



Date: February 11, 2026

To: Chair Wood & Members of the House Human Services Committee

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

Thank you Chair Wood and members of the committee for inviting HHA AV members to provide feedback on committee bill “26-0766 - An act relating to establishing the Vermont Homeless Response Continuum” Draft 2.1 dated 2/9/2026 – KMM -08:30 AM. HHA AV’s Homelessness Response Action Committee was able to review this draft and offer the following reflections.

We want to start off by saying we are grateful for the work done by members of the committee and legislative council to codify both existing and new approaches to preventing and addressing homelessness in Vermont. This is an important and critical step to saving lives and fulfilling the promise that everyone enjoys the right to housing.

Second, HHA AV members are expressing initial broad support for this draft and appreciate the direction and scope the bill is heading. We understand this is a complex and multi-faceted attempt to simplify and humanize a system that is simply working towards providing shelter and housing for everyone. Thank you.

Below, please find our comments, questions and feedback on each section of the bill. We took the approach of asking: What are the challenges of each provision; what are the opportunities; and what is needed. We hope these comments, questions and feedback are helpful and welcome any questions the committee may have.

Section 1: Findings

- Regarding the question around which data set to use in the findings section that informs the why behind this bill, we suggest using Coordinated Entry (CE) data entered into Vermont’s Homelessness Management Information System (HMIS). Data can be accessed [here](#).

Section 2: Legislative Intent

- HHA AV agrees with the overall intent of the bill and section provisions.
- We have a question about the use of the term “continuum of care” introduced on page 2, line 4 in this section and throughout the bill. Is it the intent of the legislature to be

additive to the existing definition and process of the [HUD-defined Continuum of Care \(CoC\)](#) or, to create a new, Vermont-based system? If the intent is to create a new, Vermont-based system for a statewide homelessness response, we would suggest renaming the system/initiative as to not confuse the long-standing, existing, federally-defined CoC. If the intent of the legislature is to be additive, meaning, improve upon the existing HUD-defined CoC, HHAV recommends specifying this in the intent and definition sections.

- We recommend adding the term “convertible” after the term “specialized shelter and” on page 2, line 6 to show intent to increase the supply of shelters while also preparing for long-term, supportive housing investment by including Convertible Homeless Shelters into the suite of options. (We also recommend adding the term “convertible homelessness shelter” under the definition section).
- We recommend removing the word "inefficient" from #5, line 11 and add at the end "but should not result in people being displaced or left without access to safe shelter."

Section 3: Purpose

- We agree with suggestions to remove the term “accountability” when solely referencing individuals and would suggest removing the words “and accountable” on page 2, lines 18-19 as well as “accountability measures,” on page 3, line 1.
- We suggest adding the word “convertible” before the word “shelters,” on page 3, line 13

Section 4: Creation of the Vermont Homelessness Response Continuum. Definitions

- Per our comments above, if the intent is to create a new Vermont-based homelessness response system and/or codify the existing system in statute, we would suggest using a term other than “continuum” so not to confuse it with existing federally-defined program. Instead, the legislature could name this new system “Vermont Homelessness Response Act” (VHRA)...We can also play with this name over the next few days.
- Generally speaking and per our comments during committee discussion Tuesday and above, we would encourage the committee to align any definitions with existing state and federal definitions, where they exist. Several terms are defined by [HUD as part of the CoC program components](#). Aligning definitions will avoid confusion or conflict when attempting to make funding awards or administering services. We especially think this is important when defining terms such as “Coordinated Entry” or “Disability,” both of which have existing state and federal definitions and inform how people are assessed

and provided access to shelter, supports and services. HHAV advocates for using the most inclusive definitions possible to ensure everyone has access to shelter, supports and services when needed.

- We recommend adding the definition of “convertible homeless shelter.” While we are not aware of an existing definition, practice across the country including use of this model in Vermont informs the use of the following definition: “A convertible homeless shelter is a type transitional housing designed to initially function as a short-term, non-congregate emergency shelter before being converted into permanent supportive housing.” (HHAV has posed this question to members who work in this space and may follow-up with a refined definition).
- We ask that in any reference to “domestic violence” to also add “and sexual violence” to that definition and use of term.
- On page 5, line 4, we are concerned that the term “Eligible household” limits who could access this new state program. For example, the definition, as written, does not appear to include people fleeing domestic or sexual violence. HHAV continues to support that eligibility is determined solely by a person being homeless and not having access to other shelter or housing options.
- HHAV agrees with and appreciates the elegance and simplicity in the establishment of this program, as defined on pages 8 and 9. This aligns with our principles that a full spectrum of shelter and housing types as well as supports and services are necessary to meet the diversity of human needs. We have three questions/points on this part of the bill.
 - We encourage the committee to clarify if this is an additive approach to the existing CoC system or, a new system all together and if the latter, we encourage the use of a different term other than “Continuum of Care.”
 - As written, OEO would be the program administrator. We just want to clarify that OEO would contract with community partners to administer services (Section 6) and that there would be some planning and time allowed to complete this process. Is this correct?
 - We appreciate the specific calling out of components on lines 11-17 on page 8. Is it the intent that component 6 on line 18 allow for some program flexibility (and therefore corresponding appropriations) to meet emerging human needs? If so, we would agree with this approach of both naming specific components, and, allowing the Department some flexibility to support and fund community-driven

programs, supports and services.

