VERMONT COMMUNITY ACTION PARTNERSHIP

- **Vicki Loomis, BROC 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: Legislative Committee on Administrative Rules
FROM: Vermont Community Action Partnership
RE: Vermont Housing Response Continuum Emergency Rules – PLEASE REJECT

We are writing collectively to ask you to REJECT the rules for the Vermont Homelessness Response Continuum. These rules are not aligned with the law as it was written. VCAP was very engaged in the legislative process around Act 143 and we were hopeful that this new law would bring some order and structure to Vermont's homelessness response. Instead, it is creating chaos and multiple barriers for people experiencing homelessness because of the rules that DCF is using to implement the law.

The administration's failure to plan and prepare its own staff has resulted in the removal of households who were already in the state-run shelter program, forcing people to scramble to reapply for the benefits they already qualify for. Simultaneously, the state eliminated after-hours service through its VT211 helpline. Eligible individuals and families were removed from emergency housing because the administration's phone lines were out of service or busy. Getting through often meant hours on hold—only to be disconnected. When people finally managed to reach the state to reapply for benefits, many were wrongfully denied the emergency housing they were entitled to receive because intake staff was inadequately trained or because some procedural hurdles had been overlooked, forcing them back onto the streets.

Below are some specific examples and comments from our staff across the state about how this implementation is causing harm and unnecessarily unsheltering people.

Northeast Kingdom Community Action - NEKCA
Between September 1st and September 11th, NEKCA received 14 calls directly related to difficulty accessing the Emergency Services Division (ESD). These calls reflect more than isolated frustrations with a phone system; they point to a serious access barrier for individuals and families experiencing homelessness who are trying to secure immediate, time-sensitive assistance during moments of crisis.

- One example involved a father and his two children who had become homeless. Over several consecutive days, he reported being placed on hold for hours at a time or being unable to get through at all as the phone continued to ring without being answered. When he contacted NEKCA, our Administrative Assistant spent two and a half hours that day on the phone with him and with all of our Program Directors, working to identify any immediate resources before the close of business. Even after hours, one Program Director stayed until 7:00 p.m., continuing to problem-solve with local hotels in an effort to keep the family safe.
- A second urgent situation occurred at 4:30 p.m. on the Friday immediately before the long holiday weekend, when our team received a call from a nurse discharging a patient from North Country Hospital in Newport. The nurse knew the patient had nowhere to go and reported that she had tried to reach ESD for four hours on Thursday and again throughout the day on Friday without receiving an answer. With business hours ending and the holiday weekend approaching, our team attempted to determine whether a bed was available at our Shelter at Moose River and tried to arrange an RCT ride; however, RCT was not available to schedule transportation at that time. This left very little time to create a safe discharge plan for someone with no place to go.

Michelle Stone who works at St J Pediatrics with the NEKCA's Dulce program has a client who had her baby and was discharged from the hospital to stay with the newborn's Grandma temporarily. The baby's siblings are in other homes, and the mom has been waiting for weeks to reach someone at Economic Services Department to get help so that the whole family can be reunited.

Friday September 18th, a mom called - has her son in his first year at the St Johnsbury Academy. Economic Services Department put them in a hotel all the way over in Burlington. Mom expressed concern about that being too far away for her to get him to school but they moved them there anyway. They told her to call NEKCA about getting help with gasoline to get him to school. We do not have any available gas cards to help this mother and student.

We had a caller from Gilman, VT on Tuesday September 22nd stating that she hadn't heard back from the Economic Services Department's 1-800 emergency housing number since trying to reach them back on Thursday September 17th.

Tuesday September 22nd, a caller had been waiting for a call from the Economic Services Department since Friday September 18th. Just found out she's pregnant. She and her partner are living in a car in St Johnsbury. She says she's been waiting on hold for days with ESD. When she spoke with me on Tuesday she commented, "it was really cold last night in our car, and they aren't calling me back." Then she asked, "can I just walk into their office to be able to get help since I can't reach them by phone?" NEKCA staff recommended they get on a waitlist for the shelter at Moose River as a backup plan in the meantime while they wait for help from the Economic Services Department.

