



February 7, 2020

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

RE: Food Assistance Recipient Claims Update 2020, SNAP Employment First Updates 2020

Dear Human Services Board,

Thank you for all you do for Colorado families. As proponents of ending hunger in Colorado, advocates and enrollment navigators for families who utilize the programs you oversee, we appreciate your dedication to consistent, consumer-friendly benefits.

Over the last six months we have worked with the Colorado Department of Human Services (the Department) on rule changes to update the SNAP Able-Bodied Work Requirements and claims processing. We are pleased to write today in support of the rules the Department has submitted for your approval.

First, we agree with the proposed rules clarifying the Employment First program as voluntary. This will remove an unnecessary barrier for people who need food assistance. It will also build trust with these programs, the Department, and the community. We know outreach and relationship-building are the key ways to engage and help people move forward with the specific options that will work for them. We are also supportive of the new provision requiring Employment First providers to report suspected exemptions to their client's county. We believe this will help more clients get the benefits for which they qualify.

We are also supportive of the proposed rules' new specific examples of people with medical conditions that make them unable to work ("medically unfit to work"), "including homelessness, victims of domestic violence, people applying for / appealing a determination of disability benefits.") These examples clarify for those interpreting the rules.

We also support the policies allowing for client self-attestation unless questionable and the consideration of documentation provided by nonprofit social workers as acceptable proof when needed. We need to move forward as quickly as possible to help clients meet their needs and this allows for that, while also encouraging administrative efficiency.

Finally, we are very supportive of the state moving to a one-year look back limit for benefit overpayments caused by inadvertent client error. The prior look back of six years perpetuated the financial issues clients are facing, often adding to a continued cycle of debt. We believe the goals of the SNAP program are to help those who need it, and to empower them to move forward. Being a debtor for a claim error is counter-productive.

This rule update package was done thoughtfully by the Department. They included stakeholder input, and because of that, we believe these changes are balanced and will benefit clients. 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 Sara Lipowitz at the Colorado Center on Law and Policy.

Sincerely,

Colorado Center on Law and Policy
Hunger Free Colorado
Blueprint to End Hunger in Colorado
Colorado Health Foundation