



# NCPRO

NC Pandemic Recovery Office

## NCPRO Interagency Meeting

September 24, 2026

# Agenda

1. Welcome
2. October SFRF fund shift - Tommy
3. Expenditure Deadline and Closeout Costs – Tommy
4. Cycle 3 Activities Update - Tommy

# Session Law 2026-3

- Session Law 2026-3 is a nearly NCPRO only session law that does multiple things for NCPRO.
- This bill is important for NCPRO because it gives SOME state-based flexibility to the SFRF Revenue Replacement projects, as well as this time NON-REVENUE REPLACEMENT projects. It also extends the life of NCPRO to May1, 2027 and gives NCPRO the ability to utilize interest from other programs that NCPRO has administered over the years.
- What we will try to do today is to show you most of the parts of this “flexibility” language, express next steps, and answer any questions you may have.
- The link to SL 2026-3 <https://www.ncleg.gov/Sessions/2025/Bills/House/PDF/H433v7.pdf>

# Session Law 2026-3 (Section 1)

## SECTION 6.9

- (a) Notwithstanding any other provision of law, State Fiscal Recovery Funds (SFRF) appropriated in S.L. 2021-180, as amended, that are categorized as revenue loss by the North Carolina Pandemic Recovery Office (NCPRO) may be used to support government services, subject to and consistent with 31 C.F.R. Part 35 and related United States Department of the Treasury guidance. For purposes of this section, "government services" has the meaning set forth in 31 C.F.R. § 35.6(d) and does not include any use prohibited by federal law or federal guidance.
- (b) The Office of State Budget and Management (OSBM), in consultation with NCPRO, shall identify all SFRF-funded projects with remaining unexpended balances that were categorized as revenue loss and used for government services. The Director of the Budget may reclassify such unexpended SFRF balances to support other eligible government services (i) only to the extent permitted under federal law and federal guidance; (ii) only from funds that were properly obligated on or before December 31, 2024; and (iii) with expenditures made consistent with 31 C.F.R. Part 35 and related United States Department of the Treasury guidance. A reclassification under this subsection may occur during the 2025-2026 fiscal year and, to the extent necessary to comply with federal requirements, within the applicable federal period of performance, if all of the following conditions are satisfied:
  - (1) The governmental service to receive SFRF support was previously supported by SFRF appropriations.
  - (2) The governmental service receives a net General Fund appropriation in the 2025-2026 fiscal year.
  - (3) The governmental service is an eligible use of SFRF under 31 C.F.R. Part 35 and related United States Department of the Treasury guidance during the period of performance

# Session Law 2026-3 (Section 1)

## SECTION 6.9

- (c) To implement subsection (b) of this section, the Director of the Budget shall make nonrecurring, budget-neutral adjustments as follows:
  - (1) Reduce, on a nonrecurring basis, the 2025-2026 or 2026-2027 fiscal year net General Fund appropriation for each agency receiving SFRF pursuant to this section by an amount equal to the SFRF reclassified to that agency.
  - (2) Increase, on a nonrecurring basis, the net General Fund appropriation for each agency from which SFRF were reclassified under this section by an amount equal to the SFRF removed from that agency.
  - (3) Notwithstanding G.S. 143C-1-2(b), the net General Fund appropriations made under subdivision (2) of this subsection shall be used only for the projects for which SFRF were reduced under this section and shall not revert but shall remain available until the earlier of project completion or June 30, 2027.
  - (4) In no event shall a project from which SFRF are reclassified receive net General Fund appropriations in excess of the project's unexpended SFRF balance as of the date of reclassification.

# Session Law 2026-3 (Section 1)

## SECTION 6.9

- (e) **No later than April 15, 2026, OSBM and NCPRO shall jointly report** to the Joint Legislative Commission on Governmental Operations and the Fiscal Research Division on all actions taken under this section, including:
  - (1) **For each agency and project meeting the revenue-loss criteria in subsection (a) of this section, the project name and the amount of remaining unexpended SFRF as of December 31, 2025.** The report shall also **identify which projects are complete and have excess SFRF funds and which SFRF projects need additional funds for completion.**
  - (2) **For each agency and project from which unexpended SFRF were reclassified, the project name and the amount of the corresponding nonrecurring net General Fund appropriation** provided in lieu of SFRF.
  - (3) **For each agency and project receiving SFRF pursuant to the reclassification, the project name and the amount of SFRF provided.**
- The report shall also certify that all SFRF were obligated on or before December 31, 2024, and that expenditures are being made consistent with 31 C.F.R. Part 35 and related United States Department of the Treasury guidance.

