



## Duplication of Benefits: Information Guide

### Purpose of the Information Guide

Elevate Florida is a residential mitigation program administered by the Florida Division of Emergency Management (FDEM) and funded by the Federal Emergency Management Agency (FEMA) through the Hazard Mitigation Grant Program and Flood Mitigation Assistance's Swift Current. Because Elevate Florida uses federal funding, there are rules in place to make sure that you do not receive duplicate financial assistance for the same repairs or improvements from multiple sources. This is commonly known as a duplication of benefits (DOB).

This guide is designed to help you:

- Understand what "duplication of benefits" means
- Learn how it may affect costs under Elevate Florida
- Explore duplication of benefits considerations for different project types
- Know Property Owner responsibilities for reporting and documentation throughout the program
- Review situational examples of how duplication of benefits may impact project costs

For more detailed information on DOB, please reference Appendices A-D. Note, there will be a separate in-depth guide for Acquisition Demolition projects released at a later time.

### Section 1: Duplication of Benefits Overview

A DOB is defined as "duplication that occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same disaster, and the total assistance is more than the total need for the same purpose." Simply put, a DOB may occur when assistance for the same reason has been received, will be received, or is available from another source, like insurance or legal settlements or other federal assistance provided to you.

Section 312 of the Stafford Act ([42 U.S.C. § 5155](#)) and [44 CFR 206.191](#) prohibit duplication of benefits (DOB) for disaster assistance and outline key requirements for recipients and subrecipients of federal funding to report all disaster assistance received and make sure that no duplicate financial aid is provided for the same loss.

### Understanding the Possibility of Duplication of Benefits

The scope of the DOB review for Elevate Florida Program will include funding received from damages caused by Hurricanes **Helene, Milton, and Debby** from the 2024 hurricane season.

Common examples of assistance that should be reported to assess DOB include but are not limited to:



National Flood Insurance Program (NFIP) \*Structure Coverage Only



Individual Family Grant (IFG)



Spent NFIP Increased Cost of Compliance (ICC)

Emergency Minimal Repair Grant (EMR)



Individual Households Program (IHP)



FEMA Disaster Housing Assistance



Small Business Administration (SBA) Mitigation Loan



Other assistance types such as private insurance, gifts, etc.

Assistance received must be spent prior to signing the Homeowner Grant Agreement (HGA). Unspent funds after this date will be considered a DOB. Your Case Manager will reach out to you in the weeks leading up to you signing the HGA to review and finalize your DOB determination.

### **Understanding the Impact of Previously Spent Funds for Structural Repairs for DOB Determinations**

A Property Owner may receive insurance or other funds for disaster-related damage, spend those funds on eligible recovery costs, and then seek additional federal assistance for the same project or purpose.

Federal law prohibits providing disaster assistance for costs already covered by insurance or other sources. *However, if you spend those funds as intended, those funds may not be considered a DOB – provided that the spend is properly documented.*

For example, federal assistance can cover the remaining unmet need without violating DOB rules if you:

- Receive an insurance payout for disaster damages,
- Use the insurance money for eligible repairs, reconstruction, or recovery,
  - Maintain and provide documentation showing insurance funds were spent on eligible costs,
  - Determine total recovery costs match or exceed the insurance payout,
- Request additional federal assistance for unmet need, and
- Show the insurance funds were spent on eligible costs.

It is critical that you maintain all documentation to support activities and submit this documentation to your Case Manager.



## **Section 2: Property Owner Responsibilities for DOB**

### **What Property Owners Can Expect in the DOB Review**

In the “Review” phase of the program, your Case Manager will send you a Duplication of Benefits Disclosure Form. You should make sure this form is filled out correctly and emailed back to your Case Manager.

