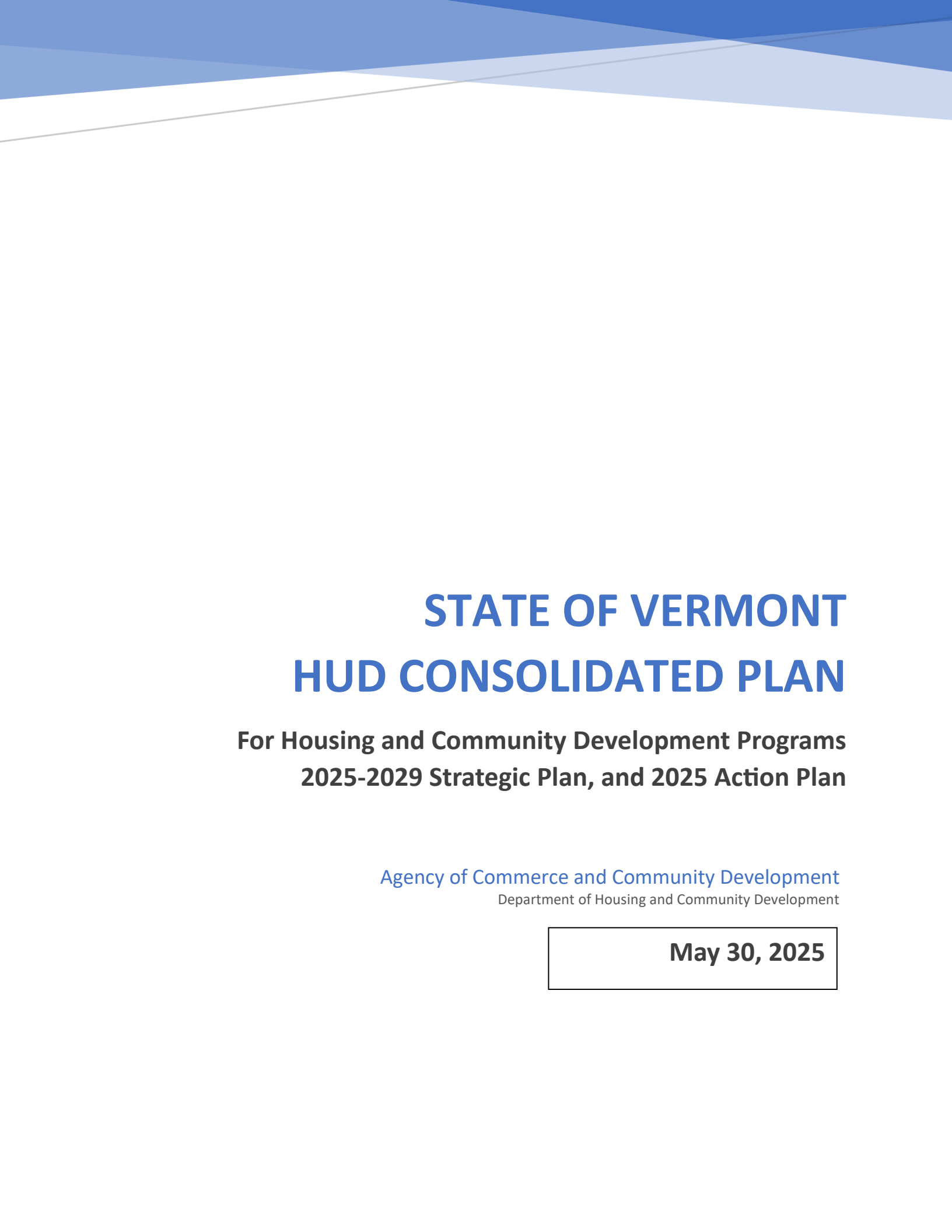




STATE OF VERMONT HUD CONSOLIDATED PLAN

**For Housing and Community Development Programs
2025-2029 Strategic Plan, and 2025 Action Plan**

Agency of Commerce and Community Development
Department of Housing and Community Development

May 30, 2025

2025-2029 Consolidated Plan

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Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The State of Vermont's 2025-2029 Consolidated Plan guides the use of funding received through several programs administered under the U.S. Department of Housing and Urban Development. These include the Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant Program (ESG) and Housing Trust Fund (HTF). The CDBG is administered by the Vermont Community Development Program (VCDP) in the Department of Housing and Community Development (DHCD) of the Agency of Commerce and Community Development (ACCD). The Vermont Housing and Conservation Board (VHCB) administers HOME and HTF. The ESG is administered by the Office of Economic Opportunity (OEO) of the Department for Children and Families of the Agency of Human Services.

This plan identifies the State's housing and community development priorities based on extensive needs assessment, market analysis, and citizen and stakeholder input. It establishes goals for meeting these priority needs over the next five years that reflect anticipated resources and past performance. Each goal is accompanied by an estimate of resources that will be used to meet it as well as outcome indicators that will be used to evaluate the State's performance.

As it has for many years, the State will use CDBG, HOME, HTF and ESG to provide decent, affordable housing, suitable living environments and expand economic opportunities for low and moderate-income Vermonters. It will do so according to three guiding principles. The first is achieving the perpetual affordability of housing resources and investments. The second principle is promoting development in State designated downtowns, village centers, neighborhood development areas and other areas that are consistent with the state's historic settlement pattern and "Smart Growth" – including designated 'new town centers' and 'growth centers'. The third principle is to link our homeless assistance activities with permanent housing through systems, practices and initiatives that are informed by data and proven approaches. Under all circumstances, the State is committed, and obligated, to ensuring that any project funded, and those entities responsible for administering such funds must work towards overcoming illegal housing discrimination and broadening housing options for all people.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The plan establishes four goals to address the identified housing and community development priorities.

1. Increase the supply and quality of affordable housing.
2. Decrease the number of people experiencing homelessness.
3. Strengthen communities and improve the quality of life of Vermonters.
4. Create and retain jobs.

Strategies for meeting these goals and the desired outcomes are detailed in the Strategic Plan section. The State will use CDBG, HOME, HTF and ESG funds for housing, homelessness, job and community strengthening activities. Outcomes over the next five years will include:

Housing: 700 rental units being constructed or rehabilitated, 510 homeowner units being developed and rehabilitated and 50 housing units for the homeless added.

Homelessness: 200 households assisted with rental and rapid rehousing assistance and 15,000 nights of shelter provided.

Communities: 21,450 persons served by improved public facilities or infrastructure, 1,750 persons/households assisted by public services, 5 acres of brownfields being remediated and 2 blighted buildings being demolished.

Jobs: 30 jobs being created or retained and 2 businesses being assisted.

3. Evaluation of past performance

The following is the actual data reported in Vermont's Consolidated Annual Performance Evaluation Report (CAPER) for FY20-FY23 for CDBG, HOME, ESG and HTF for housing units assisted, jobs created/retained, homeless individuals/households assisted, and individuals/households served through public facility and public service projects.

The State is on target to meet the 1210 "housing units assisted" originally projected in the FY2020-2024 Consolidated Plan for CDBG, HOME and HTF funds. As of the Vermont 2024 CAPER report for FY23 (July 1, 2023 -June 30, 2024) 91% of the units anticipated have been completed and with the FY24 units being assisted will continue to increase that percentage. The State will continue with the target of 1210 "housing units assisted" for this consolidated plan. Due to the states' mandate for housing developers to dedicate 15% of the units in their portfolio to serve the homeless, the current consolidated plans projection of 25 housing units assisted to be available for the homeless has been exceeded. 78 of the 1104 "housing units assisted" were available for the homeless. The state will increase the proposed number of housing units assisted for the homeless to 50 units.

CDBG is currently at 77% of its target goal of 150 jobs created/retained originally projected in its FY2020-2024 Consolidated Plan and anticipates meeting the goal with FY24 jobs created/retained completed. CDBG plans to reduce the number of jobs projected to 30 jobs created/retained for this Consolidated Plan due to the lack of economic development projects over the past four years. This change reflects an understanding of the number of jobs currently anticipated to be created/retained in the pipeline for economic development.

CDBG is currently only at 38% of the number of individuals assisted for public facility projects projected in its FY2020-2024 Consolidated Plan but anticipates meeting the goal with FY24 projects completed. In the previous plan there were 3 blighted buildings demolished, and 1 brownfield remediated. CDBG plans to continue with the current number of persons served, blighted buildings and brownfields remediated projected for public facilities for this consolidated plan.

CDBG exceeded the number of individuals and households served for “public service” in the previous plan due to one public service project that served the whole state. The State does not anticipate maintaining the levels reached over the past 4 years as indicated in the above chart for public service. CDBG plans to continue with the same projections from the previous consolidated plan for this consolidated plan.

ESG exceeded the number of homeless Rental Assistance/Rapid Rehousing households served and is on target for meeting the Homeless Overnight Shelter stays with FY24 data originally projected. In previous years, OEO contributed significant state funds to rapid re-housing activities through large increases to client-based financial assistance and a one-time statewide rapid re-housing project, which could be used for ESG match. As one-time funding sources have ended and the priorities of the state have shifted to ensure there is adequate funds available for emergency shelter activities, OEO anticipates being able to contribute fewer state dollars to rental assistance in the coming year. As a result, OEO will plan to serve 200 households with rental assistance/rapid rehousing through ESG match funds and provide 15,000 nights of emergency shelter for this consolidated plan.

Year	Housing Units Assisted	Jobs Created or Retained	Homeless Rental Assistance	Homeless Overnight	Public Facility Projects Individuals Assisted	Public Service Projects Individuals Assisted	Public Service Housing households	Community Planning Projects Awarded
2020	356	1	705	2195	2677	0	1488	9
2021	262	14	836	2594	341	202	621	6
2022	188	96	638	3180	60	117388	334	5
2023	298	5	712	3200	5165	75	889	4
Totals	1104	116	2891	11,169	8243	117,665	3332	24

4. Summary of citizen participation process and consultation process

In developing this Plan, the Agency of Commerce and Community Development (ACCD) Department of Housing and Community Development (DHCD), the Vermont Housing and Conservation Board (VHCB), and the Office of Economic Opportunity (OEO) followed the State's Citizen Participation Plan and consulted with a broad range of local, regional and State organizations, including units of local government, both Continua of Care and the Citizen Advisory Group. In addition, they conducted five community outreach meetings, two formal public hearings, and an online survey to gather input on the needs of residents and communities in the areas of housing, economic development, public facilities, and services. Input provided during the outreach meetings is summarized in the Citizen Participation and Consultation sections and greatly informed the draft plan published for public comment.

5. Summary of public comments

The Department received more robust public comments on the 2025-2029 draft Consolidated Plan than for past plans. This is likely due to increased outreach and solicitation for comments as well as growing awareness of the importance of the sources covered by this plan to fund proposed projects. In an era of shrinking resources and rising costs, the programs articulated here are increasingly oversubscribed and simultaneously essential for completing the array of funding necessary to address the goals outlined below.

Written comments were received from Vermont Legal Aid and Homes for Norwich. 37 additional comments were received through public engagement meetings and formal hearings. In addition, DHCD widely publicized an online survey from December 11, 2024, through May 2, 2025, and received 248 responses.

Overall, comments ranged from suggestions for very specific changes in the narratives to broad support of overall goals and the necessity to continue the important work supported by the programs discussed in this Plan. Most comments were accepted and integrated into the plan in some form, resulting in increased specificity, clarity, and strength of the Plan.

Addressing homelessness through rapid rehousing, support services, and creating more affordable housing units were considered the highest priorities for federal funds by most of the stakeholders. DHCD agreed and is increasing its focus on reducing and eliminating homelessness, including changing "addressing homelessness" to the number two priority in evaluating applications for CDBG funding.

Developing new infrastructure like water and sewer systems that support new unit creation was also a high priority. Additionally, there was broad support for more housing with supportive services for individuals experiencing homelessness, disabled individuals, and older Vermonters.

Other comments were acknowledged and a response given for how they were considered and why changes were not made to the plan, as detailed below.

6. Summary of comments or views not accepted and the reasons for not accepting them

Comments were submitted by Vermont Legal Aid regarding evictions by nonprofit housing providers. They would prefer the state to focus on reducing or eliminating evictions by nonprofit organizations. The State has made it a priority to fund eviction prevention programs with State dollars, and focus federal dollars on wider housing initiatives, and more broadly assist individuals in need. In addition, all housing providers, including nonprofits, are required to follow state and federal laws regarding eviction procedures and applicable relocation of residents.

Homes for Norwich, a community advocacy group, also provided detailed feedback. They asked the state to prioritize new housing and infrastructure in areas with substantial job opportunities. Their goals were to increase opportunities for low-income Vermonters and reduce the carbon emissions caused by longer commutes to work. Applications for projects with new housing developments in downtown districts and near public transportation and other services are currently prioritized by DHCD when making recommendations to the Community Development Board. The State as a whole strives to focus development in strategic areas that provide ready access to businesses, schools, services, and other vital services.

There were several participants who disagreed with the state's proposal to increase the set aside for the Single-Scattered Site program from 35% to 45%. They felt that investments in multi-family developments would have a bigger impact overall than making repairs to single-family homes. The State of Vermont is investing in multi-family housing through other programs. The majority of CDBG program funds remain available for multifamily housing projects. However, the administration is prioritizing the use of federal funds for preserving existing single-family homes, as the cost of preserving an existing home and keeping a family housed is far less than the price of creating new housing in the current market. DHCD will continue to closely review and monitor the Scattered Site Program to ensure that the homeownership centers that administer the program on the ground have capacity for the additional funds and that they are used appropriately.

7. Summary

The growing need and shrinking availability of resources to support housing and community development has lead to an increased interest in the Consolidated Plan from stakeholders. Many of these comments voiced support for the proposed program priorities and an understanding of the fundamental needs that need to be addressed with these limited funds. Other comments provided constructive suggestions for alterations to the Plan that led to increased clarity and specificity.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	VERMONT	Vermont Community Development Program, DHCD/ACCD
HOME Administrator	VERMONT	Vermont Housing and Conservation Board
ESG Administrator	VERMONT	Office of Economic Opportunity, DCF/AHS
HTF Administrator	VERMONT	Vermont Housing and Conservation Board

Table 1 – Responsible Agencies

Narrative

The Department of Housing and Community Development (DHCD), within the Agency of Commerce and Community Development (ACCD), is designated as the agency responsible for developing the Consolidated Plan and administering the Community Development Block Grant (CDBG) Program. The mission of the department is to improve the lives of Vermonters and further the sustainable development of Vermont communities.

By State statute, the Vermont Housing and Conservation Board (VHCB) has been designated as the agency responsible for administering HOME Investment Partnerships Program (HOME) and the Housing Trust Fund (HTF) programs. Therefore, the State's HOME program will be administered by VHCB pursuant to a contract with the DHCD. Additionally, HTF is to be administered by VHCB in accordance with the "Vermont HTF Allocation Plan".

The Office of Economic Opportunity (OEO), as part of Agency of Human Services (AHS), administers the Emergency Solutions Grant (ESG) program. The mission of AHS is to improve the conditions and well-being of people in Vermont. The highest priority for AHS housing efforts is to end homelessness in Vermont. The AHS Office of Economic Opportunity works in partnership with the private sector, community-based organizations, and others to increase the self-sufficiency of Vermonters, strengthen Vermont communities, and eliminate the causes and symptoms of poverty.

Stable, safe, affordable housing is critical to the health and well-being of all Vermonters. Homelessness is a complex issue that is about poverty as well as chronic health challenges that impact a significant portion of Vermonters served by the Agency. Put simply, AHS cannot achieve its mission when people are experiencing the trauma and instability of homelessness.

As such, the goal of all AHS housing-related investments is to prevent and end homelessness in Vermont.

The Agency, and its many state and local partners, support a continuum of housing and housing-related support services.

Above all, AHS prioritizes permanent housing that is 1) affordable to those making less than 30% of Area Median Income (AMI) and 2) that accommodates the needs of AHS clients struggling with any number of challenges like poverty, family instability, and disabling medical conditions including substance use and mental health issues.

Consolidated Plan Public Contact Information

Ann Karlene Kroll, Director of Grants Management

OR

Shaun Gilpin, Director of Housing Division

Vermont DHCD

1 National Life Drive, Davis Building, 6th Floor

Montpelier VT 05620

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)

1. Introduction

In developing the State's 2025-2029 Consolidated Plan, DHCD consulted with a multitude of organizations, including municipal governments, representatives on the “ConPlan Advisory Board”, and many local and regional organizations and stakeholders in housing and homeless service programs. In preparing its plan DHCD, through the Advisory Board and other partner organizations, distributes information about the consolidated planning process and seeks to engage involvement from a wide constituency of people, including participation from low and moderate-income people, people living in slum and blighted areas and in areas where CDBG, HOME, HTF and ESG funds are used. In addition, DHCD created an online survey to gather input. A link to the survey was distributed through several stakeholder newsletters encouraging participation from stakeholder groups and to forward to the general population.

The public comment period ended May 2, 2025. A summary of survey responses can be found on the Departments website on the Consolidated Plan Citizen Participation page <https://accd.vermont.gov/housing/plans-data-rules/hud/how>.

To consult specifically on ESG, the Office of Economic Opportunity (OEO) reaches out to the Continuums of Care (CoC), nonprofit homeless shelter and service providers, as well as other State agency and nonprofit partners where homeless policy and service populations overlap.

Provide a concise summary of the state’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

In the last several years, affordable housing providers and representatives of health, mental health, environmental, labor, and service agencies have substantially strengthened their networking and coordination activities. The State, through DHCD and OEO, has led, actively encouraged and participated in these efforts, and will continue to do so. In addition to participating in the two Continua of Care groups, DHCD also coordinated with the Department of Health on Vermont’s “Health in All Policies” initiatives that are aimed at ensuring a health-centric policy lens is used to assess all State policies and address gaps in the system to maintain and enhance the health outcomes for all Vermont residents.

Similarly, DHCD coordinates economic development activities with the Department of Economic Development (also of ACCD), regional development corporations, local and state chambers of commerce and other State agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The State of Vermont has two Continua of Care, Chittenden County and “Balance of State”. The OEO and DHCD both participate in regular meetings of these groups through the Chittenden County Homelessness Alliance and the Balance of State Continuum of Care are each a coalition of homeless service providers, mental health care providers, Veterans Affairs, service providers addressing the needs of homeless and runaway youth, and other organizations with missions to address the needs of those who are experiencing homelessness or precariously housed. These groups meet monthly to discuss ongoing efforts and needs and coordinate resources and advocacy efforts.