## SECTION 1.(b)

- No Later than January 15, 2027, OSBM and NCPRO shall jointly update the report required by Section 6.9(e) of SL 2025-97, as amended by subsection (a) of this section, to reflect agency and project status through December 31, 2026.

# Session Law 2026-3 (Section 1)

## SECTION 6.9

(f) The Director of the Budget shall ensure that implementation of this section results in no change to the net General Fund appropriations in **either** the 2025-2026 **or 2026-2027** fiscal years.

# Session Law 2026-3 (Section 2)

**SECTION 2.(b)** The funds set out in subsection (a) of this section may be reallocated only when all of the following conditions are met: (1) There is a reasonable expectation that the funds will not be expended before the deadline established by applicable federal law or guidance. (2) The reallocation is made to support activities that previously received an appropriation from the SFRF, are authorized under this act or one of the acts listed in subsection (a) of this section, and adhere to **Federal SFRF Expenditure Category 5 (Water, Sewer, or Broadband Infrastructure) guidance**. Reallocated funds shall not be used for any new activity, purpose, or program.

**SECTION 2.(c)** The Director of the Budget shall reallocate funds under subsection (b) of this section by making nonrecurring transfers of General Fund appropriations from each agency receiving SFRF fund transfers to the agency from which the SFRF funds were transferred. The authorization to reallocate under this section is not an authorization to modify the purposes of the original appropriations to either the receiving or transferring agency.

**SECTION 2.(d)** The Director of the Budget may allocate any funds remaining after the reallocation process authorized in subsection (b) of this section to the State Treasurer up to an amount equal to the remaining unreimbursed COVID-19-related expenses incurred by the North Carolina State Health Plan for Teachers and State Employees between March 3, 2021, and December 31, 2024, provided the reallocation is consistent with federal law and guidelines.

**SECTION 2.(e)** To the extent that funds reallocated pursuant to this section are unappropriated, those funds are hereby appropriated and available for use pursuant to this section.

**SECTION 2.(f)** Reporting. – No later than January 15, 2027, the Office of State Budget and Management (OSBM) shall report to the Fiscal Research Division on the reallocations made pursuant to this section in the same manner as required in Section 6.9(e) of S.L. 2025-97.

# Session Law 2026-3

## Next steps:

- For the month of JULY 2026, there is \$325,004,603 left in SFRF program.
- For the month of JULY 2026, there is \$79,395,437 left is SFRF Revenue Replacement:
  - 1 Project in the 50% and under category
  - 4 Projects in the 51% to 75% category
  - 56 Projects in the 76% to 99% category
- NCPRO has commenced another round of analysis to focus in on **ALL REVENUE REPLACEMENT** projects that are in danger of NOT being fully expended by 12-31-2026.
- NCPRO is looking at closing those projects that have not expended any funds over the past 6 months.
- That Revenue Replacement swap will take place in October 2026. Your Grants Manager will be contacting you to discuss the amount of any swap that is identified and next steps.
- NCPRO is currently compiling and updating a report per section 6.9(e).

# CSLFRF FAQ Updated August 7, 2026

## Five New FAQ's Added (17.24 – 17.28)

FAQ's are consistent with guidance from NCPRO

- 17.24. Liquidation period is from January 1, 2025 – December 31, 2026.
- 17.25. If the term of a multi-year contract extends beyond the period of performance (December 31, 2026), recipient may not use SFRF to cover costs after the deadline and should be prepared to use other financing sources.
- 17.26. Subrecipients are subject to the same expenditure deadlines as recipients.
- 17.27. Closeout processes include reissuing uncashed checks in accordance with recipient policies and procedures through April 30, 2027.
- 17.28. Uncashed checks or cancelled checks after April 30, 2027, are no longer regarded as an expenditure for an eligible use of SFRF. Recipients must return any unexpended funds to Treasury.