The Elevate Florida team will perform an initial review the completed Duplication of Benefits Disclosure Form and accompanied supporting documentation to understand requirements of other assistance. This review is aimed to:

- Assess if there may be an overlap between the scope for the reported assistance with the Elevate Florida project
- Verify if additional information is needed from the Property Owner
- Determine whether a duplication of benefits may exist
- Provide the expected impact to the federal and Property Owner cost shares

If a DOB is identified, you will be notified via your preferred method of communication. Additionally, the federal share of the total project costs will be reduced for Elevations, Mitigation Reconstruction, or Wind Mitigation project types. The offer amount for Acquisition/Demolition projects will also be lowered.

### **Property Owner Documentation Needed for DOB Evaluation**

In addition to the Duplication of Benefits Disclosure Form, you may be required to submit additional documentation of other assistance, support for funding received, and receipts showing that previous funding was spent in accordance with outlined requirements. Examples of supporting documentation may include but are not limited to:

- Insurance claim policies
- Insurance claim settlement letters
- Proof of insurance payments received
- Award letters
- Documentation of disaster grants and/or loans
- Letters or statements from private or charitable assistance
- Invoices, contracts, receipts for work performed

*If you are unable to provide supporting documentation related to the assistance you received, the assistance will likely count as a duplication of benefits. Please contact your Case Manager if you do not have the documentation listed above. Elevate Florida will work with you to determine what other documentation we can accept for the DOB evaluation.*

### **Property Owner Responsibilities on Elevate Florida**

It is important for you to work with your Case Manager during the program to share any previous or upcoming assistance, insurance payouts, and gifts that may overlap with the scope of an Elevate Florida project



throughout the duration of the project. This helps to follow compliance and prevent potential future claw backs.

FEMA's Hazard Mitigation Assistance does not require that Property Owners seek assistance from other sources (except for insurance). However, it is the responsibility of the Property Owner to report other benefits received, any applications for other assistance, the availability of insurance proceeds, or the potential for other compensation, such as compensation from pending claims for damage related to the property. If the Property Owner has an insurance policy that could potentially cover hazard mitigation activities (including ICC coverage), FEMA generally requires that the Property Owner file a claim prior to receipt of aid from HMA grants.

Your responsibilities to support DOB requirements on Elevate Florida include:

- Complete the Duplication of Benefits Disclosure Form accurately, completely, and timely when provided by your Case Manager in the "Review" phase of the program
- Maintain and provide receipts and documentation for all assistance received
- Promptly report any changes in payouts, settlements, awards, and gifts to your Case Manager throughout the duration of the program
- Reach out to your Case Manager or [support@elevatefl.org](mailto:support@elevatefl.org) with specific questions related to the property owner's unique circumstances



## **Appendix A: Duplication of Benefits Common Questions**

### **If the NFIP payment I received was for interior repairs, would it be considered a DOB?**

It depends. NFIP covers building/structure and contents. NFIP payments for interior repairs would fall under the building/structure coverage. They are not considered DOB if the money was spent on its intended use (interior repairs) and the property owner maintains receipts and supporting documentation to demonstrate work completed. An NFIP payment is the money you receive after making a claim with NFIP and accept the settlement offer given to you by your insurance provider. This money can be used to fix or replace your damaged property. Please make sure you provide a copy of your insurance policy, your final settlement offer, and any receipts if you have used your NFIP payment.

### **If I received my NFIP claim payment for building / structure repairs, does this count as a DOB?**

The answer depends on the project type, what the funds were supposed to be used for, what the funds were actually used for, and if you have receipts for funds spent. For example, on an elevation project, only the money received for the foundation is considered DOB if the funds have not yet been spent or you can't provide receipts for funds spent. Your Case Manager will be able to walk you through your specific situation during a DOB review.

### **I'm trying to elevate my house. I received a check from NFIP to fix my home. The money has already been spent on things that needed to be repaired such as drywall, floors, cabinets, doors, etc. Will this count as a DOB?**

This depends on the project type, what the funds were supposed to be for, and if you have receipts for funds spent. If you used the money for repairs on the house as per the payout guidelines, it will not count as a DOB. Your Case Manager can help explain your exact situation during a DOB review.

### **What if we have already spent our insurance money on repairing damage from the flood?**

Please provide receipts for all work done related to your payout to your Case Manager. We will review them to determine if a DOB exists or not.

