



# HOUSING FIRST VERMONT

## Evidence-Based Solutions to Homelessness

### 2024 Policy Recommendations

*Housing First Vermont is a coalition of organizations and individuals, including Vermonters with lived experiences of homelessness, working to advance evidence-based policies and best practices to solve homelessness. Signing organizations and individuals are as follows: Disability Rights Vermont, End Homelessness Vermont, Pathways Vermont, ACLU of Vermont, Vermont Center for Independent Living, Vermont Legal Aid, Michael Ruggles, Brenda Siegel, and Anne Sosin.*

#### Introduction

Vermont reported the second highest per capita rate of homelessness in the US in 2023 for the second year.<sup>1,2</sup> Children, Vermonters with disabilities and severe medical conditions, veterans, youth exiting foster care and elder Vermonters are some of the many faces of this crisis. Vermonters do not have to accept this. A large body of research shows us that homelessness is a housing problem and that proven strategies can solve it.<sup>3,4</sup> Housing First Vermont is an alliance of organizations and individuals, including Vermonters with lived experience of homelessness, to advance evidence-based policies and best practices to solve homelessness in Vermont. The Housing First 2024 Policy Platform proposes proven solutions to address Vermont's crisis of homelessness and describes the large body of research and experience in support of these recommendations.

#### Recommendations

**Establish a system-wide orientation to housing first using the following strategies:**

- 1. Set Statewide Targets to Accelerate Progress on Homelessness** Vermont leaders must adopt a common framework accompanied by ambitious and measurable targets to accelerate progress on Vermont's growing crisis of homelessness. Vermont leaders should set targets for rehousing Vermonters and creating new non-congregate shelter beds. To achieve these goals, Vermont policymakers should require that at least 30% of all new units funded with state investments be dedicated to Vermonters exiting homelessness. Regular reporting and monitoring on progress towards these targets is essential.
- 2. Build Statewide Infrastructure for Housing First Evidence-Based Practice of Permanent Supportive Housing** A \$5 million investment to Pathways Vermont would allow for the

<sup>1</sup> The 2022 Annual Homelessness Assessment Report (AHAR) to Congress, Department of Housing and Urban Development (HUD), 2022. <https://www.huduser.gov/portal/sites/default/files/pdf/2022-AHAR-Part-1.pdf>.

<sup>2</sup> The 2023 Annual Homelessness Assessment Report (AHAR) to Congress, Department of Housing and Urban Development (HUD), 2023. <https://www.huduser.gov/portal/sites/default/files/pdf/2023-AHAR-Part-1.pdf>

<sup>3</sup> Colburn, Gregg, and Clayton Page Aldern. Homelessness Is a Housing Problem: How Structural Factors Explain U.S. Patterns. Oakland, California: University of California Press, 2022.

<sup>4</sup> National Alliance to End Homelessness, The Evidence on Housing First, <https://endhomelessness.org/resource/data-visualization-the-evidence-on-housing-first/>

evidence-based practice of Housing First Permanent Supportive Housing to be available in every community in Vermont. Pathways began as an affiliate of Pathways to Housing New York, the national organization that designed Housing First. Pathways has been evaluated several times for fidelity to the evidence-based Housing First model and has both the organizational infrastructure and technical expertise to deliver evidence-based services and advise statewide Housing First initiatives.

3. **Adopt a Housing First Orientation for State Investments, Programs, and Practices in Line with HUD Guidance.** Require Vermont state housing and service investments to follow evidence-based Housing First practices and adhere to the Americans with Disabilities Act (ADA). Set funding rubrics to direct funding to the agencies and actors who most successfully adopt Housing First principles.<sup>5</sup> Align all appropriations with the Housing First approach using federal HUD Housing First Assessment Criteria.
4. **Invest in non-congregate interim housing units as a shuttle to permanent housing opportunities using a Housing First approach.** Housing is the permanent solution to homelessness; however, existing data shows that Vermont needs significantly greater interim housing or shelter capacity to prevent unsheltered homelessness. Many studies on the use of hotels in many states during the pandemic have added to evidence that non-congregate shelter, or housing people in private, decent rooms, is superior to congregate shelter and unsheltered homelessness.<sup>6,7,8,9,10</sup> The state should set the goal of increasing its capacity of non-congregate shelter as a shuttle, or direct link without time limits, to permanent housing.
5. **Reform General Assistance Emergency Housing program in line with Housing First principles, evidence-based practices, and the Americans with Disabilities Act definition of disability.** The current General Assistance Emergency Housing program offers the vast majority of interim housing in Vermont; however, both the design and implementation of the program fail to follow Housing First principles. Reforms to the program should reflect best practices on interim housing, including the use of evidence-based Housing First