On Wednesday September 23rd Umbrella told a client to call NEKCA. After a domestic violence assault where her ex attempted to strangle her the week before, she and her eight-year-old daughter were placed in the Fairbanks Hotel in St Johnsbury and there were bed bugs. She then paid out of pocket for a few nights in the Comfort Inn. Next, she was placed in housing adjacent to her attacker and she and her daughter didn't feel safe there. So, Umbrella told client to call NEKCA for help getting into an apartment she found.

Capstone Community Action

Long Wait Times on the Phone/Information Confusion

- Case managers report wait times can be 3-6 hours. It's really hard for people that are working; they have to take time off to get on the phone. There is also misinformation and confusion; i.e. people are being told they have x number of days then in another conversation they are being told then have less than that.
- This comment from a motel owner- "During the first week of September, I watched guests sit on hold for a week straight while their vouchers remained in limbo. Most ultimately weren't able to secure vouchers. The complexity of qualifying is brutal. One of the biggest challenges has been the switch to 100% out-of-state call centers. I used to have relationships with Vermont agents who were invaluable when problems came up. Now, I have no direct way to contact anyone. There are no email addresses, and extensions and placements can only be handled by phone. If we miss that phone call, the guest is often out of luck. The call times are also challenging. Even something as simple as having an email option for extensions would make the process so much more efficient. I will say when I finally do connect with an agent, they're lovely, but they're stressed with headwinds as well"

Housing Plans

- People are panicking about their housing plans. We have waiting lists for case management, and this is frustrating. The RFP just came out for the additional case management funds. We had envisioned the process as first hiring case managers to ensure everyone in the motel was assigned one, then they could work with clients to develop a real plan they can achieve, instead of scrambling to produce something with no case manager support.

Letter from a Capstone Client

To Whom It May Concern,

I am writing this because the current emergency housing policies—and the sheer, overwhelming effort it takes just to get basic help—are breaking families down at a time when we are already trying so hard to survive.

Before we could even get a place to sleep, we spent a full week trapped in a cycle of calling the placement lines over and over, sitting on endless hold, praying someone would pick up. When you are sitting there with your child, not knowing where you are going to lay your head that night, every hour spent listening to a phone ring is terrifying. That single week took a massive emotional toll on us before our placement even began.

Once we were finally placed, the relief didn't last long. The strict limits on how many days we could stay meant the clock was constantly ticking in the back of my head. Trying to find permanent housing isn't a simple, fast process. I was doing everything humanly possible, but I couldn't speed up housing applications, waitlists, background checks, or repair schedules. A strict deadline doesn't make permanent housing appear out of thin air—it just forces a parent to live in absolute panic, terrified that time will run out while we are actively doing everything right.

I honestly don't know how I would have made it through this without my Capstone worker. Having someone in my corner who was actually willing to sit with me through the sheer frustration, listen to me break down and vent about the broken phone lines, and help advocate for my extension made all the difference. When the system feels like it's built to make you give up, having just one person who actually sees you as a human being is a lifeline.

It broke my heart to feel like the days we lost just trying to reach a human on the phone were being held against us. Every single day matters when you are trying to give your child stability. The policy changes don't just shift numbers on a spreadsheet—they rip away a family's sense of safety, drain their mental health, and make an already terrifying situation feel impossible.

I understand there are rules and limited resources, but there has to be room for real life. Families who are actively fighting for permanent housing shouldn't be pushed back toward homelessness just because the system itself is slow and hard to reach. I urge you to look at what families are actually living through and build flexibility into these policies for parents who are trying their absolute best to build a stable life for their children.

Thank you for listening to my story.

