



A Study to Determine the Feasibility of Establishing an Alternative Child and Adult Care Food Program Eligibility Process for Family, Friend and Neighbor Caregivers in Colorado

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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. Our mission is to build a more inclusive child care system that values and supports home-based child care (HBCC) as a quality option for families and children. Home Grown envisions a country in which all children have the care they need to grow, learn, and thrive.

This report has been prepared by Home Grown on behalf of the State of Colorado, Department of Early Childhood. This report responds to the House Bill 24-1223 passed by the Colorado General Assembly directing CDEC in consultation with CDPHE, to conduct or contract a study to determine the feasibility of de-linking Family, Friend and Neighbor caregiver eligibility for the Child and Adult Care Food Program from Colorado Child Care Assistance Program participation. Following a competitive solicitation process (DQ1 QAAA 2025000239 Feasibility of De-Linking Eligibility for the Federal Child and Adult Care Food Program Study) Home Grown, via fiscal agent Health Federation of Philadelphia, was awarded the study contract (PO number is 202500008411).

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Executive Summary

Family, friend and neighbor (FFN) caregivers play a vital role in the early childhood care landscape, often serving vulnerable and diverse populations. The federal Child and Adult Care Food Program (CACFP) has the potential to offer crucial nutritional support and financial reimbursement. Unfortunately, FFN providers face unique barriers to accessing CACFP nationally and in Colorado.

FFN providers care for more than half of children under the age of 5 in Colorado.¹ FFN caregivers are license exempt providers serving up to four or fewer children over the age of 2, or two or fewer children under the age of 2. There are many types of FFN caregivers, from grandmothers, abuelitas, and aunts, to friends and neighbors who care for children. Many FFN caregivers offer their services for free or at rates insufficient to cover costs.² Colorado's Comprehensive Early Childhood Workforce Plan reports economic instability is prevalent among FFN caregivers.³ A study of Colorado FFN caregivers revealed that "The rising cost of fresh, healthy food was the top financial challenge." Most are not normally connected with traditional child care systems or the food program in Colorado.^{4,5}

To create a pathway to the food benefits, Colorado expanded CACFP eligibility to FFN caregivers participating in the Colorado Child Care Assistance Program (CCCAP). As policy makers look to further optimize this federal food program, research was needed to develop and assess the feasibility of an additional pathway to CACFP eligibility. For this reason, the Colorado General Assembly passed House Bill 24-1223, funding the Colorado Department of Early Childhood (CDEC), in consultation with Colorado Department of Public Health and Environment (CDPHE) to conduct or contract for a study to determine the feasibility of de-linking FFN eligibility for CACFP from participation in the child care assistance program. Home Grown was awarded the contract for the study in 2025.

"Es posible que la alimentación que recibe el niño de su casa FFN es la única comida nutritiva a la que está expuesto / It is possible that the food the child receives from their FFN home is the only nutritious food they are exposed to."

– FFN Focus Group participant

Study Goal

This study aimed to develop and assess the feasibility of a range of alternative eligibility processes, and implementation guidelines and best practices for de-linking FFN care eligibility for the federal CACFP from the CCCAP that will ensure oversight while minimizing administrative burdens and ensuring nutritional well-being of children in care.

Study Design and Methodology

The research addressed the central question: **"Is there a feasible alternate pathway for FFN providers to participate in CACFP without requiring participation in CCCAP?"** The three-phase, mixed methods approach:

Phase 1. Data collection and analysis: legal and regulatory, asset-based landscape, and qualitative (stakeholder focus groups and interviews) and quantitative (program) data.

Phase 2. Utilize findings to develop potential alternative eligibility processes, implementation guidelines and feasibility criteria.

Phase 3. Apply criteria to options and evaluate.

Stakeholder Engagement

The study actively engaged a diversity of Colorado stakeholders: 87 family, friend, and neighbor caregivers and parents shared their insights through focus groups in Spanish, Dari, Arabic, and English; 37 representatives from the early care and education, food security, health, foundation, state agency and FFN-serving sectors shared insights through focus groups and interviews. The engagement process prioritized transparency, inclusivity, cultural equity, and respectful dialogue to ensure diverse perspectives were heard. The research team collaborated closely with CDEC and CDPHE leadership – the study also benefited from their knowledge and ongoing support.

Evaluation and Criteria

With stakeholder input, the study established a comprehensive set of criteria to assess the feasibility and suitability of potential alternative eligibility processes for FFN caregivers to participate in CACFP.

Criteria for feasibility and selection of CACFP alternative eligibility processes:

- Compliance with laws and regulations
- Leverage existing infrastructure and systems
- Program integrity
- Simplicity and transparency
- Efficient and low-burden enrollment
- Language accessibility
- Utilization of digital tools
- Cost-efficiency
- Alignment with Colorado's early childhood values

The potential alternative process, via the Colorado PDIS-FFN, was rigorously evaluated against these criteria to ensure it provides a feasible and effective pathway.

Study Findings

The study identified a feasible alternative eligibility process: Colorado Professional Development Information Systems, Family, Friend, and Neighbor Registration (**Colorado PDIS-FFN**). Caregivers would complete a Colorado PDIS-FFN registration, including submitting background checks and a health and safety self-certification. The pathway utilizes the State Child Care Approval: Voluntary Registration / State Child Care Registry mechanism, based on the California "TrustLine" model. The Colorado PDIS-FFN pathway leverages the Colorado Care Worker Tax Credit as an important step in bringing FFN caregivers into the food program.

Implementation Strategy

The asset-based landscape analysis found that Colorado is well-equipped to support an additional FFN pathway to CACFP and the implementation strategy it would take to make it a success. The implementation strategy:

- Utilizes community engagement and coordinator capacity
- Facilitates system navigation and outreach
- Builds a cohesive referral and collaboration system
- Advances targeted outreach and opt-in options
- Supports CACFP sponsoring organization best practices

Conclusion

This study concludes the Colorado PDIS-FFN alternative eligibility process is a feasible new pathway to increase CACFP access for FFN care. The rigorous multi-phase research and evaluation process ensured the pathway is data-driven, compliant with regulations, community-informed, cost-efficient by utilizing existing systems, and aligns with Colorado's principles for early childhood services. The implementation strategy offers practical guidelines and best practices tailored to Colorado.

The new pathway is consistent with the study's legislative mandate and with stakeholder recommendations for a streamlined, low-burden process balanced with adequate oversight that supports the nutritional well-being of the children in FFN care.

Introduction and Background

Family, friend and neighbor (FFN) caregivers play a vital role in the early childhood care landscape, often serving vulnerable and diverse populations. The federal Child and Adult Care Food Program (CACFP) has the potential to offer crucial nutritional support and financial reimbursement. Unfortunately, FFN providers face unique barriers to accessing CACFP nationally and in Colorado.

FFN providers care for more than half of children under the age of 5 in Colorado.⁶ FFN caregivers are license exempt providers serving up to four or fewer children over the age of 2, or two or fewer children under the age of 2. There are many types of FFN caregivers, from grandmothers, abuelitas, and aunts, to friends and neighbors who care for children. Many FFN caregivers offer their services for free or at rates insufficient to cover costs.⁷ Colorado's Comprehensive Early Childhood Workforce Plan reports economic instability is prevalent among FFN caregivers.⁸ A study of Colorado FFN caregivers revealed that "The rising cost of fresh, healthy food was the top financial challenge." Most are not normally connected with traditional child care systems or the food program in Colorado.^{9,10}

To create a pathway to the food benefits, Colorado expanded CACFP eligibility to FFN caregivers participating in the Colorado Child Care Assistance Program (CCCAP). As policy makers looked to further optimize this federal food program, research was needed to develop and assess the feasibility of an additional pathway to CACFP eligibility. For this reason, the Colorado General Assembly passed House Bill 24-1223, funding the Colorado Department of Early Childhood (CDEC), in consultation with Colorado Department of Public Health and Environment (CDPHE) the agency administering CACFP, to conduct or contract for a study to determine the feasibility of de-linking CACFP eligibility from participation in the child care assistance program. Home Grown was awarded the contract for the study in 2025.

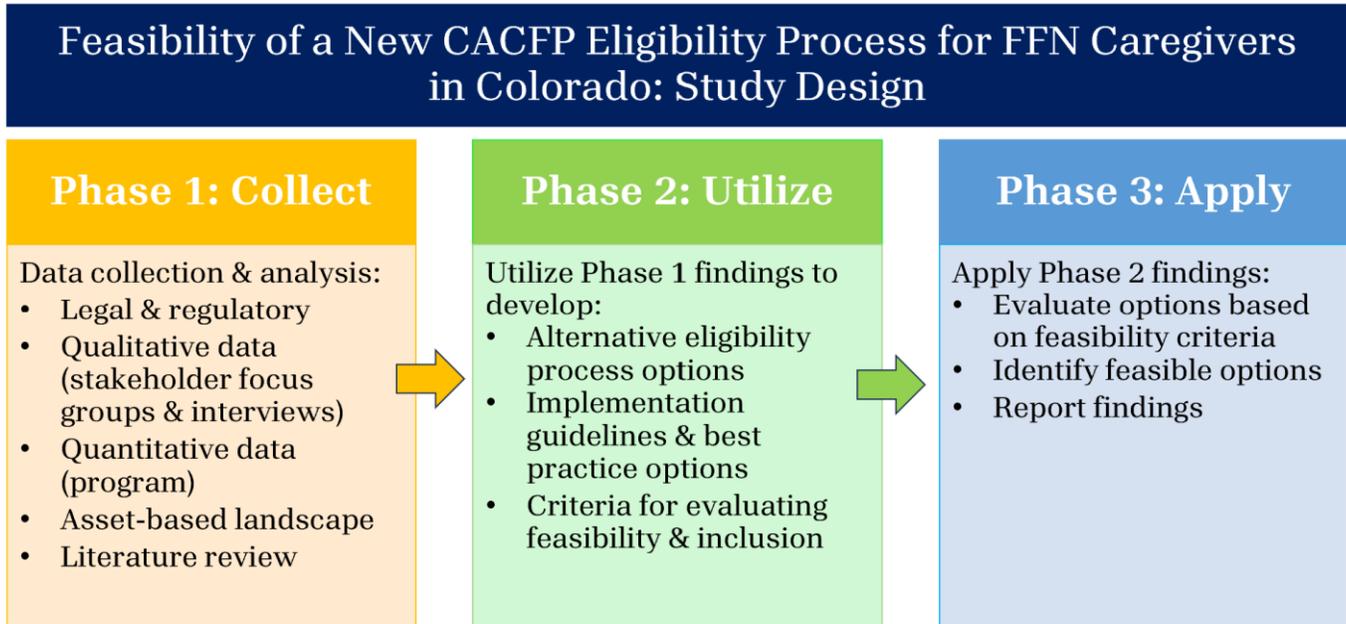
Glossary:

- **Child and Adult Care Food Program (CACFP):** The federally funded Child and Adult and Care Food Program provides training, technical assistance and reimbursements for nutritious meals and snacks served to children in home-based child care, centers, afterschool programs and other settings. In Colorado, the Colorado Department of Public Health and Environment (CDPHE) administers CACFP as the recently renamed Colorado Food Program.
- **Colorado Child Care Assistance Program (CCCAP):** The purpose of CCCAP is to provide eligible households with access to high quality, affordable child care that supports healthy child development and school readiness while promoting household self-sufficiency and informed child care choices. The Colorado Department of Early Childhood (CDEC) administers CCCAP.
- **Family, Friend, and Neighbor (FFN):** FFN caregivers are family members, trusted friends and neighbors who care for related and other children. FFN caregivers are license-exempt, serving up to four or fewer children over the age of 2, or two or fewer children under the age of 2 in Colorado.

Study Design and Methodology

This chapter delineates the study’s design and methodology, describing the multi-phase, mixed-methods approach used to evaluate the feasibility of an alternative CACFP eligibility pathway for FFN providers in Colorado. It covers the data collection processes, stakeholder engagement, regulatory review, pathway development, and systematic evaluation procedures employed to ensure the pathway is compliant, community-informed, and scalable.

Figure 1



Study Design and Methodology

The study employed a three-phase, mixed methods approach to answer the central research question: **“Is there a feasible alternate pathway for FFN providers to participate in CACFP without requiring participation in CCCAP?”**

The three-phase, mixed methods approach:

Phase 1. Data collection and analysis: legal and regulatory, asset-based landscape, and qualitative (stakeholder focus groups and interviews) and quantitative (program) data.

Phase 2. Utilize findings to develop potential alternative eligibility processes, implementation guidelines and feasibility criteria.

Phase 3. Apply criteria to options and evaluate.

The methodology was designed to incorporate comprehensive data collection, stakeholder engagement, regulatory analysis, and systematic evaluation aligned with federal and state policies.

Stakeholder Engagement

The study actively engaged a diversity of Colorado stakeholders. The design centered the voice, ideas and expertise of FFN providers and FFN serving organizations, and a broad array of key stakeholders from many relevant sectors. The stakeholder engagement process emphasized transparency, inclusivity, cultural equity, and respectful dialogue to ensure diverse perspectives were prioritized and heard. The study was enriched by a broad spectrum of Colorado stakeholders:

- **87 family, friend and neighbor caregivers and parents** shared their insights through focus groups conducted in Spanish, Dari, Arabic, and English, ensuring linguistic and cultural relevance.

- **29 representatives** from child care organizations, FFN-serving organizations, food security and food justice groups, health care associations and practitioners, state agencies, CACFP sponsors, and a foundation contributed insights through focus groups tailored to their expertise.
- **10 stakeholders** from a Native American community-based organization, a statewide rights organization, CACFP sponsors, and the statewide FFN lead organization participated in interviews to offer in-depth perspectives and respond to key study questions.
- **Policy and Administrator stakeholders:** The research team collaborated closely with CDEC and CDPHE leadership –the study also benefited from their knowledge and ongoing support.

Phase 1: Data Collection and Landscape Analysis

- The initial phase focused on collecting both qualitative and quantitative data to establish a nuanced understanding of existing systems, community assets, and stakeholder perspectives. This involved a literature review and a comprehensive review of current laws, regulations and policies. Building upon this legal framework, a landscape analysis was conducted to identify existing pathways, program infrastructures, and community assets supporting FFN providers. Quantitative analysis of program data informed an understanding of current relative demand. Qualitative analysis of stakeholder input was central to the research.
 - **Literature Review:** National and Colorado research and reports were reviewed to capture the complex interplay of factors influencing CACFP access for FFN caregivers: primary key topic CACFP (participation, impact, access, pathways), and secondary topic recent relevant FFN care.
 - **Qualitative analysis of stakeholders** input through focus groups, interviews and meetings;
 - *Recruitment:* Participants were recruited through FFN Networks, CDEC, a foundation, community-based organizations and other partner outreach efforts. A Study Launch Tool Kit, featuring outreach and recruitment social media, model newsletter articles, action alerts, fact sheets and a volunteer form, was shared with our partners in English and Spanish. In addition, the recruitment email and PowerPoint presentation were translated and distributed in Dari and Arabic.
 - *Methodology:* A detailed plan/guide was produced for each focus group/interview with pre-set questions, scripts, and text to drop in the chat for each meeting. A brief PowerPoint was translated and used to level set in some cases. Professional translators were hired to provide real time translation when necessary. Focus groups, interviews and meetings were recorded.
 - *Analysis:* A rapid qualitative analysis was employed to synthesize and interpret the data collected from all focus groups. Data was coded into four main domains: 1) knowledge, 2) barriers, 3) solutions, and 4) best practices. Within each domain, subcategories were further organized into emerging themes. Transcriptions were reviewed for accuracy, summarized, and integrated into summaries highlighting common themes and illustrative participant quotes.
 - *Confidentiality:* Participant confidentiality was maintained, data was stored securely and accessed only by authorized research personnel.
 - **Legal and Regulatory Analysis:** Analyzed Federal CACFP and Colorado child care statutes to identify compliance requirements, key legal frameworks and flexibilities.
 - **Colorado Asset-based Landscape Analysis:** Analyzed Colorado systems pathways for FFN care, identifying successes, capacity of relevant components of the system, and opportunities for cross cutting coordination. This research utilized the review of Colorado literature, stakeholder input, and a scan, to identify and map the assets and relationships. The findings were translated into a streamlined schematic diagram and narrative.
 - **National Landscape Scan:** Examined state eligibility processes, outreach and retention strategies, and community engagement models to identify innovative approaches that could be adapted for Colorado. Best practices and guidelines were developed based on in-depth knowledge of selected states and sponsors. The landscape analysis was also utilized to inform the implementation recommendations.

- **Quantitative Analysis:** Analyzed Colorado program data for 1) home-based child care providers in CACFP, 2) child care providers in CCCAP, 3) FFN caregivers participating in CCCAP (Qualified License-Exempt providers), and 4) FFN caregivers participating in CCCAP (Qualified License-Exempt providers) participating in CACFP. Analysis included comparisons with national data and trends. Data sources: 1) Colorado FNS-44 monthly CACFP reporting form, 2) USDA CACFP database and keydata, 3) CDPHE: Qualified License-Exempt CACFP participation data and consultation, 4) CCDF reports on CCCAP, and 5) CDEC: CCCAP state and county data, confirmation and updating of report data.

Phase 2: Development of Feasibility Criteria and Pathway Prototypes

- Findings from Phase 1 informed the conceptual development of potential eligibility pathways, grounded in best practices from existing models such as California’s TrustLine system and others. Specific feasibility criteria were established based on regulatory compliance, system capacity, community trust, cultural relevance, and fiscal sustainability. Criteria development involved qualitative synthesis of stakeholder feedback, policy analysis, and performance benchmarks from successful programs. Draft pathway models, such as incorporating Colorado’s Professional Development Information System (PDIS) and leveraging the Colorado Care Worker Tax Credit, were then refined through iterative stakeholder review, including focus groups and expert consultations.

Phase 3: Pathway Evaluation and Feasibility Assessment

- The final phase involved systematically applying the established feasibility criteria to the proposed pathway. Applied the relevant criteria evaluating compliance with federal and state regulations, integrity, potential for integration with existing infrastructure, use of digital tools, and cost implications. The cost estimate was reviewed, adjusted, and completed by CDEC and CDPHE. The qualitative evaluation of the pathway centered around stakeholder input, community trust, and cultural responsiveness: efficient and low-burden enrollment, simplicity and transparency, language accessibility and alignment with Colorado’s Early Childhood values criteria. This multi-criteria decision approach yielded a clear finding for a feasible alternative eligibility pathway: Colorado PDIS-FNN. The outcome was this comprehensive report outlining the most viable pathway, accompanied by implementation guidelines and best practices for scalable deployment within Colorado’s early childhood system.

This multi-stage process ensured that the proposed pathways are data-driven, compliant with regulations, community-informed, and operationally feasible, supporting the overarching goal of equitable access to CACFP for FFN care. The following chapters of this report provide more detail on each of the phases, components, and findings.