[Coronavirus State and Local Fiscal Recovery Funds Frequently Asked Questions](#)





# SFRF Closeout Deadlines, Requirements, and Sources

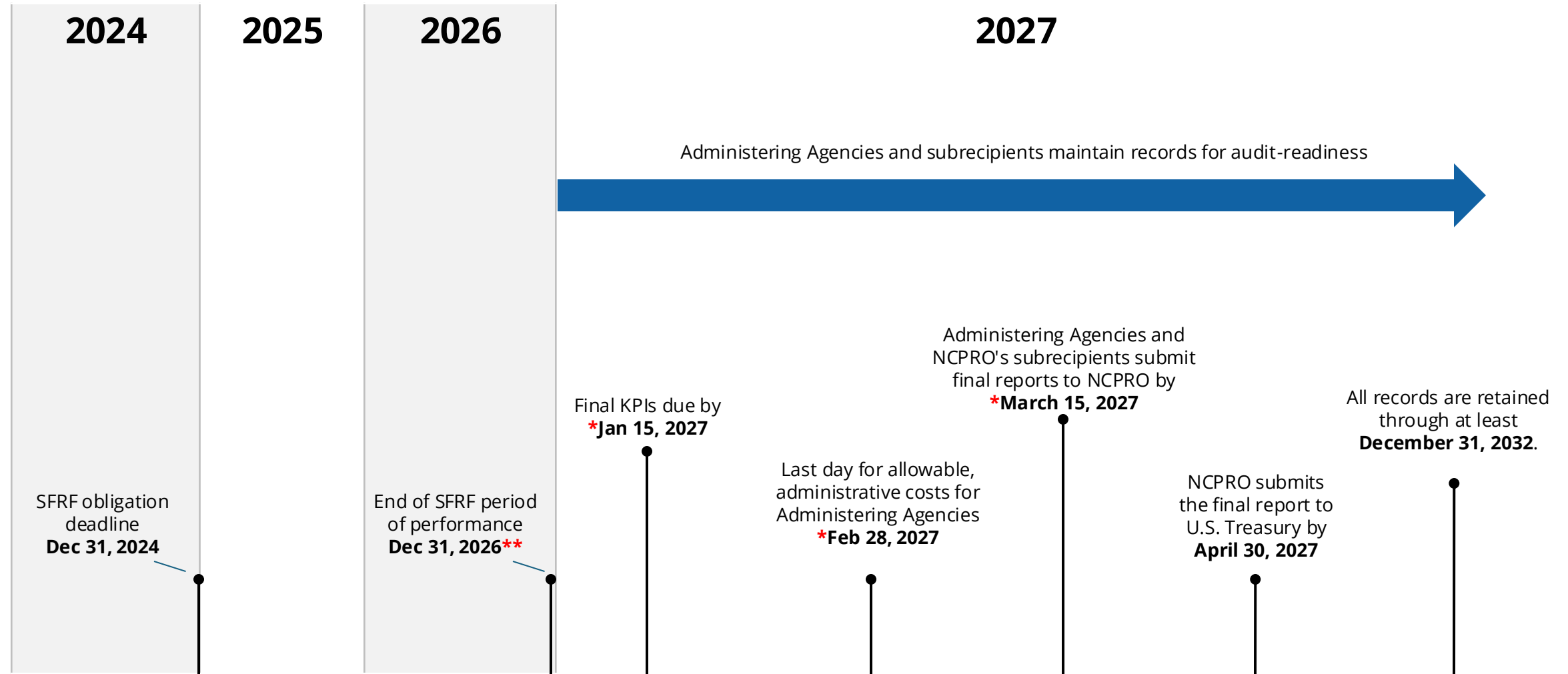
| Deadline                               | Requirement                                                                                                                                                                                                                                                                                                                                                                     | Source                                                                                                                                                                    |
|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>December 31<sup>st</sup>, 2024</b>  | SFRF obligation deadline.                                                                                                                                                                                                                                                                                                                                                       | <a href="#">U.S. Treasury Guidance</a> – Part 1, Section C (2) (pg.7)                                                                                                     |
| <b>December 31<sup>st</sup>, 2026</b>  | End of period of performance of the award. <ul style="list-style-type: none"> <li>Final date for Administering Agencies and all subrecipients to incur and expend allowable programmatic costs               <ul style="list-style-type: none"> <li>After this date, only administrative closeout costs incurred by Administering Agencies are allowable</li> </ul> </li> </ul> | <a href="#">U.S. Treasury Guidance</a> – Part 1, Section C (2) (pg.7)<br><a href="#">U.S. Treasury Guidance FAQs</a> – FAQ 17.5 (pg.95)<br><a href="#">31 CFR 35.5(c)</a> |
| <b>*January 15<sup>th</sup>, 2027</b>  | Final key performance indicators (KPIs) for all SFRF projects are due to NCPRO                                                                                                                                                                                                                                                                                                  | <a href="#">NCPRO Interagency Meeting – 4/30/2026</a> – (pg. 16)                                                                                                          |
| <b>*February 28<sup>th</sup>, 2027</b> | Last day for Administering Agencies to incur and expend administrative closeout costs<br>Administering Agencies and NCPRO subrecipients must return any unexpended balances to NCPRO by this date                                                                                                                                                                               | <a href="#">NCPRO Interagency Meeting – 4/30/2026</a> – (pg. 16)                                                                                                          |
| <b>*March 15<sup>th</sup>, 2027</b>    | Final expense report due no later than March 15, 2027                                                                                                                                                                                                                                                                                                                           | <a href="#">NCPRO Interagency Meeting – 4/30/2026</a> – (pg. 16)                                                                                                          |
| <b>April 30<sup>th</sup>, 2027</b>     | NCPRO submits the final United States Department of the Treasury report by this date                                                                                                                                                                                                                                                                                            | <a href="#">U.S. Treasury Guidance</a> – Part 1, Section C (2) (pg.12 )                                                                                                   |
| <b>December 31<sup>st</sup>, 2032</b>  | Administering Agencies and NCPRO's subrecipients maintain audit-readiness until at least <b>12/31/2032**</b> <ul style="list-style-type: none"> <li>Project files are maintained in a central location with appropriate access controls</li> <li>Policies, procedures, and training are in place for legacy planning</li> </ul>                                                 | <a href="#">09 NCAC 03M .0202(1)</a> – (pg.2)<br>Award Agreement                                                                                                          |