Sincerely,

Michayla Diek

Comments from a Capstone Housing Case Manager

We have learned that the GA Emergency Housing Program is now gone. There is now VHRC-Vermont Housing Response Continuum. This continuum has 4 levels. The first 3 levels support needed services, specialized beds, shelter beds, and affordable housing for people in need. These levels are not being implemented until next year. The 4th level is the hotel program. This level is meant to shelter people who have not been able to access other means of housing/shelter via level 1-3. In theory, this means people should have a place to go and not need as many hotel stays. The reality is the state exited the vast majority of hotel stayers on 9/1/26. This is an already vulnerable population who have now been exited to the streets, tents, vehicles, and precarious housing. *In Lamoille, all but 2 households were exited.* In speaking with other lead agencies in the state, they all saw the same pattern.

The Level 4 Hotel Program has been rolling out for a few weeks now, and it has been an avoidable nightmare for people trying to survive and the service providers trying to help them. The changes made to the program have met the goal of winding down the hotel program, but at what cost? How many people will we now see in the hospitals, the police stations, the already overwhelmed mental health and psych beds?

First, a person must schedule their crisis during business hours and/or take time out of work to contact ESD. 211 can no longer support after hours or weekends because of ESD policy. They then wait on hold for several HOURS and many times the call gets dropped after these hours of waiting. The first step to the new program is to be screened to determine if you are homeless by self-report and then you have to prove VT residency. This means if you don't have the

proper verification or are new to VT you don't get shelter. Having shelter keeps people alive. How many lives are we willing to lose because they are not a resident? Next, ESD does a risk assessment based on medical needs. If you have a high risk due to a medical need, which has not been defined clearly, you will be sent to the reservationist to determine if there is a room for you in the state. If you do not score as high, you are scheduled for the rest of your assessment and must wait to be sent to the reservationist until that is complete. This will not be the same day and could be several days. There will be a room cap of 700 during warm weather and 1000 room cap during cold weather (12/126-3/31/26). If there is a room and you get it, you then have 7 days to get connected to Coordinated Entry, a case manager, and get a housing plan uploaded. At each renewal of your stay, you are meant to upload progress on your plan. CE specialists have to notify ESD after each CE assessment they complete.

What we are seeing that is not ok:

- This system is not trauma informed on any level. People in crisis are not being approached as such. There is too much they need to do and no face-to-face time with anyone. The steps are confusing, and clients are having to go back and forth between ESD and agencies several times, which means hours and days on hold.
- ESD cut out the emails that providers had access to in order to collaborate with them. We are literally having to rely on client report or wait on hold for hours. Each case now takes hours upon hours more than it did in the past to navigate getting and keeping shelter.
- ESD phone staff are not trained on any helpful level. People are being required to do plans with ESD and ESD does not know the housing nuances, they don't know the clients, they don't know the resources, and they send the clients on a wild goose chase. They often put our Coordinated Entry Specialist as the case manager (this is not their role, they are assessments only), and we have told ESD many times that CE is not case management. They are setting goals that include dates and times to meet with Capstone when there has been no appt scheduled with us; they are essentially scheduling appts for us without telling us, and they are not appts that we would make. They are telling them to apply to housing that that our clients cannot get into. One was told to apply to Copley house, which is a level 3 mental health facility. One was told to apply to the "manner". It should be The Manor and that is a nursing home. They are being told to get a vehicle in a month when they have GA income of $56 a month. We are listed on some of them as CAPS Stone. These are just a few examples. This is a sincere waste of time and dollars.
- They are being told they need to have a plan with ESD even when they do actually have a case manager, and they should be able to do the plan with case manager.
- They are using such similar language many clients think the risk assessment they did with ESD was the Coordinated Entry assessment.
- They are duplicating services. We have all the info/services they are asking for in our own databases. Again, we are wasting time and resources.
- There is no communication with providers from ESD after we submit plans or fair hearing requests. We have to rely on the client to keep us informed.
- Our relationships with clients are being damaged because they feel they should be able to trust that we can help them navigate this. We can't do any better than they are when we don't have decent contact/collaboration with ESD and when ESD is giving each client different steps on what to do.
- People continue to be shifted around the state away from services, medical providers, and any natural supports they may have.
- **People are being exited from the rooms they are already in because the housing plan isn't in place and ESD can't get them in for several days. They have to exit until ESD calls them for that 2 hour interview on the phone. Many reports across the state that people aren't getting the scheduled calls and then being told they missed it.**
- The ESD uploader where we have been asked to upload plans has no real spot dedicated in the uploader. We have to put it in another category and hope it gets where it needs to go. Very confusing and stressful.
- More rural smaller hotels, like Deer Run will likely have to stop participating with the current room caps. They can't keep enough rooms full. Deer Run literally won't be able to pay its bills to stay open.