## Appendix B: DOB Considerations for Elevate Florida Project Types

Below are the types of assistance that would and would not qualify as DOB by project type.

### Structure Elevation

Would Qualify as DOB	Would NOT Qualify as DOB
<b>Private insurance payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent (if the intended use of funds overlaps with project scope)</li> <li>✓ If funds were spent without receipts (if the intended use of funds overlaps with project scope)</li> <li>✓ If funds were spent not as intended (if the intended use of funds overlaps with project scope)</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× Private insurance payments are not DOB if the intended use of funds does not overlap with project scope</li> </ul>
<b>NFIP payment (structure coverage only)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>ICC payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were unspent</li> <li>× If funds were spent as intended with receipts</li> </ul>
<b>SBA loan</b>	
<ul style="list-style-type: none"> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If the intended use of funds overlaps with the project scope (mitigation only)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were unspent</li> <li>× If funds were spent as intended with receipts</li> </ul>



Would Qualify as DOB	Would NOT Qualify as DOB
<b>Other disaster assistance (IHP, IFG, EMR, FEMA Disaster Housing, etc.)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>

### Mitigation Reconstruction

Would Qualify as DOB	Would NOT Qualify as DOB
<b>Private insurance payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>NFIP payment (structure coverage only)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>ICC payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were unspent</li> <li>× If funds were spent as intended with receipts</li> </ul>
<b>SBA loan</b>	
<ul style="list-style-type: none"> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If the intended use of funds overlaps with the project scope (<i>mitigation only</i>)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were unspent</li> <li>× If funds were spent as intended with receipts</li> </ul>



Would Qualify as DOB	Would NOT Qualify as DOB
<b>Other disaster assistance (IHP, IFG, EMR, FEMA Disaster Housing, etc.)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>

### Wind Mitigation

Would Qualify as DOB	Would NOT Qualify as DOB
<b>Private insurance payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>NFIP payment (structure coverage only)</b>	
Not applicable.	<ul style="list-style-type: none"> <li>× All NFIP payments are not DOB</li> </ul>
<b>ICC payment</b>	
Not applicable.	<ul style="list-style-type: none"> <li>× All ICC payments are not DOB</li> </ul>
<b>SBA loan</b>	
<ul style="list-style-type: none"> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If the intended use of funds overlaps with the project scope (<i>mitigation only</i>)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were unspent</li> <li>× If funds were spent as intended with receipts</li> </ul>
<b>Other disaster assistance (IHP, IFG, EMR, FEMA Disaster Housing, etc.)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>





## Acquisition Demolition

Would Qualify as DOB	Would NOT Qualify as DOB
<b>Private insurance payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>NFIP payment (structure coverage only)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> <li>✓ If a claim could have been made for damages but was not (FEMA will generally require you to file a claim prior to receiving assistance from Elevate Florida)</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>ICC payment</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>SBA loan</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent (<i>repair only</i>)</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>
<b>Other disaster assistance (IHP, IFG, EMR, FEMA Disaster Housing, etc.)</b>	
<ul style="list-style-type: none"> <li>✓ If funds are unspent</li> <li>✓ If funds were spent without receipts</li> <li>✓ If funds were spent not as intended</li> </ul>	<ul style="list-style-type: none"> <li>× If funds were spent as intended with receipts</li> </ul>

## Appendix C: Understanding the DOB Calculation to Determine Property Owner Cost Share

### Important Factors for Evaluating DOB on Elevate Florida

You should understand how a DOB affects your cost share for projects funded under Elevate Florida. This includes understanding key considerations to assess if a DOB exists and how a DOB is included to determine project costs.

When assessing a DOB to determine the impact on project costs, the following factors are considered:

- Is there an overlap in scopes with the scope in the Elevate Florida project and the intended scope of the additional funding source?
- Is the additional funding source from a disaster within scope of review for the Elevate Florida Program (e.g. Debby, Helene, and Milton)?
- How should the additional assistance have been spent and what are the requirements around the funding? For example, for insurance, what was the payout intended for in the policy and payout?
- Has funding been spent yet?
- Is there documentation to support amounts?

