Voices for Vermont's Children

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To: Legislative Committee on Administrative Rules
From: Michelle Fay, Executive Director
Subject: Rule 26-E03, Vermont Homelessness Response Continuum Emergency Rules
Date: October 15, 2026

Dear Chair Squirrell and Members of the Committee:

On behalf of the hundreds of children, youth and families experiencing homelessness and the thousands more facing housing insecurity, Voices for Vermont's Children respectfully asks the Committee to object to the Agency of Human Services' Vermont Homelessness Response Continuum Emergency Rules.

Research points to the fundamental role of caring, responsive relationships and stability to support children's healthy development.[1,2] When young children's brains develop in conditions where their basic needs aren't being met, they are at higher risk for poor health, worse educational outcomes, and less financial security as adults. This risk is amplified when parents are stressed by their circumstances and unable to provide a supportive buffer against adversity. Family stability relies on a constellation of supports, such as safe housing, liveable wages, paid leave, quality schools, accessible health care, nutritious food, and dependable social networks. Disruption in one area can create a cascade effect that undermines the whole family system. Experiencing homelessness—particularly unsheltered homelessness—is especially harmful, as it makes accessing other supports exponentially more difficult.

The legislative intent of the Vermont Homelessness Response Continuum (VHRC) detailed in Act 143 acknowledges this, and aims to establish a "continuum of supports and services" to "stable pathway to permanent housing" and meet "the specific needs of households experiencing homelessness," in addition to "reduc[ing] reliance on the inefficient use of hotel and motel rooms for emergency housing."

But the Department for Children and Family's ("DCF" or "Department") emergency rules,

[1] National Academies of Sciences, Engineering, and Medicine. 2025. Early Relational Health: Building Foundations for Child, Family, and Community Well-Being. Washington, DC: National Academies Press. https://doi.org/10.17226/29234.

[2] Early Childhood Scientific Council on Equity and the Environment. (2026). From Resources to Routines: The Importance of Stability in the Developmental Environment Working Paper No. 4. Retrieved from www.developingchild.harvard.edu

implemented on September 1 of this year, fails to address any aspect of the Continuum other than the goal of reducing hotel and motel room utilization. While there are many instances where the emergency rules run afoul of the intent of Act 143, we are particularly concerned about the lack of clarity around if or when DCF will apply the discretion granted to them in Act 143 to extend motel stays for families with children. The state's interest is not served by turning children out of emergency housing.

Children are not responsible for the policy failures that created the current housing access and affordability issues. Among these are the administration's ongoing underfunding of Reach Up benefits, which drives housing precarity for families enrolled in the program. During last winter's peak program utilization in March 2026, 117 of the 309 families in GA emergency housing (38%) were also receiving RU benefits. The Reach Up housing allowance has not kept up with the skyrocketing cost of housing in Vermont.

There is a significant gap between the number of extremely low income families and the number of affordable rentals in the state. Due to the dramatic increase in rents in Vermont since 2019 and inadequate investments from the federal Department of Housing and Urban Development, there are almost no federally-funded rent subsidies for families who need help paying for housing. For low income families, including many families on Reach Up, there are literally no affordable apartments.

When combined with the governor's restrictive 2028 budget framework, which foreshadows additional cuts to the programs that help keep families safe and housed, the emergency rules reflect a cruel and ineffective use of public resources. Children bear the brunt of this short-sighted policy, living in unsafe conditions, including outside, unsheltered. Exiting children from shelter while the remainder of the housing continuum lacks the capacity to provide safe options is unconscionable. This policy harms children, families, communities, and the state as a whole, and we urge LCAR to reject this approach.

Specifically, we call upon DCF to use the discretionary power authorized in Act 143 to be responsive to the needs of families, rather than to apply punitive blanket exclusions to emergency shelter stay extensions. **We ask LCAR to reject the rules submitted on Sept 1 and ask DCF to rewrite the rules to more clearly define any criteria applied to discretionary decisions, and uphold the legislative intent to "provide stable pathways to permanent housing."**