



December 12, 2025

Governor Jared Polis
State of Colorado
State Capitol Building
200 E. Colfax, Room 136
Denver, CO 80203

Dear Honorable Governor Polis,

Colorado counties recognize the need to adapt our human services delivery model in response to sweeping federal changes under H.R. 1 (see attached letter from CHSDA for further detail on our shared concerns). Counties are committed to ensuring these programs meet the expectations of our constituents and protect critical funding streams and the preservation of local jobs. However, we are deeply concerned that the accelerated timeline to implement a consolidated district model by July 2026 poses significant risks to service quality, operational stability, and the well-being of over 1.7 million Coloradans who rely on these programs.

Our guiding principles are clear:

- People come first.
- High-quality services are essential to building trust between constituents and government.
- Generational changes require deliberate planning, not rushed implementation.

Counties want to be true working partners in this transition—not name partners only. To that end, we ask for clarity and collaboration on the following critical issues:

1. **Technology Readiness:** System and technology changes must be identified and completed before implementation. CBMS must be stable and fully functional, with clear timelines, accountability measures, and progress tracking.
2. **Eligibility Business Processes:** Counties need clear guidance on how eligibility workflows will be redesigned, how hub counties will be selected, and what responsibilities, benefits, and risks accompany serving as a hub.
3. **Fiscal Implications:** Counties must navigate a complex mix of local, state, and federal funding. Any misalignment could create significant downstream impacts on program operations and both county and State budgets.
4. **Legal Considerations and Flexibility:** Counties require clarity on legal obligations, including employment law, and whether governance structures allow high-performing counties the option to decline participation in regional hubs.



5. **Increased alignment and effectiveness from CDHS and HCPF** Counties need greater alignment and clear policy direction and expectations from the state departments. This was identified in the report from SB22-235 and improvements have not been implemented. Counties would ask for clear commitment from both departments to align and consolidate the oversight of these programs for counties wherever possible. For example: one consolidated policy team to provide aligned policy direction to counties, one clear quality control/assurance process, consistent fraud expectations, and many other ideas that counties commit to providing that would increase the effectiveness of these services at the local level.

We strongly urge the State to slow down and ensure this transition is done correctly—not simply quickly. Completing technology modernization, finalizing legal and fiscal frameworks, and establishing robust change-management structures before launching districts will protect federal funding, reduce error rates, and build a sustainable system for generations to come.

Counties stand ready to collaborate on a deliberate, well-structured plan that prioritizes accuracy, accountability, and the people we serve. We ask for your leadership in developing a process that truly values partnership and prudence over speed.

Respectfully,

A handwritten signature in black ink, appearing to read "Kelly Flenniken".

Kelly Flenniken
Executive Director

A handwritten signature in black ink, appearing to read "Jennifer O'Hearon".

Jennifer O'Hearon
Rio Blanco Commissioner
Chair, Human Services

A handwritten signature in black ink, appearing to read "Marsha E. Porter-Norton".

Marsha Porter-Norton
LaPlata Commissioner
Vice-Chair, Human Services

ATTACHMENT: CHSDA Letter

CC: Michelle Barnes, CDHS
Kim Bimestefer, HCPF
Heather Durasko, CHSDA