



# Implementation Guide: Linking Family, Friend and Neighbor Caregivers to the Child and Adult Care Food Program

*August 2025*



Home Grown is a national collaborative of funders, caregivers, and providers working together to advance an inclusive child care system where home-based child care is visible, valued, and well-resourced. We work in partnership with the diverse array of family child care providers and family, friend and neighbor caregivers who comprise the home-based child care sector. Learn more on our [website](#).

## Overview

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This implementation guide is intended to be used by public leaders at the state level responsible for child care and food program administration and by community organizations and advocates working on behalf of vulnerable children and families. The guide offers a pathway toward realizing the goal of family, friend and neighbor (FFN) caregiver participation in the Child and Adult Care Food Program (CACFP), which may include addressing a myriad of structural barriers and policy omissions. (Note that the terms *license-exempt providers* and *FFN caregivers* are often used interchangeably as most FFN caregivers are legally exempt from licensure.) In addition, while success will result in greater state drawdown of federal CACFP funding, state and/or private resources will be needed to supplement this funding source and fully realize the goal of reducing hunger.

Offered as a companion piece to the **Cook County Illinois Case Study of Success: Family, Friend and Neighbor Participation in the Child and Adult Care Food Program**, this six-step guide is based on lessons learned over more than a decade of program implementation. The steps are designed to support you in identifying the current number of FFN caregivers in your state and the number of those who participate in the public child care subsidy and/or the food program. Research is also recommended to understand your state's Child Care Development Fund (CCDF) plan and how it addresses collaboration between the child care subsidy program and the food program. Once you have collected baseline data, you can determine what the most immediate barrier to FFN provider participation in CACFP might be in your state. Step Five is organized around the most likely challenges you will face and includes key questions and options for you to consider as you strategize how to address the challenge. The guide also offers resources you can use to identify allies in this work – from child care resources and referral organizations to hunger advocates.

## Step One - Review your state's Child Care Development Fund (CCDF) plan

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Each state's [current CCDF plan is available online](#) and offers information regarding:

- State lead agency responsible for administering CCDF
- If the state lead agency for CCDF is also responsible for CACFP
- How license-exempt providers are defined
- How license-exempt providers are monitored
- How/if license-exempt providers are permitted participation in CCDF programs
- How/if license-exempt providers are permitted participation in CACFP
- Coordination between CCDF and other funding programs, including CACFP

While the plans are lengthy, they each follow the federally prescribed format. This allows easy comparisons of how various states answered the same set of questions about the operation of CCDF.

- **Section 1:** Define CCDF Leadership and Coordination with Relevant Systems: includes information about the lead agency and the state administrator for CCDF. This section also includes information about the authority of the lead agency and will reveal who monitors license-exempt providers. This section also identifies the state agency responsible for CACFP and describes coordination goals, processes and results between CCDF and CACFP.
- **Section 2:** Promote Family Engagement through Outreach and Consumer Education: includes information about which providers in addition to licensed providers are included in the lead agency's searchable list of child care providers. Hopefully your state includes at least a minimal information set regarding license-exempt providers (centers and homes) in this database.
- **Section 4:** Ensure Equal Access to Child Care for Low-Income Children: includes information on how lead agencies determine rates of payment to various providers for various services. Section 4.3.3 describes tiered and differential rates and add-ons. For example, this section of the Illinois plan includes: "... license-exempt family child care providers completing Training Tiers receive an add-on for each CCAP child in care. The percentage ranges from 10%-20% depending on the tiers completed."