---

<sup>5</sup> National Alliance to End Homelessness, Housing First Assessment Pressure Points,

[https://endhomelessness.org/wp-content/uploads/2022/02/DesignFile\\_Housing-Questionnaire\\_May2022-edited.pdf](https://endhomelessness.org/wp-content/uploads/2022/02/DesignFile_Housing-Questionnaire_May2022-edited.pdf)

<sup>6</sup> Fleming, Mark D., Jennifer L. Evans, Dave Graham-Squire, Caroline Cawley, Hemal K. Kanzaria, Margot B. Kushel, and Maria C. Raven. "Association of Shelter-in-Place Hotels With Health Services Use Among People Experiencing Homelessness During the COVID-19 Pandemic." *JAMA Network Open* 5, no. 7 (July 27, 2022): e2223891.

<https://doi.org/10.1001/jamanetworkopen.2022.23891>.

<sup>7</sup> Robinson, Leah, Penelope Schlesinger, and Danya E. Keene. "'You Have a Place to Rest Your Head in Peace': Use of Hotels for Adults Experiencing Homelessness During the COVID-19 Pandemic." *Housing Policy Debate* 32, no. 6 (November 2, 2022): 837–52. <https://doi.org/10.1080/10511482.2022.2113816>.

<sup>8</sup> Colburn, Gregg, Rachel Fyall, Christina McHugh, Pear Moraras, Victoria Ewing, Samantha Thompson, Taquesha Dean, and Sarah Argodale. "Hotels as Noncongregate Emergency Shelters: An Analysis of Investments in Hotels as Emergency Shelter in King County, Washington During the COVID-19 Pandemic." *Housing Policy Debate* 32, no. 6 (November 2, 2022): 853–75. <https://doi.org/10.1080/10511482.2022.2075027>.

<sup>9</sup> <https://ps.psychiatryonline.org/doi/10.1176/appi.ps.202100170>

<sup>10</sup> Padgett, Deborah K., Lynden Bond, and Christina Wusinich. "From the Streets to a Hotel: A Qualitative Study of the Experiences of Homeless Persons in the Pandemic Era." *Journal of Social Distress and Homelessness*, January 9, 2022, 1–7. <https://doi.org/10.1080/10530789.2021.2021362>.

principles, emerging best practices on interim housing, and trauma-informed practices.<sup>11</sup> Policymakers should employ the ADA and Vermont definition of disability for program eligibility rules and implementation. Policy reforms must be accompanied by enhanced oversight of motels to protect the rights of guests.

- 6. Address rights and needs of Vermonters with disabilities experiencing homelessness and housing insecurity.** Vermonters with disabilities are significantly overrepresented among people experiencing homelessness and face many barriers to accessing and maintaining housing. As an immediate priority, Vermont policymakers must ensure all homelessness policies, implementation, and investments use the Americans with Disabilities Act (ADA) definition of disability. The ADA requires that people with disabilities have equal access to public services like emergency housing, and receive reasonable accommodations needed to access those services. The ADA also has an integration mandate. The integration mandate means that people with disabilities can't be forced to live in institutions like hospitals and nursing homes if they could live in the community, don't object to living in the community and getting services and supports there, and living in the community can be reasonably accommodated.<sup>12,13,14</sup> Vermont should continue to improve access to housing for people with disabilities and should also grant people with disabilities equal access to emergency and permanent housing. Expanding the supply of geographically and physically accessible housing should be a priority for all housing investments.
- 7. Adopt Eviction Prevention Policies in Line with Housing First** Evictions are skyrocketing in Vermont amid soaring rental costs, growing economic distress, and the end of pandemic safety net programs. People with disabilities, including psychiatric disability and substance use disorder, are often evicted for reasons related to their disability. Some people with disabilities can and should be reasonably accommodated to keep their subsidized housing. If no reasonable accommodation is possible, tenants should have access to support to move to a more appropriate and supportive living option – not evicted into homelessness. Aggressive enforcement of fair housing laws should be coupled with eviction prevention initiatives grounded in Housing First principles to reduce the rate of evictions out of subsidized housing into homelessness. Rates of eviction and subsidy termination for all recipients of federal and state funding should be regularly tracked and reported.