### Understanding the DOB Calculation to Determine Property Ownership Share – Structure Elevations and Wind Mitigation Projects

It is important to understand that DOB should always be taken from total eligible project costs, prior to making the cost share calculation. For structural elevations and wind mitigation projects, the following calculation will be used:

Structure Elevations and Wind Mitigation		
Title	Description	Reference for Calculation
A. Initial Total Eligible Project Cost	Total estimated Elevate Florida project cost determined pre-construction	A
B. Assistance from other sources for the same purpose	Amount from other assistance determined to overlap with the scope of the Elevate Florida project, including any unspent or unsupported amounts	B
C. Credits for all valid receipts / documentation	Credits for all valid receipts and documentation	C
D. Total Eligible Project Costs	Total Eligible Project Costs used solely to calculate the federal cost share	$A - B + C = D$
E. Federal Share (75%)	75% of the Total Eligible Project Costs as Elevate Florida projects are funded at a 75% federal cost share	$D * .75 = E$
F. Amount Owed by Property Owner	Remaining amount Property Owner must cover of the Total Eligible Project Costs	$A - E = F$

Structure Elevations and Wind Mitigation		
Title	Description	Reference for Calculation
G. Other assistance	Additional amounts that may contribute to help support Property Owner Cost Share such as ICC, SBA loans, etc.	G
H. Total Amount Owed by Property Owner	Portion of the Total Eligible Project Cost the Property Owner must contribute towards the Elevate Florida Project	$F - G = H$

Key takeaways from the calculation above include:

- The potential for a DOB is captured in B. Assistance from other sources for the same purpose. This amount is subtracted from the project costs, but C. Credits, aims to offset these amounts. Note these amounts must be supported with adequate documentation.
- The portion of federal funding available for the project is captured in E. Federal Share.
- F. Amount Owed by the Property Owner represents the remaining amount from the Initial Total Project Cost that the Property Owner must cover before additional assistance such as SBA, ICC amounts, etc. are incorporated into the calculation. H. Total Amount Owed by the Property Owner represents the amounts that must be provided by the Property Owner prior to construction beginning.

### Understanding the DOB Calculation to Determine Property Ownership Share – Mitigation Reconstruction Projects

FEMA maintains a maximum limit of \$220,000 for "hard costs" associated with mitigation reconstruction projects. Hard costs refer to direct and tangible expenses related to the physical construction of a project, such as site work, foundation, structural elements, electrical systems, and more. Conversely, "soft costs" are not subject to the same monetary ceiling and encompass items including architectural and engineering fees, permit fees, temporary facilities, among others. Costs associated with ADA accommodations are not subject to the hard cost maximum limit.

Mitigation Reconstructions		
Title	Description	Reference for Calculation
A. Initial Total Eligible Project Cost	Total estimated Elevate Florida project cost determined pre-construction	A
B. Assistance from other sources for the same purpose	Amount from other assistance determined to overlap with the scope of the Elevate Florida project, including any unspent or unsupported amounts	B
C. Credits for all valid receipts / documentation	Credits for all valid receipts and documentation	C

Mitigation Reconstructions		
Title	Description	Reference for Calculation
D. Total Eligible Project Costs (Hard Costs and Soft Costs)	Total Eligible Project Costs used solely to calculate the federal cost share including hard and soft costs	$A - B + C = D$
E. Federal Share (75%) – Soft Costs	75% of the Total Eligible Project Costs for project soft costs as Elevate Florida projects are funded at a 75% federal cost share	Soft Costs in D * .75 = E
F. Federal Share (75%) – Hard Costs	75% of the Total Eligible Project Costs for project hard costs up to \$220,000 as Elevate Florida projects are funded at a 75% federal cost share	Hard Costs in D * .75 OR \$220,000, whichever is lower = F
G. Amount Owed by Property Owner	Remaining amount Property Owner must cover of the Total Eligible Project Costs	$A - E - F = G$
H. Other assistance	Additional amounts that may contribute to help support Property Owner Cost Share such as ICC, SBA loans, etc.	H
I. Total Amount Owed by Property Owner	Portion of the Total Eligible Project Cost the Property Owner must contribute towards the Elevate Florida Project	$G - H = I$