Staff from DHCD and OEO also participate in meetings of the gubernatorially created Council on Housing and Homelessness, which is co-hosted and co-chaired by the Agency of Human Services, OEO’s parent Agency, and the Agency of Commerce and Community Development, DHCD’s parent Agency. Quarterly meetings of the Council bring together a broad swath of service providers, housing developers, housing funders, persons with lived experience, the League of Cities and Towns, a regional planning commission, and representatives from the Continuums of Care to make recommendations on how to increase the supply of housing and prevent Vermonter’s from entering homelessness.

The Vermont Council on Housing and Homelessness’ mission is to reduce the rate of homelessness in Vermont through prevention, services, and availability of affordable housing and increase housing in Vermont to reduce homelessness and increase workforce. The Council develops, monitors, and reports on its annual Tactical Action Plan. This council includes leadership from the Agency of Human Services, the Department for Children and Families, and the Department for Housing and Community Development along with committee members from across the state as directed by Vermont State Executive Order 01-23. The council consists of three sub-committees which oversee the three methods the council will use to achieve its mission:

1. Unit Generation (From Temporary Shelter to Permanent Housing): Focus on Council recommendations to expand the number of units or beds along the full spectrum of temporary, transitional and permanent housing, including, but not limited to: shelter beds, rentals (subsidized or market rate), and home ownership (shared-equity or market rate).
2. Supports (The Systems and Services): Identify and strategize around the spectrum of services and supports needed to ensure stability in shelter and housing, including, but

not limited to: rental subsidies, landlord relief, social services, coordinated entry, housing applications, and coordination of state and local partners.

3. Special Populations (The People We Serve): Further identify highest needs from the Council recommendations and strategize around persons or groups requiring targeted considerations or programming to ensure equitable, healthy, and safe access to housing to those for whom traditional systems are inadequate.

Vermont has worked to restructure its homeless assistance funding to better align with state and federal goals to reduce the number of individuals and families experiencing homelessness, shorten the length of time persons are homeless, and to reduce the number of people returning to homelessness.

Vermont was a recipient of HUD's Youth Demonstration Program in Round 2 and was able to pilot various innovative program to address and prevent homelessness amongst youth and young adults. These programs are now funded through the annual Continuum of Care funding.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Vermont has two HUD Continuums of Care (CoC), the Chittenden County CoC (known as the Chittenden County Homeless Alliance) and the Balance of State CoC. The Balance of State CoC is a coalition of 11 local or regional housing coalitions.

The State Office of Economic Opportunity (OEO) coordinates with partners in AHS, the CoCs, and external stakeholders to ensure that the Emergency Solutions Grant program is part of an integrated, statewide strategy to ending homelessness and improving housing and stability outcomes for families and individuals. CoCs have provided input into how Vermont is determining the allocation of funds, the development of performance and evaluation outcomes, and the development of policies and procedures for the administration of HMIS. OEO provides information and gathers feedback through formal presentations and discussion at CoC meetings at least annually. OEO also utilizes an OEO Advisory Group, composed of grantee organizations, when significant updates are needed to program standards or performance measures. Most recently an Advisory Group was convened to review emergency shelter standards regarding length of stay policies. OEO is currently reviewing feedback received during the process in order to make updates to our program standards for SFY2026.

OEO and AHS are active participants in the governance of each CoC. OEO also serves on and/or chairs various committees in each, including HMIS, Coordinated Entry, Strategic Planning, Veterans, Education/Training, and other ad hoc workgroups.

OEO issues a public survey distributed to all program grantees and posted to both CoC list-serves to solicit input on funding priorities and review performance measurements. This survey is in addition to the public survey and community sessions for the entire Consolidated Plan.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

To consult on ESG, OEO reached out specifically to the Continua of Care (CoC), nonprofit homeless shelter and service providers, as well as other State agency and nonprofit partners where homeless policy and service populations overlap.

Additionally, DHCD convenes the Consolidated Plan Advisory Board in addition to public outreach meetings to solicit input from an array of stakeholders.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Vermont Legal Aid
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing Legal services
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
2	Agency/Group/Organization	CVOEO
	Agency/Group/Organization Type	Services - Housing Regional organization Tenant rights
	What section of the Plan was addressed by Consultation?	Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.

3	Agency/Group/Organization	Bennington County Regional Commission
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
4	Agency/Group/Organization	VERMONT HOUSING FINANCE AGENCY
	Agency/Group/Organization Type	Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board and conducted the Statewide Housing Needs Assessment that informed this Plan
5	Agency/Group/Organization	Vermont Agency of Human Services
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Health Agency Child Welfare Agency Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board and contributed to the drafting of this Plan
6	Agency/Group/Organization	Brattleboro Development Credit Corporation
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
7	Agency/Group/Organization	WEST RUTLAND
	Agency/Group/Organization Type	Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
8	Agency/Group/Organization	Southern Windsor County Regional Planning Commission
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
9	Agency/Group/Organization	Vermont Center for Independent Living
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
10	Agency/Group/Organization	CHAMPLAIN HOUSING TRUST
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Annual Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
11	Agency/Group/Organization	Housing & Homelessness Alliance of Vermont
	Agency/Group/Organization Type	Statewide membership organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
12	Agency/Group/Organization	Vermont Human Rights Commission
	Agency/Group/Organization Type	Services Fair Housing Other Government-State
	What section of the Plan was addressed by Consultation?	Other – Fair Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
13	Agency/Group/Organization	Vermont Economic Development Authority
	Agency/Group/Organization Type	Other government - State Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
14	Agency/Group/Organization	Community Capital of Vermont
	Agency/Group/Organization Type	Small business and microenterprise lender Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
15	Agency/Group/Organization	CATHEDRAL SQUARE CORPORATION
	Agency/Group/Organization Type	Housing Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.

16	Agency/Group/Organization	VERMONT HOUSING AND CONSERVATION BOARD
	Agency/Group/Organization Type	Housing Other government - State Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board and contributed to drafting this plan. VHCB administers the HOME funds and HTF for Vermont.
17	Agency/Group/Organization	Central Vermont Economic Development Corporation
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
18	Agency/Group/Organization	Homeless Prevention Center
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
19	Agency/Group/Organization	Vermont State Housing Authority
	Agency/Group/Organization Type	Housing PHA Other government - State

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
20	Agency/Group/Organization	Montpelier Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is represented on the Advisory Board.
21	Agency/Group/Organization	Town of Rockingham
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Rockingham Regional Outreach meeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization hosted a Consolidated Plan Regional Outreach meeting.
22	Agency/Group/Organization	Town of St. Johnsbury
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	St. Johnsbury Regional Outreach Meeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization hosted a Consolidated Plan Regional Outreach meeting.
23	Agency/Group/Organization	Town of Swanton
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Swanton Regional Outreach Meeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization hosted a Consolidated Plan Regional Outreach meeting.
24	Agency/Group/Organization	Town of Arlington
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Arlington Regional Outreach Meeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization hosted a Consolidated Plan Regional Outreach meeting.
25	Agency/Group/Organization	Town of St. Berlin
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Berlin Regional Outreach Meeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization hosted a Consolidated Plan Regional Outreach meeting.

Table 3 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

No Agencies were intentionally left out of consulting efforts for this Plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Statewide Housing Needs Assessment	Vermont Housing Finance Agency	The Statewide Housing Needs Assessment informed the NA and MA forms in the Strategic Plan

Table 4 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

In order to maximize opportunities for public participation DHCD organized five regional citizen outreach “Community Meetings” between January and March 2025. The OEO and VHCB participated in many of these, as well. Each community meeting was organized with several local co-hosts, including municipalities, regional planning commissions and regional economic development organizations. The community meetings were advertised via public libraries, social media, websites, newspaper ads, and newsletter emails. Every municipality (local government) in the state and every regional planning, regional housing and regional economic development organization was invited to attend. Meetings were held in the following communities: Rockingham, St. Johnsbury, Swanton, Arlington, and Berlin.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Consolidated Plan is developed with public input as per the State of Vermont Citizen Participation Plan adopted April 2005.

In January through March 2025 five regional meetings were held across the state to gather input and comment from the general public about community development needs. These were advertised through local newspapers, public libraries, and outreach by "Partners" from local municipalities and nonprofits. Meetings were held in Rockingham, St. Johnsbury, Swanton, Arlington, and Berlin. In addition, the Department developed an online survey that was broadly distributed across the state through posting on DHCD's website, including it in DHCD's electronic newsletter, local municipalities, local libraries, and local nonprofit "partners".

The Draft plan was published on DHCD's website, and its availability was widely distributed via email and included in the legally warned public hearing notice.

In February and April 2025, the Department convened meetings of the Consolidated Plan Citizen Advisory Board. The meetings were held in addition to two Public Hearings. The Consolidated Plan Citizen Advisory Board was formed to guide the development and priorities of the State's Consolidated Plan. The Citizen Advisory Board encompasses a broad range of constituents including representation from organizations that are faith-based, serve the homeless and people with disabilities, seniors, public housing tenants, economic development and other non-housing community development needs. Citizen Advisory Group members are encouraged to distribute information about the consolidated planning process to their constituents and people they serve. Members of this group assist in stimulating involvement from a wide constituency of people, especially participation from low- and moderate-income people, people living in slum and blighted areas, and in areas where CDBG, HOME, HTF and ESG funds are used.

Two public hearings were legally warned and publicized two weeks in advance in major newspapers across the state and by postings, email, and online. The first hearing was conducted on February 24, 2025, before development of the plan to obtain citizens' views about the needs and interests of the public in the areas of housing, public services, community development and economic development, development of proposed grant activities, and to review past performance related to the HUD Consolidated Plan. The second hearing will be held on March 27, 2025, in person with a virtual option to hear comments on the draft plan and was followed by a 30-day written comment period. A summary of written comments and the Department's response will be included in the Executive Summary (ES-05) of this plan.

Citizen Participation Outreach						
Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/b road community	Meeting held on Jan 9, 2025, in Rockingham at the Bellows Falls Town Hall. Number of attendees were: 8 persons were in person. 11 persons were online. 8 staff members from DHCD, OEO, and VHCB	9 participant s commente d or asked questions	See meeting notes and summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how
2	Public Meeting	Non-targeted/b road community	Meeting held on Jan 14, 2025, in St. Johnsbury at the Welcome Center. Number of attendees were: 9 persons were in person. 4 staff members from DHCD, OEO, and VHCB	7 participant s commente d or asked questions	See meeting notes and summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how
3	Public Meeting	Non-targeted/b road community	Meeting held on Jan 23, 2025, in Swanton at the Swanton Village Complex. Number of attendees were: 2 persons were in person. 2 persons were online. 4 staff members from DHCD, OEO, and VHCB	2 participant s commente d	See meeting notes and summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/b road community	Meeting held on Feb 4, 2025, in Arlington at the Arlington Town Hall. Number of attendees were: 7 persons were in person. 5 persons were online. 6 staff members from DHCD, OEO, and VHCB	3 participant s commente d or asked questions	See meeting notes and summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how
5	Public Meeting	Non-targeted/b road community	Meeting held on Feb 19, 2025, in Berlin at the Capitol Grange Hall. Number of attendees were: 27 persons were in person. 5 staff members from DHCD, OEO, and VHCB	9 participant s commente d or asked questions	See meeting notes and summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how
6	Public Hearing	Non-targeted/b road community	Virtual/In-Person Public Hearing held on Feb 24, 2025, in Montpelier at the National Life. Number of attendees were: 1 persons in person. 12 staff members from DHCD, OEO, and VHCB	1 Comment	See summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how

Citizen Participation Outreach						
Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Hearing	Non-targeted/b road community	Virtual/In-Person Public Hearing held on March 27, 2025, in Montpelier at the National Life. Number of attendees were: 2 persons were in person. 14 persons were online. 4 staff members from DHCD, OEO, and VHCB	5 comments	See summary of comments	https://accd.vermont.gov/housing/plans-data-rules/hud/how
8	Internet Outreach	Non-targeted/b road community	DHCD conducted the Consolidated Plan Citizen Participation Plan Survey with Micro-soft forms and it was available December 11, 2024-May 2, 2025. 248 Responses were received.	See Survey Summary Results	N/A	https://accd.vermont.gov/housing/plans-data-rules/hud/how

Table 5 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The housing and homeless needs assessment and market analysis in this plan are based on the pre-populated data tables provided by HUD as supplemented and supported by the Vermont Housing Needs Assessment, which was conducted by the Vermont Housing Finance Agency. Homeless and special needs information was provided by the State Agency of Human Services, Office of Economic Opportunity as well as the Department of Corrections and a network of organizations that provide support for survivors of domestic violence. Public housing needs are primarily based on pre-populated data as evaluated by Vermont's public housing directors.

In 2024, DHCD selected the research team at Vermont Housing Finance Agency (VHFA) to conduct a statewide Housing Needs Assessment. In addition to providing analysis of a number of indicators of the economic and housing market throughout the state and for each of the 14 counties in Vermont, this effort continues to support an ongoing data collection and dissemination project known as the HousingData.org Community Profiles. VHFA analyzed the current state of Vermont's housing stock along with the economic makeup of the state and used growth and economic projections to suggest priorities for addressing Vermont's current and future housing needs. Much of the data collected for this analysis, and its conclusions, were drawn upon during the creation of this Plan. The statewide report and county chapters from the Vermont Housing Needs Assessment are available on the Department's website at: <https://accd.vermont.gov/housing/plans-data-rules/needs-assessment>

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

The Housing Needs Assessment clearly notes that Vermont continues to grapple with a housing shortage that has been significantly affected by the changing residential patterns that resulted from the COVID-19 pandemic. The Assessment notes that Vermont began to see a notable uptick of migration into the State around 2017 and this trend increased significantly in the years after 2020 when far more people were able to work from home. Combined with slow pace of home building, increased development costs, and relatively stagnant local wages, this trend has exacerbated the pressure on the housing market.

Rising rents and home prices have hit low- and middle-income Vermonters hardest. A quarter of renters are severely cost burdened and fewer renters can afford to buy a median-priced home, further stressing the supply of rental homes. In each year since the pandemic began, rising home prices and mortgage interest rates, coupled with stagnant incomes among many Vermont renters, have drastically shrunk the portion of renters who are likely to leave the rental market by buying a home. In 2021, 32% of renters had the income needed to buy a median-priced home but this plummeted to 6% in 2023.⁹ This means that many renters who otherwise might have bought their first Vermont home were kept living in rental housing by rising prices, interest rates and other market constraints

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	626,618	624,636	-0%
Households	257,192	258,535	1%
Median Income	\$0.00	\$57,808.00	

Table 6 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	32,780	31,190	45,735	28,190	120,640
Small Family Households	7,735	7,765	14,520	10,605	62,740
Large Family Households	660	1,110	2,420	1,415	6,545
Household contains at least one person 62-74 years of age	7,265	8,345	11,415	7,430	30,495
Household contains at least one person age 75 or older	5,825	6,980	6,890	2,885	7,965

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Households with one or more children 6 years old or younger	3,625	3,440	5,550	3,735	10,775

Table 7 - Total Households Table

Data 2016-2020 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	595	345	295	265	1,500	325	160	275	80	840
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	370	290	445	135	1,240	4	70	140	70	284
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	80	305	345	225	955	75	135	240	140	590
Housing cost burden greater than 50% of income (and none of the above problems)	11,365	4,035	855	85	16,340	8,850	5,860	3,775	805	19,290
Housing cost burden greater than 30% of income (and none of the above problems)	2,425	5,980	6,285	1,070	15,760	2,095	6,150	9,200	5,170	22,615

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	980	0	0	0	980	720	0	0	0	720

Table 8 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	12,405	4,975	1,940	715	20,035	9,260	6,230	4,430	1,095	21,015
Having none of four housing problems	6,315	9,385	14,570	7,080	37,350	3,100	10,600	24,795	19,300	57,795
Household has negative income, but none of the other housing problems	980	0	0	0	980	720	0	0	0	720

Table 9 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,300	3,395	2,425	10,120	2,225	2,855	4,350	9,430
Large Related	290	330	285	905	265	485	865	1,615
Elderly	3,490	2,925	1,315	7,730	6,200	6,810	5,180	18,190
Other	6,485	4,055	3,430	13,970	2,495	2,080	2,765	7,340
Total need by income	14,565	10,705	7,455	32,725	11,185	12,230	13,160	36,575

Table 10 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,470	1,275	95	4,840	1,970	1,550	1,155	4,675
Large Related	270	65	55	390	210	180	150	540
Elderly	2,505	1,145	340	3,990	4,705	2,900	1,600	9,205
Other	5,725	1,880	385	7,990	2,135	1,315	875	4,325
Total need by income	11,970	4,365	875	17,210	9,020	5,945	3,780	18,745

Table 11 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	305	525	580	245	1,655	79	175	325	145	724

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	39	30	95	65	229	4	35	59	30	128
Other, non-family households	135	55	120	55	365	10	0	0	39	49
Total need by income	479	610	795	365	2,249	93	210	384	214	901

Table 12 – Crowding Information – 1/2

Data 2016-2020 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 13 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

According to the 2025 Vermont Housing Needs Assessment, single person households continue to be one of the fastest growing household types. By 2023 there were an estimated 83,588 single person households, comprising 31% of all households in the state. Single person households continue to be one of the most likely to be cost burdened, with the median household income of a single family household (\$37,917) at less than half of the overall median household income (\$78,024).

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

An estimated 56,000 Vermonters are at least 75 years old, with 13,000 of these elders aged 85 and older. The likelihood of having a cognitive, ambulatory, self-care, or independent living disability is much higher among Vermonters who are older. The onset of disabilities, which, whether physical, mental, or intersecting between the two, can make independent living increasingly difficult, and needs for housing accessibility increasingly acute.

In 2022, the Vermont Network tracked 2,483 individuals who were provided emergency or permanent housing support following domestic or sexual violence. Amongst these were 89 families which secured stable housing as a result of government programs. During the 2023

Vermont Point-In-Time count, 200 households that had experienced domestic violence were experiencing homelessness.