- No more self-pay days does not mean people will save as the state has asked. It means less days in the hotels for people. They get a strict 70 days with no self-pay days to stretch it out. No one can find housing in 70 days.

Southeastern Vermont Community Action – SEVCA

Brattleboro ACT TEAM:

- The patient contacted ESD to inquire about the number of remaining benefit days and when services would be reinstated. During the call, the patient and this writer experienced significant delays and multiple transfers without receiving the needed information.
    - After waiting approximately 30 minutes for an initial representative to answer, the patient spoke with staff for only a few minutes before being asked a series of identification questions and transferred to another department for intake. The intake process required an additional 30-minute wait, followed by a 15-minute intake interview. Once completed, the patient was transferred again.
    - During the next transfer, the patient waited approximately 10 minutes before reaching another representative who repeated identification questions and advised that another transfer was necessary. The patient then remained on hold for an additional 45 minutes. **Ultimately, the call was disconnected before the patient was able to speak with the appropriate staff member or receive answers to his questions.**
    - The patient expressed frustration and dissatisfaction with the process due to the excessive wait times, repeated requests for the same information, multiple transfers, and the inability to obtain assistance after spending over two hours on the phone. This experience created a significant barrier to accessing needed information regarding his benefits and services.

From HCRS Peer Support Advocate

A story from one person I've been supporting:

- Extremely long wait times (over an hour, sometimes two hours)
- Calls disconnected/hung up (hour wait and then call disconnected 9/21/26, multiple instances of calls disconnecting in the past few weeks and having to call back and start over)
- Given a hard time
- Answering organizations faster than individuals
- Different information given by different individuals, leading to confusion and wasting precious time
- Person didn't feel safe in a motel and left, tried to get a different place but ESD refused unless they filed a police report, and this person has past trauma with police so did not feel comfortable doing so. They are currently still homeless.
- Having to walk far distances to physically get to ESD in order to receive better care
- None of this has been resolved. This person has been trying to get housing for almost two months and continues to face discouraging barriers. They want to be able to have a place so their family can relocate here to a safer state. The process has traumatized the person I'm supporting and has put them in dangerous situations ending up in the ER and having the police called on them because of standing outside and having nowhere to go.
- This person has expressed a need for an advocate and has been trying to find if there is one for ESD/211 but has been without luck, especially with little to no finances.

Springfield Supportive Housing

- One of the things I have noticed is there are individuals who have not even been in contact with our agency who reach out, some in our district and some outside, that are saying ESD is telling them to call here for a Housing Plan. During my meeting with the other CE Leads, it appears they are having the same issue.
- I have also had several clients who share that they are on that phone from the moment ESD opens until the end of the day when they close to renew their vouchers and no one answers. They leave a call back message and no one calls them. They have shared they do this several days in a row and it takes 3 more days to actually

connect with someone. There have also been complaints among some of the clients that they get through the first two steps and then they wait on hold for hours for the phone to just disconnect.

- Along with all that, I have been receiving some referrals that give little to no information, only a name and at best a phone number. There is no hotel placement and no information as to what district the individual is in or what their housing status is at that time. I can only assume they are literally homeless if they made it that far in the process, but some folks I have reached out to are not even in our district or interested in being in this district.

