

JOSH STEIN • Governor

DEVDUTTA SANGVAI • Secretary

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DATE: June 24, 2025

TO: Health and Human Services/Administration for Children and Families

FROM: North Carolina Division of Child Development and Early Education

SUBJECT: Comment on American Relief Act 2025 Disaster Supplemental Funds for Child Care: Program

Instruction

The NC Division of Child Development and Early Education (DCDEE) appreciates the opportunity to provide comment on the American Relief Act 2025 Disaster Supplemental Funds for Child Care: Program Instruction (PI).

In May 2025, the DCDEE opened a Disaster Impact Report (DIR) portal using Supplemental Funds for Child Care Disaster Recovery Planning Grants – Hurricanes Fiona and Ian funds. The purposes of a DIR portal are:

- To provide regulated child care programs a tool to report the impacts of declared disasters to DCDEE.
- 2. To provide information so that DCDEE can make funding determinations if or when funding comes available.
- 3. To distribute funds to regulated child care programs in response to disasters once funding has been received from any source and funding determinations have been made.
- 4. To provide data and evidence to state and federal government officials of the need for assistance or the need of a policy to address an issue.

Though the portal has the capacity for regulated facilities to report the impacts of multiple disasters at one time, each DIR module must be created separately. The first two reports created in the portal were a DIR for Hurricane Ian and a DIR for Tropical Storm Helene. At the end of June 2025, the portal will open for providers to report the impacts of Tropical Storm Debby. A payment module is in its final stages and will be ready for use in July. DCDEE plans to open two more reports in the next two weeks; DIR Helene Phase 2 and DIR Debby Phase 2.

DCDEE understands the two Public Comment Periods on the Disaster Supplemental Funds for Child Care - 2023-2024 DRAFT PI were required due to the <u>Paperwork Reduction Act</u>; one 60-day and one 30-day. Without a firm PI, there has been a delay in asking regulated facilities to report on major construction costs/major renovations due to Tropical Storm Helene. We have yet to open Phase 2 Helene and Debby due to module and portal development, and delays in more fully understanding the details of the PI. Due to the timing of the application, DCDEE can only allow a few weeks for facilities to report impacts, including a typical holiday week. DCDEE needs time to analyze the data, complete the application letter and send it through state approval processes to submit an application by August 1.

DCDEE asks the Administration for Children and Families (ACF), Office of Child Care (OCC) to consider extending the deadline to submit the application for Disaster Supplemental Funds since public comment does not end until June 26, 2025 and a final OCC PI will not be available until sometime in July. We have concerns about providers having enough time to obtain and upload official estimates from certified engineers/architects/contractors as well as other contracted work.

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DCDEE also needs additional time due to deliberations concerning most effective method(s) to estimate the amount of funds needed in keeping with state procurement procedures. DCDEE is not permitted to complete a Request for Information or Proposals with partner agencies and organizations without having a set funding amount. An extended time to apply would increase the accuracy of the funding request.

When ACF/OCC does have available the final PI, would you provide a response based on legal interpretation of the Act to the following questions?

- 1) For Tropical Storm Debby, would you confirm that programs in the following counties could receive disaster recovery funding if they have sufficient documentation of impacts which occurred as a direct result of Tropical Storm Debby? These programs were listed as eligible for Public Assistance -B on the FEMA website.
 - Alamance, Alleghany, Anson, Beaufort, Bertie, Bladen, Brunswick, Cabarrus, Camden, Carteret, Caswell, Chatham, Chowan, Columbus, Craven, Cumberland, Currituck, Dare, Davidson, Davie, Duplin, Durham, Edgecombe, Forsyth, Franklin, Gates, Granville, Greene, Guilford, Halifax, Harnett, Hertford, Hoke, Hyde, Iredell, Johnston, Jones, Lee, Lenoir, Martin, Mecklenburg, Montgomery, Moore, Nash, New Hanover, Northampton, Onslow, Orange, Pamlico, Pasquotank, Pender, Perquimans, Person, Pitt, Randolph, Richmond, Robeson, Rockingham, Rowan, Sampson; Scotland; Stanly; Stokes, Surry, Tyrrell, Union, Vance, Wake, Warren, Washington, Wayne, Wilkes, Wilson, Yadkin
- Por any of the disasters between 2023-2024, if a child care program has documentation of damage received, a repair which occurred, or a purchase made to mitigate the impacts of one of the declared storms within a reasonable timeframe following the disaster, but the program is not in one of the identified counties listed in FEMA, could they be eligible to receive funds from the Supplemental Disaster?
- A non-licensed program in x county was eligible for Public Assistance-B in Tropical Storm Debby but was not impacted by Tropical Storm Debby. It already had in development a plan to build an early childhood development center co-located with facilities to host emergency workers in the event of a disaster. To what extent would the supplemental disaster funds support this child care supply building and emergency preparedness project? Could we offer this program a start-up grant from the 2023-2024 Supplemental Disaster Funds if awarded funding?