

Senate Health and Welfare Committee

Senator Virginia Lyons, Chair et. al.

RE: H.938

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I am writing to the Senate Health and Welfare Committee with concerns around H.938, *An act relating to establishing the Vermont Homelessness Response Continuum*.

As a homeless services and housing provider with operations in Chittenden County, providing 117 shelter beds (63 for individuals, 54 for families), housing navigation services for all shelter guests, a daytime drop-in center for homeless individuals that served 1845 unique individuals last year, a Family Supportive Housing Program that serves 70 families, and 108 units of permanent affordable housing for those exiting homelessness, we offer the following input and critique of H.938.

1. **Prioritization.** The current bill seeks to enshrine program eligibility into State statute. We believe that this is counterproductive and will tie the State's hands into the future. The needs and acuity of the population experiencing homelessness changes rapidly, and service providers will not be able to remain nimble and to provide solutions accordingly if the eligibility is set in statute. This Prioritization is also directly counter to the intent of the bill. There are many guests in our shelters currently who would not fit these criteria, and who would also be the most likely to benefit from shelter services and become self-sustaining, taxpaying, contributing members of society – the working poor. We should not be turning our backs on a segment of the population experiencing homelessness who have a very high likelihood of succeeding with a small amount of assistance and serving only a select segment as defined by the Prioritization. ***COTS suggests that the prioritization be left to the AHS to determine in coordination with community partners who provide shelter.***
2. **Appeals.** COTS suggests that the Human Services Board be removed from the appeals process for shelter services. The inclusion of the HSB will bog down this process, presenting cases to Human Service Board members who may not have any experience in providing homeless services or in running a shelter program. The health, safety, well-being, and success of participants is directly tied to the

provision of a safe and secure environment for guests and staff. ***COTS suggests that the appeals process be left to the AHS to determine in coordination with community partners who provide shelter. We currently have an appeals process built into our programs.***

3. **Rate Payment Structure.** This is a vague section that speaks only to creation of rate structure by AHS in collaboration with community partners. However, the current grant system is much more predictable and reliable. A rate payment structure promises to become overly bureaucratic without yielding better results. This is tied back to the Prioritization section, in which a service provider could force a guest into the cold because they will not be paid for sheltering them should they not fit eligibility. More likely, it will result in providers being underfunded, and again, force out guests who are most likely to succeed in a shelter system if they are not “disabled enough” to receive services. ***COTS recommends that a stable grant system, based on actual operations costs, be left to the AHS to determine in coordination with community partners who provide shelter.***

4. **Overall Assessment of H.938.** This bill makes many assumptions about human behavior as it seeks to fit people neatly into a progression of services with time limits. People do not necessarily resolve issues in that fashion. This bill is a re-arranging of existing services but threatens to add unnecessary red tape to service providers across the state who are already stretched thin. ***COTS suggests that we remove all language regarding participants moving from one level of service to another.***

Thank you very much for your time working on this bill and considering these adjustments. COTS shares your commitment to making homelessness rare, brief, and non-recurring.



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