

CARES Act Programs through SBA, FEMA, IRS, Treasury, USDA, and HHS for CDBG Grantees' Awareness for Duplication of Benefits

Agency	Program Name	Populations Served	Services Provided	Program Rollout and Duration	Size & Additional Notes on Eligibility	Funding and operating mechanisms
SBA	Payment Protection Program Loans	All small businesses, including non-profits, Veterans organizations, Tribal concerns, sole proprietorships, self-employed individuals, and independent contractors, with 500 or fewer employees, or no greater than the number of employees set by the SBA as the size standard for certain industries. ¹	The new loan program will help small businesses with their payroll and other business operating expenses. It will provide critical capital to businesses without collateral requirements, personal guarantees, or SBA fees – all with a 100% guarantee from SBA. All loan payments will be deferred for six months. Most importantly, the SBA will forgive the portion of the loan proceeds that are used to cover the first eight weeks of payroll costs, rent, utilities, and mortgage interest.	Treasury and the Small Business Administration launched this program on April 3, allowing businesses to go to a participating SBA 7(a) lender, bank, or credit union, to apply for a loan, and be approved on the same day. As of April 7, the program had reached the funding limit set in the CARES Act. The Paycheck Protection Program resumed accepting applications July 6, 2020. The new deadline to apply for a Paycheck Protection Program loan is August 8, 2020.	Maximum loan amounts up to \$10 million. Small Business owners in all U.S. states and territories	\$669 billion of loans available. Loan forgiveness if proceeds used for payroll costs and other designated business operating expenses in the 8 weeks following the date of loan origination (due to likely high subscription, it is anticipated that not more than 25% of the forgiven amount may be for non-payroll costs). All loans under this program will have the following identical features: Interest rate of 0.5%, maturity of 2 years, first payment deferred for six months, 100% guarantee by SBA, no collateral, no personal guarantees, no borrower or lender fees payable to SBA
SBA	Economic Injury Disaster Loans	Small Business owners in all U.S. States and territories	In response to the Coronavirus (COVID-19) pandemic, small business owners in all U.S. states, Washington D.C., and territories are eligible to apply for an Economic Injury Disaster Loan advance of up to \$10,000. ²	Funds will be made available within three days of a successful application, and this loan advance will not have to be repaid.	Loans up to \$10,000. Small Business owners in all U.S. states and territories	An additional appropriation of \$10 billion . This advance will provide economic relief to businesses that are currently experiencing a temporary loss of revenue. Funds will be made available within three days of a successful application. This loan advance will not have to be repaid.

¹ <https://www.sba.gov/about-sba/sba-newsroom/press-releases-media-advisories/349-billion-emergency-small-business-capital-cleared-sba-and-treasury-begin-unprecedented-public>

² <https://www.sba.gov/disaster-assistance/coronavirus-covid-19>

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SBA	Express Bridge Loans	Small Business owners in all U.S. States and territories	Express Bridge Loan Pilot Program allows small businesses who currently have a business relationship with an SBA Express Lender to access up to \$25,000 quickly.	These loans can provide vital economic support to small businesses to help overcome the temporary loss of revenue they are experiencing and can be a term loans or used to bridge the gap while applying for a direct SBA Economic Injury Disaster loan.	Access up to \$25,000 quickly.	If a small business has an urgent need for cash while waiting for decision and disbursement on an Economic Injury Disaster Loan, they may qualify for an SBA Express Disaster Bridge Loan.
SBA	Debt Relief Program	Small Business owners in all U.S. States and territories	As part of SBA's debt relief efforts will automatically pay the principal, interest, and fees for: - current 7(a), 504, and microloans for a period of six months, and - new 7(a), 504, and microloans issued prior to September 27, 2020.	For current SBA Serviced Disaster (Home and Business) Loans: If your disaster loan was in "regular servicing" status on March 1, 2020, the SBA is providing automatic deferments through December 31, 2020.		Payment of applicable principal, interest, and fees, or of loan deferment, is automatic.
FEMA	Disaster Relief Fund	State and local governments attempting to mitigate against the spread of COVID-19 and protect public health.	FEMA can direct, coordinate, manage, and fund eligible response and recovery efforts associated with COVID-19 that overwhelm State resources pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act. ³	Every 30 days the Administrator shall provide the Committees on Appropriations of the Senate and the House both projected and actual costs for funds provided.	\$25 billion set aside for major disasters declared pursuant to the Stafford Act. The other \$15 billion may be used for all purposes authorized by FEMA under the CARES Act. <i>(The other \$5 billion seems to be unmentioned)</i>	\$45 billion to remain available until expended. Through the DRF, FEMA can fund authorized Federal disaster support activities as well as eligible State, territorial, tribal, and local actions, such as: (1) the repair and restoration of qualifying disaster-damaged public infrastructure; (2) hazard mitigation initiatives; (3) financial assistance to eligible disaster survivors.
FEMA	Public Assistance Program	State, territorial, tribal, and local government entities and certain private non-	Under the COVID-19 Emergency Declaration described above, FEMA may	Consistent with the President's national emergency declaration for the coronavirus (COVID-	President Trump declared a national emergency under Section 501(b) of the Stafford Act on March 13 in wake	FEMA assistance will be provided at a 75 percent federal cost share. This assistance will

