



March 16, 2020

Governor Jared Polis
State Capitol Building
200 E. Colfax Ave., Rm. 136
Denver, CO 80203

The corona virus (COVID-19) is negatively impacting public health and the Colorado economy, creating significant challenges for people experiencing poverty. Social distancing strategies decrease opportunities for work. School and workplace closures affect families already struggling to meet daily food needs, who may already be or soon find themselves without the resources to stockpile food and other supplies.

When there is a Presidential Declaration of a disaster or emergency, as was announced today, authority provided in the Robert T. Stafford Disaster Relief and Emergency Assistance Act allows federal agencies to grant greater flexibility and funding to states in administration of their public benefits programs. We would like to alert our state partners to a number of policy choices available for our safety net programs that would lessen the impact of this national emergency on Coloradans experiencing job dislocation, food insecurity, and poverty. We know that some of our state agencies are already advocating for policy changes, and we appreciate their efforts. We want to add our voices to theirs, and also bring forward some ideas that might not yet have been considered. All of the ideas we are proposing have been implemented in other locations nationwide or could be authorized by impending federal legislation.

Recommendations for Strengthening Temporary Assistance to Needy Families (TANF)

TANF serves low-income families in the deepest poverty. The typical family participating in TANF earns less than \$6,000 per year, which is around 30% of the Federal Poverty Level (FPL). The cash benefits and services TANF provides are a crucial lifeline for these families, particularly in times of recession and crisis. Our recommendations for this program include:

- Waiving in-person case management and recertification requirements.
- Waiving work requirements for persons unable to work due to illness/closures/etc.
- Encouraging applicants to file online and telephone applications, temporarily waiving in-person signature requirements.
- Where applicable, granting benefits for program participants beyond 60 months, waiving the state requirement that they engage in meaningful effort to find work prior to receipt of

benefits. Consider COVID impacts as good cause for failing to meet work requirements and communicate this interpretation broadly to administering agencies.

Recommendations for Strengthening the Supplemental Nutrition Assistance Program (SNAP)

SNAP is the country's largest program aimed at decreasing food security. We know that even before this national emergency, only about 60% of eligible Coloradans were participating in the program. It is more important than ever to decrease barriers to enrollment and retention in receiving these benefits. Our recommendations are:

- Offering fully staffed phone services in every county during business hours.
- Implementing a statewide intake hotline for all benefits programs.
- Encouraging applicants to file online and over the telephone, temporarily waiving in-person signature requirements if possible.
- Waiving interview requirements and allowing for acceptance of client declarations of income.
- Waiving SNAP work requirements for persons unable to work due to illness/closures/etc.by considering COVID impacts as good cause for failing to meet work requirements.
- Upon passage of H.R. 6201, the Families First Coronavirus Response Act, implementing federally authorized elimination of all work and working training requirements.
- Upon passage of H.R. 6201, pursuing and implementing emergency SNAP benefits to raise existing SNAP households up to the maximum monthly allotment.
- Implementing emergency EBT benefits as authorized by H.R. 6201 to provide food resources for families with children in schools that are closed.
- Enabling and encouraging counties to share their workloads and backlogs to ensure SNAP applications and recertifications are completed in compliance with federal timelines. Providing more resources to OIT to enable this to happen quickly.
- Rescheduling administrative disqualification hearings to a later date.
- Immediately implement the ABAWD injunction and, when enacted, the provision of the Families First Coronavirus Response Act that will lift the ABAWD time limit in the counties where it is in effect. Inform individuals and the public of this change, including the ability of individuals already time limited off SNAP in non-waived counties to reapply.
- Facilitate supermarkets delivering food to SNAP households by promoting the use of manual vouchers or allowing for online purchases.
- Remind caseworkers to boost SNAP promptly when households report reduced hours of work, and to act on reported changes right away. Emphasize that self-employed people may have limited ability to verify reduced hours of work and accept self-declaration of reduced pay.

Recommendations for the Office of Administrative Courts

People in need of benefits during this crisis should not have to concern themselves with losing those benefits, particularly when the Office of Administrative Courts may need to close or cut back accessibility. Our recommendations include:

- Delaying all in-person hearings where benefits are open.
- Continuing all in-person hearings where the appellant fails to show up at the hearing. Liberally granting continuance requests.
- In postponing in-person hearings, automatically authorizing and issuing interim benefits at the 90-day mark, if not as soon as the postponement occurs.

