



August 15, 2016

Members of the Colorado State Board of Human Services
Colorado Department of Human Services
1575 Sherman Street
Denver, CO 80203

RE: Comments on “Revised Food Assistance Work Program Requirements” (16-4-25-4P)

Dear Colorado State Board of Human Services Members:

The Colorado Health Foundation supports the proposed rule changes to allow greater flexibility in serving Supplemental Nutrition Assistance Program (SNAP) work registrants, 16-4-25-4P.

The Colorado Health Foundation is a non-profit organization guided by a vision of making Colorado the healthiest state in the nation. Together with partners from the public and private sectors, we engage in grantmaking, public policy advocacy, evaluation, private sector initiatives and communications outreach to help create healthy communities. Ensuring access to affordable, healthy food and promoting food security is a critical component of this vision.

Food insecurity, a condition where households lack access to sufficient food because of limited resources, has emerged as a leading health issue in the United States. According to the USDA, in 2014, 14 percent of all U.S. households, or nearly 50 million people were food insecure. More than 19 percent of households with children reported food insecurity at some point during the year.¹ Colorado closely mirrors these national trends with 13.6 percent of households reporting food insecurity.² Recent research suggests that household food security is a strong predictor of health care utilization and costs incurred by working age adults.³ In children, food insecurity is associated with increased risks of some birth defects, anemia, lower nutrient intakes, cognitive problems, and anxiety. Children living in food insecure households also are at higher risk for poor general health, behavioral problems, obesity, depression and poor oral health.⁴ Federal food assistance programs in the United States are an effective avenue to alleviate hunger and supplement the food budgets of low income families.

We applaud the efforts of the Colorado Department of Human Services (CDHS) to align Colorado regulations with federal law. Specifically, we support the following proposed changes:

1. Exempting the chronically homeless from the 3-month time limit for those deemed Able Bodied Adults Without Dependents (ABAWDs),
2. Redacting the proscription that one needs medical certification of physical or mental unfitness for work, and
3. Making participation in the Employment First program voluntary for those with dependents between the ages of 6-13.

¹ USDA Economic Research Service. Food Security of U.S. Households in 2014. <http://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics.aspx#foodsecure>. Accessed April 21, 2016

² USDA, 2012-2014 State-Level Prevalence of Food Insecurity, Average 2012-2014. <http://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics.aspx#map>. Accessed August 9, 2016

³ Tarasuk, V. et. al. 2015. Association between household food insecurity and annual health care costs. *Canadian Medical Association Journal*, Vol. 187(14): E429-E436

⁴Gundersen, C. and J.P. Ziliak. 2015. Food Insecurity and Health Outcomes. *Health Affairs*, Vol. 34 (11): 1830-1839.

Exempting the chronically homeless from the ABAWD category will help vulnerable Coloradans from unduly losing their SNAP benefits while simultaneously strengthening the Employment First program. Chronically homeless individuals experience many barriers to finding and maintaining employment. Exempting this population from participation in Employment First will allow county and state resources to be better targeted to those who could benefit most from the program.

Under current regulations, Coloradans living with mental or physical disabilities or hardships that prevent them from meeting SNAP work requirements often face difficulties in proving this unfitness because of the narrow requirements in Colorado statute. The proposal to redact the proscription for medical certification of physical or mental unfitness for work will help address this challenge.

Finally, the proposal to make the Employment First voluntary for those with dependents between ages 6-13, will grant parents and other caregivers additional flexibility as they strive to meet their families' needs. Preserving critical SNAP benefits for families with young children will help promote food security for households most in need.

Collectively these proposed changes will align Colorado regulations with federal law, allow for more practical program implementation and prevent Coloradans from needlessly going hungry. The evidence laid out by CDHS staff in support of the proposed rule changes does an excellent job illustrating the broader impacts of food access on population health, human capital and our local economies.

Thank you for the opportunity to provide input on this development for the State of Colorado. We urge you to move forward with these emergency rule changes as proposed. If you have any questions about these comments, please contact Alexis Weightman, senior policy officer at the Colorado Health Foundation at AWeightman@ColoradoHealth.org or 303.953.3659. Sincerely,



Karen McNeil-Miller, Ed.D
President and CEO
The Colorado Health Foundation