³ <https://www.fema.gov/media-library/assets/documents/31789>

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		profit organizations are eligible to apply for Public Assistance .	provide assistance for emergency protective measures including, but not limited to: <i>Management, control and reduction of immediate threats to public health and safety, Emergency medical care, Medical sheltering, and Purchase and distribution of food</i> , provided they are not funded by the HHS/CDC or other federal agency. Final reimbursement determinations will be coordinated by HHS and FEMA.	19) pandemic on March 13, 2020, FEMA urges officials to, without delay, take appropriate actions that are necessary to protect public health and safety pursuant to public health guidance and conditions and capabilities in their jurisdictions. FEMA provides the following guidance on the types of emergency protective measures that may be eligible under FEMA's Public Assistance Program in accordance with the COVID-19 Emergency Declaration in order to ensure that resource constraints do not inhibit efforts to respond to this unprecedented disaster.	of the ongoing COVID-19 pandemic. State, territorial, tribal, and local government entities and certain private non-profit organizations are eligible to apply for Public Assistance . FEMA will not duplicate any assistance provided by HHS/CDC.	require execution of a FEMA-State/Tribal/Territory Agreement, as appropriate, and execution of an applicable emergency plan. Local governments and other eligible PA applicants will apply through their respective state, tribal or territorial jurisdictions.
FEMA	Emergency Food and Shelter Program (EFSP)	American families in sudden economic crisis.	Shelter, food and supportive services to individuals and families in sudden economic crisis.	EFSP was established to supplement and expand the ongoing work of local social service organizations, both nonprofit and governmental. Accordingly, EFSP funding is open to all organizations helping hungry and homeless people, as well as organizations that support those at risk of becoming hungry or homeless due to economic hardships ⁴	\$200 million allocation to program account. Nonprofit and governmental service organizations in U.S. states and territories	Unlike FEMA's disaster assistance programs authorized under the Stafford Act, EFSP is authorized by the McKinney-Vento Homeless Assistance Act of 1987 (PL 100-77).
Treasury	Unemployment Insurance Provisions	Temporary expansion of unemployment. Covers self-employed, gig workers, independent contractors; partially offsets unemployment costs for employees of governments and nonprofits.	Makes benefits more generous by adding a \$600/week across-the-board payment increase through the end of July.	For those who need extra assistance the bill provides an additional 13 weeks of benefits beyond what states typically allow.	\$250 billion to expand unemployment benefits. Individuals in U.S. states and territories.	The expansion in unemployment benefits expires at the end of 2020 in recognition of the temporary nature of this challenge.

