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Date: 9/13/2013 10:50:22 AM

Subject: CCDBG Law Comments for Sen. Scott

Attachments: CCDBG ReAuthorization Act Table\_Sept 12 2013.docx  
Letter to Cheryl Vincent form Lillian Koller.pdf

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Most of you know that I was contacted by Lizzie in Sen. Tim Scott's office about the congressional bill revising the Child Care Development Block Grant (CCDBG), which is the companion to the updated Child Care and Development Fund (CCDF) regs recently released for two comment periods.

Attached are 2 docs. One is the approved comments we submitted on the federal regs.

The other is an update of the line by line comments we provided to the Governor's office on the regulations. What we did in this version was to take the CCDBG law requirements, indicate if they were also included in the proposed regs, and our comments on each, with as much detail on estimated cost impact as possible.

If we thought the proposed regs were costly, this proposed law goes far beyond the proposed regs.

I included actual costs where I could. The problem is that the feds are currently including very broad interpretations of the current regs, so I had to give worse-case scenario on some costs since we have no clue how they will interpret some of this. Our experience has been that this administration is driving a truck through every reg they can find.

I need to spell check these, and my staff are reviewing my comments right now.

I propose that we send these 2 to Lizzie in Senator Scott's office. The problem is that mark-up is on Wednesday, so I would think we need to get comments to her by Monday morning at the latest.

Let me know if this plan is ok, or if you would like to take another approach.

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