**Reporting resources (applies to all NCPRO reporting deadlines above):** See the [Reporting Information and Resources | NCPRO page](#) and your grant agreement for details on reporting requirements. For project-specific questions or clarifications, contact your NCPRO Grant Manager.

*\*Note: Asterisked dates are established by NCPRO and are subject to change.*

*\*\*Note: Subrecipients of Administering Agencies and NCPRO's subrecipients maintain audit-readiness until at least 12/31/2032.*

# Closeout Dates and Deadlines for American Rescue Plan Act, State Fiscal Recovery Fund (SFRF) Program Activities



*\*Note: Asterisked dates are established by NCPRO and are subject to change.*

*\*\*Note: Programmatic spending must be complete across all tiers — Administering Agencies, direct subrecipients, and lower-tier subrecipients.*

# CYCLE 3

## ❖ Cycle 3 Key Activities

- Final Phase Monitoring
  - 8 agencies being virtually monitored
    - Monitoring began in June...Last monitoring meeting was this week...5 final letters to be prepared and distributed.
    - Everyone else received an LRQ – all results are in, all follow up communications have been completed.
- Final Phase Technical Assistance
  - Five sessions on most things CLOSEOUT and Sub Recipient Monitoring have been delivered with the last July 29th. All TA sessions are now on the NCPRO website.
  - No new sessions of TA are being planned. Focus will now shift to closing out NCPRO programs, providing OSBM with handoff training for what they will be responsible for once NCPRO sunsets.
- NCPRO Closeout of our projects ongoing (117 of 215) as of last week for SFRF and (28 of 82) non SFRF projects are closed . Deloitte is reviewing our policies & SOPs for existence and accuracy, award agreements for the same thing, and is working with our IA dept to make sure everything dealing with SFRF has been looked at least once over the past 4 years.

\*Note: Dates established by NCPRO are subject to change

# Questions