Literature Review

FFN caregivers play a vital role in the early childhood care landscape, often serving vulnerable and diverse populations. CACFP offers crucial nutritional support and financial reimbursement, yet many FFN caregivers face substantial barriers to participation. National and Colorado research and reports were reviewed to capture the complex interplay of factors influencing CACFP access for FFN caregivers: Primary key topic CACFP (participation, impact, access, pathways), and secondary topic recent relevant FFN care. In this study the central research question pertains only to the current program, therefore this review did not cover legislative recommendations for federal program change.

- FFN Caregivers, Families and Children
- CACFP Program and Impact
- CACFP: Barriers, Facilitators, and Best Practices
- Best Practices for FFN Pathway to CACFP

FFN Caregivers, Families and Children

- **Food and Economic Security**

Colorado's Comprehensive Early Childhood Workforce Plan reports economic instability is prevalent among FFN caregivers in Colorado.¹¹ Many FFN caregivers offer their services for free or at rates insufficient to cover costs, exacerbating their financial vulnerability. A recent report by Feeding America found Colorado had a 12.7 percent food insecurity rate, with higher rates in many rural counties and in Denver.¹² Overall, 1 in 8 adults and 1 in 7 children in the state are food insecure.¹³ A 2021 study of Colorado FFN caregivers revealed that "The rising cost of fresh, healthy food was the top financial challenge."¹⁴ Nationally, approximately 22 percent of early educators are food insecure based on an analysis of CPS data.¹⁵

- **Nutrition**

The CDC's analysis of the National Survey of Children's Health (2021) for children aged 1-5, found that too few consumed enough fruits and vegetables, or too many consumed sugar sweetened beverages.¹⁶ In Colorado, approximately one in four (25.6%) children did not eat a daily fruit, close to one half (47.2%) did not eat a daily vegetable, and more than one half (56.1%) drank a sugar sweetened beverage at least once in a week.¹⁷ While this is slightly better than the national average, it is still problematic.

"It is something quite worrying because maybe I don't put enough lunch in his lunch box since usually a child gets to eat three to four times a day, and most of the time the lunch that one as a parent gives to the provider is not enough."

– Parent Focus Group participant

Child and Adult Care Food Program (CACFP)

The Child and Adult Care Food Program (CACFP) provides training, technical assistance and reimbursement for nutritious meals and snacks served to children in a range of early care and education and after school settings.¹⁸ The program also serves a small number of emergency shelters and adult care homes. According to USDA, "CACFP contributes to the wellness, healthy growth, and development of young children and adults in the United States."¹⁹ Good nutrition in child care settings is crucially important.

- **CACFP Nutrition Standards**

The CACFP healthy meal pattern (four food groups) and nutrition standards (e.g., sugar limits on yogurt and cereals, only 100 percent fruit juice (no more than once a day), and whole grains) are consistent with Dietary Guidelines for Americans. Based on the National Academy of Medicine recommendations, the standards support providers in serving vegetables and fruits, whole grains, lean meats/meat alternatives, and lower-fat dairy options while minimizing added sugar and saturated fat.²⁰

“El acceso a comida saludable es importante porque podemos eliminar la comida chatarra. Me gusta la frase ‘En un cuerpo sano, hay una mente sana.’ Eso es lo que hace crecer a los niños grandes y saludables / Access to healthy food is important because we can eliminate junk food. I like the phrase ‘In a healthy body, there is a healthy mind.’ That’s what makes great, healthy kids grow up.”

– FFN Focus Group participant

- **CACFP Reimbursements**

Home-based caregivers receive CACFP payments for each eligible meal and snack served to children in their care.²¹ A home participating in CACFP must offer the meal service to all children in care. Each day a caregiver can claim up to two meals and one snack or two snacks and one meal. Reimbursements are based on the type of meal (Breakfast, Lunch, or Dinner) or snack, and a two tiered sliding scale based on income.²²

Home-based child care located in low-income neighborhoods can qualify for the higher rate based on “area eligibility.”²³ Areas are eligible if 1) at least 50 percent of children qualify for free or reduced price meals at the local school or 2) 50 percent of children have family income at or below 185 percent of the poverty level based on census data. In addition, a home can qualify for the higher rates based on the provider or the children’s household income being at or below 185 percent of the federal poverty level.

Based on the higher rate, a home-based FFN caregiver serving a breakfast, lunch, and snack can be reimbursed up to \$5.74 each day for each child, equaling \$360 a month and \$4,350 a year for three children.²⁴ The lower rates are approximately fifty percent of the higher rates. The majority of CACFP homes receive the higher rates. For example, 78 percent of homes in Colorado receive the higher rates.²⁵

CACFP Impact

CACFP has been shown to enhance the nutritional quality of meals in child care settings by providing healthier food options, supporting good nutrition for children, and improving household food security for families with low incomes.

- **Healthy Nutrition**

Participation in CACFP has been associated with healthier nutrition environments, serving healthier foods and beverages, and children in environments supported by CACFP tend to experience better nutrition compared to non-participating peers.^{26, 27, 28, 29, 30} The most recent research, USDA’s national study found the CACFP meals were healthier than the average young child’s diet. Specifically, children consumed more vegetables, whole grains, and dairy, and had fewer added sugars and saturated fats during care days, emphasizing the positive impact of CACFP meals on young children’s nutrition.³¹

CACFP participation facilitates healthier nutrition environments by reducing the burden of food costs through CACFP payments and providing nutrition education and training on meeting the CACFP meal pattern and nutrition standards.^{32, 33} In a national study, family child care providers participating in CACFP reported the following top benefits: Reimburses me for meals and snacks provided to children in my care (95%); Provides me with training and technical assistance on how to plan and prepare nutritious meals and snacks (73%); Helps me provide types of food that children may not eat at home (67%); Provides me with nutrition education materials that I share with children and parents (64%); Allows me to feed children who may not have enough to eat at home (59%); Parents have a positive view of CACFP (52%); and Allows me to offer child care at a lower cost than I could otherwise (38%).³⁴

- **Food Security**

Participation in CACFP has also been shown to improve household food security for families with low incomes.³⁵ An analysis of the Early Childhood Longitudinal Study–Birth Cohort found that accessing child care through providers that participate in the CACFP resulted in a reduction in household food insecurity.³⁶ In a study of low-income families with young children, children receiving meals provided by child care (likely through CACFP) had lower adjusted odds of food insecurity and lower odds of being in poor health as compared to children with meals brought from home.³⁷

CACFP: Barriers, Facilitators, and Best Practices

CACFP is underutilized; only 67 percent of eligible home-based caregivers participate nationally³⁸ and 51 percent participate in Colorado (per data in this report). A far lower percent of FFN providers participate. Increasing participation in CACFP is strongly recommended by the Centers for Disease Control and Prevention and other organizations as a key strategy to support good nutrition and promote health in early care and education settings.³⁹ Many researchers have been clear about the need to expand CACFP. For example, “Given the known cognitive and health consequences associated with food insecurity during early childhood, our results indicate the importance of improving access to the CACFP.”⁴⁰ This section of the review will examine 1) facilitators and barriers to CACFP, and 2) best practices for a FFN caregiver pathway to access CACFP.

• Facilitators and Barriers to CACFP Participation

Two recent USDA studies found that limited knowledge or confusion about CACFP requirements and procedures is a significant barrier for providers.⁴¹ Research on license-exempt providers has found that many of them are unaware of CACFP or misunderstand eligibility and application procedures.⁴² In Colorado, researchers highlighted that many FFN providers are unaware of CACFP eligibility requirements and the application process, which impacts their participation.⁴³ In addition, Colorado’s Comprehensive Early Childhood Workforce Plan, reports that many FFN providers are not familiar with the Colorado Child Care Assistance Program or how to apply.⁴⁴ This is a barrier to the food program because the child care assistance program is the gateway program needed to participate in CACFP in the State. It is also consistent with the findings showing that FFN providers are often unaware and/or excluded from the larger programmatic support systems.

Research consistently highlights that administrative complexity and systemic barriers significantly limit CACFP participation among providers, particularly in underserved communities.^{45, 46, 47} Complex application procedures, errors, and lengthy paperwork discourage providers, especially license-exempt and informal caregivers, from enrolling or maintaining ongoing participation.⁴⁸

Conversely, facilitators such as streamlined, user-friendly digital application systems, multilingual resources, and remote support have demonstrated efficacy in reducing these barriers and broadening access.^{49, 50, 51} Building trust through culturally relevant outreach and engagement strategies, employing trusted community organizations, peer networks, and culturally competent staff, are essential for reaching diverse populations and dispelling fears related to program rules or immigration status.^{52, 53}

Additionally, ongoing technical assistance, professional development, and capacity-building efforts, including tailored training, peer mentorship, and localized support, are shown to support sustained participation and compliance.^{54, 55, 56} Policy reforms, such as simplifying requirements for license-exempt providers, integrating CACFP with workforce development initiatives, and creating regional outreach efforts, are critical for addressing structural barriers and expanding access in rural and marginalized communities.⁵⁷ Moreover, aligning CACFP with broader social supports, such as incentives and financial stipends, fosters long-term engagement for providers facing economic and administrative challenges.^{58, 59} Overall, successful strategies require reducing administrative burdens, emphasizing cultural competency, fostering trust, and integrating program participation into community-support ecosystems and policy frameworks.

Review of Literature: Best Practices for Establishing a Clear and Accessible Pathway to CACFP for FFN Care

Over half the caregivers in Colorado are FFN caregivers. They have a central role in nurturing, feeding and caring for children of family and friends. Unfortunately, often they do not have information and access to the food or child care programs. Research emphasizes the need for intentional, culturally responsive, and streamlined pathways to facilitate enrollment and ongoing participation. This review synthesizes relevant research and policy reports on evidence-based strategies and innovative practices relevant to a clear and accessible CACFP pathway for FFN care.

1. Simplify and Streamline Enrollment Process

Complex application systems and regulatory requirements significantly hinder FFN participation. Multiple reports⁶⁰ suggest that simplifying the enrollment process, such as reducing paperwork, creating easy-to-understand eligibility criteria, and increasing flexibility in documentation, can substantially increase participation. Digital platforms equipped with user-friendly features, multilingual interfaces, step-by-step guidance, and remote support are essential for reducing procedural barriers.⁶¹

2. Culturally Responsive, Multilingual Outreach and Support

Research highlights the importance of culturally tailored outreach to improve trust and understanding among diverse FFN caregivers.^{62, 63} Resources should be developed in multiple languages, with culturally relevant messaging that respects community norms and values. Employing trusted community organizations, faith-based entities, and peer leaders as outreach intermediaries fosters trust, dispels myths, and encourages enrollment.^{64, 65} Engaging communities through culturally appropriate communication strategies enhances program reach and participation.

3. Foster Peer Networks and Trusted Intermediaries

Peer support models are consistently recognized as effective for both recruitment and retention.^{66, 67} Facilitating connections among providers—through mentorship programs, peer-led informational sessions, and community networks—helps to address concerns, provide reassurance, and share best practices. Trusted intermediaries, such as local early childhood coalitions or community advocates, serve as credible messengers and technical support agents, particularly in underserved or marginalized communities.^{68, 69}

4. Provide Ongoing Technical Assistance and Capacity-Building

Continuous support is vital in maintaining participation over time. Training sessions should be tailored to the needs of FFN providers and include practical, easy-to-understand information on compliance, meal documentation, and program benefits.^{70, 71} Support can be delivered through in-person coaching, virtual workshops, or one-on-one technical assistance, leveraging technology platforms to reach remote providers.⁷² Moreover, offering multilingual technical assistance ensures inclusivity and clarity.

5. Address Financial and Systemic Barriers

Clear communication around reimbursement processes, eligibility, and funding opportunities can reduce confusion and motivate participation. Facilitating access to additional resources, such as grants or stipends, can offset costs related to registrations, paperwork, or infrastructure needed to participate.^{73, 74} Transparent policies and equitable fee structures ensure that even license-exempt and informal providers see CACFP as a feasible opportunity.

6. Address Structural and Regional Barriers

Geographic disparities pose significant challenges. Outreach strategies need to be adapted for rural and underserved urban areas, such as home visiting CACFP monitors, virtual onboarding, and local community hubs, making participation physically and logistically feasible.^{75, 76} Additionally, policies should support license-exempt and informal providers to participate with minimal regulatory hurdles, through simplified licensing or registration processes.

7. Build Trust through Transparency and Community Engagement

Trust-building is central to encouraging FFN participation. Transparent communication regarding data privacy, program safety, and immigration status is critical.⁷⁷ Sharing success stories, providing culturally relevant information, and maintaining open lines of communication.

Colorado Asset-based Landscape Analysis

Colorado

This chapter reports on the findings from the asset-based landscape analysis of Colorado systems pathways for FFN care, identifying success, capacity of relevant components of the system, and opportunities for cross cutting coordination. The landscape analysis informed options for potential new CACFP eligibility pathways and best practices. It yielded a full understanding of system capacities, an important factor in determining the feasibility of implementing a potential new CACFP pathway. Colorado is well-equipped to support an additional FFN pathway to CACFP and the implementation strategy it would take to make it a success.

- Colorado Asset-Based Landscape
- Colorado Family, Friend and Neighbor Care Programs and Services
- Broader Ecosystem and Sectors Relevant to FFN Caregivers in Colorado
- Cross-Cutting Coordination

Colorado Asset-based Landscape

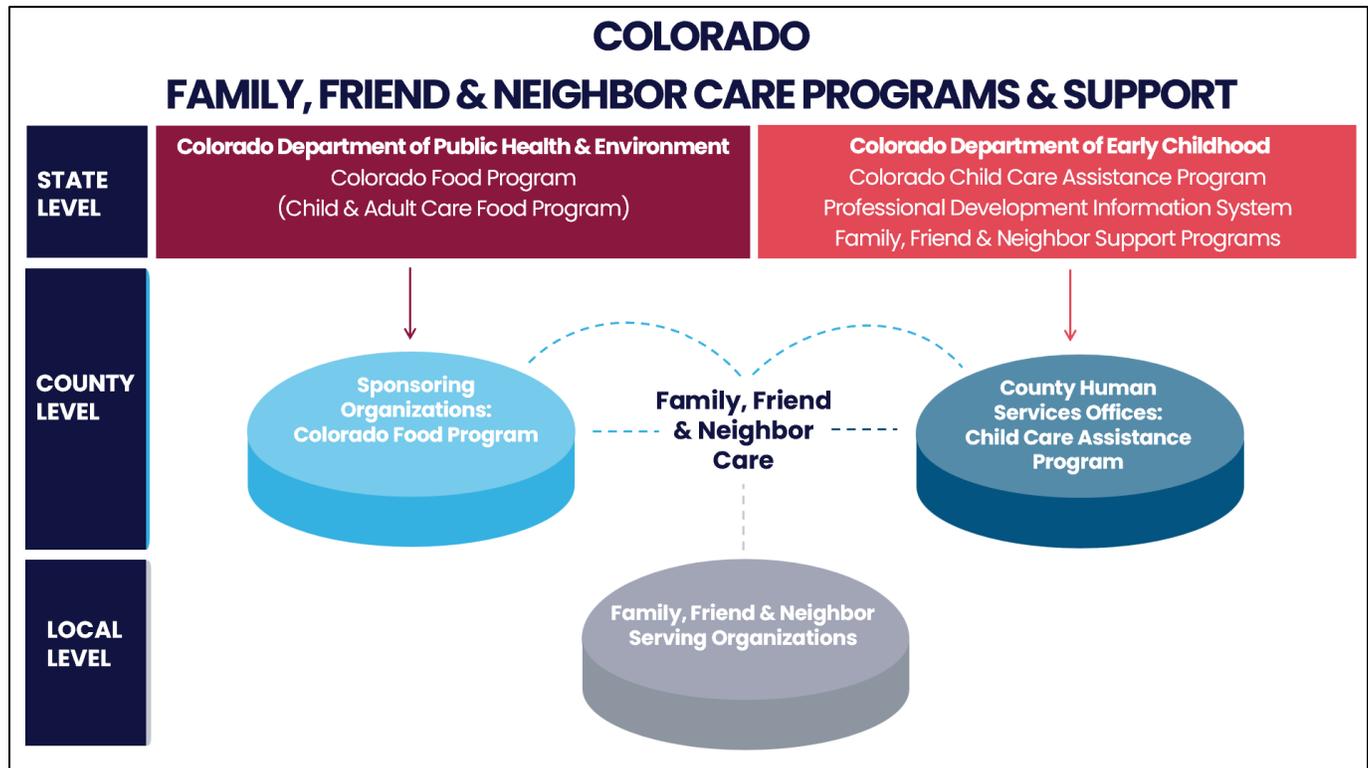
Colorado demonstrates a strong commitment and significant investment in supporting FFN care, backed by a robust system of assets. These assets include the programs, initiatives, expertise, and dedication of the Colorado Department of Early Childhood (CDEC), the Colorado Department of Public Health and Environment (CDPHE), the County Human Services Offices, Colorado Food Program (is the state name for the CACFP program) Sponsoring Organizations, a network of FFN-serving organizations, FFN leaders, and Colorado policy and advocacy groups focused on child care, and food and nutrition security. Additionally, the Colorado General Assembly actively supports innovative efforts and initiatives aimed at reaching and serving FFN providers. The Colorado philanthropy sector is deeply committed to supporting FFN care, actively leading initiatives and partnering with stakeholders to drive meaningful change.

“ Para mí como proveedora es muy importante que los niños estén bien alimentados, ya que de eso depende que su desarrollo sea saludable. Pero también su rendimiento en el día y hasta su estado de ánimo, es por eso que con gusto les comparto lo que tengo en mi alacena / For me as a provider, it is very important that children are well nourished, since their healthy development depends on it. But also their performance during the day and even their mood, which is why I am happy to share with you what I have in my pantry.”

– FFN Focus Group participant

Colorado Family, Friend and Neighbor Care Programs and Services

Figure 2



Source: Home Grown

Mapping Colorado’s programs and services for FFN caregivers was conducted through an asset-based landscape analysis and then streamlined into the schematic diagram illustrated in Figure 2. This landscape graphic outlines the “Family, Friend & Neighbor Care Programs & Support” system, categorized by different levels: State, County (program access), and Local (services and training).

The **State Level**, features the two lead state agencies:

- [Colorado Department of Public Health & Environment](#)⁷⁸: Administers the Colorado Food Program (Child & Adult Care Food Program)
- [Colorado Department of Early Childhood](#)⁷⁹: Administers the Colorado Child Care Assistance Program, Professional Development Information System, and Family, Friend & Neighbor Support Programs

The **County Level**, shows the access points for the food program and child care assistance programs serving FFN care:

- [Sponsoring Organizations: Colorado Food Program](#)⁸⁰
- [County Human Services Offices: Child Care Assistance](#)⁸¹

The **Local Level**, represents a range of entities offering services and training for FFN care:

- [Family, Friend & Neighbor Serving Organizations](#)⁸²

The graphic illustrates the system structure and pathways. CDPHE administers the Colorado Food Program (CACFP) through the Sponsoring Organizations and CDEC administers the CCCAP program through the County Human Services offices. The FFN serving organizations represent a range of entities, including Early Childhood Councils, United Way and community organizations, offering services and training for FFN caregivers. The local level indicates that FFN organizations are not available in every county.