Key takeaways from the calculation above include:

- Similar to the calculation for Structural Elevations and Wind Mitigation, the potential for a DOB is captured in B. Assistance from other sources for the same purpose. This amount is subtracted from the project hard costs, but C. Credits aims to offset these amounts. Note these amounts must be supported with adequate documentation.
- The portion of federal funding available for the project is captured in E. Federal Share – Soft Costs and F. Federal Cost Share – Hard Costs. Note the federal cost share (75%) is capped at \$220,000 for hard costs.
- G. Amount Owed by the Property Owner represents the remaining amount from the Initial Total Project Cost that the Property Owner must cover before additional assistance such as SBA, ICC amounts, etc. are incorporated into the calculation. This includes hard costs in excess of \$220,000. I. Total Amount Owed by the Property Owner represents the amounts that must be provided by the Property Owner prior to construction beginning.

## Appendix D: Duplication of Benefits Examples

If the money you received is determined as a duplication of benefits, it will be taken off the initial total eligible project cost. The federal government pays for 75% and the property owner pays for 25%, so this will lower the amount the federal government pays and increase what you owe. The examples in this section are just for illustration purposes.

### Private insurance proceeds examples

#### Example 1: Unspent Private Insurance

I applied for a structural elevation under Elevate Florida. The elevation is estimated at \$300,000. I previously received private insurance (not NFIP) proceeds of \$50,000 to work on foundation repairs to the home and have not spent any of the funds yet.

<b>Initial Total Eligible Project Cost</b>	<b>\$300,000</b>
<b>Less:</b> Assistance from other sources for the same purpose	\$(50,000)
<b>Add:</b> Credit for all valid receipts / documentation	\$0
<b>Total Eligible Project Costs</b>	<b>\$250,000</b>
<b>Federal Share (75%)</b>	<b>\$187,500</b>
Amount Owed by Property Owner	\$62,500
<b>Less:</b> Other assistance	\$(0)
<b>Total Amount Owed by Property Owner (25% cost share + \$50,000 unspent insurance proceeds)</b>	<b>\$112,500</b>

The scope of the insurance payout in this example is specified for foundation repairs, which could overlap in the scope of the Elevate Florida structural elevation project. Since the \$50,000 in private insurance proceeds have not yet been spent and is for the same scope of work, the funds must be applied towards this project to lower the overall project costs and are therefore included in the Total Property Owner Cost Share.

#### Example 2: Partially Spent Private Insurance

I applied for a structural elevation under Elevate Florida. The elevation is estimated at \$300,000. I previously received private insurance (**not NFIP**) proceeds of \$50,000 to work on foundation repairs to the home and spent \$25,000 to start work on foundation repairs with receipts.

<b>Initial Total Eligible Project Cost</b>	<b>\$300,000</b>
<b>Less:</b> Assistance from other sources for the same purpose	\$(50,000)
<b>Add:</b> Credit for all valid receipts / documentation	\$25,000
<b>Total Eligible Project Costs</b>	<b>\$270,000</b>
<b>Federal Share (75%)</b>	<b>\$206,500</b>
Amount Owed by Property Owner	\$93,750
<b>Less:</b> Other assistance	\$(0)



### Example 2: Partially Spent Private Insurance

<b>Total Amount Owed by Property Owner</b> (25% cost share + \$25,000 unspent insurance proceeds)	<b>\$93,750</b>
---	-----------------

The \$25,000 spent is not considered a duplication of benefits because the money was spent in line with the intended use of the insurance proceeds and there are receipts to support the use of funds. Since the remaining \$25,000 has not been spent, it can be applied towards this project to lower the overall project costs.

