



EXECUTIVE SUMMARY

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 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. Contact us: info@homegrownchildcare.org

Study for the Colorado Department of Early Childhood (DQ1 QAAA 2025000239) Feasibility of De-Linking Eligibility for the Federal Early Childhood.

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.

The federally funded CACFP program provides training, technical assistance and reimbursements for nutritious meals and snacks served to children in home-based child care, centers and other settings. The Colorado Department of Public Health and Environment (CDPHE) administers CACFP as the recently renamed Colorado Food Program.

FFN providers care for more than half of children under the age of 5 in Colorado. 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 aunties, to friends and neighbors who care for children.

“ 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

Many FFN caregivers offer their services for free or at rates insufficient to cover costs. Colorado’s [Comprehensive Early Childhood Workforce Plan](#) reports economic instability is prevalent among FFN caregivers. [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.

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. This brief summarizes our findings.

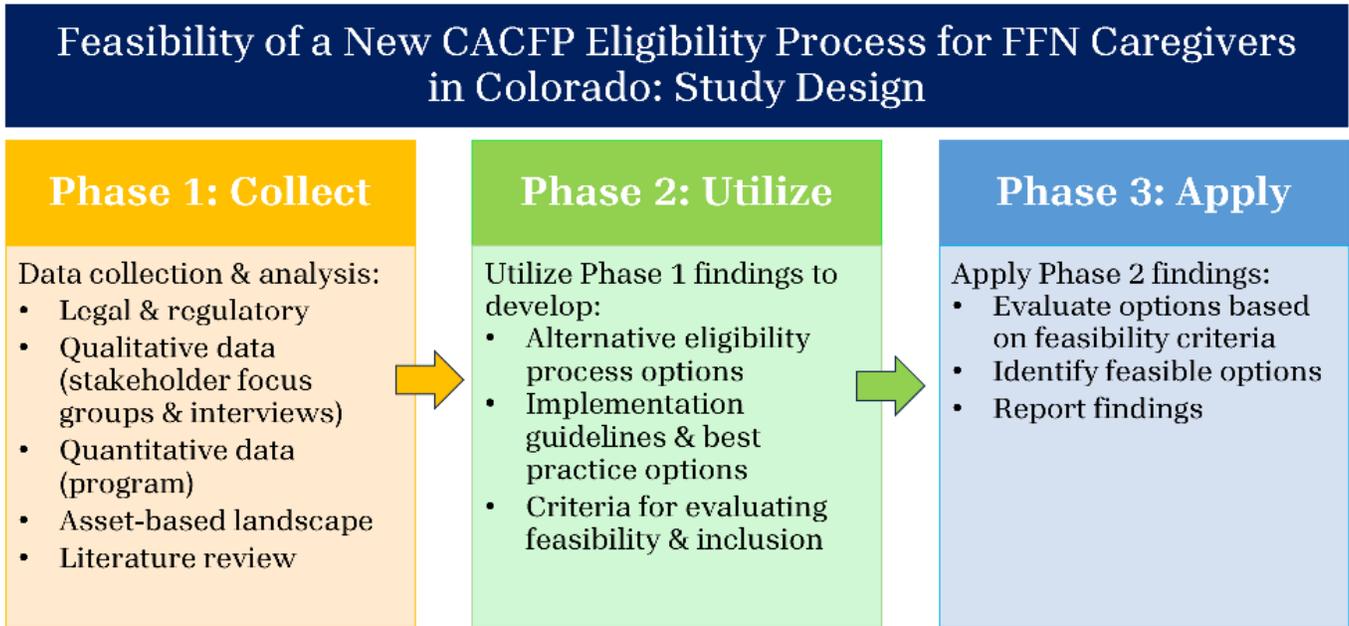
Colorado Child Care Assistance Program (CCCAP): The purpose of CCCAP is to provide eligible households with access to high quality, affordable child care that supports healthy child development and school readiness while promoting household self-sufficiency and informed child care choices. The Colorado Department of Early Childhood (CDEC) administers CCCAP.

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 the nutritional well-being of children in care.

Study Design and Methodology

Table 1: Feasibility of a New CACFP Eligibility Process for FFN Caregivers in Colorado: Study Design



The research addressed the central question: **"Is there a feasible alternate pathway for FFN providers to participate in CACFP without requiring participation in CCCAP?"**

Stakeholder Input

The study relied heavily on stakeholder input. The stakeholder engagement process emphasized transparency, inclusivity, cultural equity, and respectful dialogue to ensure diverse perspectives were prioritized and heard. The following diverse array of stakeholders from Colorado were engaged in the study:

- **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, FFN-serving, food justice, sponsor, and health organizations, state agencies, 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.

"Hopefully one day they can separate CCCAP from CACFP so we can benefit from it. In the end, the children would benefit."

– Participant in Focus Group

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.

New Potential Pathway

The study concludes that there are a variety of state mechanisms that illustrate the capability and flexibility within federal regulations to foster equitable access for license-exempt caregivers to participate in CACFP. Many states have developed 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 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 these findings 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.

The study identified a feasible alternative eligibility process informed by the California approach could be achieved via the Colorado Professional Development Information Systems, Family, Friend, and Neighbor Registration (Colorado PDIS-FFN). In this model:

- A "TrustLine" caregiver type option would be anchored into the Colorado Professional Development Information System (PDIS), Family, Friend and Neighbor Care Registration.
- FFN caregivers would complete a Colorado PDIS-FFN registration, including submitting background checks and a health and safety self-certification to verify their eligibility for the program.

This pathway leverages existing structures and assets in the Colorado landscape including the Colorado Care Worker Tax Credit. The approach is also cost effective and supports stakeholders criteria for feasibility of an alternative pathway.

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 required to make it a success. The recommended 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

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 ensures 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.

[Read the full report here](#)