- On page 9, we would suggest removing lines 6-7 to avoid confusion. We understand the desire to have a “primary entry point” to this program. We want to ensure that this does not mean *the only way* to access, and to allow people needing prevention and diversion supports and services some flexibility to access in other ways.
- Remove or modify reference to a “diversion assessment” on page 9, line 11. Diversion is assessed using a CE assessment informing which interventions could be taken.
- For the Emergency Housing Services provision starting on page 9, line 18 thru page 10, line 4, we encourage the committee to hear from municipal officials to ensure they both have enough specificity of shelter services allowed as well as flexibility to adequately operate. This may be seen as connected to emergency management activities.
- For the provisions related to Shelter Services starting on line 18 of page 10 and thru line 3 on page 11, this section will most likely need an appropriation tied to the specific requirement to meet code and/or allowed as part of another appropriation line item. We support the two-year period of funding. Thank you.
- Under the Hotels and Motels with Supportive Services provision starting on line 11 of page 11 and through line 9 of page 13, we agree with the direction and specificity of connecting the decreased use of hotel/motel emergency shelter with increasing the shelter and housing capacity in each region. We will note that starting on line 20 of page 11 thru line 2 of page 12, some of this work is already taking place as part of Act 181 of 2024 and we would encourage the legislature to connect any call to increase housing and shelter capacity with existing law and state housing goals.
- On lines 14-15 of page 12, replace “community action agency” with “community partner” to best align with other provisions in this section as well as Section 6.
- We encourage the language under Case Management Services be broadened to align with trauma-informed, person-centered best practice that encourages case management and navigation services to be chosen by the individual or household being served.

Section 5: Merger of Continuums of Care

- HHAV welcomes the opportunity to explore merging of the CoCs and agrees with the intent to promote the effective use of resources. As a reminder, the CoC Program is a HUD-defined and federally overseen program and would require approval from our federal partners. HHAV has some initial thoughts on opportunities, challenges and what might be needed to successfully move ahead

with a merger process. We may come back to the committee with further questions and suggestions but our initial thoughts are:

- We agree with the entities named on page 14, lines 11-14. Other entities, members of the two CoCs and technical assistance agencies may be needed to fully inform the process.
- We agree that one benefit of a merged CoC would be better aligned response to preventing and addressing homelessness and more efficient use of state and federal resources.
- Merging the two CoCs would require merging and creating new governance, data management, training and technical assistance, and award allocation systems, among others. This may require resources to fulfill the intent, and those resources may not be available through federal funding streams. If it is the desire of the legislature to merge the two CoCs, state support may be required.
- One unintended consequence may be a potential net negative in overall federal funding coming to Vermont.

Section 6: Grant Requirements

- We understand the intent of this program and this section is that all community partners participating would enter into an agreement with AHS and utilize the Coordinated Entry assessment. We agree with this approach, and, want to highlight that the CE assessment is specific to aligning household need with appropriate housing types. Further assessment may be required to identify services and supports needed.

Section 9: Payment Rate Structure; Shelter Services

- Thank you for including this section
- We suggest adding language to have the rate developed in collaboration between OEO and shelter providers. The base rate should include the full operating costs of shelters and factor in regional costs differences and the menu of services offered. It should also consider if the rate is negotiated every two years to build-in/consider planned increases in the second year.

Section 10: Appropriations

- It is our understanding that this bill proposes a new state program and/or codifies existing program investments into state statute. It is unclear to us how to align



current FY26 budget line items with this new construct. HHAV's priority is to ensure the entire system (AKA, as proposed, the "Vermont Homelessness Response Continuum") is adequately funded to ensure the needs of all people at risk of or currently experiencing homelessness are met.

- To that end, HHAV advocates for the total amount to align with what our collaborative [FY27 appropriation proposal \(starting on page 7\)](#) under HOP, GA Emergency Hotel/Motel and Convertible Homelessness Shelter expansion investments. This will allow for a transition period to move away from hotel/motel use, while still ensuring everyone who needs shelter can access that shelter by expanding shelter capacity, with an eye towards creating permanent supportive housing. It also maintains adequate funding for services and supports needed to prevent and respond to homelessness.
- HHAV asks the committee to fully consider our budget proposal.
- Per comments above related to the proposal to merge the CoCs, we recommend creating a specific appropriation amount for these efforts. We can get back to the committee and work with named partners to identify a specific amount that may be needed.

Section 11: Effective Dates

- What happens to existing programs, services and investments made to Vermont's current homelessness response system if not explicitly defined or codified in this bill before July 1, 2026? HHAV members have questions about the impact on programs, services and supports that are currently being done to prevent homelessness from occurring and supporting those currently experiencing homelessness if not explicitly named in this bill. Please refer to our question from