### ICC example

#### Example 3: Unspent ICC

I applied for a mitigation reconstruction under Elevate Florida estimated at \$450,000 and received a substantial damage determination from my county. \$300,000 of the project costs are hard costs, and the remaining \$150,000 project costs are soft costs. Under my NFIP policy, I have been allotted up to \$30,000 for an ICC that has not been distributed yet.

<b>Initial Total Eligible Project Cost</b>	<b>\$450,000</b>
<b>Less:</b> Assistance from other sources for the same purpose	\$(0)
<b>Add:</b> Credit for all valid receipts / documentation	\$0
<b>Total Eligible Project Costs</b> (hard and soft costs)	<b>\$450,000</b>
<b>Federal Share (75%) – Soft Costs</b>	<b>\$112,500</b>
<b>Federal Share (75%) – Hard Costs</b>	<b>\$220,000</b>
Amount Owed by Property Owner	\$117,500
<b>Less:</b> Other assistance	\$(30,000)
<b>Total Amount Owed by Property Owner</b> (25% cost share + \$5,000 fed share hard cost cap)	<b>\$87,500</b>

There is no additional assistance to be considered during the duplication of benefits review. The federal cost share for hard costs is capped at \$220,000 for mitigation reconstruction projects. Therefore, even though 75% of \$300,000 hard costs is \$225,000, the federal cost share for hard costs is \$220,000. Since the ICC has not yet been distributed and used, it can be applied towards the non-federal cost share.

### NFIP payout examples

#### Example 4: Spent NFIP with Receipts

I applied for a structural elevation project under Elevate Florida estimated at \$100,000. I received an NFIP payout for flood damage of \$25,000 including \$10,000 for foundational repairs and \$15,000 for interior repairs and have receipts to support all repairs in accordance with the payout.

<b>Initial Total Eligible Project Cost</b>	<b>\$100,000</b>
<b>Less:</b> Assistance from other sources for the same purpose	\$(10,000)
<b>Add:</b> Credit for all valid receipts / documentation	\$10,000



#### Example 4: Spent NFIP with Receipts

<b>Total Eligible Project Costs</b>	<b>\$100,000</b>
<b>Federal Share (75%)</b>	<b>\$75,000</b>
Amount Owed by Property Owner	\$25,000
<b>Less: Other assistance</b>	<b>\$(0)</b>
<b>Total Amount Owed by Property Owner (25% cost share)</b>	<b>\$25,000</b>

The \$15,000 spent on interior repairs is not a duplication of benefits because interior repairs do not fall into the scope of a structural elevation project. The \$10,000 spent on foundational repairs is not a duplication of benefits because the money was spent in line with the intended use of the NFIP proceeds and there are receipts to support the use of funds.

#### Example 5: Unspent NFIP

I applied for a mitigation reconstruction project under Elevate Florida estimated at \$400,000 (all hard costs). I received an NFIP payout for flood damages of \$200,000 that has not been spent. The flood payout does not specify what the \$200,000 must be spent on other than building coverage.

<b>Initial Total Eligible Project Cost</b>	<b>\$400,000</b>
<b>Less: Assistance from other sources for the same purpose</b>	<b>\$(200,000)</b>
<b>Add: Credit for all valid receipts / documentation</b>	<b>\$0</b>
<b>Total Eligible Project Costs (hard and soft costs)</b>	<b>\$200,000</b>
<b>Federal Share (75%) – Soft Costs</b>	<b>\$0</b>
<b>Federal Share (75%) – Hard Costs</b>	<b>\$150,000</b>
Amount Owed by Property Owner	\$250,000
<b>Less: Other assistance</b>	<b>\$(0)</b>
<b>Total Amount Owed by Property Owner (25% cost share + \$200,000 unspent NFIP)</b>	<b>\$250,000</b>

Since the \$200,000 in NFIP proceeds have not yet been spent, they must be applied towards this project to lower the overall project costs.