What are the most common housing problems?

As defined by HUD, housing problems are cost burden, overcrowding, and lack of a complete kitchen or plumbing facilities (substandard housing). By far, the most common housing problem experienced by Vermonters is cost burden.

There are an estimated 81,578 Vermont households (36%) that are paying more than 30% of household income for housing costs and of these cost burdened households 36,741 (14%) are paying 50% or more of household income. A larger proportion of renters, 51%, are cost burdened statewide than similarly burdened homeowners, who make up 25% of the total number of homeowner households.

Are any populations/household types more affected than others by these problems?

Households with income below 50% of Area Median Income are significantly more likely to experience cost burden. This is true regardless of household size, although more large households – 5 or more individuals - with incomes below 50% of AMI are experiencing cost burden.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Families living in poverty spend a higher proportion of their household income on basic necessities. According to recent estimates, the number of households living under the Federal Poverty Line have decreased slightly, from 11% to 9.7%. While this would typically be a promising indicator, it is likely a function of higher income households moving into the state rather than a reduction in the number of households exiting poverty.

It is difficult to predict which families and individuals are currently housed but at imminent risk of homelessness. Many who do end up homeless report their previous living situation as 'doubled up' with family or friends. The characteristics of families and unaccompanied youth currently experiencing homelessness can be informative. According to the 2024 Point in Time Count, a total of 3,458 Vermonters were counted as literally homeless. Of this total, 21% (737 people) were children under 18 years of age.

Over the last five years, households experiencing homelessness have required significantly longer stays in shelter before finding permanent housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The jurisdiction does not have estimates of the at-risk population, but uses the HUD definition to define this population as:

An individual or family with an annual income below 30% of median family income for the county; who lacks sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the homeless definition; who has no appropriate subsequent housing options identified; AND who meets one of the following conditions:

- Has moved because of economic reasons 2 or more times during the preceding 60 days; OR
- Is living in the home of another because of economic hardship; OR
- Has been notified they will lose their housing within 21 days; OR
- Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
- Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons; OR
- Is exiting a publicly funded institution or system of care.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Substandard housing or housing with one or more housing problems including cost burdened are linked to instability. In particular, households that are extremely low income and severely cost burdened are linked to an increased risk of homelessness.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems as defined by HUD at a greater rate (10 percentage points or more) than the income level as a whole. While Vermont is slowly becoming more diverse, it is still made up of predominately white households with 265,208, or 94.9%, of all Vermont households identifying as “white alone”. In comparison, approximately 77% of all U.S. households similarly identify as “white alone”. Due to the small proportion of racial and ethnic minority households in Vermont, even a small number experiencing a housing problem can result in a disproportionately greater need for that group than the State as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	27,187	7,365	0
White	24,760	6,555	0
Black / African American	517	115	0
Asian	357	232	0
American Indian, Alaska Native	224	88	0
Pacific Islander	0	0	0
Hispanic	480	198	0

Table 14 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,651	9,886	0
White	21,099	9,251	0
Black / African American	213	80	0
Asian	378	123	0
American Indian, Alaska Native	98	62	0
Pacific Islander	30	0	0
Hispanic	368	145	0

Table 15 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,320	28,427	0
White	18,767	26,827	0
Black / African American	221	356	0
Asian	251	204	0
American Indian, Alaska Native	105	35	0
Pacific Islander	10	12	0
Hispanic	629	516	0

Table 16 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,959	23,059	0
White	5,562	22,010	0
Black / African American	54	62	0
Asian	25	202	0
American Indian, Alaska Native	0	123	0
Pacific Islander	20	0	0
Hispanic	131	308	0

Table 17 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

In the 0-30% of Area Median Income category, it was found that 78.6% (27,187 out of 34,552) of all households reported have housing problems, with households of all types ranging from 60.6% - 81.8%. In the 30-50% of Area Median Income category, it was found that 69.6% (22,651 out of 32,537) of all households reported having a housing problem, with households of all types ranging from 61.2%-75.5%. In the 50-80% of Area Median Income category, it was found that 41.6% (20,320 out of 48,747) of all households reported having a housing problem. Within this category, 75.5% (105 out of 140) of American Indian, Alaskan Native households and 100% (20) of Pacific Islander households have housing needs. In the 80-100% of Area Median Income category, it was found that 20.5% (5,959 out of 29,018) of all households reported having a housing problem. Within this category, 47.4% (54 out of 116) of Black/African American households, and 100% (4) of Pacific Islander households have housing problems, which represents a disproportionately high exposure to housing problems than the jurisdiction as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As described in NA-15 above, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Vermont is predominately white. Racial and ethnic minority groups represent only 3.5% of the total number of Vermont households. Therefore, even a small number of racial or ethnic minority households having a severe housing problem can result in a proportionately greater need for that group than the State as a whole.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,067	12,445	0
White	20,038	11,244	0
Black / African American	343	289	0
Asian	343	246	0
American Indian, Alaska Native	179	131	0
Pacific Islander	0	0	0
Hispanic	410	262	0

Table 18 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,210	22,381	0
White	9,369	20,989	0
Black / African American	135	153	0
Asian	209	292	0
American Indian, Alaska Native	53	109	0
Pacific Islander	0	30	0
Hispanic	155	353	0

Table 19 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,496	43,181	0
White	4,942	40,628	0
Black / African American	55	522	0
Asian	67	387	0
American Indian, Alaska Native	74	66	0
Pacific Islander	10	12	0
Hispanic	203	941	0

Table 20 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,249	27,747	0
White	1,136	26,422	0
Black / African American	24	92	0
Asian	0	227	0
American Indian, Alaska Native	0	123	0
Pacific Islander	0	20	0
Hispanic	4	428	0

Table 21 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

In the 0-30% of Area Median Income category, it was found that 63.9% (22,067 out of 34,512) of all households reported having a severe housing problem, ranging from 54.3% for Black households to 64% for White households. In the 30-50% of Area Median Income, it was found that 31.3% (10,210 out of 32,591) of all households reported having a severe housing problem. Within this category 46.8% (135 out of 288) of Black households reported having a severe housing problem. In the 50-80% of Area Median Income category, it was found that 11.3% (5,496 out of 45,570) of all households reported having a severe housing problem. Within this category, 52.8% (74 out of 140) of American Indian, Alaskan Native households and 45.5% (10 out of 22) of Pacific Islander households reported having disproportionately greater housing needs. In the 80-100% of Area Median Income category, it was found that 4.3% (1,249 out of 28,996) of all households reported having a severe housing problem. Within that category, 21.5% (24 out of 116) of Black households reported severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A housing cost burden exists when a household pays more than 30% of income toward housing and a severe cost burden exists when housing costs are more than 50% of household income. A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience a cost burden at a greater rate (10 percentage points or more) than the income level as a whole. Vermont is predominately white. Racial and ethnic minority groups represent only 3.14% of Vermont households. Therefore, even a small number of racial or ethnic minority households having a housing cost burden or severe cost burden can result in a disproportionately greater need for that group than the state as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	181,993	43,224	35,557	2,274
White	173,461	40,474	32,402	1,947
Black / African American	939	549	477	59
Asian	1,786	414	552	58
American Indian, Alaska Native	494	129	202	64
Pacific Islander	22	50	10	0
Hispanic	2,290	888	636	89

Table 22 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion

Of the 263,048 households in Vermont as reported in the table above (Table 21 – Greater Need: Housing Cost Burdens AMI), 43,224 households (16.4%) are considered to be cost burdened and 35,557 households (13.5%) are considered to be severely cost burdened. While these instances are significant for the households experiencing them, using HUD's definition of disproportionate needs it is found that there are no statistically significant instances of disproportionately greater needs due to housing cost burdens among racial and ethnic minorities in Vermont.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Using the income category data and definition of disproportionate needs provided by HUD in NA-15 and NA-20, the following discussion presents the occurrences in which a racial or ethnic group has a disproportionate greater instance of housing problems within certain income categories.

Black/African American households are shown to have a disproportionately greater instance of housing problems in the low- (30-50% AMI) and middle- (80-100% AMI) income categories and show no disproportionally prevalent instances of severe housing problems. Asian households in Vermont are shown to have disproportionately greater instances of housing problems in the low-, moderate- (50-80% AMI), and middle-income categories and are shown to have severe housing problems within all four income categories of extremely-low- (0-30% AMI), low-, moderate-, and middle-income. American Indian, Alaskan Native households show a disproportionately greater instance of housing problems within the low-income category and no instances of severe housing problems. Pacific Islander households show a disproportionately greater instance of both housing problems and severe housing problems within the moderate- and middle-income categories. Hispanic households are shown to have a disproportionately greater instance of both housing problems and severe housing problems within the low-income category.

There are no statistically significant instances of disproportionately greater needs due to housing cost burdens among racial and ethnic minorities in Vermont (see NA-25).

If they have needs not identified above, what are those needs?

No other housing needs were identified for these groups.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Nearly 95% of Vermont households identify as White. Racial and ethnic minority households make up only 3.5% of Vermont households. Many of Vermont's minority households live in and near the City of Burlington, which is Vermont's largest city and is a HUD entitlement community.

NA-35 Public Housing – (Optional)

Introduction

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	92	1,755	6,137	696	4,523	64	417	313

Table 23 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	2	2	31	3	10	11	7
# of Elderly Program Participants (>62)	0	19	834	1,359	210	1,061	11	3
# of Disabled Families	0	38	551	2,693	236	2,038	37	74
# of Families requesting accessibility features	0	92	1,755	6,137	696	4,523	64	417
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	90	1,641	5,727	660	4,211	60	375	303
Black/African American	0	1	75	262	14	210	3	27	6
Asian	0	1	27	76	12	54	0	4	4
American Indian/Alaska Native	0	0	12	66	10	42	1	11	0
Pacific Islander	0	0	0	6	0	6	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	2	23	77	5	57	4	7	2
Not Hispanic	0	90	1,732	6,060	691	4,466	60	410	311
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

This section is optional for State grantees, and the information was not obtained or evaluated as part of the Vermont Housing Needs Assessment but the Vermont State Housing Authority provided the following information:

Recipients of Federal funds, including Public Housing Authorities, are required to comply with Section 504 of the American with Disabilities Act, which includes providing accommodations to buildings, units, policy, and practices. Public Housing Authority's and Multifamily Housing providers receiving funds under the PBRA initiative, were required to undertake a needs assessment of their housing, tenants and applicants and develop a 504-transition plan.

VSHA, in the administration of its Housing Choice Voucher and Mainstream Housing programs, provides reasonable accommodations to applicants and program participants.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

This section is optional for State grantees, and the information was not obtained or evaluated as part of the Vermont Housing Needs Assessment but the Vermont State Housing Authority provided the following information:

As of May 27, 2025, there 3,068 families on the Housing Choice Voucher waiting list. Of those, 60.7% were on the waiting list for one-bedroom units. Only 23.9% of families on the list have children; an additional 12.39% are elderly and 25.46% are disabled. The racial breakdown is as follows: 55.3% have white heads of households, 4.17% have black heads of households and 41.59% are "other".

How do these needs compare to the housing needs of the population at large

According to Vermont's local public housing directors, the needs of individuals and families on wait lists are "vastly" greater than the population at large. This is supported by the Vermont Housing Needs Assessment and a comparison with the Directory of Affordable Rental Housing that found that vacancy rates for government subsidized housing are much lower than the rest of the rental market. Most government subsidized housing is fully occupied with wait lists.

VSHA's Section 8 waiting list has been closed since January 31, 2025.

Discussion:

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

The homeless needs assessment data is based on the one-day count (Point-in-Time) in January 2024, as well as data from the Homeless Management Information System (HMIS) covering January 1, 2024 through December 31, 2024. There are two significant datasets that are missing from the HMIS data: publicly funded motel vouchers (General Assistance) and data from providers serving domestic and sexual violence survivors. Vermont does not currently have mechanisms to include non-HMIS data in estimates for the numbers below, with the exception of the estimates for a given night, which are based on Point-in-Time count data. The data sets excluded from the HMIS data are likely to include persons also captured in the HMIS data, which means numbers cannot simply be added to the HMIS data available without risking significant duplication. Therefore, there is a discrepancy between the estimates reported below for a given night (based on the PIT) and for each year (based on HMIS data).

The rural homeless needs assessment uses the same data sources as the homeless needs assessment, but with a focus only on data from the Vermont Balance of State Continuum of Care, which HUD considers to be largely rural.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	1,305	558	611	251	282
Persons in Households with Only Children	0	0	12	10	6	286
Persons in Households with Only Adults	167	1,986	2,028	407	317	438
Chronically Homeless Individuals	62	578	659	0	103	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Chronically Homeless Families	0	266	114	0	51	0
Veterans	6	102	151	0	40	0
Unaccompanied Child	7	124	229	0	48	0
Persons with HIV	2	9	11	0	2	0

Table 27 - Homeless Needs Assessment

Data Source

Comments:

2024 Point-In-Time (PIT) Count and Homelessness Information System (HMIS) Reports

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	1,037	457	610	203	276
Persons in Households with Only Children	0	0	11	9	6	229
Persons in Households with Only Adults	80	1,530	1,335	645	235	401

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Chronically Homeless Individuals	6	443	430	0	76	0
Chronically Homeless Families	0	231	97	0	43	0
Veterans	3	78	119	0	34	0
Unaccompanied Youth	5	89	152	0	36	0
Persons with HIV	0	7	9	0	2	0

Data Source

Comments:

2024 Point-In-Time (PIT) Count and Homelessness Information System (HMIS) Reports

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

In the Vermont 2024 Point-in-Time (PIT) Count, a total of 3,458 persons were experiencing homelessness. The PIT seeks to capture all sheltered and unsheltered individuals and families experiencing homelessness in one 24-hour period of time. Of the 3,458 persons from the combined Chittenden CoC and Balance of State CoC 2024 PIT data; 167 persons were unsheltered. Using this data, approximately 76.5% (2,647) of Vermonters experiencing homelessness are found outside of our sole metropolitan area (Chittenden County). However, only approximately 48% (80) of Vermonters experiencing unsheltered homelessness are found outside of the sole metropolitan area (Chittenden County). This highlights the disproportionate amount of unsheltered homelessness in Chittenden County when compared to the percentage of people experiencing homelessness in that area. It is possible that, given the rural nature of many areas covered by the Balance of State CoC, unsheltered homelessness is more hidden and therefore less likely to be captured in the PIT. It is also possible that those experiencing unsheltered homelessness find more resources in the urban area covered by the Chittenden County CoC and are therefore more likely to be found in that area of the state.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness,"

describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Vermont used the HMIS System Performance Measures report to estimate the number of persons becoming homeless each year and the average length of time persons experience homelessness. However, that report does not provide us with the average length of time or person counts broken out beyond household type, so there is no data for the following population types: chronically homeless individuals, chronically homeless families, veterans, unaccompanied youth, or persons with HIV. As noted in the introduction to this section, there are also datasets that are missing from the HMIS data, but that is currently the best source available at this time for the estimates required here.

In general, a number of factors can drive an extended duration of homelessness. Under current rental vacancy conditions, access to a rental unit, even when a subsidy or voucher is secured can delay rehousing. Given the general age and quality of Vermont’s rental housing units, it has also been reported by homelessness service providers that available apartments often do not meet basic HUD Housing Quality Standards and can therefore not be utilized to house those experiencing homelessness until repairs are made, further delaying the process of accessing housing. A prospective tenant’s credit, criminal record, previous rental history and lack of income/employment are major barriers for individuals accessing rental units.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Ethnicity:	Sheltered:	Unsheltered (optional)

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2024 PIT count found 1,305 persons in 412 households with at least one adult and one child experiencing homelessness. Additionally, the 2024 PIT count found 131 youth under the age of 25 who were unaccompanied and homeless. Of these, 52 were parents of 67 young children.

The 2024 PIT count found 108 Veterans experiencing homelessness. The 2020 PIT count found a record low for the state with only 71 Veterans experiencing homelessness. This number has been rising since then, peaking in the 2023 PIT count with 122 Veterans. There continues to be a coordinated effort of veteran’s service providers around the state to move this number towards “functional zero” according to the Vermont Balance of State and the Chittenden County Homeless Alliance.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Persons identified as American Indian, Alaska Native, or Indigenous, Black, African American, or African, and Native Hawaiian or Pacific Islander were disproportionately represented in the overall homeless population (in relation to these groups' representation in the total state population) in the 2024 PIT count. 13.56% of all people counted in 2024 identified their race as other than white, compared to only 10.2% of Vermont's total population. Black Vermonters in particular are 5.6 times more likely than white Vermonters to be experiencing homelessness.

Disproportional representation is even more pronounced when reviewing the 2024 PIT count for the Chittenden County CoC only. That data shows 24.78% of people counted in 2024 identified their race as other than white, compared with only 14.02% of the general population. Black Vermonters in Chittenden County are 6.6 times more likely than white Vermonters to be experiencing homelessness.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Vermont has seen significant increases in both sheltered and unsheltered homelessness over the last several years. The 2024 PIT count showed an over 230% increase in people experiencing sheltered homelessness and an over 45% increase in people experiencing unsheltered homelessness compared to pre-pandemic levels counted in 2020. Unsheltered homelessness outside of the coldest months of the year is much higher, as the State's General Assistance motel voucher program is more restrictive between April and November. Since the PIT Count takes place in January when the motel voucher program is less restrictive, it does not reflect what unsheltered homelessness looks like during other times of the year.

Vermont has been investing heavily in expanding shelter capacity around the state through a network of community providers but are still far from being able to meet the need. Currently there is capacity to shelter approximately 630 households within state-funded emergency shelters.

Discussion:

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

This section serves to highlight the number of persons who are not homeless but may require supportive housing. This includes but is not limited to the elderly, frail elderly, persons with mental, physical and/or developmental disabilities, persons with Alcohol or other Substance Use Disorders, persons with HIV/AIDS and their families, and victims of domestic violence. Highest among these populations in Vermont are adults with severe mental illness, persons with substance abuse, the elderly and persons with disabilities.

Permanent Supportive Housing defined by HUD includes the provision of long-term rental assistance and supportive services for persons experiencing homelessness and a disabling condition of long duration, primarily those with serious mental health challenges, substance use disorders, and related diseases. Tenants living in PSH must have access to an adequate level of services which are appropriate to their level of need.

