The Colorado Health Foundation™

Comments on Information Collection 3090-0290, System for Award Management Registration Requirements for Financial Assistance Recipients

Thank you for the opportunity to provide comments in response to the General Services Administration's (GSA) proposed revisions to the System for Award Management (SAM) registration requirements for financial assistance recipients. The Colorado Health Foundation is a statewide, nonprofit and nonpartisan philanthropic organization with a mission to improve the health and wellbeing of Coloradans. Through community engagement, research, grantmaking, and private sector investments, the Foundation aims to ensure that everyone in Colorado has what they need to be healthy.

We write to express our strong opposition to the proposed changes, which would introduce new certification requirements related to diversity, equity, and inclusion (DEI), immigration, and terrorism. As outlined below, the Foundation is concerned that the proposed revisions:

- Exceed statutory authority and impose conditions on federal funding not authorized by Congress;
- Introduce vague, inconsistent, and legally ambiguous certification requirements;
- Expose nonprofit organizations and other applicants to significant legal and financial risk, including potential liability under the False Claims Act;

- Create a chilling effect that may discourage well qualified organizations from seeking federal funding; and
- Ultimately undermine the effectiveness of federally funded programs and harm the communities they are intended to serve, including across Colorado.

Nonprofit organizations are essential to the health, stability, and well-being of communities and are often the first line of response when people need support. They deliver critical services including health care navigation, behavioral health care, food assistance, housing support, and disaster recovery, particularly in rural and historically under-resourced communities where they are often the primary providers of these services.

READ THE FULL LETTER

TYPE

Announcements

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BY

The Colorado Health Foundation