Recommendations for Strengthening the State Food Pantry Network

Many pantries and food banks rely on volunteers, many of whom are older adults. There will be a need for more volunteers to assist in providing meals, boxing food, and delivering items. Our recommendations for this program include:

- Creating a coordinated volunteer response list to increase community volunteer engagement.
- Providing funding for more mobile pantries, such as refrigerated trucks.
- Pursuing all possible flexibilities in implementation of The Emergency Food Assistance Program (TEFAP) so that food banks can more easily distribute TEFAP goods to food pantries and the community.
- Waiving income requirements to expand access to TEFAP.
- Pursuing waivers or added flexibility from USDA to make it easier to expand the Child and Adult Care Food Program (expedited approval of additional meals, expedited contracts for new CACFP sponsors, etc.)

Recommendations for Strengthening School Meal Programs

Schools participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) and institutions participating in the Child and Adult Care Food Program (CACFP) may be dismissed or closed due to Federal, State, or local public health requirements for social distancing due to COVID-19. Under these circumstances, school food authorities (SFAs) and other eligible community organizations (CO) may continue to serve meals to children affected by school or childcare closures through the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO). Our recommendations for this program include:

- Waiving area eligibility to allow for many more locations to be able to host meal sites.
- Waiving meal pattern and meal requirements for school meal programs to address potential food sourcing challenges.

- Upon passage of H.R. 6201, allowing SNAP allotments to households with children who attend a school that is closed for five or more days, in an amount equal to the school meal amount the child loses.
- Supporting robust distribution of information to the community about open meal sites around the state.

Recommendations for Strengthening Services to People Experiencing Homelessness

People experiencing homelessness are at an increased risk of contracting COVID-19 because it is nearly impossible to self-isolate and many have existing health conditions like diabetes that make them more vulnerable to the virus. The recommended preventative measures, including frequent handwashing and avoiding large gatherings are not feasible for the roughly 30,000 people experiencing homelessness in Colorado. State and local governments must consider the limitations that may lead to the spread of COVID-19 among this population. We recommend:

- Increasing the number of motel vouchers offered as an alternative to community shelters for persons experiencing homelessness who are medically vulnerable or displaying signs of illness.
- Identifying and utilizing additional locations for people to shelter, such as hotels/motels, abandoned or empty dormitories, vacant buildings, schools, or rec centers.
- Increasing the number of hand-washing stations available.
- Providing adequate personal protective equipment (PPE) like masks and gloves to clinics and agencies that provide direct services to this population.
- Putting a moratorium on evictions. Many municipalities across the country have taken this step, to avoid adding more people to the homeless population.

Recommendations for Strengthening the Special Supplemental Nutrition Program for Women, Infants, and Children Program (WIC)

WIC provides federal grants to states for supplemental foods, health care referrals, and nutrition education for low-income pregnant, breastfeeding, and non-breastfeeding postpartum women, and to infants and children up to age five who are found to be at nutritional risk. This program has been shown to improve the health of participants and reduce health care costs. Our recommendations for this program include:

- Waiving WIC in-person recertification requirements; allowing self-declaration for income and enrollment.
- Pursuing a waiver to WIC's physical certification requirement for enrollment.
- Giving WIC shoppers more flexibility around allowable sizes and brands so that families can purchase pieces of the food package even if stores run out of the normally designated products.
- Extending WIC eligibility certification periods by up to 30 days to streamline the certification process to get newly eligible participants in the program and extending recertification due dates by 30 days to avoid creating unnecessary hardship on current

participants. These options can also streamline the workload for county staff during disasters, allowing them to meet the increased need for WIC.

- Upon passage of H.R. 6201, implementing automatic WIC eligibility for families receiving emergency EBT benefits for children in closed schools as authorized by the legislation.
- Offering special WIC nutrition and breastfeeding support and services as a vital support for mothers during the COVID 19 crisis.
- Coordinating efforts among agencies and partnering organizations to widely disseminate WIC information to communities and populations, and also offering referrals to needed services for WIC families.

Please feel free to contact any of the listed parties below for more information and policy support as we move through this difficult time. Thank you for your time and consideration.

Sincerely,

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