



VERMONT  
COMMUNITY ACTION  
PARTNERSHIP

- ❖ Vicki Loomis, BROCC Community Action (BROC)
- ❖ Alison Calderara, Capstone Community Action
- ❖ Paul Dragon Champlain Valley Office of Economic Opportunity (CVOEO)
- ❖ Jenna O'Farrell, Northeast Kingdom Community Action (NEKCA)
- ❖ Joshua Davis, Southeastern Vermont Community Action (SEVCA)

**TO: House Human Services & Senate Health & Welfare Committee**

**FROM: Sarah Russell, CVOEO, representing the Vermont Community Action Partnership**

**RE: Act 143**

**DATE: October 9, 2026**

Thank you for the opportunity to testify. I am Sarah Russell, Director of Emergency Services at the Champlain Valley Office of Economic Opportunity (CVOEO). CVOEO is the regional Community Action Program serving Addison, Chittenden, Franklin, and Grand Isle Counties. We also have several statewide programs. We address the fundamental issues of economic, social, racial, and environmental justice and work with people to achieve economic independence by leveraging programs aimed at weatherization, fair housing, fuel assistance, micro-business development, early learning, food security, and ending homelessness. CVOEO has rapidly become the largest shelter provider in the state, operating shelters for adults, families, people in recovery, and survivors fleeing domestic and sexual violence across northwest Vermont. This growth is in response to the crisis of homelessness.

I am here today on behalf of all 5 Community Action Agencies – the Vermont Community Action Partnership (VCAP) - to express grave concern about the implementation of Act 143. VCAP believes Vermonters have a basic human right to access safe, stable shelter until they can move into permanent housing - and that it is our moral responsibility to provide shelter to our neighbors.

The 5 Community Action Agencies cover all areas of the State of Vermont and the other four have confirmed seeing similar impacts from the implementation of Level 4 of the Vermont Homelessness Response Continuum. The 5 CAPs are:

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Although we had concerns with H.938 as it was being developed, we did appreciate the legislature's willingness to incorporate much of our feedback into the bill, and we had hope that the new Homelessness Response Continuum would provide a structure and foundation to work from and build a system of services that would make sense to people who needed those services - especially those experiencing unsheltered homelessness. Unfortunately, our experience with the implementation of Level 4 (hotels/motels), has been that people were unnecessarily exited from rooms and forced to reapply through a new system that was not ready to field the incoming calls, resulting in long hold times, the necessity to complete very long and invasive assessments, and develop new housing plans that are confusing and, in most cases, irrelevant to their actual needs. The barriers to access have increased and many people have been forced to sleep outside even though rooms are available across the state. Many of these people who have had to exit the hotels and are now outside meet the criteria for "priority" status as outlined in the bill.

This situation is untenable and traumatic for all involved - from the people who themselves are experiencing homelessness, to the community service providers, to the municipalities who are dealing with so many people exited at once, to the hotels who are not able to provide rooms that are available. Along with my testimony,



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you have been provided with real stories of people impacted by these rules for Level 4 shelter access. Many people have been forced to live outside because they cannot stay on hold with DCF for hours on end, they can't access assistance to complete the housing plan, they cannot access a case manager who can help them with any of this. What will be the plan for them until AWC on 12/1? Not only is this terrifying for adults and downright dangerous for children, but it is also resulting in actual moral injury to the providers who are unable to find a solutions to get people inside as we all watch the temperature drop. I am absolutely confident the intent was never to cause families, children, and vulnerable adults to be unsheltered, however this has been the clear impact of the rules as they have been implemented. The trauma of being unsheltered as a child is only slightly worse than that of a parent who cannot access stable shelter options. We are actively creating multi-generational harm.

When Act 143 was enacted, we fully expected that funding for the case managers would be provided, so that the community providers could be ready to help people navigate the new system when it went into effect on September 1st. The NOFO for case management was released a full 7 days after households were exited from the motels. Applications were not due until October 7th, with award notifications not coming until October 28th. By the time agencies are notified of funding, post positions, conduct hiring and onboarding, these case managers will likely not be ready to work with people until January - a full four months after people have been exited from motels. Further, DCF's decision to end after-hours support from 211 has created further stress and stretched our staff beyond any expectations that we had. For example, our DV hotline has seen a significant increase in after-hours calls for people desperate to access shelter. I must say here that the emergency of unsheltered homelessness does not wait for normal business hours - it can happen at any time, for a variety of reasons.

We did expect it to be a little bumpy - all new systems are - and we also had hoped that DCF would work with community providers to figure out how to make the roll-out as smooth, dignified, and human-centered as possible for clients - also for our staff who bear witness to the anxiety and trauma their clients are experiencing. Unfortunately, this has not at all been the case.

Along with my testimony, I am submitting a document that describes what all of the CAPs across Vermont are seeing on the ground as Level 4 of the Homeless Response Continuum has been implemented. Unfortunately, we don't have any celebratory stories to share. Although some of our clients have been able to find shelter or even housing, it is not because of how VHRC has been implemented - rather it has been the creativity and resourcefulness of our staff and our use of funds that, frankly, we don't have, while state funding goes unused and hotel rooms sit empty.

Our most vulnerable people, experiencing some of the most challenging health and mental health situations, are being forced to wait days to even find out if they will be allowed inside.

We are specifically asking you to recommend that LCAR reject the rule, as it does not seem to comport with your legislative intent.

We are hopeful that you will clarify for DCF what your intent was and do whatever you can to reinstate VT 211 to being able to provide temporary vouchers outside of business hours.



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We hope that you will insist that the initial assessment is brief (far less than 22 pages), and that people are allowed to fill out a realistic housing plan in a dignified way that acknowledges the systemic barriers - including severe lack of shelter beds, rental assistance, and permanent affordable housing.

We hope that you will ensure that every room available will be used if there are eligible people who need shelter.

We hope that you will insist that DCF adhere to the law and provide reasonable accommodation and programmatic extensions for all who need it.

We hope that you will take the moral impact on our staff into account and understand that the stress and strain on our organizations is both overwhelming and unfunded at this time. We hope that you will consider this strain during the Budget Adjustment process.

Thank you for listening and for considering these requests.