



TO: Senate Health and Welfare Committee
FROM: Taylor Thibault, Associate Director of Homelessness Prevention Initiatives and Hotel Operations, Champlain Housing Trust
RE: H.938 – Draft 3.1 Feedback
DATE: May 11, 2026

Thank you for your continued work on H.938 and your efforts to strengthen Vermont’s homelessness response system. I appreciate the opportunity to provide brief operational feedback on Draft 3.1 from the perspective of a shelter provider working directly within Vermont’s emergency housing system.

I would specifically like to raise concern regarding two areas of the proposed legislation.

Program Components – Sec. 2203

I am concerned that the structure outlined within Sec. 2203 “Program Components” establishes a continuum that appears to move households through increasingly structured levels of shelter and intervention. In practice, homelessness response systems are rarely linear. Households experiencing homelessness present with a wide variety of needs, acuity levels, disabilities, and barriers to housing stability, and many households do not fit neatly within a prescribed progression of services or shelter models.

I am additionally concerned with language that appears to elevate or prefer more highly structured shelter settings within the continuum. From an operational standpoint, more service-intensive or highly structured environments are not inherently more appropriate or successful for all households experiencing homelessness. Individuals and families have a wide range of needs, and in many cases lower-barrier or less restrictive settings may be the most appropriate option to support stability and long-term housing outcomes.

Similarly, portions of the bill referencing household responsibilities and participation in services appear inconsistent with the goals and principles of low-barrier shelter and Housing First approaches. While engagement in services should always be encouraged and made accessible, participation requirements may unintentionally create barriers for some of the very households the system is intended to support.

I would also encourage reconsideration of language directing the Office to determine and develop “sufficient” shelter capacity statewide. While aspirational, this standard may unintentionally establish expectations that cannot realistically be achieved without substantial long-term investment and sustained operational funding. Providers across the state are already operating within significant financial and staffing constraints.

Prioritization – Sec. 2211



I also remain concerned about how the prioritization requirements outlined in Sec. 2211 would function operationally for shelter providers. As currently drafted, it remains unclear how providers are expected to implement prioritization practices in real-time shelter operations.

At present, one of the primary shared priorities across many communities is prioritizing individuals and households experiencing unsheltered homelessness. Beyond that, shelter providers are often making highly complex, case-by-case decisions shaped by safety concerns, vulnerability, disability, household composition, and available program capacity.

Without additional operational guidance and flexibility, I worry that the prioritization language may create inconsistency across communities while placing difficult implementation burdens on frontline shelter providers responsible for making immediate intake and placement decisions.

Thank you again for your consideration and for your continued work on this important legislation.