- **Section 5:** Establish Standards and Monitoring Processes to Ensure the Health and Safety of Child Care Settings: includes information relevant to license-exempt care. Section 5.1.2 requires states to identify CCDF-eligible providers who are exempt from licensing requirements, including length of day, maximum number and allowable ages of children in care, and how lead agencies ensure the health, safety, and development of children in care. Required health and safety standards and training (pre-service and ongoing) can be found in this portion of the plan, along with information about background checks and annual inspection of health and safety compliance. The process for securing background checks and the costs are included. Look for information on whether your state expects FFN caregivers to pay for these clearances. In Illinois, "The Lead Agency provides additional funding to the Department of Children & Family Services to process license-exempt provider background checks ..." Section 5.6 describes these factors for license-exempt relative providers.
- **Section 6** speaks to training and professional development. States must specify which training sessions are required for license-exempt providers.
- **Section 7:** Support Continuous Quality Improvement: includes information about the quality improvement efforts in the state. This portion of the Illinois plan includes detail about the Tiers program: "The Illinois Network of Child Care Resource and Referral Agencies (INCCRRA) administers the QRS Training Tiers available for License Exempt Family Child Care. Tiers focus on Safety, Nutrition, and Child Development..." This section also specifies if financial incentives and other supports (grants, bonuses, stipends) are included in the quality improvement program.
- You can also search these PDF documents for the keywords of "license-exempt," "relative provider," "CACFP," etc.

## Step Two - Document your state's Child and Adult Care Food Program (CACFP) policy and operation

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Information is available on the U.S. Department of Agriculture website about [CACFP in general and sponsorship in all the states](#) and about [state agencies involved in CACFP](#).

- Which state agency is responsible for administering CACFP? How does that agency treat participation of FFN caregivers?
- From that state agency's website you can search for agencies that serve as CACFP sponsors and find out what region(s) of the state they serve and how to contact them.

### Relevant Resources

- Urban Institute, [The Child and Adult Care Food Program and Home-Based Child Care Providers: Expanding Participation](#)
- Child Trends & Home Grown, [Promising Practices for Home- Based Child Care | A Review of State-Level Approaches](#)

## Step Three - Identify Trusted Family, Friend and Neighbor (FFN) Intermediaries

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- Who are the Child Care Resources and Referral (CCR&R) agencies in the state? What regions do they serve? Do any of them also serve as food program sponsors? Do any offer training or other programs specifically for FFN caregivers?
  - [Child Care Aware of America](#) offers information about CCR&Rs around the country.
  - You can also search for a statewide network of CCR&Rs in your state. For example, in Illinois, it is called the Illinois Network of Child Care Resource and Referral Agencies. In Maryland, it is the Maryland Family Network.
- Are there other organizations in the state/region that offer training, technical assistance, or other supports to family, friend and neighbor caregivers? Unions? Shared Service Alliances or Networks? Provider networks or associations?

## Step Four - Collect FFN Data

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This information should be known by the CCDF state lead agency in the state, although it may not be readily available.

- How many FFN caregivers are in the state? Where are they located? What is their contact information? Are they already participating in CACFP?
- What are the demographics of FFN caregivers?
- How long and how consistently have FFN caregivers been receiving subsidy funding?

## Step Five - Prioritize Changes Needed

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Review the list of challenges below. Find the first challenge your state faces and then move through the list.

Consider these challenges:

- **State doesn't allow participation of FFN caregivers in the CCDF program.**

Federal regulation allows license-exempt FFN caregivers to participate in CCDF, but states may choose to exclude them. This is a fundamental challenge that will require a group of stakeholders to: document the negative impacts of this policy on FFN caregivers and the children they serve; present data regarding how many other states allow FFN caregiver participation in CCDF funding; offer amending language to the state's CCDF plan; and note changes that will be needed in state CCDF policy, procedures, communication and training in order to operationalize those changes.

- **CCDF rates for FFN participation are so low that few FFN caregivers participate.**

- What are the subsidy rates of payment to FFN caregivers for care provided? To various age groups? Full time? Part time? Overnight care? Weekend care?
- Are there any grants, quality add-ons or incentives available to FFN providers serving children participating in CCDF?

Low rates may inhibit FFN participation in CCDF and, thereby, also perpetuate hunger in communities. To address this challenge, FFN and early childhood education (ECE) stakeholders need to: compare FFN provider rates to those of licensed family child care providers and calculate percentages; create FFN provider budgets and calculate the actual cost of care (with the caregiver earning a living wage); calculate the annualized cost for the state administrator to raise FFN provider rates to the actual costs; calculate the additional federal funding from CACFP that the state would earn if the increased state CCDF investment resulted in higher FFN caregiver participation in both programs.