“Supportive housing” provided outside the homelessness continuum is largely undefined and there is not a system-wide funding mechanism to pay for supportive housing in Vermont. Thus, Vermont does not have a robust array of permanent supportive housing for vulnerable people outside the homeless continuum. It is understood that there are limited psychiatric services available for those in need of such to secure and maintain their housing. These limitations result in significant housing challenges for a particularly vulnerable population. Part of the reason this state persists is a result of a lack of skilled healthcare workers within the job market to meet the needs of persons with psychiatric disabilities and behavioral problems.

Describe the characteristics of special needs populations in your community:

State planners recognize that the housing needs of most sub-populations are not radically different from those of the general population. The Agency of Human Services promotes safe and permanently affordable housing integrated into non-specialized residential buildings or settings. This strategy has been aided by promotion of clearer standards around universal design through the State qualified allocation plan, as well as mixed-income housing achieved through project and tenant-based rental assistance. The large majority of AHS clients with special needs live in the community and depending on their needs may receive specialized case management services to help them coordinate and access services in the community. For Vermonters with severe special needs, such as serious mental health issues, they have access to residential care with on-site services.

Vermont believes that people are best served in the least restrictive environment. To that end, AHS facilitates housing stability for its most vulnerable clients by working closely with our housing partners to ensure they have access to scarce affordable housing and rental subsidies. In addition, AHS works closely with community service providers to ensure that all low-income

Vermonters have access to a comprehensive array of supportive services no matter their needs or where they live.

What are the housing and supportive service needs of these populations and how are these needs determined?

The Department of Mental Health administers the Subsidy + Care (S+C) program, modeled after HUD's PSH program to serve Vermonters in mental health acute care beds or those who are homeless and at serious risk of needing an acute care bed. S+C provides tenant-based rental subsidies administered by the VT State Housing Authority. Treatment Services for tenants housed with S+C are provided by community organizations that serve those with serious mental illness. Roughly 100 households benefit from this program per year.

For people with physical or developmental disabilities, AHS' Department of Disabilities, Aging and Independent Living provides:

- Home & Community Based Services to help pay for home modifications for physical accessibility and for modifications related to an individual's disability, including cost effective technology that promotes safety and independence
- Funding to pay for assistive technology, adaptive equipment, and home modifications to make the home physically accessible, and other special supports and services not covered under the Medicaid State Plan
- Funding to help cover the costs associated with moving into an apartment (rent furnishings), including Supported Apartment Fund and Brandon Training School Fund (for people who used to live in the state institution)
- Through its network of non-profits, used furnishings/appliances are offered through grants from community organizations and VT's participation in the ABLE account program
- Supports, including by Public Guardians, GMSA & their local peer support network and VT Center for Independent Living, to assist participants apply for vouchers, locate apartments and successfully transition to tenancy
- Financial support to those transitioning from institutional settings like nursing homes to community-based housing through the Money Follows the Person program, which helps prevent homelessness and ensure that older Vermonters and individuals with disabilities can live independently
- Funding for the Support and Services at Home model to care for older adults in their own home, thus avoiding homelessness and/or nursing home care

The Vermont Department of Health funds a network of recovery housing organizations to provide safe, substance use free homes for those in recovery who are seeking to live in a sober environment while accessing recovery and treatment supports and services in their communities.

When public safety is no longer a concern, and individuals are release-eligible, the Department of Corrections (DOC) releases people from incarceration into approved residences, transitional housing (TH), or approved plans to support their re-entry into the community. DOC funds 241 TH beds for those on DOC supervision re-entering the community to prevent homelessness and reduce rates of return to incarceration. Through grants to community partners, DOC funds TH in a mix of congregate housing sites and scattered apartments. Participants have complex needs, are generally exiting institutions (incarceration or substance abuse treatment) and have no other housing options available to them and need stability. In FY24, 396 people were served by DOC-funded TH and 39% exited to permanent stable housing. Those referred to TH have limited familial support, moderate to high criminality assessments, and some are designated significantly functionally impaired. DOC's largest grantee, Pathways VT, enrolled 143 individuals in FY24, most of which have a complex mental health diagnosis, a history of homelessness, and are under DOC supervision.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Vermont Department of Health funds the Housing Opportunities for People with AIDS (HOPWA) program administered by the Vermont State Housing Authority (VSHA). The rental assistance is intended to help someone become permanently housed while awaiting a federally funded HOPWA voucher. In addition to the federal HOPWA program, persons with HIV/AIDS can access State emergency financial assistance to prevent eviction or secure stable housing. This funding comes from the AHS Department of Health and is delivered through one of three local AIDS Service Organizations (ASOs).

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

Discussion:

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

Vermont has a number of non-housing community development needs. The needs and extent of appropriate assistance differ from community to community. Vermont is one of the most rural states in the nation and thus has few large population centers. Vermont was an agriculturally based economy for decades and has moved to a diversified economy. Tourism, education, healthcare, high-tech and green economy jobs are driving the economy of Vermont. However, Vermont residents and lawmakers continue to support commitments in honor of the past agricultural traditions of a working landscape, historic villages and sustainable growth patterns.

The need for public facilities varies from region to region and from community to community. Many communities need the support to establish or continue to operate senior centers, childcare facilities, community centers and facilities that assist or prevent homelessness. Facilities that support special needs populations, such as addiction treatment centers, domestic and sexual abuse victims and adult daycare centers are also needed.

Vermont still has an abundance of recovery needs remaining from the flooding disasters in July 2023 and 2024. These include the need for funding for design and engineering, clearance, relocation, rehabilitation, and new construction of damaged public infrastructure facilities. The Vermont CDBG program is working with Vermont Emergency Management to identify the unmet needs to apply for CDBG Disaster Recovery funding.

Vermont residents pride themselves on local effort, ingenuity and creativity in solving local problems. With a small rural population, the need to coordinate, collaborate and work regionally is important. The long-term sustainability of these public facilities and those that depend on them must be considered. Vermont's CDBG program supports and encourages local community development initiatives that benefit low- and moderate-income residents, leverage funds and addresses sustainability and resiliency issues to have lasting results.

How were these needs determined?

In addition to past experience, the need for public facilities was determined through community outreach meetings, Consolidated Plan surveys and consultation with partner agencies and organizations.

The remaining unmet Disaster Recovery needs from July 2023 and 2024 floods will be determined through public outreach, consultation with the most impacted communities throughout the state and FEMA data sets.

Describe the jurisdiction's need for Public Improvements:

Vermont's population, like much of New England's, is aging fast. In addition, many of our downtowns, villages and historic buildings were built before modern accessibility codes and standards were required. In Vermont, we continue to see the need to address architectural barriers that prevent populations with disabilities from participating in daily activities. Communities throughout the state need assistance to provide accessible sidewalks, public buildings and parking facilities for their residents. In addition, some communities are experiencing difficulty maintaining water and sewer systems. This is especially challenging for communities experiencing a population decline, loss of large employers or predominately low- and moderate-income populations. On the other hand, some of Vermont's smaller rural communities are challenged by the lack of municipal sewer and water systems. These systems are expensive to install and maintain and limited grant dollars are available to help defray the costs of installation. These communities cannot add businesses or housing without installing municipal water and sewer. This lack of infrastructure is preventing growth and prosperity and driving development farther from the commercial core where adequate land for onsite water and sewer exists. This type of development puts housing farther from jobs and services and disproportionately impacts low-income populations.

How were these needs determined?

In addition to past experience, the need for public improvements was determined through community outreach meetings, Consolidated Plan surveys and consultation with partner agencies and organizations.

Describe the jurisdiction's need for Public Services:

The Vermont CDBG program works with communities throughout the state and encounters a wide and diverse range of public service needs, issues and challenges. These could include the need for job training programs, financial fitness counseling, meals on wheels and other food security programs benefiting low- and moderate-income populations. These are just a few examples of the type of eligible public service projects that could be assisted. The Vermont CDBG program considers each community's needs and works first to identify if those services or needs can be addressed with existing programs and resources. If unavailable or cost prohibitive, the Vermont CDBG program works with community and service leaders to marshal the resources needed to address the underserved needs of low- and moderate-income populations. CDBG funding for Public Services must remain within the annual 15% cap on public services. Therefore, the Vermont CDBG program looks to partner with local service providers and identify ongoing, stable sources of program funding before awarding CDBG funds. Thankfully, Vermont has a strong network of social service providers including State, federal, private and non-profit.

How were these needs determined?

In addition to past experience, the need for public services was determined through community outreach meetings, Consolidated Plan surveys and consultation with partner agencies and organizations.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The housing and homeless needs assessment and market analysis in this plan are based on the pre-populated data tables provided by HUD, supplemented and supported by the Vermont Housing Needs Assessment. Homeless and special needs information was provided by OEO.

The 2025 Housing Needs Assessment was conducted by the Vermont Housing Finance Agency. Information available in the Assessment is also made available and regularly updated based on reliable, regular sources, on the Community Profiles section of the www.housingdata.org website. This site is a vast expansion of past housing needs assessments and functions as an ongoing resource for individual residents, industry experts, policy makers, municipal officials, and other interested parties to access up-to-date information on the needs and opportunities within their community and region.

As noted in past housing needs assessments, Vermont has some of the oldest housing stock in the country. The median Vermont home was built in 1974 and a quarter of the existing stock was built before 1939. Housing units occupied by renters tends to be older, with a median renter-occupied home built in 1965. While not universally the case, older housing stock tends to have the potential for more household hazards such as lead paint, low energy efficiency, and antiquated heating systems. As we seek to ensure that more of our elder population is able to age in the communities they have connections within, maintenance issues on these buildings may become problematic.

Vermont also relies heavily on the tourism industry and many fear that the continued prevalence of online rent-by-owner platforms, such as AirBnB, VRBO, and others, may be having an effect on the long term rental housing market. There have, however, been developments in the last five years with a number of Vermont municipalities enacting ordinances that aim to limit the prevalence of short term rentals in order to encourage long term rental opportunities for residents of the community. As a result, the number of short term rental has not expanded past 13,000 units and in December of 2024 that number was calculated at 12,441 units.

MA-10 Number of Housing Units – 91.310(a)

Introduction

While local and regional markets vary, the low vacancy rates and relatively high level of cost burden reported in the Housing Needs Assessment indicates that the number of quality housing units in the state is insufficient for the current and projected needs. Additionally, Vermont has some of the oldest housing stock in the country. In order to address housing gaps, housing development will need to be accompanied by rehabilitation and preservation of existing stock.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	220,193	67%
1-unit, attached structure	13,151	4%
2-4 units	40,131	12%
5-19 units	21,855	7%
20 or more units	12,710	4%
Mobile Home, boat, RV, van, etc	23,066	7%
Total	331,106	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	855	0%	6,373	8%
1 bedroom	6,562	4%	21,524	28%
2 bedrooms	40,528	22%	27,358	36%
3 or more bedrooms	134,376	74%	20,959	28%
Total	182,321	100%	76,214	100%

Table 29 – Unit Size by Tenure

Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Affordable rental housing developed with government subsidies

According to Vermont's Directory of Affordable Rental Housing (DoARH), there are approximately 15,152 apartments in buildings that received government development subsidies in the State of Vermont. Of these units, 2,795 are age-restricted and another 3,622 are restricted to seniors and people with disabilities. The vast majority of the apartments in these

buildings that are not market rate units serve households at or below 60% of the area median income.

The largest single funding source for the development of these apartments is the Low-Income Housing Tax Credit. A variety of other federal and state funding sources have also been used to develop these apartments, as shown in the table below.

Rental assistance

Statewide, 7,338 apartments are subsidized through federal project-based rental assistance. The primary sources of rental assistance funds are the HUD Section 8 program, the Public Housing Program, and USDA's Rural Development Section 521 Program. In addition, 5,348 apartments are made affordable through federal tenant-based vouchers. Both the project-based and tenant-based rental assistance programs are generally directed to households at or below 50% of the area median income, both seniors and younger households.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There are 664 apartments subsidized through Section 8 rental assistance from the U.S. Department of Housing and Urban Development have Housing Assistance Payment (HAP) contracts that expire before 2025. Of these apartments, 417 are monitored by the Vermont State Housing Authority and the remaining 247, by Vermont Housing Finance Agency. Renewal occurs at the date of contract expiration.

At least 4,384 publicly subsidized apartments in Vermont are required to be maintained perpetually affordable. Since the late 1980s, all state housing development funding has required perpetual affordability. The most limited type of housing tax credits (called allocated 9% federal Low-Income Housing Tax Credits) has done the same since the early 2000s.

Does the availability of housing units meet the needs of the population?

While markets vary amongst regions, Vermont's overall vacancy rate is below what is considered healthy, indicating that there is unmet need. Additionally, nearly 50% of Vermont households are experiencing some cost burden. As the number of households continues to grow as expected and homelessness continues to be experienced, it is clear that the housing needs of the population have not been met. This is especially true amongst the lowest income brackets. The fact that vacancy rates are near or at zero with existing waiting lists in nearly all of our subsidized housing stock also speaks to unmet need.

Describe the need for specific types of housing:

Types of housing that are more affordable relative to household income are greatly needed. With such small, slow growing housing stock, the few vacant units in growing parts of the state carry high rents or sales prices relative to the income level of people experiencing the most severe needs. There are also several co-occurring factors that suggest a greater need for accessible, small units within easy walking distance from municipal centers. As discussed elsewhere in this report, Vermont's population continues to age and household size among all age groups continues to stay smaller than historical averages. In consultation with numerous stakeholder groups, it was also made clear that there is a growing desire for units within a short distance from centers for social interaction and the provision of services. This suggests that the policies of encouraging Smart Growth in and around our historic development patterns should continue to be prioritized. There is also a clear need for greater accessibility within the housing stock as the aging population increasingly encounters mobility challenges.

Discussion

MA-15 Cost of Housing – 91.310(a)

Introduction

Housing costs in much of the state continue to rise as wages have been generally stagnant. The move towards telework after the onset of the pandemic has also affected the housing market, with a notable number of new residents moving into the state with high purchasing power. This contributes to the affordability issues that affect Vermont as well as many areas across the country. The most prevalent housing problem in Vermont is Cost Burden with nearly 31% of all households experiencing some cost burden and approximately 17% experiencing a severe cost burden.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	217,500	220,600	1%
Median Contract Rent	778	821	6%

Table 30 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	16,263	21.3%
\$500-999	37,779	49.6%
\$1,000-1,499	16,162	21.2%
\$1,500-1,999	4,366	5.7%
\$2,000 or more	1,644	2.2%
Total	76,214	100.0%

Table 31 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	7,150	No Data
50% HAMFI	18,430	10,895
80% HAMFI	47,540	38,150
100% HAMFI	No Data	62,815
Total	73,120	111,860

Table 32 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent					
High HOME Rent					
Low HOME Rent					

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

No. Vermont's rental vacancy rate has decreased substantially since 2010, which mirrors the pattern experienced nationwide. This suggests strong demand for Vermont rentals relative to the supply available. While homelessness continues to be a significant issue in Vermont, and the lowest income bands are struggling, it is becoming increasingly apparent that households earning between 80% and 120% of area median income are also having difficulty finding suitable housing options. With a greater purchasing power than their lower income neighbors, these households have the potential to outbid for the available housing units and add to the downward pressure on those seeking housing affordable at low-income levels.

How is affordability of housing likely to change considering changes to home values and/or rents?

Without significant increases in wages or available housing units, housing affordability is expected to continue to be a challenge in many parts of the state.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

ACS estimates of area median rent are often lower than the rents of market rate units available. This occurs because (1) in many places, subsidized apartments with rent limits make up a large portion of the rental stock and (2) housing quality is poor among many market rate rentals. The Vermont Housing Finance Agency conducted analysis of a number of different sources of rental data as part of the statewide Housing Needs Assessment. Median monthly gross rental cost estimates for all unit bedroom amounts is \$1,193 in Vermont with a range from a low of \$904 in Caledonia County to \$1,590 in Chittenden County.

Regardless of number of bedrooms, in all cases 2025 Fair Market Rent (FMR) amounts are lowest in Caledonia County and highest in the Burlington Metropolitan Statistical Area. These ranges are significant. In the past five years, rental rates have climbed considerably, likely due to higher income individuals relocating to Vermont due to an ability to work remotely with out-of-state employers.

Given the lack of available, subsidized multifamily rental units in the state, many residents must choose from alternatives in the private market. In Vermont, these are typically single family and duplex rentals and units over storefronts. It appears that most non-conventional rentals are priced above Fair Market Rents and HOME rents, limiting the ability of low-income households to afford most non-conventional rentals. It is critical, therefore, to continue to preserve existing affordable housing and strive to create additional affordable housing opportunities in the state.

Discussion

MA-20 Condition of Housing – 91.310(a)

Introduction:

Detailed data on housing problems both statewide and by county are included in the Vermont Housing Needs Assessment. As defined by HUD, housing problems are cost burden, overcrowding, and lack of a complete kitchen or plumbing facilities (substandard housing).

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

The State's definitions are as follows:

"Standard Condition" means: A housing unit that meets HUD's Section 8 Housing Quality Standards.

"Substandard Condition but Suitable for Rehabilitation" means: A housing unit that does not currently meet HUD's Section 8 Housing Quality Standards, but is structurally sound and can be brought up to code for less than replacement cost.

(The table below refers to HUD's definitions.)

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	52,020	29%	34,940	46%
With two selected Conditions	923	1%	1,833	2%
With three selected Conditions	97	0%	274	0%
With four selected Conditions	5	0%	0	0%
No selected Conditions	129,276	71%	39,167	51%
Total	182,321	101%	76,214	99%

Table 34 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	26,885	15%	8,177	11%
1980-1999	53,086	29%	15,814	21%
1950-1979	55,265	30%	21,770	29%
Before 1950	47,085	26%	30,453	40%
Total	182,321	100%	76,214	101%

Table 35 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	102,350	56%	52,223	69%
Housing Units build before 1980 with children present	13,145	7%	9,560	13%

Table 36 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 37 - Vacant Units**Need for Owner and Rental Rehabilitation**

Vermont's housing stock continues to be some of the oldest housing stock on average in the country and is seeing an increasing need for rehabilitation. This is true in both owner occupied and rental occupied homes, although rental stock tends to be older on average than owner occupied housing stock. Of all Vermont's housing stock nearly 60% was built before 1980 and a quarter of the stock was built before 1939. The median construction year for Vermont's rental housing stock was 1964 compared to a median construction date for owner-occupied housing in 1976. Several programs have been instituted in the past five years to address these issues, most notably the Vermont Housing Improvement Program, which has assisted in the rehabilitation of 1,061 rental units. The Department of Housing and Community Development has also been conducting the Manufactured Home Improvement and Repair Program, which assists manufactured homeowners with grants to stabilize their housing and address habitability issues. These programs are aimed at reducing the number of households falling into homelessness and increasing the viability of underutilized buildings in our communities.