Once an FFN caregiver is eligible to enroll in CACFP, they can deal directly with a sponsor. In order to become eligible, they must first go through the CCCAP process. Hence, the blue loops connect CCCAP to FFN care and then from FFN care to CACFP.

Asset-based Landscape Analysis

Colorado Family, Friend and Neighbor Care Programs and Services: Systems, Structure, Assets, and Capacity

1. CDPHE: Colorado Food Program (CACFP): Structure and Assets
2. CDEC: CCCAP, FFN Support Programs, and PDIS: Structure and Assets
3. Colorado Food Program (CACFP) and CCCAP: Capacity and Current CACFP Eligibility Pathway
4. Family, Friend and Neighbor Care Serving Organizations
5. FFN Caregivers and Leader Networks

1. Colorado Food Program (CACFP): Program Structure and Assets

CDPHE administers the Colorado Food Program* (CACFP) through three non-profit sponsoring organizations. These organizations act as an umbrella organization assisting the caregivers with the CACFP paperwork, providing nutrition education training on the meal patterns and nutrition standards, and submitting the providers' meal claim for reimbursement to the state. Sponsoring organizations assign a CACFP monitor to each home. The monitor provides training, technical assistance and oversight through at least three home visits a year. Colorado secured a special USDA waiver to allow virtual visits/offsite reviews which will be covered in more detail below.

Colorado also has three U.S. Military CACFP sponsors serving the three military bases. The U.S. Military certifies child care on base: all programs are Department of Defense certified.

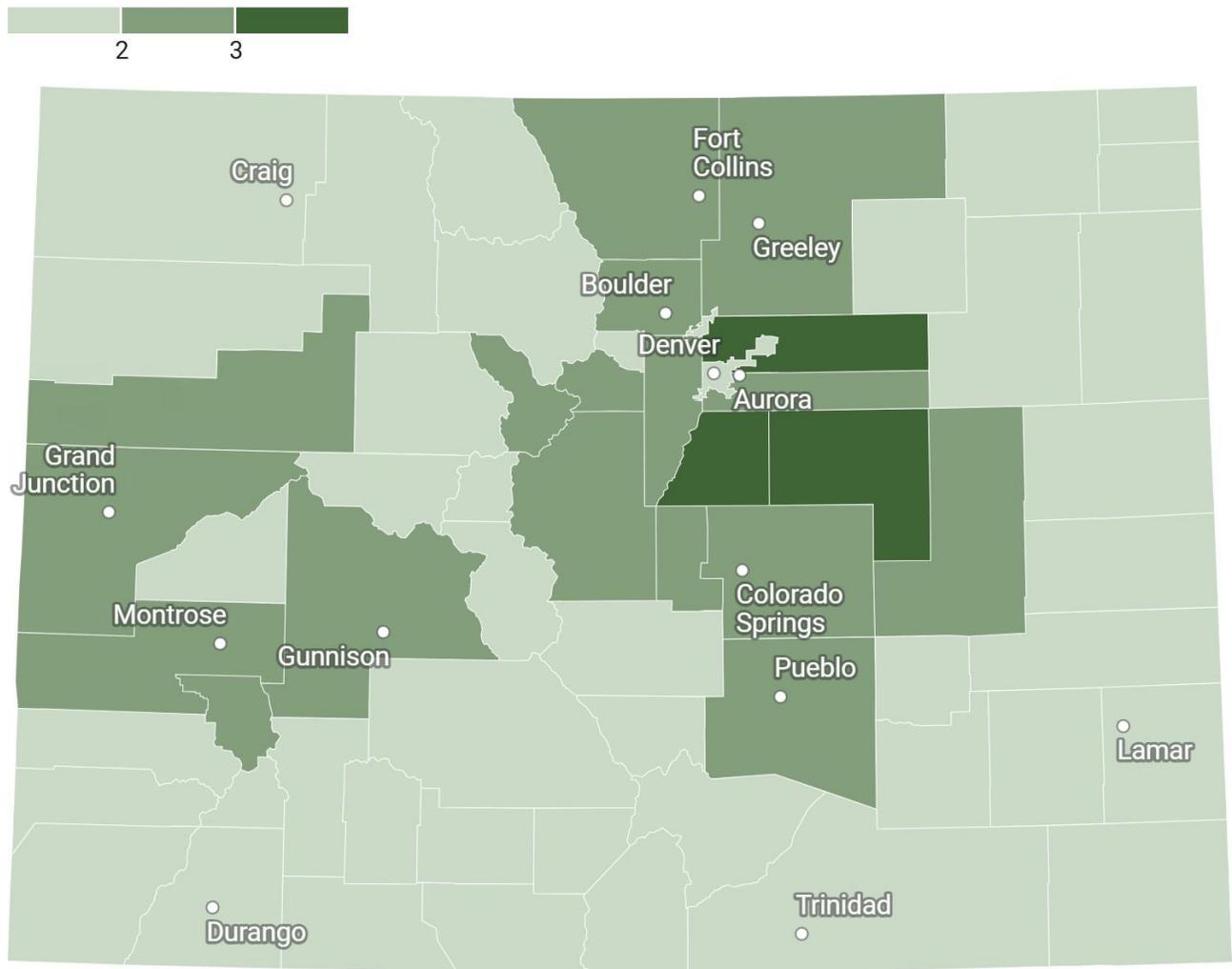
The sponsors receive a per-home monthly reimbursement for supporting a home-based caregiver's participation in CACFP. As outlined in CACFP regulations, monthly administrative payments to sponsors are based on a sliding scale: initial 50 homes - \$147, next 150 homes - \$112, and next 800 homes - \$87. Each month that a caregiver claims reimbursement for meals, the sponsor will receive the per-home administrative payment. Sponsors report this payment system does not recognize the time and travel needed to recruit and enroll providers who then decide not to participate. Cross sector collaboration for recruiting and supporting FFN caregivers in CACFP participation can help to alleviate this strain.

Each sponsor has a service area—the counties they serve. As can be seen in Figure 3, the map shows that each county has at least one sponsor. A few rural counties, as well as almost all the urban counties have two sponsors. Of the remaining urban counties, three counties have three sponsors and one county has one sponsor.

** CDPHE recently rebranded their CACFP program as the Colorado Food Program. The agency uses both the Colorado Food Program and CACFP. This report uses CACFP and Colorado Food Program depending on the context and refers to both as the food program. "Colorado Food Program (CACFP)" is used when needed for clarity.*

Figure 3

Colorado Food Program: Number of Family Child Care Home Sponsors Serving Each County



3 military base providers are in El Paso County

Data Source: Home Grown

CDPHE's Technology-Driven Support for CACFP Access

CDPHE has harnessed technology to improve access to the Colorado Food Program (CACFP), implementing tools such as virtual visits for home reviews and an online cost-benefit calculator (available in both English and Spanish). Colorado recognizes the importance of leading with innovation to serve the many rural and frontier areas in the state.

Colorado secured a special USDA waiver to allow the use of virtual visits (offsite reviews). For Fiscal Year 2025, Colorado sponsoring organizations of homes are permitted to conduct one of the three required monitoring reviews

offsite. In addition, the sponsors are permitted to conduct a second off site review for home providers who reside over 50 miles from the sponsor's office.

- CACFP virtual visits include real-time, two-way video interactions, such as using FaceTime or similar platforms, allowing providers to share feedback, demonstrate meal practices, and ask questions directly with monitors. Virtual visits allow monitors to provide timely and responsive training, technical assistance, evaluation, and oversight, expanding support for FFN and other providers.
- This approach addresses key accessibility issues faced by providers in rural, underserved, or congested areas where transportation or scheduling obstacles hinder in-person visits. The impact has been an increase in service reach, as virtual monitoring reduces geographical barriers, controls cost and enables services during inclement weather.

FFN caregivers considering participation in CACFP can utilize CDPHE's online tool to "*See how much money you might receive: Cost Benefit Tool (English⁸³) and (Spanish⁸⁴)*". Other State agencies are using Colorado's tool on their websites.

Language Link

To support equitable access for all providers, CDPHE has implemented a language line service for sponsoring organizations of homes, and state staff. This language interpretation service aims to play an important role in bridging communication gaps: working to ensure accurate, responsive messaging is conveyed to child care providers. Sponsoring organization staff may utilize Language Link when engaging with both participating and non-participating family child care homes, with the costs covered by CDPHE.

Rebranding CACFP: Colorado Food Program

CDPHE recently rebranded CACFP as the Colorado Food Program. This improved name is a key component of the Department's efforts to market the program which include English and Spanish promotional fact sheets. Reaching more providers is vital since most of the FFN stakeholders did not know about the program.

2. Colorado Department of Early Childhood: Programs Structure and Assets

CDEC administers the CCCAP program through the County Human Services offices. The Colorado Shines Professional Development Information System (PDIS) is also housed in CDEC. On PDIS, FFN providers can complete training, apply for credentials and qualifications, and other options. This is an important resource with ample capacity.

CDEC Family, Friend, and Neighbor Support Programs

The CDEC Family, Friend, and Neighbor Support Programs include a CDEC FFN Advisory Council and FFN Strategic Action Network, and the Family, Friend and Neighbor Child Care Provider Grants and Support Program offering training and grants for community-based and non-profit organizations. The initiative, funded by the Colorado General Assembly in 2022, exemplifies a strategic mobilization of community assets to strengthen early care systems for FFN caregivers.

- **FFN Advisory Council and FFN Strategic Action Network:** Central to their effort is CDEC's FFN Advisory Council, composed of providers, community organizations, and advocacy groups, which serves as a trusted platform for ongoing dialogue, feedback and shared learning. The Council fosters trust among caregivers and families but also acts as a pivotal asset by amplifying the provider voices within the statewide care system regarding policy, rules, regulations, and funding. Alongside this, CDEC has created a broad network of approximately 750 FFN providers and service organizations providing a vital resource pool – offering opportunities for engagement, education, and mutual support. These community partnerships reinforce the program's foundation, enabling responsive, culturally relevant support mechanisms that leverage existing relations and local knowledge.
- **FFN Child Care Provider Grants and Support Program:** CDEC selected the widely respected Colorado Statewide Parent Coalition (CSPC) to administer the Family, Friend, and Neighbor Child Care Provider Grants and Support Program. Through this historic program, CSPC is supporting a network of community organizations providing training, resources and technical assistance to the FFN caregivers. The program is discussed in further detail later in this landscape assessment.

Through the FFN Advisory Council and FFN Strategic Action Network and the targeted training and grant programs, CDEC aims to leverage existing community trust and local expertise to build a resilient, culturally responsive support infrastructure. This asset-based approach aims to foster a landscape of shared ownership, where community organizations serve as vital connectors bridging gaps and creating pathways for sustainable, equitable access to quality early care and nutrition services. This increased capacity is important in supporting the development and implementation of a potential new pathway for FFN providers to access CACFP.

This study fully utilized the FFN Support Programs built capacity for dialogue. Partners from Donnell-Kay Foundation engaged the FFN Advisory and Network members in dialogue through a series of Study presentations at their monthly meeting (English, Spanish, Dari and Arabic PowerPoint presentations and real-time translations.) In addition, CDEC, as the lead for the FFN Strategic Action Network, used the power of their FFN network communications to help bring the voice of FFN providers into the study.

“Yo como proveedora me preocupo bastante y constantemente sobre cómo alimentarlos sanamente y apropiadamente. Me esfuerzo mucho por darles una alimentación completa y balanceada / As an FFN provider, I worry a lot about how to feed them healthily and properly. I try very hard to give them a complete and balanced diet.”

– FFN Focus Group Provider participant

3. Colorado Food Program (CACFP) and Colorado Child Care Assistance Program (CCCAP) Capacity

In Colorado, many children are being served through CACFP (34,298) and CCCAP (28,370). Both programs have the offices and organizations necessary to expand. However, there is a fundamental difference between the two programs limiting participation for CCCAP: the funding mechanism.

As a federal entitlement program, CACFP is guaranteed funding to serve all eligible participants. The reimbursements for child care providers, sponsoring organizations, and state agencies are available to support increased participation generated by a new eligibility pathway. This presents an opportunity to bring additional funding into Colorado to support the state’s goals of promoting good nutrition for young children in care settings.

The Colorado Child Care Assistance Program (CCCAP) is funded through the federal discretionary program, Child Care and Development Fund (CCDF), along with state and local funding.⁸⁵ As a discretionary program, CCCAP operates within a fixed funding allocation and must operate within a caseload that does not exceed available resources. Once the funds are expended, the doors close on any more new participants. Unfunded federal mandates can deplete budgets and reduce the number of families that can be served.

In Colorado, 20 counties are not accepting new CCCAP applicants due to funding constraints from new unfunded federal rules. A total of 24 counties have reached caseload limits, resulting in a moratorium on new enrollments. In these counties, FFN caregivers lack access to CACFP through CCCAP, creating a gap. Establishing an alternative pathway could enable Colorado to leverage CACFP funds more effectively, supporting healthy nutrition and food security for children in FFN care. Also, an additional pathway could support a “no wrong door” approach allowing county staff to refer caregivers to CACFP as a support.

Figure 4



Source: Home Grown

Colorado has worked hard to find ways to serve FFN care. To create a pathway to the food benefits, CDPHE expanded CACFP eligibility to FFN participating in the CCCAP. FFN homes enrolled in CCCAP, known as Qualified License-Exempt Homes, are eligible for CACFP. Family child care homes must be licensed or approved to participate in CACFP. The Colorado pathway, utilizing CCCAP approval, is a form of State Child Care Approval: State Child Care Subsidy. CDEC and CDPHE were able to design and implement this new form of approval through excellent interagency cooperation and coordination.

As explained earlier, CDEC administers CCCAP through the County Human Services offices. For FFN care, it is a two-step process: first the parent of a child in care applies and qualifies for CCCAP, then the FFN caregiver is sent an email with an invitation to apply to meet the CCCAP Qualified License-Exempt Home requirements. Caregivers take a series of child care trainings (15 hours), complete a background check for themselves and all adults in the household over 18, and pass a home inspection. Relative care providers do not undergo formal inspections. The majority of Qualified License-Exempt Homes are relative care providers; in the last reported data from FY 2019, they accounted for approximately 72 percent⁸⁶.

The study's stakeholder focus groups confirmed CDEC's report in their Comprehensive Early Childhood Workforce Plan finding that many FFN providers are not familiar with the CCCAP program or how to apply. This is similar to the low level of knowledge about the CACFP program. In addition, the rates for qualified license exempt homes vary by county creating inequities. The Qualified License Exempt process can take from 4 to 6 months.⁸⁷ This results in a significant delay in receiving CCCAP payments but also in being able to enroll in CACFP. CDEC is exploring offering a direct route for FFN caregivers to initiate the application process to become a qualified license-exempt home. Currently, parents can apply for CCCAP online through Colorado PEAK (Program Eligibility and Application Kit), a central application portal for numerous state benefits.

4. Family, Friend and Neighbor Care Serving Organizations

The Colorado Statewide Parent Coalition (CSPC) administers the groundbreaking Family, Friend, and Neighbor Child Care Provider Grants and Support Program. CSPC has established a broad network of community-based organizations including early childhood councils, United Way agencies, and a variety of nonprofit organizations across Colorado. They are focused on providing culturally and linguistically appropriate training, resources, and technical assistance. This network plays a vital role in fostering trust, enhancing provider skills, and building capacity within diverse communities, including those serving multilingual and culturally distinct communities.

Further, this web of FFN-serving organizations—such as the Early Childhood Councils of Boulder, Yuma, Washington, and Kit Carson Counties, as well as organizations like Healthy Child Care Colorado, La Piñata del Aprendizaje, and the

University of Colorado Denver—represents a core asset in Colorado’s early childhood landscape. The landscape of potential FFN partners includes Colorado’s robust system of community-based Early Childhood Councils working to improve the quality of early learning environments. The network of organizations serving FFN is expanding.

5. FFN Caregivers and Leaders Networks

Colorado’s FFN caregivers and leaders are powerful assets and central to the success of any effort. FFN leaders have strong informal collaborative networks in Colorado. Partners including CSPC and Home Grown are offering support and leadership training to these community leaders who can drive program and policy objectives. The key role of FFN leaders in the CDEC FFN Advisory and FFN Strategic Action Network has already been described. The structure and support of FFN leaders’ commitment and drive enhances their capacity to recommend, advocate, and engage. The Colorado FFN leaders supported this study, offering expert advice from the start. They also tapped their networks to ensure the focus groups were well attended.

Asset-based Landscape Analysis

Broader Ecosystem and Sectors Relevant to FFN Caregivers in Colorado:

1. Statewide Early Care and Education Organizations
2. Food and Nutrition Security Advocacy Organizations
3. Philanthropy: Foundations and Partners
4. Colorado General Assembly

1. Statewide Early Care and Education Organizations

Colorado boasts a robust network of statewide early care and education organizations. These organizations are instrumental in producing policy recommendations, conducting research, advocating for equitable access, and implementing initiatives that improve early childhood systems. Notable organizations include Early Milestones Colorado, which advances quality care and policies and has published a report on FFN care; Colorado Children’s Campaign, an advocate for equitable early childhood access; Healthy Child Care Colorado, which provides direct support and best practices; and Mile High United Way which has also produced a report on FFN care and operates Colorado Shines Child Care Resource and Referral, which connects families and providers to resources and supports quality improvement efforts.

2. Food and Nutrition Security Advocacy Organizations

Colorado’s statewide food and nutrition security advocacy organizations serve as critical assets in securing food justice, expanding access to the federal food programs and healthy food. The leading organizations, Hunger Free Colorado, Colorado Blueprint to End Hunger, Nourish Colorado, and the Colorado Food Cluster and others, play a vital role in producing policy recommendations, conducting research, lobbying, advocating, and implementing initiatives to improve food access and security across the state. Their longstanding efforts have helped secure significant program expansions, including Colorado’s distinction as one of only eight states with a Universal School Meals Program. Unlike many states that lack a statewide hunger advocacy organization, Colorado’s strong presence of these groups provides a strategic advantage in advancing equitable access to the food programs including CACFP and ensuring children’s nutritional needs are prioritized at the policy level.

3. Philanthropy: Foundations and Partners

The philanthropic community has played a vital role in supporting FFN care by leading initiatives and fostering collaboration among stakeholders to create meaningful, systemic change. The collective impact has been to change the narrative, create change and build capacity for further improvements.

