



Date: May 7, 2026

To: Senate Health & Welfare Committee members

From: Chad Simmons, Executive Director, Housing & Homelessness Alliance of Vermont (HHA AV)

Good morning Chair Lyons and members of the committee. Thank you for continuing to hear from advocates and the providers who ensure the people experiencing homelessness are cared for and eventually find the homes they deserve.

This is a follow-up to our [April 29 memo](#) containing a longer list of recommendations to improve H.938. What follows are four key areas we are asking to improve before the bill is voted on. With limited time to work on this bill, we ask for your consideration on these four recommendations.

- **Administration of prioritization and eligibility.** As proposed, § 2210 ("Household Responsibilities") and § 2211 ("Prioritization") seem to apply to all types of shelter, including low-barrier shelters. This poses a significant burden on highly stretched shelter providers and seems inefficient. We recommend clarifying what these eligibility and prioritization criteria apply to, who administers them and what shall happen when someone does not meet the thresholds (where do they go?). Eligibility and prioritization should be kept to a minimum or eliminated all together and the annual budget should be used to determine capacity/use of shelter and services. Otherwise, the state is just spending resources on administration, and shelters will be responsible on top of providing services and shelter to people in need.
- **Case Management.** Case management is critical to moving people out of homelessness. We suggest further clarification in § 2213 that case management can happen anywhere and that a lead is based on where the household is sheltered and the household having choice. There is not enough case management capacity based on the proposed budget and AHS cannot require case management if there is not enough budgeted for case management services.
- **Payment Rate Structure.** In section 12, change "shall" to a "may" and clarify that this is a report in collaboration with the Department and providers to explore the feasibility of moving to a payment rate structure. Add "shelter providers" to clarify they are one of the partners in exploring this option. We are concerned this moves us away from best practice to fund shelter capacity towards an outdated model of funding per-bed use and creates a more transactional arrangement between the state and providers.
- **Use of "Levels" in section 4, parts § 2204 thru § 2209.** Remove all mentions of levels and need to move linearly from one shelter type to another. In section 4, § 2204 thru § 2209, remove all references/language that require people to move from one level to another, as this is just not realistic or based on any type of evidence. Leave some openness and flexibility for innovation. Specifically, remove language currently included at the end of each level stating "If an eligible household's needs cannot be met with the (level #)..." and instead replace with "Shelter service type shall be applied based on household need and availability and understood by the most recent data available."