⁴ <https://www.fema.gov/media-library/assets/documents/24422>

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Treasury	The Coronavirus Relief Fund	States, Tribal governments, and units of local governments with a population above 500,000	The CARES Act requires that the payments from the Coronavirus Relief Fund only be used to cover expenses that— (1) are necessary expenditures incurred due to the public health emergency created by COVID-19. (2) were not accounted for in the budget most recently approved as of March 27, 2020 (the date of enactment of the CARES Act) for the State or government; and (3) were incurred during the period that begins on March 1, 2020, and ends on December 30, 2020.	The legislation specifies that within 30 days of passage the funds will be released to states based on their relative populations, with each state receiving at least \$1.25 billion.	\$150 billion fund. U.S. states and territories. Additional information on eligible uses of Fund disbursements by governments will be posted as it becomes available.	Funds will be released to states based on their relative populations, with each state receiving at least \$1.25 billion. A local government must have a population above 500,000 to qualify. \$3 billion for making payment to the District of Columbia, the Commonwealth of Puerto Rico, the United States Virgin Islands, Guam, the Commonwealth of the Northern Mariana Islands, and American Samoa. \$8 billion for making payments to Tribal governments.
Treasury	Unemployment Insurance Provisions	Makes sure self-employed and independent contractors, gig workers, can receive unemployment during the public health emergency. The bill also includes support to state and local governments and nonprofits so they can pay unemployment to their employees.	Makes benefits more generous by adding a \$600/week across-the-board payment increase through the end of July.	For those who need extra assistance the bill provides an additional 13 weeks of benefits beyond what states typically allow.	\$250 billion to expand unemployment benefits. Individuals in U.S. states and territories.	The expansion in unemployment benefits expires at the end of 2020 in recognition of the temporary nature of this challenge.
IRS	Economic Impact Payments	Tax filers with adjusted gross income up to \$75,000 for individuals and up to \$150,000 for married couples filing joint returns will receive the full	Direct payment.	One-time payment for eligible citizens.	Up to \$1,200 for single filers. Up to \$2,400 for joint filers. Individuals in U.S. states and territories.	The payments will be administered by the Internal Revenue Service (IRS) and function as a federally refundable tax credit.

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		<p>payment. For filers with income above those amounts, the payment amount is reduced by \$5 for each \$100 above the \$75,000/\$150,000 thresholds. Single filers with income exceeding \$99,000 and \$198,000 for joint filers with no children are not eligible. Social Security recipients and railroad retirees who are otherwise not required to file a tax return are also eligible and will not be required to file a return.</p>				
USDA	Commodity Assistance Program	Through CSFP, USDA distributes both food and administrative funds to participating states and Indian Tribal Organizations (ITOs).	The Commodity Supplemental Food Program (CSFP) works to improve the health of low-income elderly persons at least 60 years of age by supplementing their diets with nutritious USDA Foods.	Sec 1101. (g) AVAILABILITY OF COMMODITIES.—During fiscal year 2020, the Secretary of Agriculture may purchase commodities for emergency distribution in any area of the United States during a public health emergency designation. (i) FUNDING.—There are hereby appropriated to the Secretary of Agriculture such amounts as are necessary to carry out this section.	Through CSFP, USDA distributes both food and administrative funds to participating states and Indian Tribal Organizations (ITOs).	\$450 million to Commodity Assistance Program, \$150 million of which may be used for distribution.
USDA	Child Nutrition Programs	Children from low-income families (at or below 130% of the Federal Poverty Level (FPL), or \$31,590 for a family of four in school year 2016 - 2017) are eligible for free meals. Those with incomes up to	Child nutrition programs help to ensure that children have access to nutrition meals and snacks in schools, summer programs, childcare centers and homes, and afterschool programs. FNS also issued guidance on meal delivery	Waiver authority for existing program.	For Congregate Meal Waivers, FNS has approved waivers from all 50 states, DC, Guam, Puerto Rico, and the Virgin Islands, enabling Summer Food Service Program (SFSP) and National School Lunch Program Seamless Summer Option (SSO) sponsors to serve meals in a non-congregate setting and at school	\$8.8 billion. Pandemic EBT – Supplemental EBT allotments in FY2020 for the value of school meals for each eligible child in the household.

