbursement for a CDBG-DR eligible activity (V.B.3(vii)).
<p>Step 6</p>	<p>Within one year of the effective date of the Substantial Action Plan Amendment approving the revised policy, provide an assessment and supporting data documenting, as per V.B.3(ix):</p>	<ul style="list-style-type: none"> The total amount of CDBG-DR funds used for the reimbursement of SBA and other subsidized loans; The total number of households and the number of low- to moderate-income households that have been reimbursed; and 	<ul style="list-style-type: none"> Data on each individual household that was reimbursed for its SBA loan costs, including the household’s FEMA Registrant ID, the SBA loan number, the amount of the initial SBA real property loan; the amount of the initial SBA personal property loan; the amount of 	<p>the loan costs paid by CDBG-DR; and the household’s income</p>

E. Example Scenarios Applicable to SBA: Homeowner Repair or Reconstruction Program



Using the fields in the table below from the SBA data feed, you can see how this guidance can impact an applicant's eligible CDBG-DR repair or reconstruction award and the grantee's program budget:

2011 DOB Notice Requirements (2011-2013 Grantees):

- This column reflects how grantees should have been calculating eligible award amounts prior to the 2019 DOB Notice. Grantees who received CDBG-DR allocations for disasters in 2011-2013 should continue to calculate DOB using the 2011 and 2013 guidance.
- When subject to the 2011 DOB Notice requirements, grantees were required to count all applicable SBA loan amounts, except they were allowed to choose to discount SBA approved loan amounts in cases where homeowners declined (never executed) their SBA loans and those homeowners were LMI or met certain demonstrable hardship criteria.
- Except in the case of Declined and Canceled loans, grantees may continue calculating eligible awards using this methodology if, after an initial analysis of their program, they determine they do not have adequate funding available to change their DOB policy or that a change in policy would adversely impact their ability to meet certain unmet recovery needs, their low- or moderate-income (LMI) and/or most impacted and distressed (MID) expenditure requirements. While grantees cannot count Declined or Canceled Loans as a DOB, they may consider those approved amounts in the program's underwriting or review of necessary and reasonable expenses.

Revised Policy Scenario 1:

- As required by the 2019 DOB Notice, the grantee stops counting all Declined and Canceled Loans as a DOB and chooses not to perform additional underwriting of the applicant related to declined and/or canceled loan amounts. Therefore, the Declined and Canceled Loan amounts are not included in the DOB calculation.
- The grantee performs an analysis of their program and unmet needs and chooses to keep counting disbursed and undisbursed SBA amounts as a duplication of benefits, as a change in policy would adversely impact the grantee's ability to stay within program budget and/or meet their LMI and/or MID expenditure requirements.
- The grantee chooses to require applicants to cancel remaining undisbursed amounts with SBA if they are not to be counted as a DOB and will require written documentation from SBA indicating the final SBA loan amount, with information that the remaining balance has been canceled and is no longer available to the applicant.
- The grantee will count the "current" approved amount in their calculation of DOB if the applicant has executed the SBA loan and their loan has not been canceled.

Revised Policy Scenario 2:

- As required by the 2019 DOB Notice, the grantee stops counting all Declined and Canceled Loans as a DOB and chooses not to perform additional underwriting of the applicant related to declined and/or canceled loan amounts. Therefore, the Declined and Canceled Loan amounts are not included in the DOB calculation.
- The grantee performs an analysis of their program, their outstanding unmet needs, determines they will still be able to meet their LMI and MID expenditure requirements, as well as address the unmet needs of households with outstanding repairs and decides to submit a revised DOB policy and substantial action plan amendment to HUD that allows CDBG-DR funds to be used to reimburse disbursed and undisbursed SBA loan amounts.
- The grantee will be required to prioritize LMI households over non-LMI households and will be required to meet all reporting requirements contained in the 2019 DOB Notice.

Please note: Currently SBA does not break out disbursed loan amounts by category of approved assistance. Grantees should work with SBA to obtain this level of detail to ensure CDBG-DR funds are used to reimburse for CDBG-DR program eligible costs.

	A. Total CDBG-DR Program Assessed Damages	Loan Decision APPROVED= Approved by SBA Declined= Declined by SBA Withdrawn= Withdrawn by applicant	Loan Canceled Indicator Y= Yes, Loan was Canceled N= No, Loan was not Canceled	Loan Authorization and Agreement (LAA) Date Indicates the date the applicant executed the loan with SBA	B. SBA Original Approved Amount Real Estate Repair, Reconstruction, Debris Removal, Mitigation, Elevation and MHU	C. SBA Current Amount Real Estate Repair, Reconstruction, Debris Removal, Mitigation, Elevation and MHU	D. SBA Disbursed Amount *currently SBA does not break out disbursed amounts by the same sub-categories that are listed under "Approved and Current" fields. Grantees will need to work with SBA to obtain this information	E. Other Duplicative Assistance	F. 2011 DOB Notice Eligible CDBG-DR Award (A-B-E=F)	G. Revised Policy Scenario 1 Eligible CDBG-DR Award (A-C-E= G) *Assume App 4 will cancel \$25K undrawn amt	H. Revised Policy Scenario 2 Eligible CDBG-DR Award (A-E = H)
Applicant 1	\$90,000	Approved	Y	Blank	\$100,000	\$0	\$0	\$30,000	\$0* with some LMI or hardship exceptions	\$60,000	\$60,000
Applicant 2	\$90,000	Approved	Y	02/09/2018	\$100,000	\$25,000	\$25,000	\$30,000	\$0	\$35,000	\$60,000
Applicant 3	\$90,000	Approved	N	02/09/2018	\$100,000	\$100,000	\$100,000	\$30,000	\$0	\$0	\$60,000
Applicant 4	\$90,000	Approved	N	02/09/2018	\$100,000	\$50,000	\$25,000	\$30,000	\$0	\$10,000	\$60,000
Applicant 5	\$90,000	Withdrawn	Blank	Blank	Blank	Blank	Blank	\$30,000	\$60,000	\$60,000	\$60,000
Applicant 6	\$90,000	Declined	Blank	Blank	Blank	Blank	Blank	\$30,000	\$60,000	\$60,000	\$60,000

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