The Donnell-Kay Foundation is a key supporter of culturally and linguistically responsive strategies, promoting community-led initiatives that prioritize the voices of FFN caregivers. Through its convenings and community forums, Donnell-Kay ensures that these voices remain central to efforts aimed at increasing access, enhancing quality, and ensuring the sustainability of FFN care.

Recently, the Buell Foundation, Colorado Gives Foundation, the Colorado Health Foundation, worked with Donnell-Kay documenting the success of efforts of six Bright Spots communities that have intentionally supported FFN caregivers.⁸⁸ This reflects the Foundations' long-standing support for FFN caregivers and quality care for all children in Colorado.

Home Grown has been investing in FFN programs, leaders and initiatives in Colorado, often in collaboration with local organizations, the Colorado Statewide Parent Coalition, and Foundation partners including Donnell Kay, Gary Ventures and IMPACT Charitable.

4. Colorado General Assembly

The Colorado General Assembly has shown leadership in passing innovative legislation to support FFN caregivers. Recognizing that FFN providers care for more than half of children under the age of 5 in Colorado, the Colorado General Assembly passed SB22-213 allocating \$7.5 million in funding to support quality in FFN care through CDEC, and HB 24-1312 offering FFN caregivers a Care Worker Tax Credit. Both of these bills have created opportunities and capacity for expanding access to CACFP through a new eligibility pathway.

In addition, the Colorado General Assembly appropriates significant funding for the CCCAP program: "FY 2024- 25 appropriations for CCCAP total \$170.7 million, including \$32.1 million General Fund, \$17.4 million cash funds comprised of local dollars, and \$121.2 million federal Child Care Development Funds."

Asset-based Landscape Analysis

Cross-Cutting Coordination

Colorado has excellent inter-agency coordination between the early care and education (CDEC) and food program (CDPHE) state agencies. In addition, the agencies and the broader ecosystem of other relevant sectors are organized to interface regularly:

- **Quality Nutrition Work Group:** CDEC hosts a monthly meeting of their Quality Nutrition Work Group, a range of Colorado State agency departments (e.g. CDPHE), organizations (e.g. Grand Beginnings Early Childhood Council and Nourish Colorado) and foundations (e.g. Donnell-Kay Foundation). This group has committed to supporting outreach on a potential new CACFP pathway in their workplan. This commitment seeks to reach the Quality Nutrition Work Group goal of "expanding access to quality nutrition for underserved or vulnerable children in the early childhood care and education system" in Colorado Shines Brighter Strategic Plan.⁸⁹
- **Child Nutrition Advocacy Group:** CDPHE actively engages with partners. CDPHE's work as part of the food and nutrition security organization's broader Colorado Child Nutrition Advocacy Group ensures regular communication. This advocacy group has the capacity to support a new pathway and bring implementation partners that aim to improve food security and child nutrition in the state.

Cross-cutting coordination for the Colorado county and local organizations and offices serving FFN caregivers is important. In a governance sense, the higher level of service and access for FFNs is an emerging system on the direct service level. It is now well-resourced and moving forward. This system has the power to facilitate increased access to CACFP for FFNs through a potential new pathway.

Participation Data Analysis

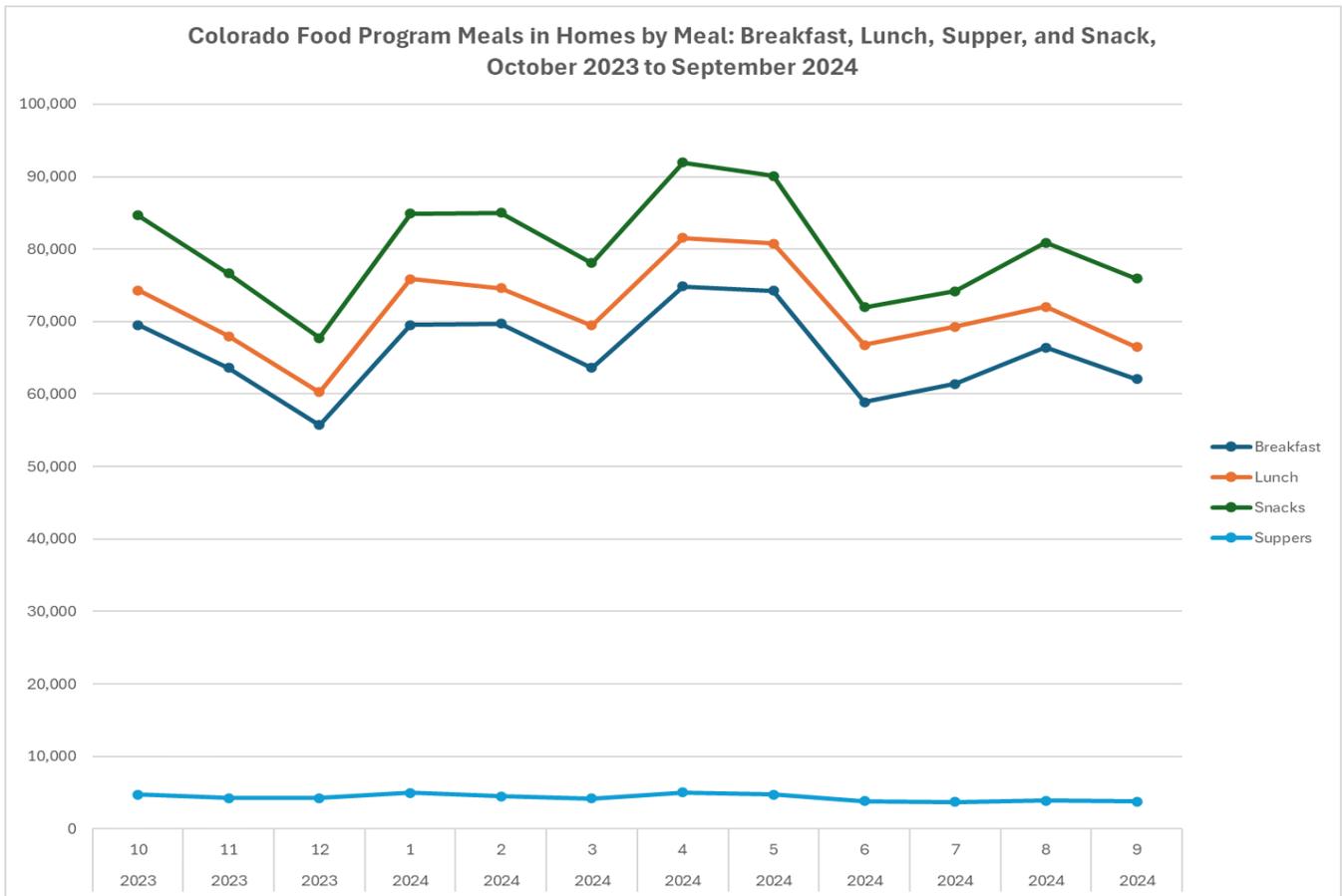
This chapter covers the analysis of CACFP program data in Colorado: program participation, the current pathway, the intersection of the food program and the child care environment, and implications for future pathways.

- Colorado Food Program (CACFP)
- Current Pathway
- Considerations for Potential new Pathway

CACFP (Colorado Food Program)

CACFP is a valuable resource for Colorado, bringing in \$27.5 million (FY23) in reimbursements for healthy meals and snacks served in child care and after school programs. In Colorado, 708 licensed family child care homes—a total of 4,877 children—are enrolled in CACFP. The program supports 2.7 million healthy meals and snacks a year served in child care homes. Figure 5 shows the pattern of the meals and snacks being claimed: breakfast, lunch and a snack being most common.

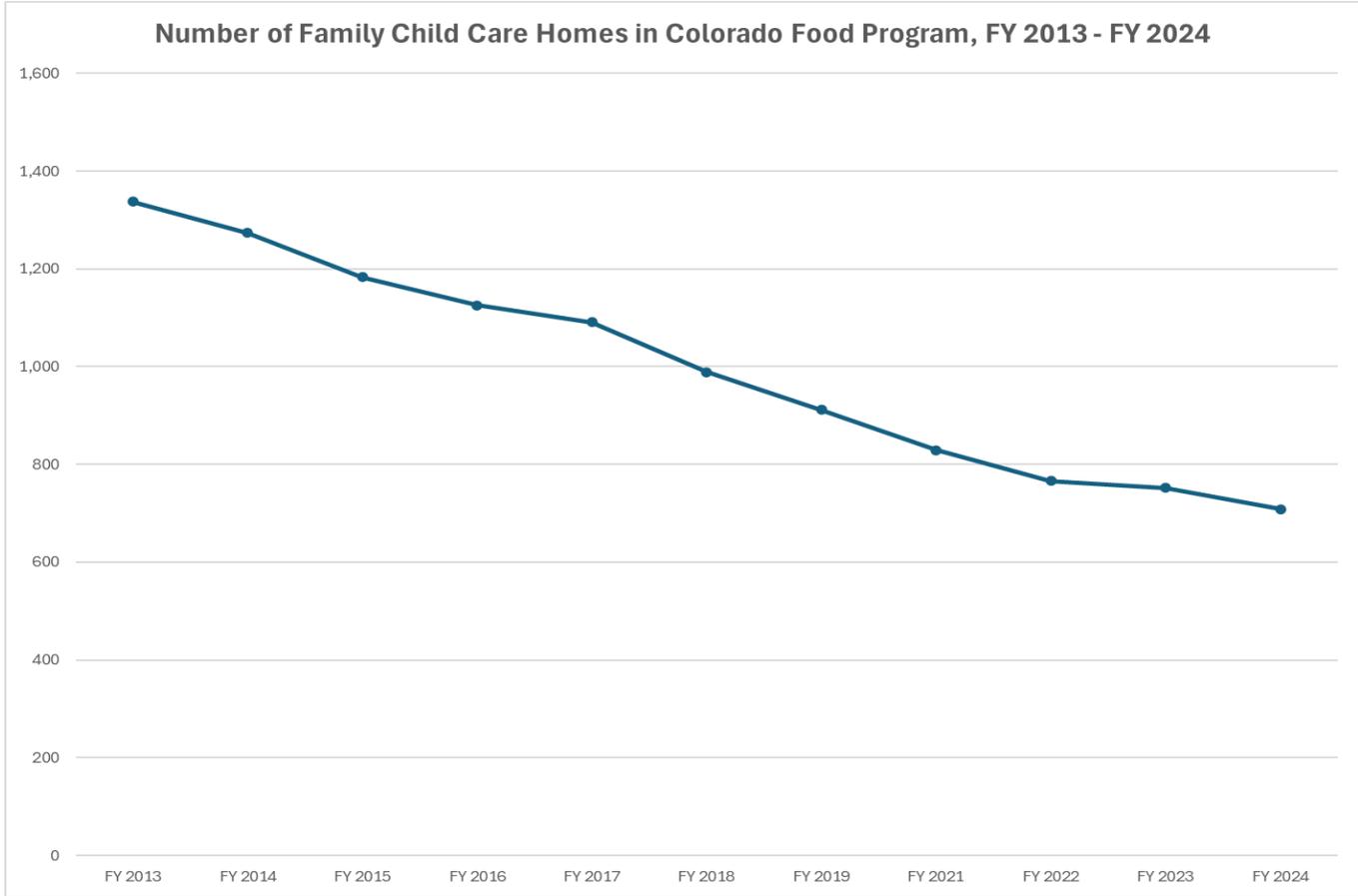
Figure 5



Data Source: CDPHE

As can be seen in Figure 6, over time the number of homes participating in CACFP has declined: most recently, 5.7 percent from FY23 to FY24. The downward trend mirrors the national decline, 5.6 percent, in the number of homes participating in CACFP. The decline in the number of licensed family child care homes is a significant factor. This is one reason states seek to offer CACFP to license-exempt FFN care. As explained earlier, FFN providers care for more than half of children under the age of 5 in Colorado.⁹⁰

Figure 6

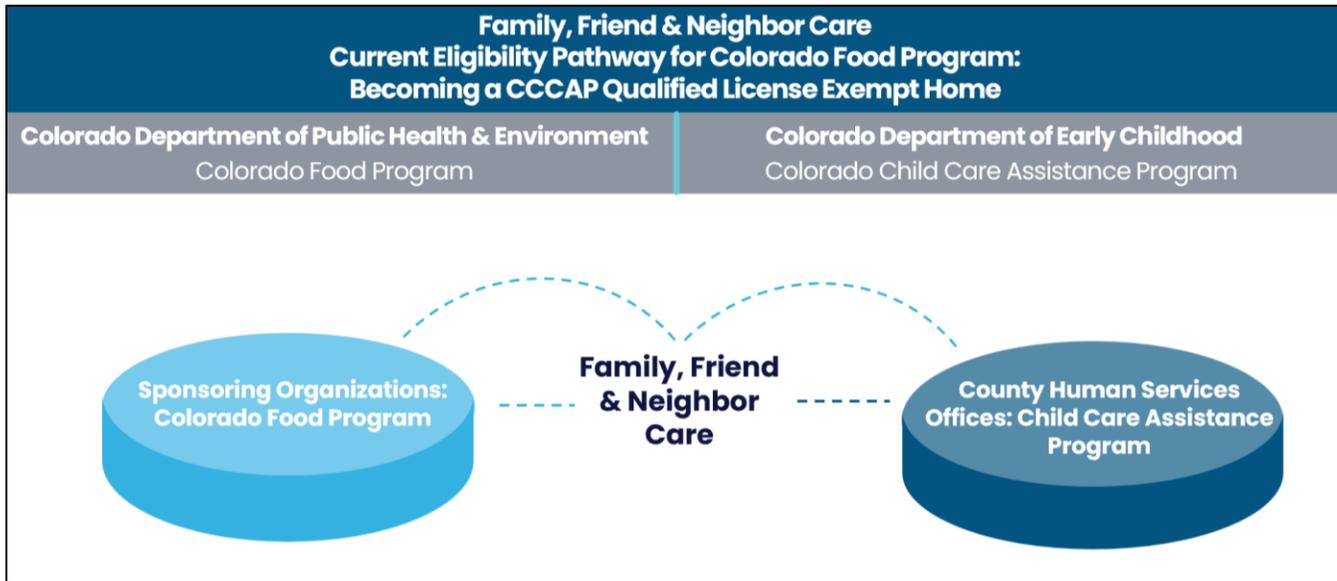


Data Source: Home Grown

Current Pathway

The need for the food program is clear. Colorado FFN providers are more likely to have economic instability, experience food insecurity and be disconnected from the traditional child care and food program systems.^{91, 92, 93} The current pathway, CACFP eligibility for FFN caregivers participating in CCCAP, was created to open access to CACFP. The Departments invested significant staff time designing and implementing the new system.

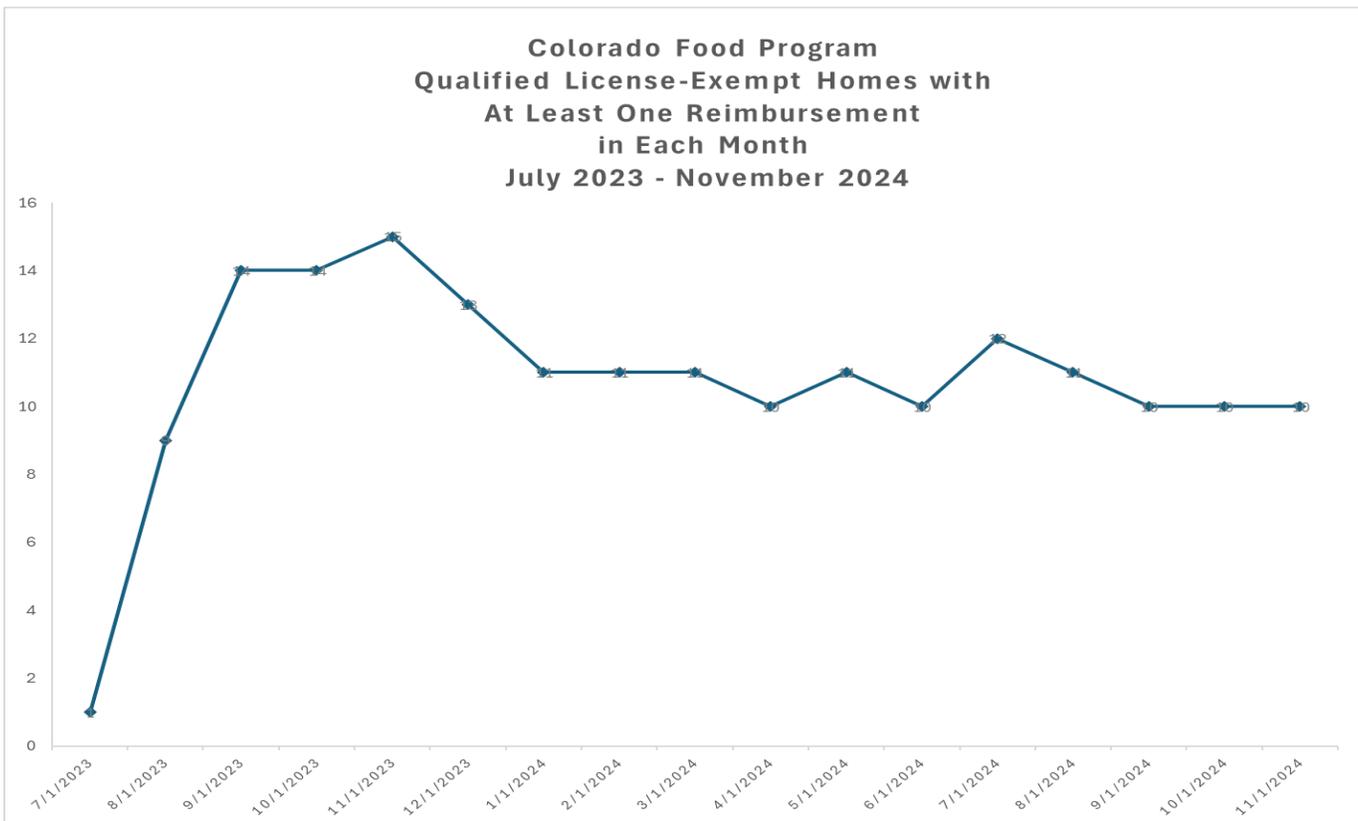
Figure 7



Source: Home Grown

A “Qualified License Exempt Home”, a home that has met the CCCAP requirements and is enrolled in the program, is eligible to enroll in CACFP. (CCCAP requirements include training (15 hours), a criminal background check, and home inspections (not for relatives). Since July 2023 when the new eligibility process began, 25 providers have enrolled and 20 have submitted at least one monthly food program claim for reimbursement. The highest participation was 15 providers in a single month, November 2023. Following this peak, the number of CCCAP Qualified License-Exempt providers receiving CACFP reimbursements declined and stabilized at approximately 10 providers per month.