Discussions with Vermont Legal Aid and the network of homelessness service providers operating in Vermont indicate that the lack of rental housing options that meet basic habitability standards is a barrier to housing those experiencing homelessness. Additionally, it is understood that low rental vacancy rates lead many low- and moderate-income renters to suffice with living in substandard conditions. Public outreach also garnered numerous

comments about the inability of communities outside Chittenden County to attract new residents despite job availability. The major reason cited for this challenge was the significant rehabilitation needs of the existing housing stock that made purchasing or renting in the area undesirable to potential employees and residents.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

An estimated 191,325 homes, or 58% of Vermont's housing stock was built before 1978, when lead-based paint was banned for residential use in the United States. An analysis of ACS PUMS data, conducted as part of the Vermont Housing Needs Assessment, suggests that 36,589 Vermont homeowner and 36,123 Vermont renter households live in homes that were built before 1978 and earn incomes less than 80% of Area Median Income. These low to moderate income households would likely struggle with the cost of lead paint remediation or abatement. In 2018 alone, the Vermont Department of Health identified 420 children under the age of six who tested positive for elevated levels of lead in their blood.

To address these issues, Vermont has two lead remediation programs, one administered by The City of Burlington and limited to Burlington and Winooski, and the Lead-Based Paint Program, administered by the Vermont Housing and Conservation Board, that covers the rest of the State. Since 1980 these two programs have remediated lead from roughly 3,562 homes with over 2,900 of those homes outside of the City of Burlington. While other homes may have been remediated at personal cost, the homes addressed through these two programs represent just under 5% of Vermont homes at high risk of containing lead paint. This would suggest that ongoing resources must be applied to this issue to reduce exposure risk to deteriorating lead paint.

Discussion:

MA-25 Public and Assisted Housing – (Optional)

Introduction:

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	98	1,792	6,248	751	4,815	521	3,553	6,675
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data PIC (PIH Information Center)
Source:

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Discussion:

MA-30 Homeless Facilities – 91.310(b)

Introduction

This section includes a brief inventory of facilities, housing, and services that meet the needs of homeless persons, with a particular focus on chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. In Vermont, many facilities are available to serve both families and individuals. Particularly in rural areas, few facilities are targeted to a subpopulation. In the following table, emergency shelter refers to any facility, the primary purpose of which is to provide a temporary shelter for the homeless, and which does not require occupants to sign leases or occupancy agreements. Transitional housing projects are designed to provide housing and supportive services to homeless persons to facilitate movement to independent living within 24 months. Permanent Supportive Housing is permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Vermont used preliminary 2025 HIC data to complete the following table. Currently the 2025 HIC and PIT do not have a due date and HDX 2.0 is not open to submit this data to HUD. It is possible that the HIC data will change slightly when HUD determines a due date and open HDX 2.0 for submission.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	681	892	36	188	11
Households with Only Adults	336	1441	74	459	0
Chronically Homeless Households	0	0	0	647	11
Veterans	0	8	42	196	0
Unaccompanied Youth	50	3	32	0	0

Table 39 - Facilities Targeted to Homeless Persons

Data Source: Preliminary 2025 HIC

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are a number of statewide initiatives to better leverage mainstream resources:

- There has been a significant effort to increase substance use treatment and recovery services through the “hub and spoke” model, and integrated screening for substance use across all AHS programs, and training for recovery center staff. OEO has and will continue to offer training opportunities for homeless shelters and service providers focused on substance use and co-occurring disorders. OEO recently proposed a project to the Vermont Opioid Settlement Advisory Committee to support long-term programs at emergency shelters for those experiencing homelessness through trainings, harm-reduction supports, and clinical nursing programs. The Advisory Committee recommended OEO’s project be funded and this recommendation was supported by the Vermont Department of Health. Final project approval and funding is currently under review by the Legislature for FY26.
- AHS and the prior version of the Vermont Council on Housing and Homelessness have made significant developments to discharge policies and protocols for those publicly funded systems of care.
- AHS Department of Mental Health Subsidy Plus Care program provides ongoing rental subsidy and assistance to adults with severe and persistent mental illness.
- The Vermont Chronic Care Initiative (VCCI) is a statewide program that provides care coordination and intensive case management services to non-dually-eligible Medicaid beneficiaries with one or more chronic conditions, with a focus on improving outcomes and reducing unnecessary utilization.
- The Vermont Blueprint for Health is a State-led, nationally-recognized initiative transforming the way primary care and comprehensive health services are delivered and paid for. Under the Blueprint, increased value is placed on addressing the social determinants of health, such as homelessness.
- AHS Department of Corrections Transitional Housing programs provides re-entry support to prevent homelessness and reduce recidivism.
- AHS Reach Up (TANF) case managers support housing placement and retention for homeless and at-risk households enrolled in TANF. Two of ten communities contract with community-based housing case managers to offer additional housing-related services.
- Vermont has expanded the capacity of nonprofit homeless service providers to connect clients to Supplemental Security Income (SSI) and Social Security Disability (SSDI) benefits through SSI/SSDI Outreach, Access and Recovery (SOAR) training.

In addition to the above list, a wide array of mainstream resources are coordinated through local service providers and CoC, including:

- Community-based Mental Health Services
- Vocational Rehabilitation

- Legal Aid
- Area Agencies on Aging
- Community Action Agencies, including utility assistance
- Head Start programs
- Parent Child Centers, childcare assistance
- Women, Infants and Children (WIC)
- Federally Qualified Health Centers and free clinics
- SNAP (3SquaresVt), and SNAP Employment & Training programs

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

OEO administers funds that support homeless services and facilities across Vermont, including the Emergency Solutions Grant and State funds. In State Fiscal Year 2025, these combined funds supported operations, staffing, and homelessness prevention and rapid re-housing assistance at approximately 35 non-profit emergency shelter, transitional housing, coordinated entry, re-housing and prevention organizations serving all regions of the state. Through the General Assistance program, AHS Department for Children and Families provides funding for motel vouchers when no appropriate shelter bed can be found. This represents a significant portion of Vermont's emergency shelter overflow capacity. Except during the cold weather months, the length of stay in a motel is capped at 80 nights for eligible households.

OEO administers the Family Supportive Housing (FSH) project which provides intensive home-based case management and service coordination to formerly homeless families with children, many with DCF family services involvement. OEO is also in the process of standing up a new Permanent Supportive Housing Assistance program authorized by Vermont's Global Commitment to Health 1115 Demonstration waiver. This program is intended to support Permanent Support Housing services that help Vermonters with complex health and social needs to successfully transition into and maintain residency in permanent housing.

The Transitional Living Programs of the Vermont Coalition of Runaway and Homeless Youth Program (VCRHYP) member organizations helps youth ages 16 to 24 that are homeless or at risk of becoming homeless make the difficult transition into adulthood by helping them reengage with education, increase employability, and build vital life skills. Youth receive housing support through VCRHYP transitional living programs. VCRHYP programs also provide support to help stabilize families in crisis in order to prevent youth from running away from home; or help those who already have.

Facilities and services available specifically to Veterans experiencing homelessness include the Supportive Services for Veterans Families program (rapid rehousing and prevention), HUD-VASH (permanent housing), and several facilities with transitional housing targeted to serve Veterans.

HUD's competitive CoC SHP programs funds services and programs in Vermont as well. Some of these services and facilities overlap with those addressed above. The CoC SHP supports transitional shelter facilities, support services, and permanent supportive housing. As permanent supported housing vouchers and units become available, they are being targeted to serve persons experiencing chronic homelessness.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

This section provides an overview of programs within the AHS Department of Mental Health, supportive services linked to housing for the elderly and frail elderly, persons with disabilities, and more limited options for other populations such as persons with addiction. The Agency of Human Services also reviews discharge procedures and practices across the agency to support housing stability for Vermonters with special needs.

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

For people exiting mental health institutions, discharge-planning is a partnership between the local community partner agencies and a DMH Care Management Team (CMT). Discharge-planning from acute care is a plan of return to the community. The hospital social workers have the primary responsibility for connecting clients and their care with and to the local community and its resources. The DMH CMT helps to facilitate this process through active partnerships with the agencies that provide the primary support and services to the individual in the community. DMH is the single agency in VT that has the primary responsibility for coordinating the activity of all stakeholders involved in the community re-entry system for homeless mental health consumers who are in treatment in acute care beds.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

AHS Department of Mental Health (DMH) supports a number of community-based options for persons leaving a State psychiatric bed and returning to the community. These programs work together to ensure housing stability for this vulnerable population. In addition to Safe Haven and Transitional options for the homeless, DMH supports:

- The Mental Health Subsidy & Care program, modeled after federal Shelter plus Care which provides tenant-based rental vouchers for people with serious mental illness coming from a hospital or acute care setting.
- The Community Rehabilitative Treatment (CRT) Housing Support Fund, which provides subsidy as well as start-up and move-in costs to people who meet CRT definitions.
- Housing First programming which uses a team-approach to provide optional services to clients with mental illness who are not connected to the State's system of designated agencies.

For people with physical or developmental disabilities, AHS' Department of Disabilities, Aging and Independent Living provides:

- Home & Community Based Services to help pay for home modifications for physical accessibility and for modifications related to an individual's disability, including cost effective technology that promotes safety and independence
- Funding to pay for assistive technology, adaptive equipment, and home modifications to make the home physically accessible, and other special supports and services not covered under the Medicaid State Plan
- Funding to help cover the costs associated with moving into an apartment (rent furnishings), including Supported Apartment Fund and Brandon Training School Fund (for people who use to live in the state institution)
- Through its network of non-profits, used furnishings/appliances are offered through grants from community organizations and VT's participation in the ABLE account program
- Supports, including by Public Guardians, GMSA & their local peer support network and VT Center for Independent Living, to assist participants apply for vouchers, locate apartments and successfully transition to tenancy
- Financial support to those transitioning from institutional settings like nursing homes to community-based housing through the Money Follows the Person program, which helps prevent homelessness and ensure that older Vermonters and individuals with disabilities can live independently
- Funding for the Support and Services at Home model to care for older adults in their own home, thus avoiding homelessness and/or nursing home care

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

In general, Vermont promotes supported housing integrated into non-specialized residential buildings or settings. This strategy is aided by promotion of universal design through the State qualified allocation plan, as well as mixed-income housing achieved through project and tenant-based rental assistance and on-site supportive services customized to a client's needs.

The challenges of addressing the housing and support service needs of multi-faceted and will take the collaboration of all State agencies and community partners to ensure that vulnerable Vermonters are able to become and remain stably housed. All communities benefit when residents are safe, healthy and connected.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A for State grantees

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

A number of state and federal public policies negatively impact the cost of housing and the incentives to develop, maintain or improve affordable housing. In most cases, these policies are sound and designed to provide ancillary benefits but have an effect of making housing more costly or difficult to develop. Listed below are barriers to affordable housing identified through past analyses of housing development barriers. The list also reflects information gathered from a broad group of planning, development and municipal stakeholders. There has been a growing acknowledgement among lawmakers of the need to reduce these barriers and efforts have been made in the past legislative sessions to reduce the permitting burden in Vermont's designated development areas.

1. Limited public resources, particularly decreasing funding for development, preservation, services and subsidies that support affordable housing.
2. Increasing standards for energy efficiency.
3. State and local land use controls.
4. Permitting processes and community development standards – particularly the broad eligibility of appellants.
5. Limited funding to promote Fair Housing and address discrimination in rental and sales housing markets.
6. Federal funding regulatory requirements such as the National Environmental Policy Act, Davis-Bacon, Procurement and Build American Buy America (BABA) requirements.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

This section summarizes the State of Vermont non-housing community development assets, major sectors of the economy, educational attainment, and workforce development.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	3,571	3,782	2	2	0
Arts, Entertainment, Accommodations	31,637	31,932	13	14	1
Construction	14,395	14,603	6	6	0
Education and Health Care Services	59,434	50,473	25	22	-3
Finance, Insurance, and Real Estate	10,921	10,099	5	4	0
Information	4,301	4,279	2	2	0
Manufacturing	28,003	28,203	12	13	1
Other Services	7,992	7,573	3	3	0
Professional, Scientific, Management Services	15,816	12,994	7	6	-1
Public Administration	0	0	0	0	0
Retail Trade	35,059	34,136	15	15	0
Transportation and Warehousing	6,291	6,391	3	3	0
Wholesale Trade	8,691	8,668	4	4	0
Total	226,111	213,133	--	--	--

Table 40- Business Activity

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	317,109
Civilian Employed Population 16 years and over	304,875
Unemployment Rate	3.84
Unemployment Rate for Ages 16-24	12.72
Unemployment Rate for Ages 25-65	2.49

Table 41 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	80,618
Farming, fisheries and forestry occupations	9,556
Service	29,224
Sales and office	58,801
Construction, extraction, maintenance and repair	30,878
Production, transportation and material moving	17,846

Table 42 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	184,387	68%
30-59 Minutes	71,504	26%
60 or More Minutes	15,916	6%
Total	271,807	100%

Table 43 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	9,382	870	7,577
High school graduate (includes equivalency)	62,757	2,656	20,034
Some college or Associate's degree	63,575	1,674	14,837
Bachelor's degree or higher	103,497	2,269	13,865

Table 44 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	477	766	766	2,551	4,156
9th to 12th grade, no diploma	5,018	3,022	2,921	7,973	5,242
High school graduate, GED, or alternative	18,937	17,209	16,197	52,033	35,343
Some college, no degree	19,348	12,663	11,508	27,378	19,341
Associate's degree	2,003	5,858	6,265	16,766	8,996
Bachelor's degree	5,874	20,369	18,369	35,426	22,566
Graduate or professional degree	292	7,301	11,432	27,229	20,660

Table 45 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	
High school graduate (includes equivalency)	
Some college or Associate's degree	
Bachelor's degree	
Graduate or professional degree	

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

Based on the Business Activity table above, the largest employment sector is Education and Health Care Services, employing approximately 25% of the workers in the state. This is followed by Retail Trade (15%). Arts, Entertainment, Accommodations and Manufacturing each employ 13% of the state's workers.

Describe the workforce and infrastructure needs of business in the state.

Maintaining a settlement pattern that promotes development within our traditional growth areas through state Designation programs is an important tool to support our recreation and tourism sectors as well as supporting our existing developed growth centers where much of our retail and service businesses are located. By focusing on development and redevelopment within Designated Downtowns, and Village Centers the State promotes smart growth development by planning for working lands (agricultural and forest) and open space that the State is known for, while allowing economic and community development to be supported in a manner that discourages sprawl development.

Vermont's population is aging more rapidly than the nation's. This creates challenges to our education system, tax structure, customer base and workforce. It also raises questions about succession in the many small businesses that make up a large part of our economy. More Vermonters will be leaving the workforce in the foreseeable future than will be entering it. Thus, recruiting younger workers from outside the state and training the youth and workforce currently within the state will be important to maintain a healthy employment base. This includes training for the new “technical and manufacturing jobs” of the future.

As of March 17, 2025 the Vermont Department of Labor reported data on the Vermont economy for the time period covering January 2025. According to household data, the seasonally adjusted statewide unemployment rate for January was 2.6 percent. This reflects an increase of one-tenth of one percentage point from the prior month's revised estimate. The civilian labor force participation rate was 65.5 percent in January, no change from the prior month's revised estimate.

“The latest data indicates an uptick in unemployment compared to 12 months ago, with Vermont's unemployment rate now at 2.6%. Despite this increase, the rate remains low for the state and below the national average.

The average duration of unemployment remains near historic lows, indicating that most individuals are securing new employment relatively quickly after job loss. However, we recognize that even short periods of unemployment can be challenging for individuals and their families. The Department has two critical roles to play during these challenging times – ensuring individuals who lose their job have access to both unemployment and reemployment services, and assisting businesses in finding needed talent. To access our suite of resources and services, visit labor.vermont.gov.” - Michael Harrington, Commissioner

The Vermont seasonally adjusted unemployment rate rose to 2.6 percent in January. The comparable United States rate in January was 4.0 percent, a decrease of one-tenth of one percentage point from the revised December estimate. The seasonally adjusted Vermont data for January show the Vermont civilian labor force increased by 188 from the prior month's revised estimate (see Table 1). The number of employed persons increased by 113 and the number of unemployed persons increased by 75. None of the changes were statistically significant in the seasonally adjusted series.

The January unemployment rates for Vermont's 14 counties ranged from 2.3 percent in Chittenden County to 5.7 percent in Orleans County (note: county unemployment rates are not seasonally-adjusted – see Table 2). For comparison, the January unadjusted unemployment rate for Vermont was 3.0 percent, an increase of five-tenths of one percentage point from the revised unadjusted December level and an increase of five-tenths of one percentage point from a year ago. “

Vermont has an estimated 335,061 homes, of which 196,446 are owner homes (59%), 76,262 are renter homes (23%), and 51,474 are used as seasonal or vacation homes (15%). The

remaining 10,879 are vacant homes used occasionally for migrant workers or with no specific use indicated (3%).¹ The composition of Vermont's housing stock varies widely by county. Chittenden County has the highest share of rental housing (36%), containing 31% of the state's overall rental stock. Orange County has the state's highest rate of owner housing (71%), with comparatively few seasonal or rental homes.*

*Data source: U.S Census Bureau, American Community Survey 5-year estimates, 2018-2022

Vermont is likely to need an additional 24,000-36,000 total homes across the state in 2025-2029.² Without increased supply, Vermont's home sale and rental markets will continue to grow tighter, with prices likely to continue to increase.*

*Data sources: U.S. Census Bureau data (American Community Survey estimates, Population and Housing Unit Estimates and Current Population Survey/Housing Vacancy Survey) and the Vermont Coalition to End Homelessness and the Chittenden County Homeless Alliance 2023 Point-In-Time Count of those Experiencing Homelessness. "Pre-pandemic demand" is based on household demand increases in 2016-2019 of 1% per year. "Pandemic-era demand" is based on 2019-2022 household demand increases of 1.8% per year. Assumes a target vacancy rate of 5% for rental homes and 2% for owner homes and annual housing loss rate of 0.15%.

