

To: House Committees on Appropriations; Human Services; General, Housing and Military Affairs
From: Providers of Shelter and Services to Homeless Vermonters (*list of sign on agencies below*)
Subject: Comments and Concerns Related to DCF's Proposed Emergency Housing Initiative
Date: February 18, 2021

Dear Chair Hooper, Chair Pugh, Chair Stevens and Committee Members:

As Providers of Emergency Shelter and Services to Vermonters experiencing homelessness, our organizations are positioned to have a nuanced understanding of the individual challenges faced by homeless Vermonters as well as the systems issues which impact conditions on the ground. We write today to express concerns about DCF's proposal to devolve the State's General Assistance emergency shelter motel program to communities.

While thoughtfully presented, shifting responsibility to communities would likely cause the Continuum of Care to buckle in a few larger communities at a time when a record number of Vermonters are homeless. The timing of a transition to coincide with the day FEMA will no longer pay 100% of program cost looks good on a balance sheet but fails to acknowledge the immense strain homeless Vermonters and the non-profit network of shelter and service providers are under. But the issues we wish to note go beyond merely timing and should be carefully reviewed before concluding that what doesn't make sense for this year is ideal for next.

Expedited Connection to Services are Already Happening

The proposal implies that people in motels would be more quickly connected to services, but expedited connection to services is already happening in the majority of communities through improved communication between state district offices and local organizations, as well as the statewide system known as Coordinated Entry and Assessment. DCF has indicated many times over the past decade they intend to connect the state's motel program more with this system but have thus far not done so. Coordinated Entry and Assessment, an existing system required by HUD and generously supported by the State, can achieve that rapid service connection without moving administration of the motel program if that is truly the desire.

Roles in a Partnership

Vermont's Homeless Continuum of Care runs highly effective programs to prevent homelessness, rehouse people who become homeless, provide specialized transitional and supportive housing, coordinate access to services and improve communication with landlords and other partners. DCF's recognition of this community-based work is noted and much appreciated, but it's essential to acknowledge that these strong outcomes are possible partly because of the funding and technical support received from DCF, as well as knowing the State is a full and active partner in the work, providing a final backstop as provider of emergency shelter when shelters are full.

If the nonprofits were made to become administrators of the State motel program it could seriously distract from the homelessness prevention and rehousing focus, driving the need for emergency

shelter still higher and resulting in longer episodes of homelessness. Becoming an operator of the GA motel program also means muting an important advocacy role. This was the experience of Vermont's Community Action Agencies a number of years back when they agreed to assist DCF with administration of the program. If a homeless service organization has to deny access to shelter, what organization is there to advocate for the homeless family? And what does wielding the power to deny someone an emergency motel room do to the relationship between case manager and client?

True Utilization of General Assistance

By emphasizing data from fiscal year 2019, the proposal does not reflect the current cost of operating the program, nor the historic trend line. GA motel utilization and spending increases over time. It's important to look at more recent utilization and expenditure data as well as the five or 10-year trend instead of focusing on SFY 2019 as a baseline for pre-COVID demand.

Relationship Between Eligibility, Cost and Parity

While the byzantine eligibility that has evolved around the General Assistance program is widely unpopular, it was developed to control cost. If the Administration and Legislature propose removing GA eligibility and caps on length of stay, they should be prepared to see utilization and expenditure in motels climb more steeply above historic trends. Conversely, if districts are given capped grants and greater autonomy to decide who receives a benefit, will families sheltered in July or August exhaust a resource for those who become homeless in February or March?

Assumptions around GA Investments

GA Community Investments are cited as improving outcomes where a part of the program has been handed to nonprofits to serve a certain population. This can often be true, that outcomes in some areas improve, but given that people can qualify for a GA motel through multiple eligibility paths, it seems likely reductions under some criteria (such as domestic violence) are being offset by increases through others (such as constructive eviction). Extrapolating from narrow results of the GA pilots leave out much of the story. It would be informative to see if GA community investments have been able to bring overall GA utilization down within a district.

Rights to Appeal – Capacity to Represent

Under current rules, Vermonters who feel they are improperly denied motel vouchers have recourse to a fair hearing before the Human Service Board. Will Vermonters continue to have access to the Human Service Board, an entity which receives administrative support from the state? Private nonprofits often lack the same in-house legal capacity. Who would represent them in an appeal process?

Quality and Habitability

In many parts of Vermont, a main concern of the G.A. motel program is not the *cost* of the program, but the sub-standard quality of rooms people are placed in. The Agency of Human Services is in a unique position of both overseeing the quality of these establishments (through the Food and Lodging Program in the Health Department) and being their single biggest customer (through the G.A. program in the Department for Children and Families). Why would AHS not use this combined regulatory authority and power of the purse to compel improvements in some of Vermont's most deplorable motels prior to a transition?

What's Next?

Members of the Homeless Continuum of Care do remain open to working with the Department to identify common ground and address how best to provide shelter and coordinate services. Those conversations are starting again this winter, but it would be inaccurate, or at least premature, to suggest that the local continua are all ready to fully embrace this proposal and take over administration of a motel program so long as it is simply pushed back another year.

Thank you for your consideration of these complex challenges,

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Rita Markley, Executive Director, Committee on Temporary Shelter (COTS) (Chittenden County)

Rick DeAngelis, Executive Director, Good Samaritan Haven (Central Vermont)

Angus Chaney, Executive Director, Homeless Prevention Center (Rutland County)

Michael Redmond, Executive Director, Upper Valley Haven (Windsor County)

Steve Geller, Executive Director, SEVCA (Southeast Vermont)

Paul Dragon, Executive Director, CVOEO (Addison, Chittenden, Franklin & Grand Isle Counties)

Tom Donahue, CEO, BROCC Community Action (Bennington & Rutland Counties)

Jenna O'Farrell, Executive Director, NEKCA (Caledonia, Essex & Orleans Counties)

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Claire Kendall, Family Center of Washington County (Washington County)

Mary Moulton, Executive Director, Washington County Mental Health (Washington County)

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Eileen Peltier, Executive Director, Downstreet Housing & Community Development (Central VT)

Kim Anetsberger, Executive Director, Lamoille Community House (Lamoille County)

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