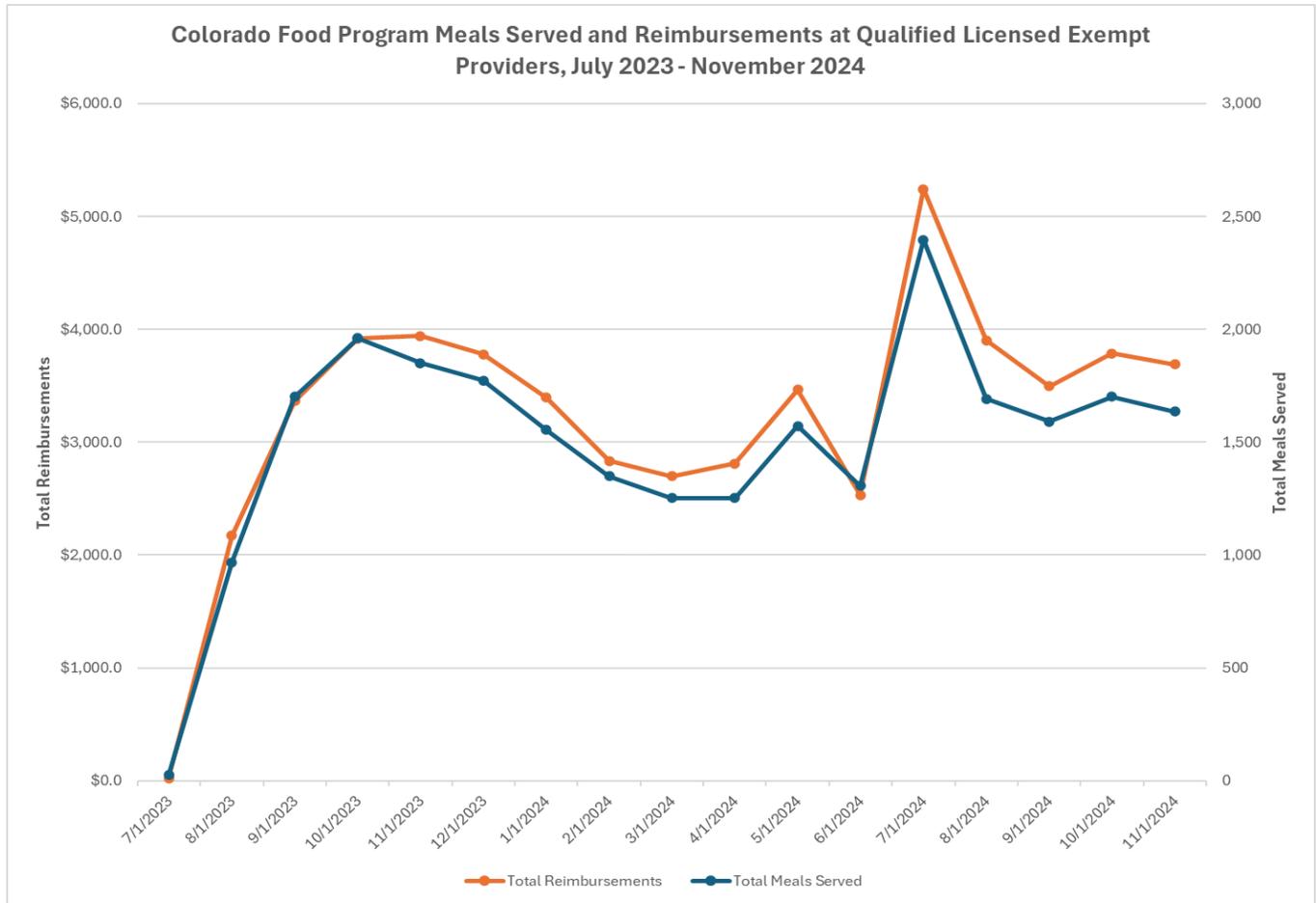
Figure 8



Data Source: CDPHE

As can be seen from Figure 9, for the FFN caregivers participating in the food program it is a source of support. FFN providers claimed a total of 1,600 meals with a total of about \$3,700 in reimbursements. However, this pathway is limited by a number of factors that limit CCCAP, including federal level changes. CCCAP serves a relatively small total number (145) of Qualified License Exempt providers.

Figure 9



Data Source: CDPHE

Considerations for Potential new Pathway

CACFP is underutilized; only 67 percent of eligible home-based caregivers participate nationally⁹⁴ and 51 percent in Colorado.⁹⁵ A far lower percent of FFN providers participate. The current CACFP for FFN caregivers pathway has significant limitations. An additional pathway would create broader access to CACFP for FFN caregivers.

Stakeholder Engagement: Insights and Pathway Development

This chapter details the diverse stakeholder engagement processes that informed this study, drawing valuable insights, expertise, and direction from a wide range of partners across Colorado. The first section provides an overview of the stakeholders and engagement activities, while the second offers an analysis of the focus group discussions. The third section synthesizes findings from both focus groups and interviews, highlighting key themes related to pathway governance and access, as identified by participants and mandated by legislation.

- Stakeholders Engagement
- Focus Group Findings
- Focus Groups and Interviews: Colorado CACFP Pathway Access and Governance Findings

Stakeholder Engagement

The study actively engaged a diverse array of Colorado stakeholders. The stakeholder engagement process emphasized transparency, inclusivity, cultural equity, and respectful dialogue to ensure diverse perspectives were prioritized and heard. The study was influenced and enriched by a broad spectrum of Colorado stakeholders:

- **87 family, friend, and neighbor caregivers and parents** shared their insights through focus groups conducted in Spanish, Dari, Arabic, and English, ensuring linguistic and cultural relevance.
- **29 representatives** from child care organizations, FFN-serving organizations, food security and food justice groups, health association and practitioner, state agencies, CACFP sponsors, and a foundation contributed insights through focus groups tailored to their expertise.
- **10 stakeholders** from a Native American community-based organization, a statewide rights organization, CACFP sponsors, and the statewide FFN lead organization participated in interviews to offer perspectives and respond to key study questions.
- The research team collaborated closely with CDEC and CDPHE leadership – the study also benefited from their knowledge and ongoing support.

The participants were from a total of 14 counties including 5 rural counties (Achuleta, La Plata, San Juan, Washington and Yuma). Of the 87 providers and parents, 52 percent identified as Hispanic/Latino, 25 percent identified as White, 14 percent identified as Asian (the Dari speaking participants identified as Asian), 5 percent identified as Black/African American, and 4 percent identified as Middle Eastern. Of the 87 providers and parents, 76 FFN caregivers and 11 parents (only) participated with additional cross over as FFN providers also identify as parents. The other stakeholder groups and interview participants were approximately 46 percent Hispanic or Latino, 46 percent White, and 8 percent (1 person) Indigenous.

Focus Group Findings

This section synthesizes findings from the focus group sessions. The purpose of these groups was to explore the current landscape of CACFP participation, identify barriers and challenges faced by FFN providers, and gather stakeholder and provider input on potential alternative pathways to increase access. The focus groups spanned diverse linguistic and cultural backgrounds, with sessions in English, Spanish, Dari, and Arabic.

Focus Groups Summary

Participants across stakeholder and provider and parent groups demonstrated a clear need for simplified, culturally competent, and trust-based pathways to increase CACFP participation. Most agreed that current systems are cumbersome, poorly understood, and out of reach for many FFN providers. Innovative solutions, such as a streamlined pathway similar to California's TrustLine system, supported by trusted community organizations, are viewed as a way to improve access and equity.

1. Knowledge of CACFP and Pathways to Enrollment

Overall, FFN providers and parents, and the other stakeholder groups demonstrated variable levels of knowledge about CACFP and its enrollment process.

- **FFN Providers and Parents:** Most providers and parents, especially in Spanish-speaking focus groups, were unaware of CACFP altogether. Those who had heard of CACFP primarily knew it as a federal nutrition program, but very few recognized how to enroll in it. Among those familiar with CCCAP, awareness of the direct CACFP pathway was minimal, and confusion about the process was widespread.
- **Other Stakeholders:** Policy, statewide child care and anti-hunger stakeholders had heard of CACFP and understood that the primary current pathway involved first enrolling in CCCAP. However, many only possessed incomplete knowledge of the CACFP process and the specifics of the CCCAP-to-CACFP pathway. A common positive realization among stakeholders was that CACFP is an entitlement program, with one emphasizing that funds are “not competing against other state priorities” but are funds families are entitled to access, “It’s literally just money that’s going to feed kids.” but it is being left on the table.

2. Barriers to CACFP Participation

Participants consistently identified several systemic and operational barriers that hinder their engagement:

- **Lack of Information and Awareness:** Many providers, parents, and organizations reported limited knowledge of CACFP eligibility and enrollment procedures, contributing to low participation rates. Providers expressed uncertainty about how to navigate the system or even whether they qualified.
- **Language Barriers:** The availability of materials and communication in multiple languages was insufficient, impeding access for non-English speakers. Participants emphasized that “we need materials in more languages,” and that not being able to communicate effectively with staff hampers outreach and enrollment efforts.
- **Fear and Mistrust:** Concerns about privacy, immigration status, and government surveillance—especially within immigrant communities—were significant obstacles. Providers and parents expressed fears of sharing personal information, with some questioning whether participation might impact their immigration status (“public charge”).
- **Administrative Complexity and Burden:** Participants detailed extensive paperwork, health and safety inspections, and mandatory training outside their capacity, especially for informal or unlicensed providers. A provider noted, “You have to do so many steps — background checks, training, paperwork — it’s just too much for some of us.” Another caregiver shared: “What we lack all the time is time.”
- **Funding Shortages and CCCAP Solvency:** Effective access was further hampered in counties where CCCAP funding had been exhausted, blocking pathways for providers wishing to participate in CACFP through current systems. Many counties have stopped accepting new CCCAP applications due to lack of funding. As one stakeholder remarked, “if the pathway that currently exists is locking providers out of the program because it’s tied to CCCAP and CCCAP is not fully solvent [...] then it’s basically locking out providers and kids from what is basically an entitlement if they want to participate.”
- **Financial Disincentives:** The low CCCAP reimbursement rates—sometimes as low as \$10 per day—were a disincentive, especially given the costs of background checks and compliance. Income eligibility limits also excluded some families and caregivers sometimes based on rules around securing funds from absent or estranged spouses.

3. Alternative Pathways for CACFP Participation

Participants showed strong support for the development of *simplified, voluntary pathways* that do not involve CCCAP or require extensive documentation:

- **Simplified Registry Models:** Many endorsed models like California’s TrustLine, which involves a background check and self-attestation, as effective alternatives. Such systems would allow providers to register voluntarily, avoiding the lengthy CCCAP process.
- **Direct Application Processes:** There was consensus that creating a streamlined, user-friendly system where providers could apply independently—using plain language, accessible forms, and mobile-friendly platforms—would substantially increase enrollment.
- **Trusted Community Intermediaries:** Participants emphasized the potential of local organizations such as libraries, faith groups, and promotores de salud (community health workers) to act as trusted facilitators, providing application assistance, outreach, and education in culturally relevant ways.

- **Connecting Pathways to Incentives and the Tax Credit:** Participants were in favor of linking the new, simplified pathways to existing financial incentives like the child care tax credit, using databases like PDIS to streamline application and monitoring, although there were concerns about fiscal sustainability of the tax credit.

4. Best Practices for Pathway Implementation

Participants identified several core best practices to promote effective pathways:

- **Leverage Existing Community Assets:** Trusted organizations that already serve diverse communities should be involved in outreach and enrollment efforts. The success of Weld County’s United Way, for example, was cited as a model for building trust and improving access. A stakeholder recommended: “Let’s lean on those organizations that are doing this work and have built those trusting relationships to unlock access to resources.”
- **Multilingual Materials and Culturally Appropriate Outreach:** Developing accessible materials in multiple languages and employing culturally matched staff or community health workers was highlighted as vital to bringing caregivers into CACFP.
- **Transparent and Honest:** Participants want honest information about the level of risk involved so they can make their own decisions about what will work best.

Focus Group and Interviews: Colorado CACFP Pathway Access and Governance Findings

This section features an analysis of the combined focus group and interviews, honing in on pathway governance and access key themes, insights and recommendations. Oversight and compliance were important issues raised by policy-oriented stakeholders, program administrators and operators, participants and mandated by the legislation.

Thematic Breakdown: Key Themes and Insights

1. Regulatory Compliance and Its Challenges

- **Key Theme:** Maintaining adherence to federal, state, and local laws and regulations while expanding access.
- **Insights:** Participants highlighted that federal regulations, especially health and safety inspections, often create barriers for FFN providers outside of licensed settings. The necessity for compliance was universally acknowledged, but meeting these standards can conflict with efforts to reduce bureaucracy and improve accessibility.

2. Process Simplicity and Low Burden

- **Key Theme:** Need for streamlined, quick, and inexpensive pathways for providers to qualify for CACFP.
- **Insights:** Participants emphasized minimizing paperwork, requirements and complexity. There was consensus that processes should be easy to follow, and existing systems like PDIS and registries should be leveraged or expanded to reduce provider burden. Many participants cautioned against adding unnecessary requirements like inspections.

3. Existing Infrastructure and Systems

- **Key Theme:** Building on current systems such as PDIS, registries, and leveraging established pathways.
- **Insights:** Suggestions included using systems to create “no wrong door” approach and options for FFN to qualify to enroll in CACFP and building on functionalities already in place. These could streamline enrollment and oversight without reinventing entire systems.

4. Licensing and Exemption Pathways

- **Key Theme:** Differentiating between licensing, license-exempt standards, and subsidy pathways.
- **Insights:** The discussion contrasted California’s trust line system with Louisiana’s licensing approach, emphasizing that current federal regulations give states flexibility to develop pathways. The complexities of licensing exemptions and how federal changes (like CCDF updates) impact access were discussed.

5. Partner Capacity, Willingness, and Implementation Feasibility

- **Key Theme:** The readiness and willingness of county agencies and sponsors to participate in new pathways.
- **Insights:** Significant variability exists across counties regarding capacity and funding. Cost, infrastructure, and partner buy-in were identified as potential barriers. The importance of county buy-in and resource allocation was stressed.

6. Financial and Budgetary Constraints

- **Key Theme:** The financial feasibility of new pathways, particularly leveraging existing funding streams.
- **Insights:** Concerns about the continued stability of funding sources, especially related to the childcare tax credit and CCDF funds. The potential costs of expanding or modifying infrastructure (such as PDIS or licensing checks) were noted as challenges.

7. Cultural and Language Accessibility

- **Key Theme:** Need to accommodate providers and families with diverse linguistic and cultural backgrounds.
- **Insights:** Participants discussed the importance of accessible processes in multiple languages, digital literacy considerations, and practicality for providers with limited tech skills or unreliable internet access.

8. Community and Stakeholder Engagement

- **Key Theme:** The importance of ongoing collaboration and feedback from providers, agencies, and community organizations.
- **Insights:** The group stressed the value of engaging a broad spectrum of stakeholders throughout the process to ensure pathways are equitable, culturally appropriate, and practically feasible.

9. Political and Policy Environment

- **Key Theme:** Politics and funding stability impact feasibility.
- **Insights:** Budget constraints, potential policy shifts, and the need for political capital to support systemic changes were recognized as major hurdles.

Thematic Analysis: Recommendations

1. Balance Regulatory Compliance with Accessibility

- Develop pathways that incorporate health and safety standards in a way that minimizes burdens without sacrificing program integrity.

2. Simplify Application and Enrollment Processes

- Use existing systems like PDIS and registries to create a “no wrong door” enrollment process. Automate or pre-fill parts of applications where possible, and aim for a straightforward, user-friendly experience that minimizes paperwork and redundancy.

3. Build on Current Infrastructure and Systems

- Expand and enhance current systems instead of creating new, separate pathways. This leverages existing technology, reduces costs, and eases provider adaptation.

4. Clarify Licensing and Exemption Pathways

- Clearly define and communicate the distinctions between licensed, license-exempt, and subsidy pathways, ensuring that federal and state regulations are harmonized to prevent eligibility issues.

5. Engage and Support Partners and Counties

- Prioritize outreach and capacity-building for county agencies and sponsors to foster buy-in and resource allocation. Develop shared training and technical assistance to ensure consistent implementation across jurisdictions.

6. Enhance Language and Cultural Accessibility

- Provide application materials, training, and support in multiple languages, especially Spanish and other common languages within Colorado. Use low-tech delivery methods (e.g., paper, phone, community partners) in areas with limited internet access.

7. Foster Ongoing Community and Stakeholder Engagement

- Maintain regular, transparent communication with providers, community organizations, and government agencies. Solicit continuous feedback to refine pathways and ensure they meet cultural and regional needs.

National Landscape: Selected Best Practices and Guidelines

This section presents the best practices and guidelines from five key states that effectively serve FFN caregivers within CACFP. The study examined state eligibility processes, outreach strategies, and community engagement models to identify innovative approaches that could be adapted for Colorado. These examples highlight the importance of collaboration, trust-building, cultural support, and respectful engagement—factors that are crucial for onboarding FFN caregivers and ensuring their long-term participation. This analysis informed the implementation recommendations. Eligibility processes are covered in section 7.3.

- California
- New Mexico
- Oregon
- Louisiana
- Iowa
- Illinois

California

California CACFP serves FFN caregivers, “TrustLine Providers,” through the California TrustLine registry. The California Department of Social Services, the CACFP agency, is an active partner with the CACFP Roundtable community.

The CACFP Roundtable, a statewide nonprofit organization dedicated to educating, advocating, and supporting the CACFP community, is an important asset for FFN caregivers. Guided by a strong emphasis on local engagement and community experiences, the Roundtable leverages the CACFP as a pathway for positive systemic change rooted in the needs of those directly impacted. Sponsors, FFN caregivers, and other providers learn and share best practices, participate in peer-to-peer learning experiences, have regularly scheduled opportunities to have dialogue with the state agency staff, and can attend an annual conference.

- **Building Trust and Cultural Support: A Successful Model for Engaging FFN Caregivers in CACFP**

A key success factor for supporting FFN caregivers in CACFP is the use of targeted outreach and trusted community intermediaries, particularly those who share cultural and linguistic backgrounds. In California’s Sacramento area, a CACFP sponsor has demonstrated effectiveness by employing a field representative who is Ukrainian and regularly works directly with a core group of Russian and Ukrainian providers. This dedicated staff person goes beyond standard procedures by clearly communicating program requirements, especially monitoring standards, and maintaining ongoing, personal contact to ensure providers understand and adhere to regulations. This trusted, culturally aware engagement helps build relationships, fosters compliance, and supports the long-term sustainability of FFN providers within the system.

- **Building Inclusion and Engagement with FFN Providers Through Personalized Support, Outreach and Coordinating Services**

This approach exemplifies a highly effective, relationship-based strategy for encouraging FFN caregivers to participate in CACFP and the value of coordinating services. Devan Patton, the CACFP coordinator and FFN TrustLine Coordinator for Del Norte Child Care Council, shared her successful approach. The outreach team emphasizes inclusion, treating FFN providers almost as if they were licensed caregivers. Regularly scheduled personal contact plays a central role: “We go on yearly home visits, we take them goodies, and we do check-ins with them so they know they can come to us anytime,” Patton said. During these visits, staff members ensure providers feel supported and valued, offering reassurance that “they are not alone,” which fosters trust and openness.

