



November 17, 2023

Dr. Lisa Roy
Executive Director
Colorado Department of Early Childhood

RE: Comment letter – Proposed Permanent Rules for Family Childcare Homes

Thank you Dr. Lisa Roy and members of the Rules Advisory Council (RAC):

As a leading representative of nearly 690,000 small businesses in Colorado, Small Business Majority writes to share comments on the proposed permanent rules for family childcare homes (FCCH).

Small Business Majority is a national small business organization that empowers America's entrepreneurs to build a thriving and equitable economy. We actively engage small businesses and policymakers in Colorado in support of solutions that promote small business growth. A key component of our work involves outreach to small business owners on a range of small business issues, including access to capital, workforce issues, healthcare and more.

Childcare is an essential part of the entrepreneurship ecosystem. Not only are family home childcare providers small business owners themselves, but without a robust childcare industry, we cannot have a strong and diverse economy. The fate of one hinges on the success of another. This is apparent as a [recent Small Business Majority poll found](#) that more than half of small businesses are struggling with workforce shortages, which is no doubt due in part to the exit of women from the workforce to care for their children. The Colorado workforce has particularly struggled to find quality care for their children, which affects employers and their staff. In fact, half of our state lives in a childcare desert.

Colorado has consistently experienced a shortage of licensed family childcare homes over the last decade. Family childcare homes, many of which are run by women, women of color, and immigrants, are a vital component of the economy and working families with young children. These facilities provide an accessible, safe, in-home learning environment in smaller group sizes and offer great flexibility for hard-working Coloradans who have non-traditional work schedules. We are concerned that if these rules are implemented as is, the childcare crisis will be exacerbated as more providers leave the field due to continued barriers to running their business. Many of the proposed rules mandate childcare providers to increase their required materials and administrative burdens, which involves significant resources for businesses already on a very tight margin.

While I acknowledge the need for comprehensive rules for our childcare industry, the proposed regulations will undoubtedly create more unnecessary barriers to our care economy. We have a unique opportunity as a state to recognize the true cost of running a childcare business and create pathways to make this industry accessible instead of unreachable. I encourage the Department to continue exploring the cost-benefit analysis of these regulations, and what they might do to our state's childcare industry and economy as a whole.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Vigoda", written in a cursive style.

Lindsey Vigoda
Colorado Director & National Quality Jobs Policy Director, Small Business Majority