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		185% of the FPL are eligible for reduced price meals.	using existing authorities in summer meal programs.		sites during school closures related to the coronavirus.	
USDA	Supplemental Nutrition for Women, Infants and Children (WIC)	The WIC target population are low-income, nutritionally at risk: <ul style="list-style-type: none"> - Pregnant women (through pregnancy and up to 6 weeks after birth or after pregnancy ends). - Breastfeeding women (up to infant's 1st birthday) - Non breastfeeding postpartum women (up to 6 months after the birth of an infant or after pregnancy ends) - Infants (up to 1st birthday). - Children up to their 5th birthday. 	The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides federal grants to states for supplemental foods, health care referrals, and nutrition education for low-income pregnant, breastfeeding, and non-breastfeeding postpartum women, and to infants and children up to age five who are found to be at nutritional risk.	WIC is not an entitlement program as Congress does not set aside funds to allow every eligible individual to participate in the program. WIC is a Federal grant program for which Congress authorizes a specific amount of funds each year for the program. WIC is administered at the Federal level by FNS, and by 90 WIC state agencies, through approximately 47,000 authorized retailers.	WIC operates through 1,900 local agencies in 10,000 clinic sites, in 50 State health departments, 34 Indian Tribal Organizations, the District of Columbia, and five territories (Northern Mariana, American Samoa, Guam, Puerto Rico, and the Virgin Islands).	The Families First Coronavirus Response Act provided the WIC Program with \$500 million to remain available through Sept. 30, 2021 for increases in program participation. FNS will work with state to ensure funding is available to state agencies that require additional funds based on enrollment.
USDA	Nutrition Assistance Block Grant to Territories	Low-income individuals and families are eligible for benefits as determined by each Territory.	The NABG Provides food assistance to low-income households in the U.S. Territories of the Commonwealth of Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands, in lieu of operating a Supplemental Nutrition Assistance Program (SNAP).	With the authority granted them via the block grants, the U.S. territories establish eligibility and benefit levels for their nutrition assistance programs.	\$200 million U.S. Territories of the Commonwealth of Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands	\$200 million for PR, CNMI, AS.
USDA	Disaster Household Distribution	USDA has approved targeted DHD programs for the following states and	States and Tribes may apply for the DHD program to meet specific needs when traditional channels of food	Please check with the specific state or ITO for details on the DHD operation	USDA has approved targeted DHD programs for the following states and Indian Tribal Organizations (ITOs).	Please check with the specific state or ITO for details on the DHD operation

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		Indian Tribal Organizations (ITOs) .	are unavailable and not being replenished on a regular basis.			
USDA	Summer Food Service Program	Summer Food Service Program (SFSP) and National School Lunch Program Seamless Summer Option (SSO) to serve meals in non-congregate setting and at school sites during COVID-related school closures.	The U.S. Department of Agriculture's (USDA) Summer Food Service Program (SFSP), also known as the Summer Meals Program, provides kids and teens in low-income areas free meals when school is out.	The SFSP reimburses providers who serve free healthy meals to children and teens in low-income areas during the summer months when school is not in session.	The SFSP serves children and teens age 18 and younger. Serve meals in non-congregate setting and at school sites during COVID-related school closures.	There are three main players involved: State agencies, sponsors, and sites. <ul style="list-style-type: none"> - State agencies administer the program and communicate with USDA. - Sponsors enter into agreements with State agencies to run the program. Schools, local government agencies, camps, faith-based and other non-profit community organizations that can manage a food service program may be SFSP sponsors. Sponsors get reimbursed by the Program and may manage multiple sites. - Sites are places in the community where children receive meals in a safe and supervised environment. Sites may be in a variety of settings, including schools, parks, community centers, health clinics, hospitals, apartment complexes, churches, and migrant centers. Sites work directly with sponsors.
USDA	The Emergency Food Assistance Program	The Emergency Food Assistance Program (TEFAP) is a federal program that helps supplement the diets of low-income Americans,	Through TEFAP, the U.S. Department of Agriculture (USDA) purchases a variety of nutritious, high-quality USDA Foods, and makes those	States provide the food to local agencies that they have selected, usually food banks, which in turn distribute the food to local organizations, such as soup	The amount of food each state receives out of the total amount of food provided is based on the number of unemployed persons and the number of people with incomes below the poverty level in the state.	State agencies may adjust The Emergency Food Assistance Program (TEFAP) income eligibility guidelines to expand participation at any time; can consider categorical income

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		including elderly people, by providing them with emergency food assistance at no cost.	foods available to State Distributing Agencies.	kitchens and food pantries that directly serve the public.		eligibility (e.g. all SNAP and WIC participants).
USDA	Pandemic EBT	As a result of the Families First Coronavirus Response Act of 2020, children who would receive free or reduced-price meals if not for school closures are eligible to receive assistance under this provision. USDA is providing guidance to state agencies on plan requirements in order to receive approval.	Temporary emergency standards of eligibility and levels of benefits for free or reduced-price meals.	Waiver of existing requirements is provided upon request.	State agencies may submit plans in any case in which a school is closed for at least 5 consecutive days during a public health emergency designation during which the school would otherwise be in session.	Secretary has authority to approve state agency plans for temporary emergency standards of eligibility and levels of benefits under the Food and Nutrition Act of 2008. Children eligible for free or reduced-price meals if not for the school closure are eligible under this provision.
USDA	Supplemental Nutrition Assistance Program Emergency Allotments	USDA has granted waivers to all states, allowing for the issuance of emergency allotments (supplements) based on a public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public Health Service Act related to an outbreak of COVID-19 when a state has also issued an emergency or disaster declaration.	SNAP provides nutrition benefits to supplement the food budget of needy families so they can purchase healthy food and move towards self-sufficiency.	Waiver of existing program requirements is provided upon request.	Options for plan adjustments include a number of approaches to easing states' workload to facilitate processing the large number of new applications expected. For example, USDA has already allowed states to extend certification periods and take other measures to keep current participants from having their cases closed when they cannot conduct business online or remotely. USDA also has allowed states to modify their application processes to streamline operations, for example by reducing interview requirements and adapting telephone signature procedures.	The Act allows USDA to approve state plans to adjust their SNAP operations and procedures to help states manage their workload under current conditions.