The process begins with a brief introduction during the FFN orientation, where staff shares basic information about CACFP, explaining that if providers are interested, they can schedule a dedicated CACFP orientation. “When I come for their annual home visit, I also bring info on the food program and becoming licensed, giving me a chance to

reintroduce them to it,” Patton said. These routine check-ins—about once a year—are often where providers express interest in participating, with many “introduced from there.” Additionally, consistent follow-up, such as “checking in with them regularly (every couple of weeks),” ensures ongoing support. The team also offers in-person training and creates group trainings to foster a sense of community: “We put together trainings that really help bring all of our food program providers together so FFNs don’t feel so alone, but more like they are part of the team, receiving the same treatment and help as those licensed providers.” This relationship-centered, supportive approach effectively encourages FFN providers to become active CACFP participants and reinforces their value as integral members of the early care community.

These sponsors have found a successful path for enrolling “TrustLine Providers.” California serves 370 “TrustLine Providers.” California License-Exempt Definition: Caring for children from one family and providers own children, caring for children from one family, and caring for children of a relative plus the provider’s own children.

New Mexico

New Mexico CACFP serves FFN caregivers, referred to as “registered non-licensed family child care homes,” through a voluntary registration for license-exempt home-based care. Registered homes are eligible to participate in child care subsidy and/or the CACFP. All eligible registered providers are required to enroll in the CACFP. Requiring all eligible “registered” homes to participate in CACFP is a best practice for ensuring good nutrition for all children in care.

The New Mexico Family Nutrition Bureau organizes Regional Early Care and Education Conferences in English and Spanish throughout the state. The regional conferences are conducted by the child care licensing, training programs, and CACFP. New Mexico sponsors, trusted community-based organizations, serve family child care home providers in their area. They support FFN providers in meeting the license-exempt requirements.

- **Best Practices in Community Outreach for FFN Caregivers: Community Action Agency of Southern New Mexico**

The Community Action Agency of Southern New Mexico (CAASNM) works closely with FFN caregivers to improve participation in CACFP. Their approach emphasizes personalized support: explaining program requirements clearly, facilitating registration, and assisting caregivers with related costs. By leveraging the Community Services Block Grant (CSBG) unrestricted quality dollars, CAASNM helps both CCDF-eligible and non-CCDF providers pay for registration requirements, such as purchasing fire extinguishers and paying for fees, ultimately enhancing child care quality. This flexible funding approach ensures providers have the financial and technical support needed to participate effectively. Adela Trujillo, CAASNM Family Wellness Director, shared: “Our customer service is what helps potential caregivers choose us as their CACFP Sponsor, because we take that extra step to help them navigate a very cumbersome process.”

CAASNM has earned trust within its community through a long history of service and compassion. Active engagement and culturally relevant CACFP outreach efforts are ongoing. Staff regularly attend community events like health fairs and distribute CACFP materials in both English and Spanish, making information accessible to diverse populations. They also communicate key messages, such as the potential monthly earnings of up to \$132 per child and highlight the importance of providers knowing when they can claim their own children, an incentive to join. Their ongoing social media campaigns, particularly on Facebook, are popular among providers and support continuous outreach. These practices foster relationships, build trust, and increase participation, demonstrating a comprehensive, community-centered approach to FFN engagement.

New Mexico Guidelines: New Mexico has a two-tiered system of background check requirements for FFN caregivers. For food program only applicants, the primary caregiver (and the substitute caregiver) submits fingerprints for a background check, and all other household members over the age of 18 and adults over the age of 18 who spend a significant amount of time in the home are screened based on an “Adult Written Statement” (no fingerprints). The household members are screened for all relevant registries including State Abuse and Neglect and the Sex Offenders registries. This reduces the overall cost to the provider and reduces concerns about the use of federal lists.

New Mexico serves 642 registered providers. *New Mexico License-Exempt Definitions: Individuals providing care for four or fewer non-resident children are exempt from licensing if they are the primary caregiver.*

Note: New Mexico: Colorado is unlikely to adopt a CACFP mandatory participation requirement. Without the mandatory CACFP participation requirement generating demand for the program, this level of requirements would discourage most FFN caregivers in Colorado. For this reason, the New Mexico requirements would not pass the study feasibility criteria evaluation.

Oregon

Oregon CACFP serves FFN caregivers participating in the child care assistance program Employment Related Day Care. The Oregon Department of Education emphasizes the importance of partnering with organizations and local officials to secure support for CACFP.

- **Oregon State Legislature Supporting Sponsoring Organizations**

The Oregon State Legislature, supported by the governor's office and advocates, allocated \$660,000 to the Department of Education to support and stabilize CACFP sponsors of family child care homes.

- Existing sponsors have access to \$50,000 a year to help cover administrative costs and initiatives that the current federal funding does not cover or may be considered unallowable costs for the federal funds.
- Sponsors can hire more staff or implement other practices/tools to allow them to reach more providers and/or support their providers better through access, trainings, staff, and resources.
- Sponsors can use the funding to underwrite some of the costs of onboarding new family child care providers, including FFN caregivers.
- This strengthens sponsors' ability to coordinate with other initiatives and organizations.

- **Nutrition First: Engaging Communities and Elevating Child Nutrition in Oregon's Mid-Willamette Valley**

Mid-Willamette Valley Community Action markets their program with the modern and engaging name "Nutrition First" and the tagline, "Ensuring children have access to healthy food." Their website is bright, lively, and clear with topline messages designed to reflect the concerns and interests of caregivers: "Bringing lower food costs and fresh ideas to child care providers across Oregon" and "Feeding Good Habits."

Nutrition First's CACFP provider forms and website are available in English, Spanish, and Russian. They hire from the community and have a number of former caregivers on staff. Nutrition First staff offers ongoing assistance and support with CACFP that reflects the language and culture of their communities: English, Spanish, and Russian.

Oregon serves 279 listed providers. *Oregon License-Exempt Definition: Providing care in the home of the child and all children present reside in the house; relatives; all the children including the providers own children are from one family; caring for three or fewer children, not including the provider's children, at any one time.*

Louisiana

Louisiana CACFP serves FFN caregivers, "family daycare home food program providers" through an alternate approval process – an inspection from the fire marshal. Sponsors will also enroll homes in CACFP that have a child care assistance program certification. The Louisiana Department of Education participates in the Louisiana Seeds of Success initiative, which offers child care providers the Louisiana Harvest of the Month Club materials.

- **CACFP Best Practices for FFN Caregivers Recruitment and Retention – The Louisiana Model**

Louisiana offers examples of how to successfully engage FFN caregivers in CACFP through a tailored, relationship-driven approach centered on respect, compliance support, and community outreach. Outreach efforts leverage trusted community members, including church leaders, local organizations, and neighborhood bulletin boards,

particularly in areas with high densities of FFN caregivers.⁹⁶ This targeted outreach ensures that messages reach providers where they already connect with their communities, such as at elementary school pickups.

Once enrolled, sponsors emphasize retention by providing prompt and supportive responses to meal questions and conducting effective respectful monitoring visits – avoiding a punitive or confrontational approach. A quick response guarantees the provider will know the right food to feed and the meal will not be “disallowed” resulting in no payment. For the many caregivers with limited budgets there is no room for mistakes.⁹⁷ Additionally, some sponsors distribute newsletters featuring kid-friendly recipes (that can be used for CACFP meals and snacks), crafts, and seasonal activities tailored to Louisiana’s regional culture, strengthening provider engagement and fostering a sense of community. E.g. The LUNCH Program sends a quarterly newsletter, The LUNCHTIME News, to all providers. These practices have proven effective in supporting sustained CACFP participation, ensuring that providers meet program standards while feeling valued and supported.

Louisiana serves 4,482 FFN providers. *Louisiana License-Exempt Definition: Family child care providers serving six or fewer children, including their own.*

Iowa

Iowa CACFP serves FFN caregivers, referred to as non-registered providers, who are approved for the Child Care Assistance Program. Through CACFP, the Iowa Department of Education serves a number of categories of registered and unregistered family child care providers.

• Iowa’s Ambassador Stipend Program

Based on a survey of provider needs, the Iowa Department of Education created the Ambassador Stipend Program to help reduce barriers to CACFP participation. A participating home provider could apply to receive an Ambassador Stipend (\$150) to mentor a home provider and assist them in applying for the food program. This program has been successful in bringing more providers into CACFP:

- Ambassador Program Impact: 26 family child care homes mentors assisted 23 family child care homes submit their CACFP application to enroll in the program.

The Ambassador Stipend project was funded through the Nemours Healthy Kids Healthy Futures Technical Assistance Program. As follow-up to the survey, the Department created two key CACFP promotional tools:

- CACFP promotional flyers “What CACFP Can Do for Me?”
- CACFP online training

Iowa License-Exempt Definition: Five or fewer children or six or fewer children, if at least one of the children is school-aged.

Illinois

Illinois CACFP serves FFN caregivers, referred to as “license-exempt child care providers” who are approved for the Child Care Assistance Program. The Illinois State Board of Education coordinates with CCAP to facilitate timely access to CACFP. The state pays for the cost of the background checks.

• Best Practices: Illinois Action for Children (IAFC) – Cook County

Since 2005, nearly 2,000 FFN providers have participated in CACFP through IAFC.

• Collaboration for Outreach and Timely Verification

Illinois Action for Children (IAFC) has partnered to create a collaborative system of CACFP outreach through the child care assistance program (CCAP). CACFP is marketed as the Healthy Food Program. The CCAP coaches and facilitators all promote CACFP to License-Exempt providers:

- Coaches promote participation in CACFP during all technical assistance engagements.

- CCAP coaches are required by the state as a part of their home-monitoring checklist to ask about CACFP participation during visits.
- Coaches promote CACFP enrollment and make referrals to IAFC CACFP-funded staff during monitoring visits.
- CCDF Resources Facilitators provide CACFP introductory training, 1:1 technical assistance, and peer learning supports.

In addition, CCAP verifies a license-exempt provider's enrollment in CCAP in real time, allowing the sponsoring organization to move quickly ahead with CACFP enrollment.

- **Tailoring Recruitment**

IAFC's best practices and recommendations for FFN caregiver recruitment and retention in CACFP include:

- Utilize trusted messengers from community-based organizations and CCAP coaches
- Share things multiple times because adults need to hear things several times before acting
- Focus effort on FFN providers most interested and likely to succeed in CACFP. Those providers
 - Have more children in care
 - Have more hours of operation to utilize all reimbursement for meals/snacks
 - Have a long-term mindset for results and see the program as good for the children
 - Have a professional or clerical background e.g. a grandmother who retired from teaching or from being an administrative assistant.
 - Have a laptop

- **Advice and Referrals: Problem Solving Assistance**

- IAFC has a system of referrals offering resources and support during home visits. If an issue of concern is raised or identified during a home visit or phone call, the Nutrition Advocates (CACFP monitors) can utilize these resources and a subscription service: Unite US website (<https://uniteus.com>) to offer resources and assistance that go beyond the scope of the work of IAFC.
- The most common searches in the IAFC account were food and food pantries, diapers, housing, transportation, special needs/children, emergency financial support, mental health, and holiday gifts. Monitors are trained as mandated reporters but they have not seen that level of problem in the FFN homes.
- IAFC staff has access to a language service in which Arabic is the language most commonly needed.

Illinois serves 397 license-exempt providers. *Illinois license-exempt definition: Care for no more than three children, unless they are all relatives.*

Legal and Regulatory Analysis

Colorado

- In 2017, the Colorado General Assembly passed Senate Bill 17-110 expanding the definition for license-exempt home-based care. The bill increased the number of unrelated children who could be cared for without a license from one to four children, with the stipulation that only two of the children could be under 2 years old. Family, friend and neighbor care, as defined by Colorado Revised Statute §25.5-5-303 (2024) and Colorado Revised Statute § 26.5-5-304(2024), is allowed to operate legally without a license in Colorado. The intention of the law was to expand child care capacity. Expanding access to benefits is consistent with that intent.
- The home-based license exemption is operationalized in the Code of Colorado Regulations: Department of Early Childhood, Division of Early Learning, Licensing, and Administration, Child Care Facility Licensing Rules and Regulations, Licensing Exemptions 2.112(B)(5). In response to this newly eligible category of provider, CDEC created guidelines and a county-level system to qualify license-exempt care for CCCAP payments. CDPHE then deemed the category of CCCAP-qualified license-exempt homes as eligible to apply for CACFP. This is allowable under the USDA rules.

Federal

- There are no federal child care licensing standards/requirements. Each state legislates/promulgates their own child care licensing rules based on what they believe will work best in their state. In addition, the licensing rules are administered through each state's unique structure of agencies and systems. In many states, there are categories of home-based care that are exempt from the licensing requirements. These range from exempting only homes providing relative care to exempting homes serving 12 or fewer children. Colorado's exempted category of homes serving four or fewer children (or two or fewer children if the children are under 2 years of age) is in the middle.
- In deference to the state variation, USDA regulations give CACFP-administering state agencies the flexibility needed to adapt the program rules — flexibility to make decisions — to create pathways for license-exempt providers to participate in CACFP. A CACFP state agency can recognize the approval of another state agency including licensing, child care subsidy (CCDF), child care registries, and voluntary registration. In addition, if state approval isn't available or practical for license-exempt providers, the state CACFP agency can utilize the USDA regulations with child care standards to create alternate approval for CACFP. This is consistent with the federally defined purpose of CACFP (42 U.S.C. 1766(a)(1)(A)), which operates under the Child Nutrition Act of 1966, and the federal regulations (7 CFR § 226.6(d)), which outline the eligibility criteria for providers, including categories of family child care homes that can participate.
- States work to maximize access to CACFP in complex state systems, while staying consistent with the state and federal rules. The next section has a **Review of State Mechanisms for CACFP Eligibility of License-Exempt Home-Based Child Care.**

Review of State Mechanisms for CACFP Eligibility of License-Exempt Home-Based Child Care

This review examines the various mechanisms by which states establish eligibility for license-exempt home-based caregivers to participate in the Child and Adult Care Food Program (CACFP). These mechanisms fall into two broad categories: **1) State Child Care Approval Systems** and **2) CACFP-Approved Alternate Approval Systems**. Each state builds upon its existing regulatory infrastructure, leveraging familiar approval pathways such as child care subsidies, registries, and voluntary registration programs, or establishing separate approval standards, to create accessible pathways to CACFP participation.

Table 1: State Mechanisms for License-Exempt Home-Based Child Care Participation in the Child and Adult Care Food Program

State Mechanisms for License-Exempt Home-Based Child Care Participation in the Child and Adult Care Food Program			
State Child Care Subsidy (Child Care Development Fund) Approval	Voluntary Registration: State Registry Approval	Hybrid Registration: Subsidy and Program Approval	State CACFP Agency Alternate Approval
Enrollment in the state child care subsidy system qualifies	Enrollment in child care registry anchors qualifying standards	Enrollment in a voluntary registration qualifies for subsidy and/or food program	CACFP-sponsoring organizations determine compliance with state CACFP Alternate Approval standards
Example: Illinois State Child Care Assistance Program (CCAP) (Colorado)	Example: California TrustLine Providers	Example: New Mexico Non-Licensed Registered Family Child Care Homes [Mandatory Participation in CACFP]	Example: Louisiana License-Exempt Providers

As can be seen in Table 1, state mechanisms for establishing CACFP eligibility for license-exempt home-based caregivers are in two broad categories: 1) State child care approval systems and 2) CACFP alternate approval. There are three categories utilizing state child care approval systems: 1) State Child Care Subsidy (Child Care Development Fund), 2) Voluntary Registration: State Registry, and 3) Hybrid Registration: Subsidy and Program. These eligibility mechanisms build on existing forms of approval to create pathways to CACFP for FFN providers. State CACFP agency alternate approval standards and systems are based on USDA standards.

1. State Child Care Approval Systems

- **State child care approval systems: State Child Care Subsidy (Child Care Development Fund)**

These systems recognize enrollment in the state child care subsidy program as an acceptable form of state child care approval. The child care subsidy program requirements differ but meet the Child Care Development Fund rules.

For example, the Illinois State Board of Education serves caregivers participating in Illinois’s Child Care Assistance Program. Illinois child care subsidy provider requirements include background checks, annual monitoring by a health and safety coach, and training.

- **State child care approval systems: Voluntary Registration: State Registry Approval**

In this form of approval, enrollment in voluntary registration/child care registry anchors qualifying standards. For example, California TrustLine Providers are enrolled in the California TrustLine registry, have background checks, and complete a health and safety self-certification. The California TrustLine registry anchors the additional requirements.

- State Child Care Approval Systems: Hybrid Registration: Subsidy and Program Approval

This form of approval utilizes enrollment in a hybrid registration. An example is New Mexico Registered Non-Licensed Family Child Care Homes. New Mexico's hybrid system, administered by the Regulatory Oversight Unit, offers the option of a voluntary registration for license-exempt home-based care. Registered homes are eligible to apply for child care subsidy and/or the CACFP. Registered home requirements include a background check, an inspection, participation in CACFP, and, for subsidized care, training. All registered providers are required to enroll in CACFP.

2. State CACFP Agency Alternate Approval

- State CACFP agencies establish CACFP alternate approval standards. The CACFP child care standards in the federal regulations [7 CFR § 226.6(d)(3) and (4)] provide a guide for standards. For example, in Louisiana, license-exempt providers can qualify to participate in the Family Daycare Home Food Program by passing a fire marshal inspection.

In a targeted review of selected other states, the most common mechanisms were State Child Care Approval Systems: State Child Care Assistance and State CACFP Agency Alternate Approval. States using State Child Care Approval Systems: State Child Care Assistance include Illinois, Kentucky, Maine, Michigan, New York, Oregon, and Washington. Based on the data we received, CACFP participation ranged from seven registered relative homes in Kentucky (Kentucky serves three categories of home-based care: licensed, certified, and registered) to 397 FFN license-exempt caregivers in Illinois. The states using State CACFP Agency Alternate Approval include Arizona, Louisiana, and Utah. For example, Louisiana serves 4,482 caregivers.

Conclusion

The variety of state mechanisms illustrates the capability and flexibility within federal regulations to foster equitable access for license-exempt caregivers to participate in CACFP. States develop tailored systems based on existing approval pathways and alternative standards, often focusing on safety, background checks, and community trust to expand participation while maintaining program integrity.

