The Colorado Health Foundation™

Public Comment on Proposed Rule RIN 3245-AI67, Small Business Size Standards, Docket No. SBA-2026-0199

The Colorado Health Foundation ("CHF" or "the Foundation") is a statewide, nonprofit and nonpartisan philanthropic organization with a mission to improve the health and well-being of Coloradans. Through community engagement, research, grantmaking, and private sector investments, the Foundation works to ensure that everyone in Colorado has what they need to be healthy. Evidence shows that good health and well-being are a product of multiple factors, including equitable access to economic opportunity for small businesses.

The Foundation appreciates SBA's interest in simplifying the size-standard system and allowing successful small businesses greater flexibility to grow. However, we are deeply concerned that the proposed rule goes approach to modernization would bring negative consequences for communities in Colorado and across the country. It would consolidate nearly 1,000 industry-specific standards into 338 standards, substantially increase size thresholds across many industries, and eliminate explicit maximum thresholds. SBA estimates that these changes would newly classify approximately 114,541 businesses as "small." Expanding eligibility on this scale risks significantly altering competition for federal contracting and assistance programs and disadvantaging the smaller businesses those programs are intended to support. We respectfully urge SBA to withdraw the proposed rule, retain the existing size-standard framework, and work

with small businesses and other stakeholders to develop a more targeted approach to modernization.

READ THE FULL LETTER

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BY

The Colorado Health Foundation