

March 17, 2025

Dear Members of the House Committee on Human Services,

We, the undersigned shelter and service providers from across Vermont, greatly appreciate the work of your committee to help strengthen Vermont's homelessness prevention and response system through H.91. While there are numerous areas within the current draft where we could provide feedback, we write today to lift up two macro-level issues. First, we urge the Committee to ensure that any future homelessness prevention and response system would build upon and strengthen Vermont's existing homelessness prevention and response system created through Vermont's two Continua of Care (CoC). Second, we urge the Committee to recognize and protect the vital role that the Office of Economic Opportunity (OEO) plays within Vermont's homelessness prevention and response system. Particularly at a time when our organizations are having to plan for and react to uncertainty from the federal government, we urge you to ensure that any changes to Vermont's homelessness response system do not create further uncertainty and/or challenges.

Work Within Vermont's Existing Homelessness Prevention and Response System

We urge the Committee to ensure that any future homelessness prevention and response system builds upon and strengthens Vermont's existing homelessness prevention and response system created through Vermont's two CoCs.

First, some background on CoCs.

Vermont has two U.S. Department of Housing and Urban Development (HUD)-recognized CoC programs¹ - the Chittenden County Homeless Alliance (CCHA), which covers Chittenden County, and the Vermont Balance of State CoC (VT BoS CoC), which covers the remaining counties in Vermont. The mission of Vermont's two CoCs is to coordinate the planning and implementation of a housing and service system that meets the needs of families and individuals experiencing homelessness within its geographic area, with the ultimate goal of preventing and ending homelessness. These CoCs have a long history in Vermont, which has brought with it deep knowledge of and trust between partners and the communities they serve.

¹ The Continuum of Care (CoC) program is authorized by the McKinney-Vento Homeless Assistance Act. (See, 42 U.S.C. 11381-11389) The program is designed to:

1. Promote community wide commitment to the goal of ending homelessness;
2. Provide funding for efforts by nonprofit providers, States, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
3. Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
4. Optimize self-sufficiency among individuals and families experiencing homelessness.

Each CoC consists of a partnership of service & resource providers, housing developers, state agencies, and others in the homelessness or low-income service system in a geographic region. Any interested party may join the CoCs and CoCs actively identify gaps in membership and work to fill those gaps. Specifically, the CoCs:

- Monitor and address housing and service gaps through proactive solutions;
- Conduct the annual Point in Time Count of those experiencing homelessness;
- Manage the Coordinated Entry and HMIS systems; and
- Apply for and manage annual funding from HUD related to the work outlined above.

In addition, within the VT BoS CoC, there are 11 Local Housing Coalitions (LHCs), which focus on regional homelessness prevention and intervention efforts. These LHCs meet regularly and coordinate all aspects of the region's homelessness response work in coordination with the VT BoS CoC. Please click [here](#) for more information about the VT BoS CoCs.

In addition to the work that each CoC does as outlined above, through the annual HUD Notice of Funding Opportunity (NOFO) process each CoC has brought millions of federal dollars to Vermont to support Vermont's homelessness response infrastructure. For example, because the work of CCHA and the VT BoS CoC during the most recent NOFO process last fall,² Vermont's homelessness response infrastructure and partners will receive \$7,872,214 during the next grant cycle (December 2025 – November 2026).³ These funds will support both the planning and data-gathering work of the CoCs as well as provide direct funds to CoC members for existing and new homelessness prevention programs.

Vermont's two CoCs also operate Vermont's Coordinated Entry (CE) system. CE, which is mandated by HUD, is a process developed to ensure that all people experiencing homelessness have fair and equal access to housing and services and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs. CE is a streamlined system that provides quick access to individuals and families seeking assistance through a coordinated referral and housing placement process. Households are assessed using a standard and objective tool that identifies their vulnerability and barriers to housing. Those who are assessed as having the highest vulnerability and housing barriers are prioritized for access to available housing programs as vacancies occur.

While Vermont's homelessness prevention and response system established through the CoCs is imperfect, including the CE process, the core problems within the system stem from a lack of sufficient resources. For example, CE is an effective system for quickly identifying, assessing, and connecting people to housing and assistance, but this system faces backlogs when there is insufficient housing and/or services available to meet the need. In addition, the CE intake and

² The NOFO application that each CoC completes is extremely intensive. For example, please see VT BoS CoC's most recent application [here](#) and CCHA's most recent application [here](#).

³ See, US Dept. of Housing and Urban Development, Fiscal Year 2024 Continuum of Care Competition Homeless Assistance Award Report, available at https://www.hud.gov/sites/dfiles/CPD/documents/CoC/CoC-2024-VT_Press.pdf.

assessment process cannot happen as quickly as necessary when organizations lack necessary staff to complete the work. In addition, partner organizations within the CoCs are often funded through one-time funding, which makes long-term planning more difficult as they lack the ability to plan with clarity around available resources and staffing as well as the ability to recruit and retain staff, as positions are too often term-limited, which makes initial recruitment difficult and when initial staff leave before the end of a term for the very logical reason that they were able to secure a permanent position elsewhere, it becomes extremely difficult to hire new staff to fill the even less desirable remaining time. This results in vital roles (e.g. housing navigation or landlord liaisons) sitting unfilled. These problems could be addressed through increased base investment.

We urge your Committee to recognize the invaluable partners, systems, and trust that currently exist within the CoCs and to ensure that H.91 strengthens this system rather than builds a new system that would operate on a separate track,⁴ unnecessarily creating new hurdles and inefficiencies within Vermont's homelessness prevention and response system.

Recognize and Protect the Vital Role that the OEO Plays within Vermont's Homelessness Prevention and Response System

OEO is a core partner within Vermont's homelessness prevention and response system. OEO administers multiple vital homelessness prevention and response-related grant programs, including the Housing Opportunity Grant Program (HOP), which they do in close coordination with the CoCs. This helps to ensure that funds are spent as effectively as possible and prioritized around identified community needs and priorities.

OEO also provides core support for and technical assistance around the work of the CoCs. For example, OEO leads the Coordinated Entry Committee within the VT BoS CoC. In that role OEO plans and supports the implementation of coordinated entry and assessment across the VT BoS CoC, including ongoing evaluation of coordinated entry processes and support for each of the 11 Local Housing Coalition CE lead agencies. OEO also shows up in a meaningful way across the two CoCs, including regularly attending and participating in the work of CCHA and VT BoS CoC, including at the VT BoS CoC Local Housing Coalition meetings across Vermont.

As the shelter and service providers who work every day across our state, we view OEO as a vital part of Vermont's homelessness prevention and response system. We deeply trust and value OEO's work and commitment. We urge the Committee to ensure a continued and robust partnership between OEO and the CoCs.

Thank you for taking the time to listen to our collective concerns. We would be happy to meet anytime to discuss these concerns, the broader legislation, and how we can collectively end homelessness across Vermont.

⁴ The CoC system is mandated by HUD, thus any new state-level system that is unconnected to the CoCs would necessarily operate on a separate track because the CoC system will continue to exist per the HUD mandate.

Sincerely,

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Provider Letter to House Committee on Human Services re: H.91

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