Potential Alternative Eligibility Processes, Implementation Strategies, and Best Practices

This chapter outlines the development of a new, alternative pathway for FFN (Family, Friend and Neighbor) caregivers to participate in CACFP, distinct from the existing Colorado Child Care Assistance Program (CCCAP). Building on comprehensive research and stakeholder input, the study reviewed a range of potential options, including models like California’s TrustLine system and other state-based mechanisms, to identify potential pathways. The implementation strategy emphasizes community engagement, partnership building, system integration, and targeted outreach to help ensure a feasible, sustainable, and equitable pathway that expands access to healthy meals for children in diverse FFN settings across Colorado. The implementation strategy is based on a wide range of stakeholder input and a review of best practices.

- Potential alternative eligibility process
- Review of possible alternative mechanisms
- Implementation strategy

Potential Alternative Eligibility Process

Potential alternative eligibility processes are based on the review of the range of mechanisms for license-exempt home-based child care participation in CACFP, the current Colorado landscape, relevant law and regulations, and feedback from stakeholders. In addition, the potential implementation guidelines and best practice options were also informed by the review of best practices.

The study used research on state mechanisms for license-exempt home-based care participation in CACFP to identify potential options for an alternative eligibility process in Colorado. These options were assessed for their appropriateness and adaptability within the Colorado context. It was determined that among existing state child care approval systems, the State Voluntary Registration/Registry Approval mechanism—exemplified by California’s TrustLine caregiver system—could be effectively adapted for use in Colorado.

FFN caregivers and a broad range of stakeholders endorsed a simpler approach and the importance of offering a streamlined system with the basic requirements. Based on their feedback, there was a clear preference for the simpler TrustLine approach over the more complicated potential approaches requiring more steps to qualify. The new pathway would be in addition to the existing Colorado pathway through CCCAP eligibility.

The potential alternative eligibility process utilizes the mechanism of State Child Care Approval: Voluntary Registration/State Child Care Registry by anchoring a California “TrustLine” caregiver type option into the Colorado Professional Development Information System (PDIS), Family, Friend and Neighbor Care Registration.

The new Colorado Care Worker Tax Credit (CWTC) offers a vital stepping stone for bringing FFN caregivers into the food program. The potential alternative pathway utilizes this opportunity to offer additional benefits to the thousands of FFN care workers, an estimated 2,700 (FY2025) 3,700 (FY2026) 5,070 (FY2027) enrolled in the registry.

This alternative is also guided by stakeholder input recommending the new pathway be cost efficient and build on existing structures/systems. Program administrators and policy-focused stakeholders were clear: The current fiscal environment demands careful planning for the effective use of funds to meet shared goals for FFN caregivers and families. This potential pathway also reflects stakeholders’ belief in leveraging Colorado’s many strengths.

De-Linking Eligibility for the Federal Child and Adult Care Food Program from the Colorado Child Care Assistance Program: Colorado Department of Early Childhood: Colorado Professional Development Information System, Family, Friend and Neighbor Registration

The recommended potential alternative process will utilize the Colorado Professional Development System (PDIS), Family, Friend and Neighbor registration and leverage the new Colorado Care Worker Tax Credit tax registry. To qualify,

FFN caregivers enrolled in PDIS would need to meet baseline requirements, a criminal background check, and health and safety self-certification. In addition, the system will allow FFN caregivers enrolled in the Colorado Care Worker Tax Credit to build the FFN registry qualification into their profile, offering CACFP as an additional financial incentive.

1. PDIS FFN Registration

FFN caregivers enroll in PDIS as “Family, Friend and Neighbor Care” provider and complete the following:

- **Criminal Background Check:** Utilize existing registry infrastructure to store background clearance documentation
- **Health and Safety Self-Certification:** Utilize self-certification tool and have access to foundational training through PDIS

2. Baseline Safety Requirements for Eligibility

To qualify FFNs must:

- Complete state-approved background checks
- Complete health and safety self-certification form
- Renew every 3 years

3. Care Worker Tax Credit (CWTC)

Leverage CWTC FFN participation:

- FFN providers enrolled in the Colorado Care Worker Tax Credit will be able to build the FFN registry qualification into their profile, offering CACFP as an additional financial incentive
- Build in auto-flag and connections

4. Implementation Strategy - Best Practices: Agency Partnerships and Trusted Community Organizations

To ensure successful adoption and sustainability, implementation should:

- Utilize community engagement and coordinator capacity
- Facilitate system navigation and outreach
- Build a cohesive referral and collaboration system
- Advance targeted outreach and opt-in options
- Support CACFP sponsoring organization best practices

5. FFN Registration and Enrollment Steps

Step	Action
Caregiver Initiates Registration	FFN accesses the PDIS portal and enrolls under “Family, Friend and Neighbor Care Role,” creating a profile
Submit Background Check	FFN uploads background check results; system stores
Submit Health and Safety Self-Certification	FFN completes the form; the system stores
Approval	FFN has completed the requirements

6. Estimated Cost

Proposed Build-Out of the PDIS FFN Registry System

- Year 1: Start Up Costs
 - Programming/Development Costs: \$25,000
 - Personnel: 0.4 FTE for planning, oversight, and implementation = \$26,721
 - Licensing Costs: up to 100 users @ \$7.75 = \$775, to increase by 3% each year
 - Total Estimated Cost (Year 1): \$52,496
- Year 2: Ongoing Annual Costs (Starting Year 2)
 - Personnel: 0.4 FTE = \$26,721
 - Licensing Costs: up to 100 users @ \$7.95 = \$795, to increase by 3% each year
 - Total Annual Cost: \$27,516

Since this potential alternative eligibility process builds on an existing registration, the costs should be reasonable.

CACFP Sponsors

The Colorado Food Program sponsors will support these caregivers in participating in CACFP. Referrals to additional services will be available. Mandated reporter procedures will apply.

Leveraging Technology

By leveraging technology—the Colorado Professional Development Information System (PDIS), FFN registration—Colorado can expand access to early childhood supports including the Colorado Food Program. This potential alternative eligibility process builds on Colorado’s history as an innovator in this area. The state’s integration of WIC into the PEAK platform—highlighted in the national best practice guide⁹⁸ and recognized in presentations by the National WIC Association—illustrates its leadership. Colorado has distinguished itself by navigating the complex federal food program requirements that have historically limited other states’ referral systems. When faced with these challenges, Colorado stepped up to develop a streamlined, integrated approach, setting a valuable precedent for expanding access to food programs through technology-driven, accessible pathways.

Review of Possible Alternative Mechanisms

If the proposed alternative pathway is implemented, Colorado will fully utilize two viable CACFP pathways using state child care approval: 1) State Child Care Subsidy (Child Care Development Fund) Approval and 2) Voluntary Registration: State Registry Approval. As can be seen in Table 2, the other two mechanisms for establishing a pathway are not applicable or suitable for implementation in Colorado. The State Child Care Approval: Hybrid Registration: Subsidy and Program Approval mechanism, which relies on a third agency to register homes, is not applicable to the current Colorado system. Similarly, in the past, Colorado was told the state system was not suitable for the State CACFP Agency Alternate Approval mechanism.

Table 2: State Mechanisms for License-Exempt Home-Based Child Care Participation in the Child and Adult Care Food Program: Colorado Assessment

State Mechanisms for License-Exempt Home-Based Child Care Participation in the Child and Adult Care Food Program: Colorado Assessment				
Mechanism	State Child Care Subsidy (Child Care Development Fund) Approval	Voluntary Registration: State Registry Approval	Hybrid Registration: Subsidy and Program Approval	State CACFP Agency Alternate Approval
Description	Enrollment in the state child care subsidy system qualifies	Enrollment in child care registry anchors qualifying standards	Enrollment in a voluntary registration qualifies for subsidy and/or food program	CACFP-sponsoring organizations determine compliance with State CACFP Alternate Approval standards
Colorado: Assessment	Current Colorado Pathway	Potential Colorado Pathway	Does Not Appear Suitable for Colorado at this Time. Lacks appropriate third-party entity to “register”	State reports Colorado deemed ineligible to utilize

Value of the New Pathway

The new pathway will complement the existing CCCAP pathway. CCCAP provides excellent service and support for many families: serving an average of 28,370 children annually.⁹⁹

However, due to funding constraints, CCCAP has historically only served approximately 9 percent of the potentially eligible. The new pathway could serve FFN caregivers unable to utilize the CCCAP pathway due to the many (24) counties with a moratorium on new caregivers, as well as long-standing caseload limits. Currently, 20 counties are not accepting new CCCAP applicants due to funding constraints from the new unfunded federal rules. This pathway could facilitate a “no wrong door” approach, enabling county human services offices with closed caseloads to refer unserved caregivers to the FFN registry, allowing them to access CACFP. Additionally, it could serve as a stepping stone for caregivers to prepare for eventual CCCAP reopenings, through processes such as background checks and health and safety self-certification, thus laying the groundwork for future participation.

Targeting and Funding

CACFP, as a federal entitlement program, can serve all eligible caregivers. The food program targets higher reimbursement rates for caregivers and families with incomes at or below approximately 185 percent of the federal poverty level, which aligns closely with the current CCCAP income eligibility threshold. The lower reimbursement rates are seen as only offering about half the higher rates (50 percent) and consequently are perceived as less attractive. For this reason, the food program serves predominantly home-based caregivers qualifying for the low-income rates (78 percent in Colorado).

Implementation Strategy – Best Practices: Agency Partnerships and Trusted Community Organizations

The implementation strategy emphasizes community engagement, partnership building, system integration, and targeted outreach to help ensure a feasible, sustainable, and equitable pathway that expands access to healthy meals for

children in diverse FFN settings across Colorado. The implementation strategy is based on a wide range of stakeholder input and the study review of best practices.

To ensure successful adoption and sustainability, implementation should:

1. Utilize community engagement and coordinator capacity
2. Facilitate system navigation and outreach
3. Build a cohesive referral and collaboration system
4. Advance targeted outreach and opt-in options
5. Support CACFP-sponsoring organization best practices

1. Utilize Community Engagement and Coordinator Capacity

The implementation strategy aims to embed the new pathway within current service networks, leveraging existing assets for efficiency, scalability, and community trust. Engagement with agency and community partners, caregivers, and families will promote trust, enable gathering feedback, and support shared ownership.

The Family, Friend and Neighbor Support Program, along with other initiatives within CDEC, offers a strong foundation of community partnerships and assets to support implementation efforts. The FFN Advisory Council and FFN Strategic Action Network provide a trusted platform for ongoing coordination and feedback. CSPC's FFN-serving community organizations (CDEC grantees) throughout the state are also trusted and expert partners for this effort. The Departments' interagency Quality Nutrition Work Group can be utilized for cross-sector collaboration, as well as insights and technical support on innovation and program compliance. The group's work plan already includes a commitment to working on a potential new pathway.

CDPHE can engage their partners in the food and nutrition security coalition, Colorado Child Nutrition Advocacy Group. Partners include the Donnell-Kay Foundation, Hunger Free Colorado, Blueprint to End Hunger, and Nourish. The Donnell-Kay Foundation's Bright Spots project, focused on culturally and linguistically responsive strategies for supporting FFN caregivers, offers partnerships and convenings, which can be utilized to ensure community voices are central to implementation.

In an effort to increase capacity to deliver equitable services to family child care home providers, CDPHE launched a language line service to be utilized by CACFP sponsoring organizations and state staff. Language interpretation helps bridge communication gaps, promotes inclusivity, and helps convey accurate messaging to the child care provider. The cost of this service is covered by CDPHE. In addition, the CACFP program was recently rebranded with a new friendly title, the Colorado Food Program, and attractive logo— fresh assets that should be used to help market the program.

2. Facilitate System Navigation and Outreach

Consistent with their missions and mandates, Early Childhood Councils, family support, and FFN-serving organizations, including Colorado Statewide Parent Coalition grantees and advocacy networks, can identify FFNs; provide onboarding support; and/or offer technical assistance for digital literacy and system navigation. These organizations have the skills and staff to effectively serve the linguistically and culturally diverse FFN caregivers and families.

3. Build Cohesive Referral and Collaboration System

Implementation plans can foster cross-sector collaboration and establish referral mechanisms between county human services offices, sponsors, and trusted community organizations. Creating CACFP-sponsoring organizations and community organizations coordination and referral streams will facilitate a smooth pathway for FFN caregivers. County human services offices can develop a secure CACFP referral mechanism with community organizations and sponsors as part of the "no wrong door" approach. For participating CACFP sponsors of family child care home providers, creating these referral streams and navigation support can help to fill in capacity gaps. The referral streams will also facilitate outreach by any new sponsors. Currently, there is a new sponsor application

pending. The pending organization is proposing to offer providers the option of having healthy CACFP-approved meals delivered to their home. This adds convenience but very importantly, it facilitates FFN provider participation by eliminating the possibility of failing to meet the CACFP meal rules. A continued focus on increasing the number of sponsors and the capacity and sustainability of sponsors is essential to ensuring access to the program; county and state agencies along with philanthropy can work to support all sponsors in succeeding to meet the demand for program inclusion among diverse types of home-based providers and the families they serve.

4. Support Targeted Outreach and Opt-In Options

Implementation can include targeted outreach strategies—such as opt-in mechanisms for the Colorado Care Worker Tax Credit (CWTC) referrals—to increase awareness and participation among FFN caregivers. Sponsors, community organizations, and FFN caregiver networks can support effective targeting recruitment efforts to FFN caregivers most likely to be interested and able to participate in CACFP. Colorado’s CACFP virtual visit waiver offers a cost-effective opportunity for screening. The Colorado Statewide Parent Coalition has mini-grants for FFN-serving organizations to conduct outreach and facilitate participation in PDIS and the refundable CWTC. This effort also presents a valuable opportunity to raise awareness about CACFP and help providers consider applying. It is an example of how Colorado can co-promote CWTC, PDIS registration and CACFP.

5. Support CACFP-Sponsoring Organization Best Practices

Supporting CACFP-sponsoring organizations in providing culturally and linguistically appropriate services will help to facilitate the CACFP participation of FFN caregivers. Connections to partners and opportunities to explore development within sponsorships will be helpful. Best practices also include utilizing resources, such as the USDA and the National CACFP Association’s linguistically and culturally appropriate CACFP menu and recipe materials and tools. Engaging FFN leaders and CACFP sponsors in productive discussions around shared goals will be beneficial. It will also be important to examine the CACFP recordkeeping and out-of-home notification communication options to find solutions to accommodate more informal scheduling.

Criteria for Feasibility and Inclusion of Alternative Eligibility Processes

This chapter focuses on the development of a rigorous framework of criteria to evaluate the feasibility and appropriateness of potential alternative eligibility processes for FFN caregivers seeking CACFP participation. This process is guided by the legislative mandate in Colorado House Bill 24-1223 and is grounded in stakeholder input and federal CACFP regulations. The primary goal is to identify pathways that ensure adequate oversight, minimize administrative burdens on the state agency and caregivers, and support the nutritional well-being of children in care.

- Criteria development
- Criteria for feasibility and selection
- Criteria for feasibility and selection rationale

Criteria Development

The criteria are grounded in the comprehensive findings from phase 1 research, which encompass:

- Qualitative analysis of stakeholder input gathered through focus groups, interviews, and meetings;
- A review of relevant national and Colorado research reports and literature;
- Legal and regulatory analysis of federal CACFP regulations and Colorado child care statutes to identify compliance standards, legal frameworks, and flexibilities;
- Asset-based landscape analysis examining statewide, national, and other state-specific FFN eligibility processes, guidelines, and best practices, as well as existing Colorado systems and resources;
- Quantitative analysis of program data from both national and Colorado sources

The criteria in this framework aim to balance regulatory compliance, operational simplicity, financial viability, and community engagement, guiding the study toward practical, equitable solutions for FFN caregiver participation in CACFP. Importantly, the criteria consider federal CACFP rules—reviewed through existing mechanisms—along with Colorado’s unique regulatory environment and align with the broader goals of equitable access and community trust.

Criteria for Feasibility and Selection of Alternative Eligibility Processes

The development and evaluation of feasible pathways for FFN caregivers to participate in CACFP will be guided by the following systemic and practical criteria:

1. Compliance with Laws and Regulations

- The pathway must align with federal CACFP regulations and Colorado state laws governing child care standards and eligibility.

2. Leveraging Existing Infrastructure and Systems

- The process should build on current systems (e.g., Colorado child care professional development and care work registries) to streamline implementation and reduce the need for new infrastructure investments.

3. Program Integrity

- The pathway must incorporate and uphold program integrity—ensuring compliance measures are integrated into the process without creating an undue burden on the state agencies or FFN provider.

4. Simplicity and Transparency

- The process should be straightforward, clear, and easy to understand for caregivers, with transparent steps that encourage participation.

5. Efficient and Low-Burden Enrollment

- Minimize paperwork and administrative steps while maintaining proper recordkeeping. The process should reduce the time and resources needed for caregivers and agencies.

6. Language Accessibility

- Ensure materials and processes are linguistically appropriate to serve diverse communities.

7. Utilization of Digital Tools

- Employ digital or online platforms to facilitate enrollment, certification, compliance, and data sharing between caregivers and the state agencies.

8. Cost-Efficiency

- The process must be financially sustainable, with manageable costs for implementation, ongoing maintenance, and participation.

9. Alignment with Colorado’s Early Childhood Values

- The pathway should reflect and uphold Colorado’s priorities around early childhood development, equity, and accessibility.

Figure 10



Criteria for Feasibility and Selection of Alternative Eligibility Processes: Rationale

1. Compliance with Laws and Regulations

Rationale: The pathway must adhere to federal CACFP regulations and Colorado state laws to ensure legal eligibility and prevent jeopardizing program participation. Maintaining compliance safeguards the program’s integrity, protects families, and ensures oversight responsibilities are clearly defined and enforceable. Focus group participants emphasized that pathways must respect federal rules, even as they explore flexibility—highlighting the importance of aligning with existing regulatory standards.

2. Leveraging Existing Infrastructure and Systems

Rationale: Building on current systems—such as Colorado’s child care professional development, family, friend and neighbor, and care work registries—reduces costs and implementation time, promotes consistency, and enhances scalability. Utilizing established assets enables seamless integration, reduces duplication, and leverages existing trust within Colorado’s early childhood ecosystem. This can support a “no wrong door” approach complementing other pathways.

3. Program Integrity

Rationale: The pathway must incorporate measures—such as background checks and health and safety standards—to uphold program integrity without overburdening caregivers or the program operators. Some stakeholders objected to the criminal background check as invasive and recommended limiting or eliminating the requirement. Based on similar findings, prior research in Colorado made the following recommendation, “Limit background checks to the caregiver only rather than requiring background checks on all adults 18+ living in the household.” This balances the need for oversight, and it addresses a point raised by a few parent stakeholders suggesting that a background check could be useful.

Recommendation: New Mexico has a two-tiered system of background check requirements for FFN caregivers. For food-program-only applicants, the primary caregiver (and the substitute caregiver) submits fingerprints for a background check, and all other household members over the age of 18 and adults over the age of 18 who spend a significant amount of time in the home are screened based on an “Adult Written Statement” (no fingerprints). The household members are screened for all relevant registries including State Abuse and Neglect and the sex offender registries.