Aging infrastructure that service Vermont's many small, rural towns and Villages, including water and wastewater systems that were installed during the 1970's and 1980's with Federal funding have capacity to support new development but the infrastructure (pipes, and treatment facilities) is reaching the end of their expected useful life and are in need of major upgrades to comply with increased treatment regulations. The roads and bridges, essential for transportation, will require continued maintenance. The small tax base of these rural communities will require additional Federal and State financial support to be able to be brought up to current standards.

In addition, Vermont's energy costs, while low in New England, remain high relative to the rest of the country. To tackle these and other issues, and to explore new ways to grow our economy the State undertook an aggressive strategy to look at the state's economic challenges and opportunities. The Vermont Department of Economic Development completed a Statewide Comprehensive Economic Development Strategy (CEDS) that lays out a road map and an economic development action agenda. As much as possible, the Statewide CEDS focuses on actions that can be taken and goals that could be achieved without requiring new legislation or taxes. Similar planning has also been completed on a more regional basis as well.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The challenges referenced above are real, but local strategies, regional partners and guidance from Vermont's statewide CEDS, and regional project priority list developed by the regional development corporations identify opportunities for investments that will support a strong economic future for Vermont.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

As evidenced by the above table "Educational Attainment by Employment Status (Population 16 and Older)", Vermont has a relatively well-educated workforce. Nearly the entire labor force in Vermont (96% of civilian employed in the labor force) has graduated High School and 67% of civilian employed in the labor force have at least some college education. This bodes well for expanding high-tech service and manufacturing businesses in the state that have expressed a need for additional workers. To support these types of employment opportunities, expanding educational and training programs will continue to be a major policy focus.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Initiatives to extend internet connectivity and broadband service throughout the state have opened up opportunities in rural areas and contributed to a growing number of technology-based companies in Vermont's few population centers. The State must continue to train existing workers as well as recruit new workers into the state to support growing industries such as manufacturing and renewable energy.

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Describe any other state efforts to support economic growth.

The State of Vermont utilizes planning initiatives such as the statewide Regional Project Prioritization List. Ongoing efforts are pursuing permitting reform (ACT 250 development regulations) to identify how and where to best support economic growth through the entire

State. Revenue sources that the State utilizes to support economic growth including those provided through funding incentives such as the State Designation programs (Downtown, Village Center, Neighborhood, and Growth Center) and equity raised for projects through Opportunity Zones, New Market Tax Credits, State and Federal Historic Tax Credits and funding through Vermont Housing and Conservation Board (Federal HOME funds, State housing funding, conservation funding etc.), and equity raised through LIHTC that are administered by VHFA. Other State efforts to support economic development supported by State and local bonding authority include Tax Increment Financing and the Vermont Employer Growth Incentive (VEGI). The Elevate Vermont is a technology-based economic development program designed to catalyze growth in Vermont's high tech business sector through increased access to targeted technical and research assistance. Tax Increment Financing (TIF) is a tool that municipalities use to finance improvements for public infrastructure like streets, sidewalks, and storm water management systems. The improvements serve a specified area known as the TIF District. Active and retired TIF Districts have proven that TIF leverages additional private investment that builds and renovates the housing, commercial, and retail space needed to grow jobs and the economy.

The Vermont APEX Accelerator program provides direct support to Vermont businesses in obtaining contracts with the Federal Government. Various employment training opportunities are administered at the state, regional, and local level by both the State of Vermont and its Regional Development Corporations (RDC) and technical career centers.

Many of the efforts to support economic development are administered through the Vermont Department of Economic Development. Other efforts to highlight include the State Energy Plan which will support the creation of thousands of new green energy sector jobs through weatherization and energy conservation efforts, local renewable energy development from wood, on-farm methane digesters, wind and solar facilities.

"Nearly 90,000 renter and owner households (36% of all households in the state) are cost burdened by their housing costs. This means their monthly housing costs consume more than 30% of their income for rent, mortgage, insurance, taxes and utilities --the maximum level considered affordable for the average household. Of these cost burdened Vermonters, 39,000 households (16%) spend more than half of their income for housing." (2020 Vermont Housing Needs Assessment) One long term strategy to address the imbalance between incomes and rent is to increase the number of good paying jobs with support through the programs already described above.

It is important to include the efforts of our statewide and regional economic development partners. Vermont Economic Development Authority, Community Capital of Vermont, and Vermont Community Loan Fund provide access to capital for small, non-traditional, start-up businesses and entrepreneurs. Additional resources and services such as; the Small Business Development Center, Vermont Center for Emergent Technologies, Small Businesses Administration, USDA-Rural Development, and dozens of regional and local economic

development revolving loan funds are available to help existing businesses grow and assist with start-up and emerging businesses. The Regional Economic Development Councils (RDC's) and Regional Planning Commissions (RPC's) are key to providing assistance to businesses for access to capital, permitting assistance and workforce training. They act as liaisons and advocates for businesses with State and federal programs. They are available and accessible and know the needs of businesses in their region. In general, businesses in Vermont value Vermont's small scale and see access to industry and government leaders as a real advantage over larger states.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

As Vermont is predominately rural there are few concentrated areas. However, for the purpose of this Plan, an area of concentration may be considered a county where a significant percentage of households have multiple housing problems relative to the population as a whole. Co-occurring housing problems are spread throughout all counties of the state. Cost burden is by far the most common housing problem experienced and is relatively even throughout the state, with slightly more variation of severe cost burden.

Overall, 31% of Vermont's households are housing cost burdened, and of those 14% are extremely cost burdened, spending 50% or more of their incomes on housing. However, renters are disproportionately cost burdened compared to homeowners. 51% of all renters in Vermont are housing cost burdened, with 25% experiencing extreme housing cost burdens. In the last 5-year analysis, Lamoille County had the highest cost burden, however, it has switched due to the relatively low housing cost in Lamoille and Essex Counties, compared to the state overall. 39% of households in Lamoille County are housing cost burdened; all other counties are at 45% or higher. Bennington County has the highest rate at 59%.

Data on housing problems are included in the 2025-2029 Vermont Housing Needs Assessment statewide and county chapters.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Approximately 90.9% of Vermont households are headed by someone who identifies as White; Racial and ethnic minority households make up only 9.1% of Vermont households. Many of the state's minority households live in or near the City of Burlington, in Chittenden County, which is Vermont's largest city and is a HUD entitlement community. 96.2% of Vermont were headed by someone who identified as white in the 2020-2024 Housing Needs Assessment, so Vermont is slowly becoming more diverse.

As Vermont is predominately rural there are few concentrated areas. However, for the purpose of this Plan, an area of concentration may be considered a county with a significant percentage of minority or low-income families relative to the population as a whole. Based on this assessment it does not appear that any particular county has a disproportionately high share of minorities and hence lack a concentration of racial or ethnic minorities.

Data on racial and ethnic populations and households by income are included in the Vermont Housing Needs Assessment statewide and county reports.

What are the characteristics of the market in these areas/neighborhoods?

N/A

Are there any community assets in these areas/neighborhoods?

N/A

Are there other strategic opportunities in any of these areas?

N/A

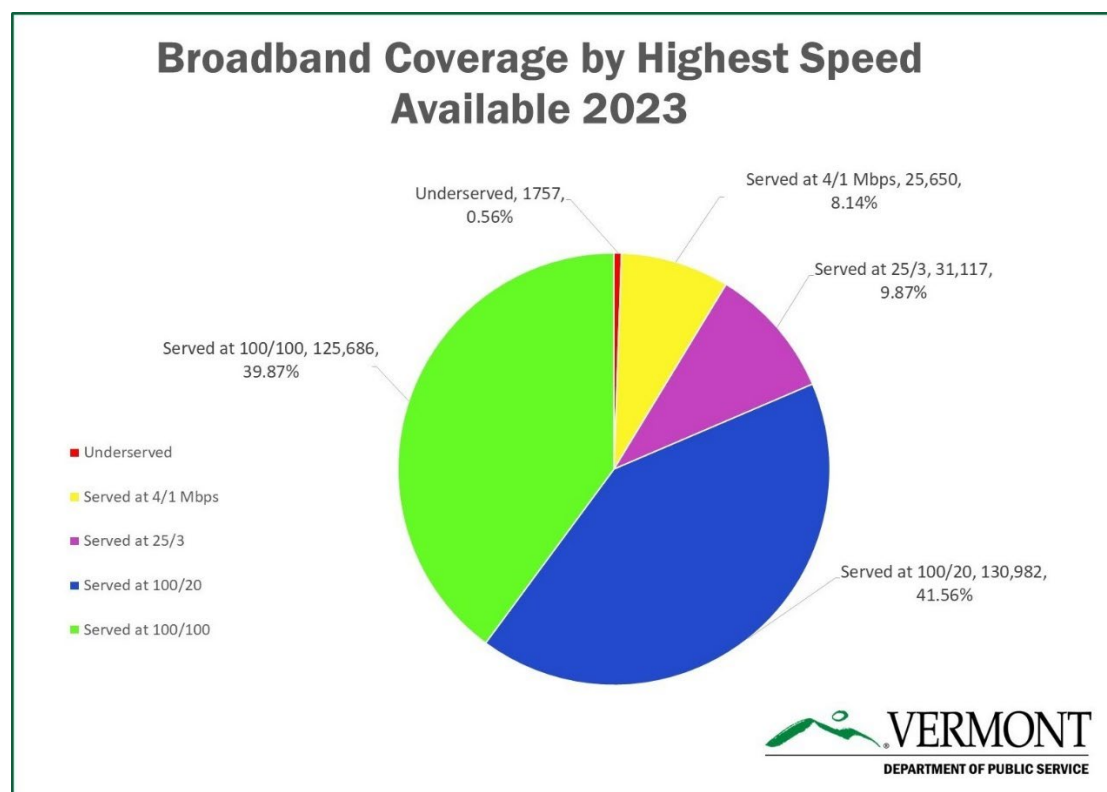
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Reference <https://publicservice.vermont.gov/content/broadband-availability>

Each tier shows the quantity of locations served at that speed or better for 2024 (as of 3/20/2025)

Speed Tier	Served	Percent	Not Served	Percent
100/100 Mbps	158,275	50.04%	157,991	49.96%
100/20 Mbps	269,004	85.06%	47,262	14.94%
25/3 Mbps	296,049	93.61%	20,217	6.39%
4/1 Mbps	315,075	99.62%	1,191	0.38%



According to the Vermont Department of Public Service, 302,917 out of 313,062 E911 building locations (96.8%) statewide are served at 4/1 Mbps or better by independent telephone companies, cable, or fiber to the premises.

10,145 out of 313,062 E911 building locations (3.2%) statewide are served with broadband less than 4/1 Mbps. Of these locations, some number are already served at 4/1 or better but this cannot be verified due to the inability of the companies to provide accurate data at this time.

The broadband dataset was prepared by the Vermont Department of Public Service (PSD) on 11/15/2022

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The Broadband Innovation Grant program was launched by the Vermont Department of Public Service on August 6, 2019, to help communities conduct feasibility studies and create business plans related to the deployment of broadband in rural, unserved and underserved areas of Vermont. The program awarded up to \$60,000 per grant to eligible grantees including non-profit organizations, for-profit businesses, cooperatives, distribution utilities, communications union districts, and other government entities. Grantees must deliver a feasibility study that proposes new broadband systems with minimum speeds of 25 Mbps download and 3 Mbps upload in unserved or underserved areas.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

As the climate continues to warm, Vermont anticipates an increase in volatility regarding precipitation and temperatures and a marked frequency and severity of weather-related disasters. As is true of the rest of the country, Vermont has historically sited communities and infrastructure in valleys and near waterbodies. With climate change models predicting increased precipitation and stronger storms in New England, many communities in Vermont now find themselves and their infrastructure increasingly vulnerable to natural disasters such as flooding. As a State with a population that is more aged on average than the nation as a whole, extreme temperatures pose a notable risk to our elderly population. Vermont and Vermonters have long been accustomed to the challenges of assuring that our aging housing stock is capable of maintaining reasonable warmth during cold winter months, the jurisdiction is now also contending with the prospect of retrofitting older homes to accommodate systems to ensure reasonably cool temperatures in the increasingly warmer months as well.

Major flooding events in July 2023 and July 2024 resulted in Federal Declared Disasters. As a result of the July 2023 flooding event 141 of the 251 municipalities in Vermont were impacted.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Natural hazards can affect everyone in Vermont, but some populations may be more vulnerable to certain types of events or more significantly impacted during events. Vermont's Social Vulnerability Index (SVI) defines overall vulnerability by summarizing four themes: socioeconomic status, household composition and disability, minority status and language, and housing and transportation. The SVI identifies five 'flags' for socioeconomic vulnerability: Poverty, Unemployment, Income per capita, and Health Insurance. Every one of the 14 Vermont Counties has a municipality with at least one of these flags. These flags are more prevalent in the northeastern counties of Orleans, Essex, and Caledonia Counties within the state of Vermont.

Vermonters over the age of 65 is a specific demographic that is potentially more vulnerable to certain events, such as extreme heat and this age group is disproportionately lower income. In 2023, 22.2 % of Vermont residents were 65 years and older, an increase of 5.2% from 2016 when 17% of Vermont residents were 65 years or older. (based on estimates from the U.S. Census), above the national average of 17.7%. Vulnerability can also be economic. As noted in previous sections, Vermont has an aging housing stock and the need for rehabilitation and weatherization to mitigate extreme temperature events is a particularly high financial burden to low- and moderate-income households. While neither the State Hazard Mitigation Plan, nor other emergency management research conducted has identified that low- and moderate-

income households are disproportionately located in fluvial erosion hazard areas, it is understood that housing replacement for homes lost or damaged in flood events will be especially burdensome on low- and moderate-income households.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The State of Vermont has determined its highest priorities for the use of CDBG, HOME, HTF and ESG funds based on the statewide previous performance, housing needs assessment, market analysis, citizen and stakeholder input.

1. Safe, Decent, Accessible, and Inclusive Affordable Housing
2. Individuals and Families Experiencing Homeless
3. Strong Communities
4. Economic Opportunity

The plan establishes four goals to address the identified housing and community development priorities.

1. Increase the supply and quality of affordable housing.
2. Decrease the number of people experiencing homelessness.
3. Strengthening communities and improving the quality of life of Vermonters.
4. Create and retain jobs.

Vermont will use CDBG, HOME, HTF and ESG to leverage other public and private resources to achieve these goals. It will do so according to three guiding principles.

1. Achieving the perpetual affordability of housing resources and investments.
2. Promoting development in the State's designated downtowns, village centers, neighborhood development areas and other areas that are consistent with the state's historic settlement pattern and "Smart Growth", including 'new town centers', 'growth centers', and the addition of federally recognized Opportunity Zones.
3. Linking homeless assistance activities with permanent housing through systems, practices and initiatives that are informed by data and proven approaches.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

In keeping with the State’s long-standing policy, the State does not plan to target assistance to specific geographic regions. CDBG, HOME and HTF funds will be allocated on a competitive basis to locally driven projects that address priority needs.

ESG funds are awarded as part of the statewide Housing & Opportunity Grant Program (HOP). Awards are made on a competitive basis according to local needs.

SP-25 Priority Needs – 91.315(a)(2)

Table 48 – Priority Needs Summary

1	Priority Need Name	Safe, Decent, and Inclusive Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	N/A
	Associated Goals	Increase supply & quality of affordable housing
	Description	Addressing the housing gaps and needs identified in the Vermont Housing Needs Assessment by increasing the supply of decent, inclusive, and accessible affordable housing.

	Basis for Relative Priority	According to the results of the citizen outreach efforts and the Vermont Housing Needs Assessment, there is a significant need for housing that is affordable and high quality. In all areas of the state, residents cited high housing costs and quality levels below what was desired as a major issue. The low vacancy rates in both rental units and owner-occupied housing reported in the Housing Needs Assessment also speaks to this existing, and growing need. This issue also exacerbates impediments to fair housing, free from illegal discrimination and our efforts to ensure inclusive communities.
2	Priority Need Name	Individuals and families experiencing homelessness
	Priority Level	High
	Population	Extremely Low Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	N/A
	Associated Goals	Decrease the # of people experiencing homelessness
	Description	Decrease the number of families and individuals experiencing homelessness.
	Basis for Relative Priority	Incidences of homelessness have been growing throughout the state for the past several years. While efforts have been made to address this issue, it continues to be a problem and some Vermonters are living in unsafe situations. Eliminating the experience of homelessness is a high priority to ensure all Vermonters are safely housed.
3	Priority Need Name	Strong Communities
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Non-housing Community Development

	Geographic Areas Affected	N/A
	Associated Goals	Strengthen communities & improve quality of life
	Description	Strengthening communities through public facilities, infrastructure, services, accessibility, and planning activities
	Basis for Relative Priority	The long-term goals of the VCDP include the fostering of Strong Communities. Vermont's communities will be strengthened through addressing all of the Priority Needs.
4	Priority Need Name	Economic Opportunity
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Non-housing Community Development
	Geographic Areas Affected	N/A
	Associated Goals	Create and retain jobs
	Description	Increasing economic opportunity by supporting job creation and retention programs.
	Basis for Relative Priority	Creating and retaining jobs, particularly those that pay a livable wage is essential to sustaining healthy, vibrant communities and ensuring that housing is affordable. Economic development and lowering barriers to economic opportunity was perennially mentioned as a high priority throughout the community outreach process.