Champlain Valley Office of Economic Opportunity – CVOEO

During September, CVOEO worked with a mixed household of 9 (3 related adults, and their combined 6 minor children), whom we have kept sheltered in a motel during September after the State ended their motel room stay through Level 4. We utilized grant funding from the UVM Emerging Needs program (Community Health Investment). We worked with a wraparound team of several advocates, including AALV, VCCI, the Burlington School District, Reach Up, and the AHS Field Director. We visited with family at two different motels as we helped coordinate and pay for temporary shelter – the household has a BHA FUV in the works and an anticipated move in date to a four-bedroom home on October 1st (fingers crossed that the inspection passes without issue). Without CVOEO and the UVMMC grant funds, they would have been on the street as of September 1st. The local shelters were full (2 adults and 3 of the children were able to access a family shelter this week; the shelter did not have room for everyone). In addition to covering temporary shelter when the State stopped assisting, CVOEO helped provide groceries and transportation assistance.

Overall, CVOEO has assisted 24 unduplicated households over the past few months, utilizing the UVMMC funding, expending over $27,000 for temporary shelter and transportation to housing opportunities

- 11 of these households were able to secure either an apartment, access to a family shelter, Adult Foster Care placement, or another longer-term housing opportunity.
- We have worked with 10 different motels and helped provide over 600 bed nights.

Extension Barriers

- One worker has two clients who are trying to get extensions through ESD. One of them got approved for one, however, they got the dates wrong on her extension. The other client was trying to get an extension before their 70 days restarted on 9/26 due to their young child needing surgery on 9/25 and needs to be in a some sort of shelter. This family is having to self-pay with money they do not have. They have been having to borrow money from family and friends just to make enough to stay at the current hotel they are in.
- We have a father who is single with a daughter who has some issues. Cannot stay in a shelter at the moment due to the daughter's behavior. He is currently self-paying right now but he is running out of money to pay. We are trying to get an extension for him as well.
- We submitted an extension request to AHS to allow an extension of time in the emergency housing program, while a subsidized housing opportunity is under review. The extension approval request required 14 days to process and respond (from 8/28/26 to 9/11/26). The extension was approved after 14 days. The senior with mental health and physical health disorders was forced to leave the program on 9/1/26, as the approval was not received in time. With CVOEO support, he identified temporary housing (room rental) that is costing more than 75% of his limited income. He is on 30-day lease and has no tenure security. This is an obstacle to identifying permanent housing and the insecurity associated with the unnecessary move further destabilized physical and mental health.
- Family of 6 – (3 adults and 3 children). Period from 9/4/26 – 9/21/26 ESD was unable to provide a clear date on which program eligibility would reopen for the household and offered three conflicting dates. The hotline repeatedly provided conflicting information to that being offered to service providers by AHS. Extension request was submitted to connect dates and allow the household to remain sheltered. The request was denied for a reported lack of submitted housing plan and other information – all of which had already been submitted to AHS

by CVOEO. Alternate funding was established to support the family at the hotel while the extension request was being considered – the conflicting eligibility dates caused repeated issues with that alternate funding, threatening shelter stability. The eligibility date finally confirmed by AHS was a Saturday and ESD hotline is only open M-F, AHS was requested to allow a pre-authorization for the Saturday date. *This was approved by state officials but then denied when the household called the hotline,* requiring further intervention. CVOEO staff were forced to intervene repeatedly to ensure the family was not left unsheltered as a result of the confused and flawed decision making by ESD hotline during that time.

- Late/No response on emergency housing extension request: Individual is a double amputee and was forced to leave the ESD program at the 9/1/26 deadline. The individual was unable to get through on the ESD program phone number on 9/1/26 and as a consequence was exited from the hotel, as no extension could be confirmed. The individual is currently eligible for the program following level 4 assessment but remains unsheltered as there are reportedly no ADA accessible rooms available. As a consequence, their fragile physical health is deteriorating, markedly.