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HHS	Community Living Allocation	Older adults in need of meals.	These programs provide meals to more than 2.4 million older adults each year, both through home delivery and in places like community centers. The need for these services, particularly home-delivered and packaged meals, has increased as community measures to slow transmission of COVID-19 have closed meal sites and have left many family caregivers unable to assist their older loved ones.	Funding has been provided to states, territories, and tribes for subsequent allocation to local meal providers. Grant amounts are determined based on the population-based formulas defined in the Older Americans Act.		\$250 million in grants from the Administration for Community Living (ACL) to help communities provide meals for older adults.
Labor	Dislocated Worker Grants	Workers laid off because of impact from COVID-19.	Grants for temporary employment and training services, including humanitarian assistance, clean-up and mitigation associated with the virus, and job training for industries still hiring during the health emergency.	Grants will be made in installments to state and local workforce programs, with the first 26 grants totaling \$131 million awarded on April 15, 2020.	States and other eligible entities may also apply for Employment Recovery DWGs to provide reemployment services to eligible individuals	\$345 million made available through state and local workforce programs.
EDA	Supplemental Economic Adjustment Assistance (EAA)	Government entities that need coordinated, long-term, regional, and strategic responses to economic recovery, particularly due to budget shortfalls as a result of the coronavirus because of declining revenues and increased demand for services.	Assistance supports the ability to return economic and business activities to a healthy state. Assisted activities can enhance a community or region's ability to anticipate, withstand and recover from future disruptions to its economic base.	Eligible applicants include EDA-designated Economic Development Districts (EDDs); Indian tribes or a consortium of Indian tribes; states and local governments; institutions of higher education or a consortium of institutions; and nonprofit organizations acting in cooperation with officials of a political subdivision of a state (42 U.S.C. §3122(4)(a)).	Provides funding in in regions experiencing severe economic dislocations. Non-Federal cost share in the non-disaster EAA program can be 20-50% (42 U.S.C. §3144). EAA grants for disaster may require lower or no non-Federal cost share. (42 U.S.C. §3233).	The CARES Act provides \$1.5 billion in disaster economic recovery funding for the EAA program. Eligible activities include construction and non-construction activities (e.g., infrastructure, design and engineering, technical assistance, economic recovery strategies, and capitalization or re-capitalization of Revolving Loan Funds).

***Note on Duplication of Benefits**

Federal disaster law prohibits the provision of federal assistance in excess of need. Before paying a cost with federal disaster assistance, a Federal agency must check to see that the assistance will not cause a duplication of benefits, meaning that the cost has not or will not be paid by another source. HUD grantees are required to prevent the duplication of benefits when carrying out HUD-funded programs to provide disaster assistance.

Knowing the other sources of assistance that may be available to pay for coronavirus-related needs can help grantees prevent duplication of benefits in two ways. First, it helps grantees design programs that target needs that are unlikely to be addressed by other sources. Second, it helps grantees know which sources of assistance it needs to look for when completing a duplication of benefits check before providing assistance to individuals, households, and entities.

Assistance is not prohibited to meet needs that remain after considering other federal, state, local or philanthropic financial assistance. Private, unsubsidized loans generally are not considered a duplication of benefits. In some cases, subsidized loans do not cause a duplication, if all assistance is used for disaster-related needs. More specific information about how to comply with this requirement is available from HUD.

This guidance was developed by a HUD TA provider. Guidance documents, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. Guidance documents are intended only to provide clarity to the public regarding existing requirements under the law or agency policies.