Narrative (Optional)

The State may use CDBG funds to help address the emergency natural disasters and or health situation that impact the state.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

<i>Affordable Housing Type</i>	<i>Market Characteristics that will influence the use of funds available for housing type</i>
Tenant Based Rental Assistance (TBRA)	Vermont will use ESG funds under Rapid Rehousing for TBRA for homeless households. This will be available statewide based on existing low vacancy rates and the limited availability of affordable units. Vermont does not use HOME funds for TBRA.
TBRA for Non-Homeless Special Needs	N/A - Vermont does not use HOME funds for TBRA
New Unit Production	Vermont has low vacancies and limited affordable housing availability throughout the state. New Unit Production is appropriate in many communities, particularly in downtown and growth centers.
Rehabilitation	Vermont has some of the oldest housing stock in the country. As such, much of it is in a condition that will require capital improvement to maintain minimum housing standards.
<i>Acquisition, including preservation</i>	Acquisition and preservation of existing affordable housing is essential to increasing availability. Funded by the U.S Department of Housing and Urban Development, the Vermont State Housing Authority administers and monitors 119 Housing Assistance Payments (HAP) contracts covering 3,268 apartments that are subsidized through the Section 8 Project-Based Rental Assistance (PBRA) initiative. Renewal, of up to 20 years, occurs at the date of contract expiration.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

During the five-year period covered by this Plan, Vermont anticipates receiving annually from HUD approximately \$7.4 million in CDBG funds to be used for housing, economic development, and public services and facilities, \$3 million in HOME funds to be used for housing, \$3 million in HTF funds to be used for extremely low income housing, and approximately \$700,000 in ESG funds to be used for emergency shelter and rapid rehousing for persons experiencing homelessness. The Vermont CDBG program estimates an additional \$200,000 in CDBG program income each year.

For the 2023 AAP, the Office of Economic Opportunity reduced the goal for rapid re-housing and rental assistance using ESG funding from 400 households to 250 and proposes to maintain this as the goal for the 2025 AAP as well. ESG funds will be used primarily for emergency shelters and State funds that are better suited and more flexible will be used for repaid re-housing and rental assistance going forward.

For the 2025 AAP, DHCD plans to increase the CDBG set aside for Scattered Site Homeownership RLFs (SS-RLF) from 35% of the state's allocation to 45% of the state's allocation.

As per HUD's goals, the State will use CDBG, HOME, HTF and ESG to provide decent, affordable housing, suitable living environments, and expand economic opportunities for low and moderate-income Vermonters. CDBG, HOME and ESG will be used strategically to address priority needs and leverage other federal, State, and local resources, including federal low-income housing tax credits.

The State's LIHTC program is administered by the Vermont Housing Finance Agency (VHFA) in accordance with Vermont's Qualified Allocation Plan (QAP) which closely reflects the priorities, goals and strategies of the Consolidated Plan.

A significant source for non-housing community development is equity generated by New Market Tax Credits which are utilized by Evernorth Rural Ventures, a qualified community development enterprise. Both VHFA and Evernorth sit on the Housing and Homelessness Council and the Consolidated Plan Advisory Board ensuring close coordination. Additional resources that may be leveraged to support the goals of the Consolidated Plan include Section 8, McKinney-Vento, Vermont Housing and Conservation Trust and matching funds.

Each program will be administered according to the State's three guiding principles:

1. The first is achieving the perpetual affordability of housing resources and investments.
2. The second principle is promoting development in State designated Downtowns, Village Centers, Neighborhood Development Areas and other areas that are consistent with the state's historic settlement pattern and "Smart Growth" – including designated New Town Centers and Growth Centers.
3. The third principle is to link our homeless assistance activities with permanent housing through systems, practices and initiatives that are informed by data and proven approaches. Under all circumstances, the State is committed, and obligated, to ensuring that any project funded, and those entities responsible for administering such funds must work towards overcoming illegal housing discrimination and broadening housing options for all people.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,485,780	200,000	0	7,685,780	30,400,000	Assuming \$7.4 million annual allocation plus \$200,000 in program income.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,014,372	0	0	3,014,372	12,000,000	Assuming \$3 million small State minimum annually. HOME will be used for Multifamily rental new construction and rehab.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	722,944	0	0	722,944	2,800,000	ESG will be used for Overnight shelter and Rapid re-housing (rental assistance). Expected amount available assumes \$700,000 annual allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,134,373	0	0	3,134,373	12,000,000	Assuming \$3 million small state minimum annually.

Table 50 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

For CDBG funds, VCDP's Program Guidelines require applicants to provide a full description of how matching requirements will be met including the name and address of the source and indicate whether it is a loan, grant, cash, cash-in-kind goods or services, etc. Matching requirements are as follows:

1. Implementation Grants (IG): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds.
 - a. Economic Development Loans: borrower must provide cash-equity of at least 10% of the total project cost. This cannot be borrowed or otherwise encumbered money. Note: The Agency may waive the 10% equity match required for a VCDP economic development project if justified.
 - b. Blighted: Cash or cash-in-kind goods or services of at least 10% of the CDBG funds. This match must directly fund remediation of the Blighted condition.
 - c. Urgent Need: Cash or cash-in-kind goods or services of at least 10% of the CDBG funds. This match must directly fund remediation of the Urgent Need.
2. Scattered Site Housing Grants (SS): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds.
3. Planning Grants (PG): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds.
4. Accessibility Modification Grants (AM): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds for Handicapped Accessibility work on municipally owned buildings and community libraries.

If a community has an inactive VCDP/HUD funded Revolving Loan Fund (RLF) as defined by Agency Procedures, at least 20% of the RLF balance on hand must be committed to the project when applying for CDBG funds.

For HOME funds, priority is given to projects with non-federal funding sources for leveraging HOME Funds to ensure the overall HOME Program meets the 25% match requirement. Projects must demonstrate leverage of resources and cost-effectiveness, which may include but is not limited to density bonuses, energy efficiency, lead paint hazard abatement, and historic preservation. Vermont Housing Conservation Board (VHCB) State funding for housing is often used as a match for the HOME Program.

ESG requires a dollar-for-dollar match. Vermont Agency of Human Services, Office of Economic Opportunity (OEO) will use State general funds appropriated for homeless assistance as a match for the ESG program.

If appropriate, describe publicly owned land or property located within the state that may be used to address the needs identified in the plan

N/A

Discussion

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
VERMONT	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State
VERMONT HOUSING AND CONSERVATION BOARD	Other	Rental	State
Vermont Office of Economic Opportunity	Government	Homelessness Planning	State
Vermont State Housing Authority	PHA	Homelessness Public Housing Rental	State
VERMONT HOUSING FINANCE AGENCY	Other	Ownership Rental	State
ADDISON COUNTY COMMUNITY TRUST	Non-profit organizations	Ownership Rental	Region
Windham and Windsor Housing Trust	CHDO	Ownership Rental	Region
Downstreet Housing and Community Development	CHDO	Ownership Rental	Region
Champlain Housing Trust	CHDO	Ownership Rental	Region
Rural Edge	CHDO	Ownership Rental	Region
Housing Foundation, Inc.	Non-profit organizations	Ownership Rental	State
Cornerstone	CHDO	Ownership Rental	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Randolph Area Community Development Corp	Non-profit organizations	Ownership Rental	Region
Twin Pines Housing Trust	CHDO	Ownership Rental	Region
Housing and Homelessness Alliance of Vermont	Continuum of care	Homelessness Planning	Jurisdiction
Cathedral Square Corporation (CHDO)	CHDO	Rental	Region
Chittenden County Homeless Alliance	Continuum of care	Homelessness Planning	Jurisdiction
Vermont Coalition of Runaway and Homeless Youth Programs	Non-profit organizations	Homelessness	State
Vermont Network Against Domestic and Sexual Violence	Non-profit organizations	Homelessness	State
Vermont Community Action Partnership	Non-profit organizations	Homelessness Non-homeless special needs public services	State
Evernorth	Non-profit organizations	Economic Development Rental	State
Addison County Regional Planning Commission	Government	Planning	Region
Bennington County Regional Commission	Government	Planning	Region
Central Vermont Regional Planning Commission	Government	Planning	Region
Chittenden County Regional Planning Commission	Government	Planning	Region
Lamoille County Planning Commission	Government	Planning	Region
NORTHEAST VERMONT DEVELOPMENT ASSOCIATION	Government	Economic Development Planning	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Northwest Regional Planning Commission	Government	Planning	Region
Rutland Regional Planning Commission	Government	Planning	Region
Mount Ascutney Planning Commission	Government	Planning	Region
Two Rivers-Ottawaquechee Regional Commission	Government	Planning	Region
Windham Regional Commission	Government	Planning	Region
Addison County Economic Development Corporation	Non-profit organizations	Economic Development	Region
Bennington County Industrial Corporation	Non-profit organizations	Economic Development	Region
Brattleboro Development Credit Corporation	Non-profit organizations	Economic Development	Region
Central Vermont Economic Development Corporation	Non-profit organizations	Economic Development	Region
FRANKLIN COUNTY INDUSTRIAL DEVELOPMENT CORPORATION	Non-profit organizations	Economic Development	Region
Greater Burlington Industrial Corporation	Non-profit organizations	Economic Development	Region
Green Mountain Economic Development Corporation	Non-profit organizations	Economic Development	Region
Lake Champlain Islands Chamber of Commerce	Non-profit organizations	Economic Development	Region
Lamoille Economic Development Corporation	Non-profit organizations	Economic Development	Region
Rutland Economic Development Corporation	Non-profit organizations	Economic Development	Region
Springfield Regional Development Corporation	Non-profit organizations	Economic Development	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Community Capital of Vermont	Non-profit organizations	Economic Development	State
Ascend Housing Allies Incorporated	CHDO	Ownership Rental	State

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Vermont’s delivery system for housing and community development funds is recognized for its effectiveness. Because of Vermont’s relatively small size, many of the people working within the state personally know each other and know who to contact for specific assistance. Major statewide housing agencies are centrally located in Montpelier and Burlington.

DHCD, VHFA, VSHA, and VHCB each play a unique and well-defined role in the production, rehabilitation, financing, and subsidy of housing for a low- and moderate-income Vermonters. These agencies work together with federal housing agencies including HUD and USDA Rural Development, and with departments of AHS to create a delivery system that leverages the maximum amount of federal dollars available to Vermont.

Coordination is further enhanced by cross membership on the statewide agencies’ boards. The agencies also comprise, along with representatives of USDA Rural Development and HUD, the Vermont Advisory Council on Historic Preservation which serves as a resource for preservation related policy work and developing solutions for troubled projects. This ensures non-duplication of effort, effective communication, multiple perspectives in policy decisions and consistency in priorities across the State’s housing agencies.

All four statewide housing agencies, along with a representative of the Governor’s office, comprise the Joint Committee on Tax Credits. This committee makes recommendations to the VHFA Board on the Qualified Allocation Plan (QAP) and supplemental State housing tax credit allocations. These are largely based on the priorities of the Consolidated Plan.

Vermont also has a strong network of non-profit housing development organizations providing statewide coverage. Housing funding applications from the non-profit developers are driven by the needs of the communities they serve. VHCB, as the HOME Program administrator, works closely with this network which includes several CHDOs with in-house development capacity. In 2011 VHCB received a HUD Doorknocker Award for HOME Program excellence specifically for Building CHDO Capacity. VHCB provides CHDO Operating assistance to eligible groups through VHCB’s Organizational Grants process. Due to this strong statewide network and several qualifying CHDOs, VHCB has never had difficulty meeting the 15% CHDO project set-aside requirement and doesn’t anticipate any problems in the future.

CDBG funding is awarded to municipalities or Units of Local Government. A majority of Vermont's municipalities are extremely small when compared to other regions of the country. In addition, Vermont does not have county or regional government. This results in many municipalities lacking the capacity to apply for and/or carryout CDBG projects without assistance. This is exacerbated by increasing regulatory requirements. Fortunately, VCDP works closely with the State's Regional Planning Commissions and Regional Development Corporations to overcome this gap and lack of capacity to ensure even the smallest communities in the state receive CDBG funding.

Shrinking resources for publicly funded agencies and organizations could cause programs and people serving the community development needs of the state to be reduced further straining already limited resources and capacity. On a per-capita basis, Vermont has an extremely high number of non-profit organizations. These organizations provide services and help meet the needs of many different communities. However, as resources become strained more collaboration and greater efficiency will be required. The state has supported the merger of smaller non-profits to gain efficiencies.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X	X	
Employment and Employment Training	X		
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	

Other			

Table 52 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

OEO will distribute State and federal resources for homeless assistance and prevention services through an RFP process which requires demonstration that local coordination exists between service providers. It is also required of ESG grantees that mainstream resources are maximized to meet the needs of those experiencing homelessness including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

While there are a number of services available at the community level for special needs populations and some services that are specifically targeted to individuals and families experiencing homelessness, these services are not available at levels sufficient to meet local needs. This is particularly the case for employment, childcare, transportation, mental health and substance abuse services. A large portion of Vermont is considered rural, which makes access to services and transportation barriers more acute.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

VCDP works closely with the State's Regional Planning Commissions and Regional Development Corporations to overcome this lack of capacity in the State's institutional and service delivery system. Each year VCDP works with and provides CDBG funding to some of the smallest communities in the state. Proving that although it is challenging to serve small communities lacking capacity, it is able to address this gap and provide assistance to all communities wishing to address their community development needs.

To address gaps in the delivery of services for special needs and homeless persons, the Chittenden and Balance of State Continua of Care include more than 70 partners across the state working to address homelessness in local communities. These organizations help to carry out the work of this plan aimed at decreasing the number of individuals and families experiencing homelessness.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase supply & quality of affordable housing	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Safe, Decent, and Inclusive Affordable Housing	CDBG: \$22,731,468 HOME: \$15,014,372 HTF: \$15,134,373	Rental units constructed: 350 Household Housing Unit Rental units rehabilitated: 350 Household Housing Unit Homeowner Housing Added: 10 Household Housing Unit Homeowner Housing Rehabilitated: 500 Household Housing Unit Housing for Homeless added: 50 Household Housing Unit
2	Decrease the # of people experiencing homelessness	2025	2029	Homeless		Individuals and families experiencing homelessness	ESG: \$3,522,944	Tenant-based rental assistance / Rapid Rehousing: 200 Households Assisted Homeless Person Overnight Shelter: 15000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Strengthen communities & improve quality of life	2025	2029	Non-Housing Community Development		Strong Communities	CDBG: \$13,260,023	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 21450 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 1500 Households Assisted Brownfield acres remediated: 5 Acre Buildings Demolished: 2 Buildings
4	Create and retain jobs	2025	2029	Non-Housing Community Development		Economic Opportunity	CDBG: \$1,894,289	Jobs created/retained: 30 Jobs Businesses assisted: 2 Businesses Assisted

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name Goal Description	Increase the supply and quality of affordable housing We hope to increase the supply and quality of affordable housing by utilizing these strategies on a statewide level: • House lower income families and individuals, with special preference to projects housing extremely low income families and individuals at or below 30% of area median income. • Produce affordable, accessible rental units, especially in regions where a market analysis identifies a shortage of elderly housing affordable to lower income seniors. • Provide service enriched housing that allows seniors the opportunity to age in place. • Provide service enriched housing serving persons with disabilities. • Locate affordable rental housing in close proximity to public transportation services with access to employment centers, services, recreational opportunities, and schools. • Increase the supply of affordable rental housing through the acquisition and/or rehabilitation of existing units especially in communities where there are tight housing markets, very low vacancy rates or there is a high incidence of distressed housing. • Increase the supply of affordable rental housing through the construction of new units especially in communities where there are tight housing markets, very low vacancy rates or there is a high incidence of distressed housing. • Promote mixed income developments to create integrated and inclusive communities. • Promote the development of new rental housing designed and built to a level of energy efficiency that meets or exceeds the levels required to qualify for the Energy Star label. • Identify and remove barriers to increasing the supply of rental housing. • Support increasing housing supply to address impediments to fair housing and inclusivity of communities. • Preserve existing affordable housing projects including mobile home parks, in a manner consistent with prudent investment criteria. • Redevelop existing properties with consideration given for projects that leverage other resources specific to the preservation of historic structures. • Address habitability and infrastructure problems in mobile home parks. • Preserve existing mobile home parks, and relocate families and individuals displaced by mobile home park closure. • Develop, replace or relocate mobile home parks and lots that are in flood hazard areas. • Support the network of scattered site rehabilitation programs. • Redevelop foreclosed properties for affordable rental housing. • Address barriers to rehabilitation of the existing supply of rental housing that serves extremely low, low- and moderate-income families and individuals.
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		• Provide accessible or adaptable housing for persons with disabilities, including homeownership opportunities. • Address the current and potential need for accessibility modifications and adaptable units to serve Vermonters with physical disabilities. • Support the network of scattered site housing rehabilitation programs. • Improve access to affordable mortgages and counseling-based lending for lower income families and individuals seeking to become homeowners. • Increase programs for homeowner education and counseling. • Maximize the use of the Section 8 homeownership option by public housing authorities. • Support projects with employer assisted home ownership programs. • Redevelop foreclosed properties for home ownership. • Promote the development of home-ownership units designed and built to a level of energy efficiency that meets or exceeds the levels required to qualify for the Energy Star label. • Promote the development of home-ownership units that include a shared equity appreciation covenant. • Encourage utilization of Private Activity Bond Cap with the potential of “4%” Low Income Housing Tax Credits • Consider per-unit development costs for requests for public funding
2	Goal Name	Decrease the number of people experiencing homelessness
	Goal Description	ESG funds will be fully leveraged along with State resources to reduce the number of individuals and families experiencing homelessness. These funds will provide: • Emergency Shelter Operations, including day shelters, year-round overnight shelters, warming shelters, and motel stays when other shelter is not available • Essential Services to individuals and families in emergency shelter • Rapid Rehousing, Housing Relocation and Stabilization Services (including short-term financial assistance) • Rapid Rehousing, Rental Assistance for up to 24 months (including rental arrears) • Homeless Management Information Systems (HMIS), including the costs to contribute data to the HMIS designated by the Continuum of Care
3	Goal Name	Strengthening communities and improving quality of life
	Goal Description	We hope to promote downtown preservation and revitalization, remediate and reuse of brownfields, and increase access to public facilities and services by utilizing these strategies on a statewide level:

		• Promote projects in Designated Downtowns and Village Centers, Growth Centers, Neighborhood Development Areas and New Town Centers, including the addition of federally recognized Opportunity Zones. • Reinvest in downtown properties, particularly in the upper stories including elevators, sprinklers, and other code-related improvements. • Promote projects in Designated Downtowns that are also area-wide low- and moderate-income benefit communities with façade, streetscape and other infrastructure improvements. • Promote projects that expand and improve water and wastewater capacity in the designated areas. • Participate in projects that leverage other State and federal programs such as tax credits and transportation grants in order to promote public and private investment in downtown areas. • Address training and technical assistance needs for downtown organizations and their municipal partners. • Redevelop Brownfields into productive use. • Support municipal projects to remove barriers to public buildings to bring them into compliance with current ADA standards. • Remove barriers to accessibility for places of business and/or residential facilities to bring them into compliance with current ADA standards. • Promote facilities and services that stabilize living environments and enhance quality of life for families and individuals. • Provide access to affordable capital and counseling-based lending for lower income entrepreneurs or potential homeowners. • Increase access to work force development and job training for low- and moderate-income job seekers. • Support unmet Disaster Recovery community infrastructure needs. Use New Market Tax Credits to attract investment for community and economic development projects in high poverty areas.
4	Goal Name	Create and retain jobs
	Goal Description	We hope to create and retain jobs by utilizing these strategies on a statewide level: • Invest in business facilities, including broadband and wireless access, energy efficiency improvements, machinery, equipment and other capital requirements. • Invest in businesses that acquire, improve and occupy otherwise underutilized or vacant industrial property. • Develop small businesses, foster entrepreneurship, and complement but not duplicate other small business programs.