---

<sup>11</sup> Reimagining Interim Housing: Stages and Action Areas for Transforming Approaches to Sheltering People Experiencing Homelessness, December 2022. [https://endhomelessness.org/wp-content/uploads/2022/12/DOC\\_ReimaginingInterimHousing\\_StagesActionAreas\\_FINAL.pdf](https://endhomelessness.org/wp-content/uploads/2022/12/DOC_ReimaginingInterimHousing_StagesActionAreas_FINAL.pdf)

<sup>12</sup> See generally *Olmstead v. L.C. ex rel. Zimring*, 527 U.S. 581, 584, 119 S. Ct. 2176, 2179, 144 L. Ed. 2d 540 (1999) (finding states are required to provide community-based services for people with disabilities who would otherwise be entitled to institutional services when: (a) such placement is appropriate; (b) the affected person does not oppose such treatment; and (c) the placement can be reasonably accommodated, taking into account the resources available to the state and the needs of other individuals with disabilities, and also noting "Nor is it the ADA's mission to drive States to move institutionalized patients into an inappropriate setting, such as a homeless shelter . . .").

<sup>13</sup> Disability Rights Vermont, "Wrongly Confined," March 2020, <https://disabilityrightsvt.org/wp-content/uploads/2020/06/DRV-T-Olmstead-Report.pdf>

<sup>14</sup> US Interagency Council on Homelessness (USICH), Fulfilling the Dream: Aligning State Efforts to Implement Olmstead and End Chronic Homelessness, February 2016. [https://www.usich.gov/sites/default/files/document/Olmstead\\_Fulfilling\\_the\\_Dream.pdf](https://www.usich.gov/sites/default/files/document/Olmstead_Fulfilling_the_Dream.pdf)

- 8. Reject Harmful Policies Not Grounded in Evidence** Vermont policymakers should reject harmful practices that are not supported by evidence, including encampment sweeps, asylums, forced institutionalization and treatment, treatment-first housing programs, required services, congregate shelter, block grants to motel owners, and reliance on private contractors without expertise.

## What is Housing First?

Housing First provides immediate and unconditional access to permanent housing and support services for individuals and families who are experiencing homelessness. Housing First is both a practical and philosophical systems orientation that views housing as foundational to achieving other goals. HUD includes the following core components of Housing First:<sup>15</sup>

- **Immediate access to housing with no housing readiness requirements:** People experiencing homelessness do not need to demonstrate sobriety, completion of alcohol or substance use disorder treatment, or success in transitional housing to enter permanent housing.
- **Low barrier admission policies** Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- **Choice, determination, and dignity** Individuals have choice and self-determination in housing placement and services.
- **Supportive services are voluntary and designed to support housing stability.** Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- **Tenants have full rights, responsibilities, and legal protections.**
- **Practices and policies to prevent lease violations and evictions** Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy.
- **Disability** People with disabilities are offered clear opportunities to request reasonable accommodations and reasonable modifications within applications and screening processes and during tenancy, and building and apartment units include accessible and adaptable physical features that accommodate disabilities.

## What Does the Evidence Show?

### *Housing First Works*

Housing First principles should be used systemically and for all populations experiencing homelessness recognizing that not all those without housing also live with mental health or substance use challenges. Permanent Supportive Housing or ACT teams utilize a specific Housing First service model for those who do have these struggles. Decades of research have shown that

---

<sup>15</sup> HUD, Housing First Assessment Tool, <https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/>; accessed November 15, 2023.

the vast majority of people experiencing homelessness, including those with significant encounters with the criminal justice system, psychiatric disability and substance use disorder can be successfully housed using this Housing First approach.<sup>16,17,18,19</sup> Housing First is also significantly more effective than the conventional housing models in practice in Vermont.<sup>20</sup> Studies have also shown that permanent supportive housing Housing First costs less than criminalizing homelessness<sup>21,22</sup>

