



Date: February 24, 2026

To: Chair Theresa Wood & Members of the House Human Services Committee

From: Chad Simmons, Executive Director, Housing & Homelessness Alliance of VT (HHAV)

The Continuums of Care (CoC) are a HUD construct required to receive and administer federal HUD funding for homeless assistance. Governance and roles within the CoC are highly defined and can be administratively cumbersome. As described in [HHAV's January 27 testimony](#) as well as our [February 9 follow-up memo](#), Vermont has two HUD recognized CoCs: Chittenden County and the "Balance of State" (BoS). The BoS is an umbrella of 11 Local Housing Coalitions (LHCs), and governance and decision-making in the BoS reflects this structure. The CoC model was created with more urban areas in mind, and it is widely accepted in the field nationally, that the model (as constructed by HUD) can be cumbersome in a BoS or state-wide model. CoCs have requirements about decision-making and who is intended to be included. For many years, the CoCs have worked to improve the efficiency and effectiveness of decision-making

The CoCs have decision-making authority over the Coordinated Entry (CE) system, the Homeless Management Information System (HMIS), the Point in Time (PIT) count, project prioritization of HUD CoC funding and more. The CoC is also intended to have a role of performance oversight of HUD Emergency Solutions Grants (ESG) funded projects, and both HUD CoC and ESG funded projects. The "CoC" is both a federal grant program as well as a federally recognized collaborative planning body which is not governed by the State. The federal CoC program is competitive, and the HUD recognized CoCs compete to fund projects based on federal criteria. Both Vermont CoCs have governance charters, and significant policy and procedural documents which document how projects and partners operate within the CoCs. "Continuum of Care" is also a term of art, coined and used to describe the full breadth of services and housing interventions needed to address and solve homelessness, even if those are not funded by the "CoC" grant.



Balance of State CoC

- Elected Steering Committee with representatives from key sectors and local coalitions
- Collaborative Applicant (backbone organization): Housing & Homelessness Alliance of Vermont
- HMIS Administrator: Institute for Community Alliances (ICA)
- CE Lead: State Office of Economic Opportunity (OEO)

Chittenden County Homeless Alliance (CCHA)

HHAV encourages committee members to [read the CCHA memo](#) submitted February 18. HHAV supports the points raised in their memo.

CoC Merger Considerations

The Collaborative Applicant, the HMIS Administrator and the CE Lead are all roles designated and overseen by the steering committee.

Merging the two HUD recognized CoCs has been a perennial conversation since the federal HEARTH act changed expectations of the CoCs and incentivized merging. There are several examples nationwide and technical assistance consultants who could support a merger process.

However, any merger between the CoCs will need to carefully consider the intended purpose, include an intentional process, and weigh the benefits and costs.

Potential benefits of merging include:

- HUD rewards CoCs for merging during the federal funding competition, Notice of Funding Opportunity (NOFO), with a scoring bonus. However, this bonus is effective for only one NOFO round. A scoring bonus may or may not yield additional funding in the current federal funding environment.
- The HUD expectations of the CoC are significant – training, performance accountability, planning and prioritization, partnership management – and the process of applying for, receiving and reporting on HUD CoC funding is a significant lift. Consolidating the regulatory requirements and funding (“NOFO” process) into one entity would save significant resources and no doubt be more efficient.

- All HUD recognized CoCs must have a single HMIS and a single CE process. Both the BoS and Chittenden CoCs use the same HMIS at this point. So merging would not yield a different HMIS. However, the CE process – referral, assessment, prioritization – would need to be aligned statewide. For many years, statewide housing partners have identified the value of having one CE system statewide to make the experience for clients and the state-level data more straightforward. There are administrative efficiencies to be gained. However, CE does not in itself solve homelessness. Housing will solve homelessness.

In summary, the most significant opportunity in merging CoCs is minimizing the resources spent on administration.

Merger concerns to be addressed:

- Merging CoCs will be a significant lift that will require a lot of bandwidth (i.e., staff time and organizational attention) from all partners within the system of care. Decision-making can be tedious and granular. At a time when significant change and effort is needed in the delivery of effective shelter, services and housing, a merger process that is forced on a quick timeline will be challenging and likely draining of system resources needed elsewhere.
- Chittenden County has significant and specific needs that are unmatched in other areas of the state. It also requires, due to its size and scale, different strategies and resources to address homelessness. It is reasonable that Chittenden County partners would be concerned about the loss of funding and loss of decision-making for projects in their geographic area. Any merger would need to consider accountability to local communities, and outline specific ways that projects must be accountable to their local communities and how local communities (specifically CCHA) would still maintain some level of decision-making. However, CCHA could benefit from no longer managing the federal administrative burden while still playing a pivotal role in planning for and addressing homelessness in their area.
- If the goal of a merged CoC is to act as an intermediary of state funding, additional work needs to be done to address accountability and decision-making. Many partners might reflect that the CoC as a construct for delivering funding has been inherently challenging.



Merging the CoCs has strong benefits but needs time to be implemented well. Funding to support facilitation and technical assistance could help move the process. However, the benefits of a merged CoC should not be overstated. While there are opportunities for administrative efficiency, there are more powerful opportunities to make improvements in the ways that Vermont deliver's homeless assistance.