#### Example 6: Partially Spent NFIP

I applied for a mitigation reconstruction project under Elevate Florida estimated at \$300,000. I received an NFIP payout for flood damages of \$200,000. I spent \$50,000 on a new car, \$30,000 on replacing floors, and \$100,000 on fine granite counter tops. I have receipts but have not spent \$20,000 of the NFIP payout.

<b>Initial Total Eligible Project Cost</b>	<b>\$300,000</b>
<b>Less: Assistance from other sources for the same purpose</b>	<b>\$(200,000)</b>
<b>Add: Credit for all valid receipts / documentation</b>	<b>\$130,000</b>
<b>Total Eligible Project Costs (hard and soft costs)</b>	<b>\$230,000</b>
<b>Federal Share (75%) – Soft Costs</b>	<b>\$0</b>



#### Example 6: Partially Spent NFIP

<b>Federal Share (75%) – Hard Costs</b>	<b>\$172,500</b>
Amount Owed by Property Owner	\$127,500
<b>Less: Other assistance</b>	<b>\$(0)</b>
<b>Total Amount Owed by Property Owner (25% cost share + \$50,000 disallowed cost of new car using NFIP + \$20,000 unspent NFIP)</b>	<b>\$127,500</b>

The \$50,000 spent on a new car is a duplication of benefits because the money was not spent in line with the intended use of the NFIP proceeds. The \$30,000 spent on replacing floors and \$100,000 spent on fine granite countertops are not duplication of benefits because the money was spent in line with the intended use of the NFIP proceeds and there are receipts to support the intended use of funds. Since the \$20,000 in NFIP proceeds have not yet been spent, they can be applied towards this project to lower the overall project costs.

### IHP examples

#### Example 7: Spent IHP with Receipts

I applied for a mitigation reconstruction project estimated at \$220,000 (all hard costs). I previously received \$40,000 in IHP funding and spent it on fixing my roof. I saved all receipts for the purchase.

<b>Initial Total Eligible Project Cost</b>	<b>\$220,000</b>
<b>Less: Assistance from other sources for the same purpose</b>	<b>\$(40,000)</b>
<b>Add: Credit for all valid receipts / documentation</b>	<b>\$40,000</b>
<b>Total Eligible Project Costs (hard and soft costs)</b>	<b>\$220,000</b>
<b>Federal Share (75%) – Soft Costs</b>	<b>\$0</b>
<b>Federal Share (75%) – Hard Costs</b>	<b>\$165,500</b>
Amount Owed by Property Owner	\$55,000
<b>Less: Other assistance</b>	<b>\$(0)</b>
<b>Total Amount Owed by Property Owner (25% cost share)</b>	<b>\$55,000</b>

The \$40,000 spent on roof repairs is not a duplication of benefits because the money was spent in line with the intended use of the IHP funds and there are receipts to support the intended use of funds.

#### Example 8: Spent IHP without Receipts

I applied for a wind mitigation project estimated at \$100,000. I previously received \$40,000 in IHP funding and spent \$15,000 on fixing my roof and \$25,000 on new appliances in my home. I have receipts for my new appliances but do not have any documentation of my roof repair.

<b>Initial Total Eligible Project Cost</b>	<b>\$100,000</b>
<b>Less: Assistance from other sources for the same purpose</b>	<b>\$(15,000)</b>



**Example 8: Spent IHP without Receipts**

<b>Add:</b> Credit for all valid receipts / documentation	\$0
<b>Total Eligible Project Costs</b>	<b>\$85,000</b>
<b>Federal Share (75%)</b>	<b>\$63,750</b>
Amount Owed by Property Owner	\$36,250
<b>Less:</b> Other assistance	\$(0)
<b>Total Amount Owed by Property Owner (25% cost share + \$15,000 unsubstantiated IHP expense)</b>	<b>\$36,250</b>

The \$15,000 spent on roof repairs is a duplication of benefits because although the money was spent in line with the intended use of the IHP funds, there are no receipts to support the intended use of funds. The \$25,000 spent on new appliances is not a duplication of benefits because the money was spent in line with the intended use of the IHP funds and there are receipts to support the intended use of funds.