Housing First through Pathways has a record of success in Vermont. Vermont's Pathways data showed that Housing First cost less than psychiatric hospitals, emergency rooms, motels, and correctional facilities.<sup>23,24</sup>

### **What the Law Requires**

In 1990, Congress passed the Americans with Disabilities Act “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” In 1999, in the Olmstead decision, the U.S. Supreme Court held that the ADA prohibits the unjustified segregation of individuals with disabilities.<sup>25</sup> Taken together, the Olmstead decision and the ADA obligates Vermont to ensure that people with disabilities who are eligible for state services are able to receive them in the most integrated setting appropriate to their needs. In other words, the fact that people with disabilities are living in institutions because there are insufficient

---

<sup>16</sup> Raven, Maria C., Matthew J. Niedzwiecki, and Margot Kushel. “A Randomized Trial of Permanent Supportive Housing for Chronically Homeless Persons with High Use of Publicly Funded Services.” *Health Services Research* 55, no. S2 (October 2020): 797–806. <https://doi.org/10.1111/1475-6773.13553>.

<sup>17</sup> Jacob, Verughese, Sajal K. Chattopadhyay, Sharon Attipoe-Dorcoo, Yinan Peng, Robert A. Hahn, Ramona Finnie, Jamaica Cobb, Alison E. Cuellar, Karen M. Emmons, and Patrick L. Remington. “Permanent Supportive Housing With Housing First: Findings From a Community Guide Systematic Economic Review.” *American Journal of Preventive Medicine* 62, no. 3 (March 2022): e188–201. <https://doi.org/10.1016/j.amepre.2021.08.009>.

<sup>18</sup> Stergiopoulos, Vicky, Cilia Mejia-Lancheros, Rosane Nisenbaum, Ri Wang, James Lachaud, Patricia O'Campo, and Stephen W Hwang. “Long-Term Effects of Rent Supplements and Mental Health Support Services on Housing and Health Outcomes of Homeless Adults with Mental Illness: Extension Study of the At Home/Chez Soi Randomised Controlled Trial.” *The Lancet Psychiatry* 6, no. 11 (November 2019): 915–25. [https://doi.org/10.1016/S2215-0366\(19\)30371-2](https://doi.org/10.1016/S2215-0366(19)30371-2).

<sup>19</sup> Cunningham, Mary, Breaking the Homelessness-Jail Cycle with Housing First: Results from the Denver Supportive Housing Social Impact Bond Initiative. Urban Institute, July 2021. <https://www.urban.org/research/publication/breaking-homelessness-jail-cycle-housing-first-results-denver-supportive-housing-social-impact-bond-initiative>

<sup>20</sup> National Alliance to End Homelessness, The Data on Housing First, <https://endhomelessness.org/resource/data-visualization-the-evidence-on-housing-first/>

<sup>21</sup> Cunningham, Mary, Breaking the Homelessness-Jail Cycle with Housing First: Results from the Denver Supportive Housing Social Impact Bond Initiative. Urban Institute, July 2021.

<sup>22</sup> Urban Institute, Homeless Encampment Sweeps May Be Draining Your City's Budget, January 2023, [https://housingmatters.urban.org/feature/homeless-encampment-sweeps-may-be-draining-your-citys-budget?utm\\_medium=twitter&utm\\_source=hm\\_social](https://housingmatters.urban.org/feature/homeless-encampment-sweeps-may-be-draining-your-citys-budget?utm_medium=twitter&utm_source=hm_social)

<sup>23</sup> Pathways Vermont, Housing First Information Sheet, 2023. Provided by Pathways Vermont.

<sup>24</sup> Department of Corrections, Presentation to the Vermont Legislature, January 18, 2023 <https://legislature.vermont.gov/Documents/2024/WorkGroups/Senate%20Judiciary/Court%20Backlog/W~Nicholas%20Deml~DOC%20Costs%20of%20Court%20Backlog~1-18-2023.pdf>

<sup>25</sup> USICH, 2016.

services for them in the community violates the ADA.<sup>26</sup> Vermont's emergency housing program needs to be aligned with the ADA and Olmstead.

---

<sup>26</sup> Disability Rights Vermont, 2020.