



**March 18, 2026**

**To: Dr. Lisa Roy, Executive Director, Colorado Department of Early Childhood**

***Submitted via 2026 CCCAP Comprehensive Rule Public Comment Form***

**From: Khatira Amn, Senior Policy Advocate for Early Childhood, Spring Institute for Intercultural Learning**

**Re: Draft proposed rule changes for the Colorado Child Care Assistance Program (CCCAP)**

### **Section 2: Fiscal Controls and Oversight**

Spring Institute for Intercultural Learning supports these rules because they move CCCAP toward a more sustainable, accountable, and proactively managed system. By requiring counties to respond to projected overspending within clear timelines, the rules shift the program away from crisis-driven decisions and toward prevention, reducing the likelihood of sudden freezes, waitlists, and service disruptions that negatively impact families and providers.

At the same time, strengthened oversight by the Colorado Department of Early Childhood ensures that limited resources are managed effectively across counties, promoting long-term stability and more consistent access to care statewide. While counties continue to play an important role in planning, these rules establish essential accountability by allowing CDEC to review and guide decisions to ensure they serve the best interests of children, families, and providers.

### **Section 3: Waitlist and Freeze Rules**

Spring Institute for Intercultural Learning supports these rules because they center transparency, equity, and access for families with the greatest need. By establishing clear thresholds for waitlists and enrollment freezes, the rules create more predictable processes that reduce uncertainty for families, providers, and counties.

They also ensure that limited resources are distributed equitably by prioritizing low-income families and children with additional care needs. In addition, clearly defined criteria and timelines for implementing and lifting waitlists and freezes bring greater transparency to difficult decisions, helping families better understand what to expect. Moreover, these rules outline structured pathways to reopen enrollment and ensure that access to child care is restored in a fair, intentional, and responsive way.