- **State monitoring of FFN CCDF participation is high stakes and off-putting.**

Federal regulations require that CCDF lead agencies: require and conduct criminal background checks for staff at licensed, regulated or registered child care providers; prohibit employment or participation of those providers with a criminal record based on a minimum set of federal disqualifications; and respond quickly to provider requests for completion of criminal record checks. The criminal background check must include FBI fingerprint check, search of the National Sex Offender Registry; and a search of state registries in which the staff/provider currently lives and has lived during the preceding five years. Federal regulation does NOT apply to "an individual who is related to all children for whom child care services are provided" and DOES apply to "any individual residing in a family child care home who is age 18 and older."

- Review your state's policy to determine if criminal convictions ABOVE and BEYOND the minimal federal requirements have been added to the list of disqualifiers based on the results of the criminal record check. If this is the case, work with FFN caregivers and ECE advocates to lobby for the elimination of these additional barriers to participation in CCDF funding and CACFP. Section 2.3.4 of the 2022-2024 CCDF plans requires states to provide the URL/website link to the list of offenses that prevent individuals from being employed by a child care provider or receiving CCDF funds. Section 5.5.7 of the CCDF plans requires a state to indicate if the state disqualifies providers based on their conviction for any other crimes not specifically listed in federal regulation. Check here to see if your state is adding requirements to the federal minimum requirements and work to determine if these are onerous for license-exempt providers.

- Review your state's CCDF plan to determine the party responsible for monitoring FFN caregivers and the language used regarding this role. Note the language used in the plan and related policies and procedures – is this a “monitor” or a “coach”? The Illinois CCDF plan includes the language of “Health & Safety Coaches” as those responsible for monitoring and inspecting License-exempt providers.
  - If a government agency is responsible for this work, consider advocating for the alternative use of one or more community-based organizations that already have trusted relationships with FFN caregivers.
  - Encourage state/community-based organizations to harness testimonials from FFN caregivers already participating to encourage peer, informal communication channels

- **State CCDF plan does not specifically speak to CCDF and CACFP coordination or alignment.**

This challenge may result in poor communication, outreach, and engagement of FFN caregivers in CACFP. Work with ECE stakeholders to encourage a meeting of the administrators to review examples of state plans (such as that of Illinois) that are considered best practice in this regard and discuss any barriers to moving forward with regular data, policy, and other check-ins.

## Step Six - Make a Case for Funding/Advocacy

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Supporting FFN caregivers takes time and resources. You may need to hire dedicated staff, and those staff may need to travel. You may need to create a website or other promotional materials in multiple languages, and you may need to collect data regarding your outreach efforts and efficacy. Documenting the needs in your community will help you make the case for necessary funding:

- Document hunger in your state/community. What percentage of children under 5 are hungry? How many SNAP recipients are in the state? What is the health status of children under 5 as it relates to conditions related to poor nutrition, such as childhood onset diabetes, overweight and obesity?
  - Feeding America, [Food Insecurity among the Overall Population in the United States](#)
- Document the role that FFN caregivers play in helping parents to work. How many FFN caregivers are in the state? What percentage operate non-traditional hours? Why do parents choose that care? Regional and local data may be hard to find and expensive to collect, but national resources are available:
  - Home Grown, [Supporting and Strengthening FFN Care](#)
  - National Women's Law Center, [Sustaining Family, Friend, and Neighbor Child Care Beyond the Pandemic: Guidance and State Models](#)
  - Bipartisan Policy Center, [Untangling Family, Friend, and Neighbor Care](#)

## Conclusion

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CACFP is a federal entitlement program designed to address hunger. Increasing FFN caregiver participation in the program has multiple positive effects, including those on: child health and wellness; caregiver financial well-being; and local economies through the injection of more federal funding. The steps outlined above, which are based on best practice successfully implemented in Illinois, are a clear pathway for advocates and policymakers to follow in pursuit of these worthy goals.