4. Simplicity and Transparency

Rationale: A straightforward and transparent process fosters caregiver participation by reducing confusion and administrative barriers. Clear, predictable steps build trust and facilitate engagement, especially among caregivers unfamiliar with complex approval procedures. Stakeholder feedback underscored the preference for simple, easy-to-understand systems, such as TrustLine, over more complicated approaches. In the review of literature, “complexity of the enrollment processes” was a commonly cited barrier to CACFP participation.

5. Efficient and Low-Burden Enrollment

Rationale: Minimizing paperwork, time, and administrative steps is critical for sustainability in participation. Stakeholders expressed that systems should be inexpensive, fast, and manageable—building on current tools like TrustLine reduces barriers and supports participation rates. The literature also supports ease of use as vital to the success of any pathway to CACFP.

6. Language Accessibility

Rationale: Materials and processes must be linguistically appropriate and culturally relevant to serve Colorado’s diverse communities. Providing multilingual resources reduces fears, supports equitable engagement, and ensures trust among non-English-speaking caregivers and families. Focus group discussions emphasized that cultural and language accessibility are crucial. This reinforces the findings in prior research that language accessibility is a key facilitator for caregivers.

7. Utilization of Digital Tools

Rationale: Employing digital and online platforms streamlines registration and ongoing compliance activities. Digital tools reduce administrative burdens, enable remote access, and support scalable operations—aligning with the needs for efficiency emphasized during stakeholder discussions.

8. Cost-Efficiency

Rationale: The pathway must be financially sustainable, balancing implementation costs with program benefits. Leveraging existing systems and infrastructure minimizes expenses and maximizes resource utilization, which is especially important given current fiscal constraints. In addition, caregivers must be able to meet the requirements at a low cost. Financial constraints have been cited as a barrier to CACFP participation in previous research.

9. Alignment with Colorado’s Early Childhood Values

Rationale: The pathway should reflect Colorado’s priorities of early childhood development, workforce development, and accessibility. It must promote inclusivity, serve diverse communities, and support quality, equitable care, aligning with the state’s broader early childhood goals.

Implementation Strategy–Best Practices: Agency Partnerships and Trusted Community Organizations

Rationale: Using trusted community organizations as system navigators and outreach partners is essential to facilitate FFN caregiver participation in the new pathway. Embedding coordination, outreach, and technical assistance within current trusted service networks leverages existing assets. Trusted community organizations were consistently identified by stakeholders as the vital link needed to shepherd FFN providers on their journey to CACFP participation. These organizations are well-positioned to help fill the gap and partner with the CACFP sponsorships to serve linguistically and culturally diverse FFN caregivers and families. Efforts to create additional referral streams are needed to effectively identify potential FFN providers for CACFP recruitment and retention.

Evaluation of Proposed Alternative Eligibility Process

The potential alternative eligibility process, Colorado PDIS-FFN, was evaluated against each of the criteria outlined to ensure a feasible, effective pathway. It's important to note that other potential alternatives were deemed inconsistent with CACFP regulations earlier in the process. The evaluation focused primarily on the potential alternative eligibility process, with a secondary focus on evaluating the proposed implementation strategy.

- Evaluation of Potential Alternate Eligibility Process
- Evaluation of Implementation Strategy - Best Practices
- Evaluation Conclusion

Evaluation of Potential Alternate Eligibility Process

Alternative Eligibility Process

Colorado Department of Early Childhood's Colorado Professional Development Information System, Family, Friend and Neighbor Registration

The potential alternative eligibility process utilizes the Colorado Professional Development Information System, Family, Friend and Neighbor Care registration (Colorado PDIS-FFN), and leverages the new Colorado Care Worker Tax Credit tax registry. As explained earlier, this process is a Child Care Approval: Voluntary Registration/State Child Care Registry approval mechanism.

1. Compliance with Laws and Regulations

Evaluation: Meets the criteria. The proposed pathway is designed to align with Federal CACFP rules and Colorado state law and regulations, ensuring compliance without creating excessive requirements that might discourage participation. Specifically, the proposed pathway is consistent with the federally defined purpose of CACFP (42 U.S.C. 1766(a)(1)(A)), which operates under the Child Nutrition Act of 1966, and the federal regulations (7 CFR § 226.6(d)), which outline the eligibility criteria for providers, including categories of family child care homes that can participate. The proposed pathway is consistent with USDA regulations, by utilizing the mechanism of State Child Care Approval: Voluntary Registration/State Child Care Registry, which is currently allowable.

The alternate eligibility processes are consistent with Colorado's expanded definition of home-based license-exempt care, as passed by the Colorado General Assembly in 2017: Colorado Revised Statute §25.5-5-303 (2024) and Colorado Revised Statute § 26.5-5-304(2024). It is also in compliance with the home-based license-exemption as operationalized in the Code of Colorado Regulations: Department of Early Childhood, Division of Early Learning, Licensing, and Administration, Child Care Facility Licensing Rules and Regulations, Licensing Exemptions 2.112(B)(5). Family, friend and neighbor care, as defined in this process, is allowed to operate legally without a license in Colorado.

2. Leveraging Existing Infrastructure and Systems

Evaluation: Meets the criteria. The pathway leverages the existing Colorado Professional Development Information System infrastructure—designed for child care professional development and care work registries—to streamline implementation and minimize new infrastructure costs. The new pathway builds on an established platform to facilitate access for FFN providers. In addition, the new Colorado Care Worker Tax Credit (CWTC) offers a vital stepping stone for bringing FFN caregivers into the food program by connecting to the thousands of FFN care workers enrolled in the CWTC registry (an estimated 2,700 (FY2025), 3,700 (FY2026), and 5,070 (FY2027).)

The new pathway could also support a “no wrong door” approach, complementing the existing CCCAP pathway. County human services offices with closed CCCAP caseloads can refer unserved caregivers to the FFN registry, allowing them to access CACFP. Additionally, participation in the PDIS/FFN pathway could serve as a stepping stone for caregivers to prepare for eventual CCCAP re-openings, through processes such as background checks and health and safety self-certification, thus laying the groundwork for future CCCAP participation.

The new pathway could also be a first door into the early care and education (ECE) space. Caregivers could start here, get comfortable, and move on to child care licensing or CCCAP if funded. CACFP sponsors are well-equipped to connect FFN caregivers into the ECE world, including licensing.

3. Program Integrity

Evaluation: Meets the criteria. The proposed pathway incorporates and upholds program integrity without creating an undue burden on FFN providers or the departments. Oversight measures—including the background checks and health and safety self-certifications for registration, and the three annual CACFP home visits (one unannounced) for participating providers—help preserve program integrity while maintaining a manageable workload for all parties involved.

4. Simplicity and Transparency

Evaluation: Meets the criteria within government systems. The proposed pathway is designed to be straightforward, clear, and easy to understand for providers, with transparent steps that encourage participation. The PDIS website and portal are designed for providers and aim to focus on user-friendly directions. While the pathway is relatively streamlined compared to other options, the pathway is still and unavoidably a multi-step government registration process. For this reason, some FFN caregivers will need assistance to successfully navigate the process.

5. Efficient & Low-Burden Enrollment

Evaluation: Meets the criteria. The proposed pathway minimizes paperwork and administrative steps while maintaining proper recordkeeping through digital data capture, which is designed to reduce the time and resources needed for providers and agencies. As stakeholders shared, such efficiencies are key, because to some, the time investment to adhere to other pathways is not enough to warrant the process. This process would be much quicker than other pathways.

6. Language Accessibility

Evaluation: Meets minimum criteria but not the full criteria. As part of the PDIS platform, the implementation ensures that materials and processes are offered in English, Spanish, and Arabic, which is crucial to serving many communities. However, as per the study findings, the systems and materials need to be accessible in multiple languages. This is an important implementation issue.

7. Utilization of Digital Tools

Evaluation: Meets the criteria. By harnessing the power of AI and digital platforms, the proposed pathway can maximize efficiency and outreach while operating within federal rules, facilitating streamlined applications, self-certifications, and referrals across multiple programs. The proposed pathway builds on Colorado's history of innovation and leadership on utilizing online platforms to increase access to services (e.g., WIC via PEAK). This approach builds caregiver agency by providing an accessible source to verify legitimacy. The PDIS has a chatbot named Petey to assist caregivers and a help desk.

8. Cost-Efficiency

Evaluation: Meets the criteria. Since this potential alternative eligibility process builds on existing registration components, the costs are expected to be reasonable. This aligns with policy stakeholder focus on carefully using funds and effectively meeting shared goals for FFN caregivers and families.

The PDIS is currently supported through CDEC's federal Child Care Development Funds, and appropriated general state funds. In the past, stimulus funds have been available to support building aspects of the system but those are no longer available. The implementation of the alternative eligibility process in the PDIS will have start-up costs for the first year (estimated \$52,496), Salesforce (the state software contractor) programming costs and staff time, and then annual ongoing costs (estimated \$22,700), staff time and individual licenses for each enrollee. This could potentially be financially sustainable depending on the applicability of the current funding streams and the possibility of securing additional funding.

FFN caregivers will be able to meet the requirements at a relatively low cost. PDIS is a free professional service. The alternative eligibility process will require FFN caregivers to pay for the background checks. This will only be \$75 if the recommendation to use New Mexico's background check system is utilized.

9. Alignment with Colorado's Early Childhood Values

Evaluation: Meets the criteria. The pathway reflects Colorado's priorities around equity, diversity, accessibility, and healthy early childhood development. The new pathway will support workforce inclusion, contributing to Colorado's efforts to account for the entire ECE workforce, and align access to public investments with care delivery patterns. The pathway is consistent with CDEC's 5-Year Strategic Plan, Goal 1: Expand Access to Early Childhood Services, Goal 2: Invest in Colorado's Early Childhood Workforce and Goal 3: Strengthening Families.

Implementation Strategy – Best Practices

The implementation strategy will utilize community engagement and coordinator capacity; facilitate system navigation and outreach; build a cohesive referral and collaboration system; advance targeted outreach and opt-in options; and support CACFP sponsoring organization best practices.

Evaluation: Meets the applicable criteria to the extent possible in a general set of recommendations. The implementation strategy is feasible for the following reasons:

CDEC and CDPHE have the competencies and experience to successfully implement the strategy. The Family, Friend, and Neighbor Support Program within the Department of Early Childhood is funded to provide training, support, and resources for FFN caregivers. This helps to provide assets and connections to support the implementation strategies. In addition, both CDEC and CDPHE have significant agency and partner networks. Both agencies would need a moderate investment in resources for implementation.

For some of the community organizations this work is within their current mission and projects. However, for some organizations, a commitment to intensive navigation assistance could benefit from additional funding. This could be an opportunity for a foundation.

Evaluation Conclusion

The Colorado PDIS-FFN registration potential alternative eligibility process meets the key criteria needed for a feasible pathway to CACFP participation for license-exempt caregivers. It demonstrates compliance, accessibility, affordability, and alignment with Colorado's key principles for early childhood services. However, (by necessity) this pathway will still be a multi-step government registration process. Barriers around experience navigating government systems, literacy, and education can be minimized but not eliminated. The implementation strategy will offer support and assistance, as well as outreach and coordination. The current distrust of government systems is a factor dominating decisions in some communities.

Regulatory Impact Analysis: Colorado PDIS-FFN Pathway

This chapter presents the regulatory impact analysis of the proposed alternative eligibility process: the Colorado Professional Development Information System: Family, Friend, and Neighbor Registration (Colorado PDIS-FFN). The analysis encompasses an assessment of the identified need, expected impacts, resource utilization, and cost-efficiency considerations.

Statement of Need

FFN providers care for more than half of children under the age of 5 in Colorado¹⁰⁰ yet they are often excluded from benefits and services:

- Colorado’s Comprehensive Early Childhood Workforce Plan reports economic instability is prevalent among FFN caregivers.¹⁰¹
- A study of Colorado FFN caregivers revealed that, “The rising cost of fresh, healthy food was the top financial challenge.”
- FFN caregivers are not normally connected with traditional child care systems or the food program in Colorado.^{102,103}
- Most FFN caregivers do not have access to the CACFP.

Background

In 2023, Colorado expanded CACFP eligibility to FFN caregivers participating in CCCAP. This pathway does open access for some FFN providers. However, it has significant limitations—such as county caseload moratoriums due to unfunded federal mandates—leaving many FFN caregivers without access to CACFP. As a result, the Colorado General Assembly House Bill 24-1223, funded CDEC, in consultation with CDPHE, for a study to determine the feasibility of de-linking CACFP eligibility from participation in the child care assistance program.

Summary of Alternative Eligibility Process

*Colorado Department of Early Childhood
Colorado Professional Development Information System: Family, Friend and Neighbor Registration*

1. Colorado PDIS-FFN

FFN caregivers enroll in PDIS as “Family, Friend and Neighbor Care” provider creating a profile and complete the following:

- **Criminal Background Check:** Utilize existing registry infrastructure to store background clearance documentation
- **Health and Safety Self-Certification:** Utilize self-certification tool and have access to foundational training through PDIS

2. Baseline Safety Requirements for Eligibility

To qualify FFN caregivers must:

- Complete state-approved background checks
- Complete health and safety self-certification form
- Renew every 3 years

3. Care Worker Tax Credit (CWTC)

Leverage CWTC FFN caregiver participation:

- FFN caregivers enrolled in the Colorado Care Worker Tax Credit will be able to build the FFN registry qualification into their profile, offering CACFP as an additional financial incentive
- Build in auto-flag and connections

Impact of Alternative Eligibility Pathway: Colorado PDIS-FFN

The Colorado PDIS-FFN pathway is projected to increase access to CACFP, which will:

- improve nutritional well-being of children in FFN care (a key goal of the authorizing legislation for this study)^{104, 105, 106, 107, 108}
- support food security¹⁰⁹
- enhance caregiver support.

Resource Utilization

• Leverages Existing Infrastructure and Systems

Assessment: The pathway utilizes the PDIS's well-established, scalable platform for training, credentialing, and provider registration. This reduces the need for new infrastructure costs and simplifies implementation. It also leverages the Colorado Care Worker Tax Credit registry as an additional tool for incentivizing FFN provider participation. The integration supports a "no wrong door" approach, facilitating the referral and onboarding of FFN providers within existing systems. This alternative utilizes CDEC's language capacities built into PDIS (English, Spanish, and Arabic), and CDPHE's newly acquired Language Link service.

• Low Administrative Burden

Assessment: The pathway's design emphasizes efficiency and a low burden process by utilizing existing digital platforms (PDIS), minimizing unnecessary requirements, and automating aspects of the certification process. FFN caregivers have a significantly lowered burden under the proposed pathway in comparison with the requirements for current CCCAP pathway: background checks, an inspection, 15 hours of training, and at least one of the children in care receiving CCCAP. (CCCAP must follow the federal rules for CCDF.) In addition, the proposed pathway, Colorado PDIS-FFN, will be quicker, CCCAP process can take 3-4 months¹¹⁰, and more direct, caregivers can apply directly rather than having a parent qualify first.

• Low Administrative Costs

Assessment: Start-up costs are estimated to be \$52,496 in Year 1, with ongoing annual costs of approximately \$27,516. The total costs are aligned with stakeholder feedback emphasizing the need for cost-effective, scalable solutions that reduce resource demands on providers and agencies.

Estimated Cost: Proposed Build-Out of the PDIS-FFN Registry System

- Year 1: Start Up Costs
 - Programming/Development Costs: \$25,000
 - Personnel: 0.4 FTE for planning, oversight, and implementation = \$26,721
 - Licensing Costs: up to 100 users @ \$7.75 = \$775, to increase by 3% each year
 - Total Estimated Cost (Year 1): \$52,496
- Year 2: Ongoing Annual Costs (Starting Year 2)
 - Personnel: 0.4 FTE = \$26,721
 - Licensing Costs: up to 100 users @ \$7.95 = \$795, to increase by 3% each year
 - Total Annual Cost: \$27,516

Cost-Efficiency

The proposed Colorado PDIS-FFN alternative eligibility process is cost efficient. The new pathway would bring much-needed federal entitlement funding into the state. Table 3 shows the substantial earnings possible for the relatively small investment. Even at the lowest level of participation, 20 FFN caregivers, federal payments would equal \$84,000 in a year, exceeding the initial investment. Sponsoring organizations would also receive support via the monthly sponsor payments for each home. In this time of uncertain child care funding, this pathway is an opportunity to pull down federal CACFP dollars to help support good nutrition and quality child care.

Table 3: Alternate Eligibility Process: Colorado PDIS-FFN Registration CACFP Annual Earning Levels by Number of FFN Homes Participating

Alternate Eligibility Process: Colorado PDIS-FFN Registration CACFP Annual Earning Levels by Number of FFN Homes Participating			
Number of Participating Homes	Caregiver Reimbursement for Meals & Snacks (1)	Sponsoring Organization Payments	Annual Total
20	\$84,000	\$20,880	\$104,880
30	\$126,000	\$31,320	\$157,320
40	\$168,000	\$41,760	\$209,760
50	\$210,000	\$52,200	\$262,200
100	\$420,000	\$104,400	\$524,400
500	\$2,100,000	\$522,000	\$2,622,000

(1) Based on the claiming rate of FFN caregivers participating in CACFP

Conclusion

The Colorado PDIS-FFN registration pathway demonstrates compliance with federal and state laws, reduces administrative burden, and leverages existing infrastructure. This cost-efficient pathway will bring funding and resources to support good nutrition and quality care. Its community-centered, culturally responsive approach supports equitable access, maintains program integrity, and aligns with Colorado’s early childhood development principles. Strategic implementation, supported by stakeholder engagement and oversight, will be key to its success.

Conclusion

This study has rigorously examined the feasibility of establishing an alternative, de-linked eligibility pathway for FFN caregivers to participate in the CACFP in Colorado. Through a comprehensive regulatory review, asset-based landscape analysis, stakeholder engagement, and cost assessment, a promising pathway—leveraging Colorado’s existing Professional Development Information System: Family, Friend and Neighbor registration (Colorado PDIS-FFN), along with connections to the Colorado Care Worker Tax Credit—has been identified as feasible and aligned with federal and state regulations. The pathway is cost-efficient and capable of bringing significant federal CACFP funding into Colorado.

The findings underscore that Colorado’s infrastructure and community partnerships are well-positioned to support this new pathway. By building on strong community engagement, trusted intermediaries, and existing digital platforms, this initiative has the potential to significantly expand access to CACFP for underserved FFN providers and vulnerable children. The new pathway is consistent with the study’s legislative mandate, and stakeholder recommendations for a streamlined, low-burden process balanced with adequate oversight while supporting the nutritional well-being of the children in care. This pathway exemplifies how thoughtful leveraging of existing assets, combined with targeted outreach and stakeholder collaboration, can create a more inclusive and effective nutrition support system for children in diverse care settings.

Endnotes

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