



TO: House Human Services Committee

FROM: Vermont Community Action Partnership

RE: [26-0766 – draft 2.1](#)

The Community Action Agencies would like to thank the House Human Services Committee for its work on this bill and for its commitment to ensuring the best outcomes for the people of Vermont. We would like to express our general support for the direction this bill will take our state, and for the overall approach the bill takes to preventing and addressing homelessness. We offer the comments below in a collaborative spirit and will remain engaged as the committee continues to work on the bill. We thank you for the opportunity to comment and the collaborative nature of the work you are doing with the community partners and the State of Vermont. Our initial comments follow.

Office of Economic Opportunity - we support the consolidation of these services under OEO.

- We also support having line items in the state budget for each part of the continuum, so that it is clear that each kind of service is funded.

Housing Retention:

- We would like to add the concept of Housing Retention to the Continuum of Care components. Specifically between the current 4 & 5 in the continuum (p8, lines 16-17).
- Likely, you would need to add a definition of Housing Retention as well. Specifically, we would like to see case management continue for 24 months after a person achieves permanent housing and we would need adequate resources to extend these important services.

Emergency Shelter Services:

- Also, on p8, lines 14 & 15, we recommend combining the current 2 & 3 to “emergency shelter services”

Section 2204: PREVENTION AND DIVERSION SERVICES

- We recommend deleting the first sentence in this section (lines 6-7). The sentence is confusing and is not needed.
- We very much appreciate the last sentence in this section (lines 16-17). We believe that flexible funding that can be used to support people staying housed or finding alternative housing is absolutely critical, and we appreciate your acknowledgement of that need here.

Section 2208 HOTELS AND MOTELS WITH SUPPORTIVE SERVICES

- We very much appreciate the recognition that hotel rooms will still need to be utilized until more shelter options are available.
- We are concerned that it seems that the only time hotels will be allowed to be utilized is from Dec 1 - March 31, per the reference here to subdivision 2205(3) on line 15. Hotel rooms need to be available year round until shelter capacity comes online (one for one), otherwise we will simply have larger numbers of people experiencing unsheltered homelessness from April through November.
- We do appreciate that section 2205 stipulates that the hotel use will not be night-by-night. We believe that if people are required to come into coordinated entry and have a housing plan, they should not have enforced night limits, as that would create confusion and a barrier to the housing plan.
 - We do recognize that available funding will be a natural limit to the rooms and the nights available.
- Page 12, lines 14-16: We believe this sentence was included inadvertently and recommend deleting it. Or, it should not be limited to Community Action Agencies.



Section 2209 PERMANENT SUPPORTIVE HOUSING SERVICES

- In addition to any other PSH, we recommend an expansion of the Agency of Human Services' [Permanent Supportive Housing Assistance Program](#) (PSHA), which currently has only 100 slots statewide. This will allow providers to draw down Medicaid and expand service to assist people experiencing homelessness who are most in need.

Section 2211 RULEMAKING

- We are concerned that the rulemaking process does not automatically include stakeholder input or public comment opportunities that are inclusive. In addition, the rulemaking process does not have robust checks and balances. LCAR has limited authority, and the scope of this bill is broad, with much discretion for the rulemaking.
- We respectfully request the following be added:
 - Requirement for stakeholder input prior to publishing the draft rule
 - Review and approval of the draft rule by the House Human Services Committee and Senate Health & Welfare Committee prior to publishing the final rule.
 - Public hearings in each region of the state (minimum of 5 hearings) with ample time for people to testify and accommodation offered and funded for people with disabilities who want to offer testimony.
 - A responsiveness summary that is published on the rulemaking webpage in a timely manner.
- We are also wondering whether it would be appropriate for OEO to promulgate the rules, rather than DCF.

2212 REPORTING

- We are curious about the intent of this section.

Sec. 5. MERGER OF CONTINUUMS OF CARE

- We support this with any additional resources to ensure a consolidated and integrated statewide platform.
- We would like clear language in the bill that requires geographic equity of services also taking in regional economic factors such as cost of living.

Sec. 9. PAYMENT RATE STRUCTURE; SHELTER SERVICES

- We appreciate the idea of a rate structure for shelter services.
- We request that language is added to have the rate be developed with input from and in collaboration with shelter providers.
- We believe the rate should cover the full operating cost of shelter services, as these services will be offered through a contract with and on behalf of the State of Vermont.

APPROPRIATIONS

- We look forward to your discussions regarding appropriations and hope you will consider the requests we have shared with your "budget buddies" related to this bill.