		• Invest in companies that meet the priorities established in the State or regional Comprehensive Economic Development Strategies (“CEDS”) and are included on the regional project priority lists developed by the regional development corporations. • Invest in businesses that use the Vermont Training Program and other job training programs offered by the Vermont Department of Labor; make business investments that might integrate with or capitalize on those resources, but do not replicate them. • Support initiatives, projects and business investments that contribute to the availability of childcare for employee families. Support infrastructure projects that lead to job creation and/or retention.
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Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

HOME Program funds will be used exclusively for rental housing development (new construction and rehabilitation). Approximately 40 households will benefit from HOME assisted units annually or 200 households over the five years of this plan. All 200 HOME units will be restricted to households at or below 60% area median income at initial occupancy. For projects with 5 or more HOME units, at least 20% will be restricted to households at or below 50% area median income. The rents shall be restricted to the applicable HOME rent limits published by HUD. It is worth noting however, that historically nearly 90% of HOME designated units are initially occupied by households at or below 50% AMI, with over 55% at or below 30% AMI.

HTF program funding will be used to construct new multifamily rental housing and to rehabilitate existing multifamily rental housing. HTF units will serve extremely low-income families. It is anticipated that over the next 5 years approximately 15 Vermont projects will be awarded HTF funds resulting in about 65 units.

ESG Program funds for Rapid Rehousing will be used exclusively to provide tenant-based rental assistance for very low-income households (below 30% AMI) in housing that is at fair market rent or below as published by HUD. An estimated 200 households will be assisted with ESG Rapid Rehousing and state matching funds from 2025-2029.

CDBG program funding will be used to construct new multifamily rental housing and to rehabilitate existing multifamily rental housing. In addition, CDBG funding will be used to rehabilitate existing homeownership units. It is estimated that approximately

70% of all CDBG assisted units will serve households below 50% area median income. From 2025 -2029 it is estimated that CDBG funding will assist approximately 350 affordable rental units and 350 affordable homeowner units that meet the HOME definition.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A

Activities to Increase Resident Involvements

The Vermont State Housing Authority administers the Section 8 Housing Choice Voucher Program (funded under HUD's Office of Public Housing) and the Section 811 Mainstream Housing Program. VSHA's Section 8 program includes a homeownership program, a project-based voucher program and a variety of special purpose programs. VSHA has operated its Section 8 Homeownership program since 1999.

To facilitate resident input into rental assistance programs, VSHA has a Section 8 Resident Advisory Board (RAB), which provides VSHA with a forum for sharing information about the Agency's Annual and Five-Year Plan. The role of the RAB is to make recommendations in the development of the PHA Plan and to provide input for any significant amendments or modification to the PHA Plan. In addition, one member of VSHA's Board of Commissioners (who are appointed by the Governor and confirmed by the Senate) is an individual residing in publicly subsidized housing within the State of Vermont.

Vermont's local housing authorities own and manage the state's public housing units.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

A number of state and federal public policies negatively impact the cost of housing and the incentives to develop, maintain or improve affordable housing. In most cases, these policies are sound and designed to provide ancillary benefits but have an effect of making housing more costly or difficult to develop. Listed below are barriers to affordable housing identified through past analyses of housing development barriers. The list also reflects information gathered from a broad group of planning, development and municipal stakeholders. There has been a growing acknowledgement among lawmakers of the need to reduce these barriers and efforts have been made in the past legislative sessions to reduce the permitting burden in Vermont's designated development areas.

1. Limited public resources, particularly decreasing funding for development, preservation, services and subsidies that support affordable housing.
2. Increasing standards for energy efficiency.
3. State and local land use controls.
4. Permitting processes and community development standards – particularly the broad eligibility of appellants.
5. Limited funding to promote Fair Housing and address discrimination in rental and sales housing markets.
6. Federal funding regulatory requirements such as the National Environmental Policy Act, Davis-Bacon, Procurement and Build American Buy America (BABA) requirements.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The State has long had a strong commitment to ensure all Vermonters have access to safe, decent, accessible homes they can afford. From 2025 to 2029, it will continue to employ and expand strategies to address State and federal policies that create barriers to affordable housing.

Limited public resources, particularly decreasing funding for development, preservation, services and subsidies that support affordable housing.

1. Promote the State's commitment to perpetual affordability.
2. Maximize leveraging and seek ways to reduce operating and development costs.
3. Support the continuation and expansion of the State affordable housing, downtown and historic tax credits.
4. Support State resources for affordable housing such as rental subsidy programs, homelessness assistance and the Vermont Housing and Conservation Trust Fund.
5. Consider per unit development costs in funding applications.

6. Consider ability to utilize Private Activity Bond Cap and potential of “4%” Low Income Housing Tax Credits

Increasing standards for energy efficiency.

1. While supporting the State’s energy goals, ensure a robust analysis of costs is considered in the development of State energy-efficiency standards and building codes.
2. Seek expanded and new sources of funding for energy improvements in both publicly supported and private single and multi-family housing.

State and local land use controls.

1. Continue to review State and local land use programs and policies for ways to strengthen environmental protection while reducing unnecessary barriers to residential development, particularly affordable housing.
2. Encourage and promote development and growth in Designated Downtowns and Village Centers, Growth Centers, Neighborhood Development Areas and New Town Centers.
3. Provide technical assistance to municipalities to review and reform outdated and exclusionary land use restrictions.

Permitting processes and community development standards.

1. Provide technical assistance to communities, developers and property owners seeking to provide affordable housing.
2. Provide technical assistance and funding to municipalities around zoning and land use planning.
3. Promote exemptions and streamlining of State permitting processes in areas designated for growth.

Limited funding to promote Fair Housing and address discrimination in rental and sales market housing markets.

1. Continue collaboration through the Fair Housing Committee of the Vermont Housing Council to undertake the actions recommended in 2024 Analysis of Impediments.
2. Support efforts of the Vermont Human Rights Commission, the Fair Housing Project, Vermont Legal Aid, and others to secure additional funding for fair housing activities.
3. Work with landlord and tenant organizations to increase awareness of State and federal housing law and ensure the rights and responsibilities of both are appropriately balanced in changes to State statutes.

Federal funding regulatory requirements such as the National Environmental Policy Act, Davis-Bacon, procurement standards and BABA.

1. Continue to provide technical assistance and update guidance to grantees as requirements expand and change.
2. Access and seek additional training opportunities for State administrators and grantees.

Provide federal funding and regulatory agencies with information on the benefits and challenges of statutory and regulatory requirements and recommendations for improvements.

SP-60 Homelessness Strategy – 91.315(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Vermont provides outreach to homeless persons through a network of local agencies, including shelters, service agencies and housing providers. United Way 2-1-1 provides a one-stop resource and referral point for all persons. The State's two Continuums of Care each manage a Coordinated Entry (CE) system which uses a standardized assessment tool in order to assess the individual needs of those experiencing homelessness. Many organizations within the Coordinated Entry system regularly conduct outreach to unsheltered Vermonters, with many of them trained to either provide the CE assessment on site or to refer households to a partner who can conduct the CE assessment with them. OEO funds several drop-in centers around the state that provide regular contact with those experiencing unsheltered homelessness. These drop-in centers are connected to their local CE system as referral partners so that people in need of an assessment can be quickly connected to a provider.

The PATH Program provides assistance to several Vermont organizations to conduct outreach efforts to people experiencing a serious mental illness or co-occurring disorder. PATH is funded by the U.S. Dept. of Health & Human Services and administered in Vermont by the AHS Department of Mental Health (DMH). For State Fiscal Years 2024 and 2025, the Department for Children and Families provided State General Funds to DMH to expand the PATH Program beyond what was federally funded. All PATH programs funded through this expansion were required to have staff trained to conduct the CE assessment with those experiencing unsheltered homelessness. A training on the benefits of having street outreach staff trained to conduct the CE assessment was provided by OEO.

Addressing the emergency and transitional housing needs of homeless persons

The State of Vermont leverages both State and federal resources to address the needs of homeless individuals and families. These resources include those for prevention, rapid rehousing, transitional housing, and shelter operations. The statewide network of local emergency shelters, including shelters for victims of domestic and sexual violence, are often full in winter months and many have developed "overflow" capacity. Additional shelter beds are available seasonally through warming shelters in communities with increased need. When shelters are full, AHS Department for Children and Families pays for emergency motel stays for homeless persons who are in a vulnerable population, including elders, people with disabilities, families with children, and victims of domestic violence.

Member agencies of the Vermont Coalition of Runaway and Homeless Youth Programs provide emergency and transitional housing services to youth through the Runaway and Family Stabilization and Transitional Living Programs with funding from the US Dept. of Health & Human Services with support from AHS. Vermont was also the recipient of a HUD Youth

Demonstration Program award which has expanded programs and resources for homeless youth.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Through AHS, the Vermont Council on Housing and Homelessness, and both Continua of Care, Vermont is actively engaged in developing multiple programs and strategies to shorten the duration of homelessness, ensure that people are stable after receiving assistance, and support homeless persons moving into permanent housing as rapidly as possible. State-funded resources include:

- The Vermont Rental Subsidy program, providing 12 months of rental assistance to formerly homeless families and individuals. Administered by AHS Department for Children and Families;
- AHS OEO administers the Family Supportive Housing Program, which links intensive supportive services and affordable housing to formerly homeless families with children, especially families with multiple episodes of homelessness;
- AHS OEO administers the consolidated Housing Opportunity Grant program, which includes State funded short-term supported housing, rapid rehousing services, and transitional housing for youth.
- AHS OEO is in the process of standing up a new Permanent Supportive Housing Assistance program authorized by Vermont's Global Commitment to Health 1115 Demonstration waiver. This program is intended to support Permanent Support Housing services that help Vermonters with complex health and social needs to successfully transition into and maintain residency in permanent housing.

Vermont has a strong relationship with the Veterans Administration's grant per diem program to provide transitional housing to veterans. Funding through the VA Supportive Services for Veterans' Families supports various initiatives statewide to provide prevention and rehousing assistance. These projects are coordinated with both Continua of Care. Additionally, Vermont has established, through an Executive Order entitled "Publicly Funded Housing for the Homeless", a goal that at least 15% of all housing portfolios that have received publicly controlled development funds be available and serving households exiting homelessness. After enacting the so-called "15% Goal", the Department of Housing and Community Development led a group of stakeholders in the creation of the Housing Access Reporting Tool (HART) for the use of housing developers and managers to report on their progress towards this goal. In addition to the quantification of the number of units that are serving households experiencing

homelessness at the time of application to the unit, the HART also includes information about collaborations between housing providers and the local Continuum of Care organizations. This annual report is to be reviewed by funders at the time of grant application and is intended to increase collaboration between housing providers and homeless service providers. Since implementation in 2016, the HART reports have demonstrated success in encouraging communication between shelter providers and permanent housing providers about the needs of households experiencing homelessness.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Vermont leverages State resources to divert low-income individuals and families from homelessness. In addition to homelessness prevention activities funded under the OEO Housing Opportunity Grant Program, the following initiatives address discharge from publicly funded institutions and systems of care:

- The Vermont Youth Development Program with AHS Department for Children & Families funding and partnerships ensure persons being discharged from the foster care system are not routinely discharged into homelessness and are accessing mainstream resources, including the Housing Choice Voucher Program, Sect. 8 Family Unification Vouchers, and Foster to Independence (FYI) Vouchers for youth in transition.
- The AHS DMH-funded Mental Health Subsidy & Care program, modeled on HUD Shelter plus Care, funds housing vouchers paired with services supports for homeless persons in higher levels of care settings, such as hospitals, who are ready for discharge. The AHS Department of Corrections (DOC) ensures persons being released from the corrections system of care are not routinely discharged into homelessness while on supervision. If suitable permanent housing in the community cannot be located for a person exiting Corrections, DOC utilizes a comprehensive statewide system of transitional housing to ensure that persons are not routinely discharged into homelessness.

Vermont promotes supported housing integrated into non-specialized residential buildings or settings. This strategy is aided by promotion of universal design through the State qualified allocation plan, as well as mixed-income housing achieved through project and tenant-based rental assistance and on-site supportive services customized to a client's needs.

The Support and Services at Home (SASH) program provides on-site supportive and coordination services to older Vermonters with disabilities through a statewide network of designated regional housing organizations (DRHOs). SASH services are funded primarily through Vermont's Blueprint for Health and State grant funds from the Department of Disabilities Aging and Independent Living.

Persons with disabilities have access to an array of housing and housing supports, with an emphasis on the least restrictive community setting and maximum consumer choice. In Vermont, Housing Choice (Section 8) rental assistance has been effectively targeted to persons with mental, physical, or developmental disabilities. Unfortunately, Vermont had not been awarded Section 811 Project-Based Rental Assistance to make rental housing affordable to more non-elderly persons with disabilities.

Beyond accessing the appropriate level of residential or outpatient treatment, persons with alcohol or other Substance Use Disorders can access a limited number of transitional housing beds or recovery housing programs supported through grants from the AHS, Department of Health, Substance Use Programs.

In addition to the federal HOPWA program, persons with HIV/AIDS can access targeted state-funded rental subsidies and emergency financial assistance to prevent eviction or secure stable housing. This funding comes from the AHS Department of Health. Emergency Rental Assistance is delivered through one of three local AIDS Service Organizations (ASOs), and short-term rental assistance is delivered through the Vermont State Housing Authority (VSHA).

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Lead-based paint remains a major concern in Vermont due to the State's older housing stock, particularly rental properties that house many lower income residents. More than 70% of Vermont's housing was constructed before 1978 when the use of lead paint was banned. Because the State is so reliant upon this older housing stock to meet the needs of low- and moderate-income people, hazards from deteriorated lead paint and unsafe renovations continue to present considerable challenges. Beginning in the early 1990's, and continuing into the present, Vermont has taken numerous actions to both address existing LBP hazards and increase access to lead-safe housing for low- and moderate-income families.

Since 1996 Vermont has had a law (Title 18, Chapter 38) that has reduced the number of Vermont children exposed to lead paint hazards in their homes by requiring rental property owners and childcare providers to safely address potential problems in pre-1978 buildings. Rates of blood lead screening continue to improve as the consequences of childhood lead poisoning become better known. Tens of thousands property owners, contractors, painters, maintenance workers and others have been trained in lead safe work practices. Public awareness of the potential dangers of lead paint hazards has improved in the last decade thanks to the efforts of the Vermont Department of Health, the Vermont Housing & Conservation Board's Lead-Based Paint Hazard Reduction Program, and other health and housing groups.

In 2008 Vermont was one of the first jurisdictions to recognize the dangers of any lead in children's blood and lowered its "level of concern" to 5 micrograms per deciliter of blood, nearing the detectable limits of standard laboratory analysis. The US CDC has since done the same for the entire country. Some changes were made to Vermont's lead paint law in 2008 that improved disclosure requirements and required the use of lead safe work practices when paint is disturbed at any pre-1978 residential property. In 2021, the CDC lowered the Level of concern to 3.5 micrograms per deciliter of blood.

Since 1994, VHCB's Lead-Based Paint Hazard Reduction Program has utilized numerous HUD Lead Hazard Control Grants to control lead paint hazards in nearly 3,000 homes and apartments throughout the State. The Program provides assistance to low-income homeowners, private owners of affordable rentals, and non-profit developers whose apartments remain perpetually affordable to low-income residents. The Program works closely with all federally funded housing assistance programs to coordinate implementation of the Lead Safe Housing Regulation. The City of Burlington, Vermont's largest city, also administers a HUD-funded lead hazard control program that has assisted hundreds of units in Burlington and Winooski.

HUD's Lead Safe Housing Regulation (1012/1013) has been fully implemented in Vermont. The State continues to evaluate how the EPA Renovation, Repair and Painting (RRP) rule intersects

with HUD's rule and the State's own, similar regulations. The Vermont Department of Health, working with EPA, have drafted new rules that would bring RRP implementation and enforcement under State jurisdiction.

The Vermont Legislature has passed an updated statute which will be triggered upon approval of these new rules. In 2024, The Vermont Department of Health updated the State Lead regulations by renaming and changing some of the work requirements in the RRP sections to Renovation, Repair, Painting and Maintenance (RRPM). In the same regulation update, they also renamed and changed the work requirements to the Essential Maintenance Practices (EMP) to Inspection, Repair and Cleaning (IRC).

Additionally, in 2025, the EPA has adjusted the Dust-Lead Hazard Standards and Dust-Lead Post-Abatement Clearance Levels from 10 micrograms per square foot ($\mu\text{g}/\text{ft}^2$) for floors, 100 $\mu\text{g}/\text{ft}^2$ for window sills, and 400 $\mu\text{g}/\text{ft}^2$ for window troughs to 5 ($\mu\text{g}/\text{ft}^2$), 40 $\mu\text{g}/\text{ft}^2$, and 100 $\mu\text{g}/\text{ft}^2$ for floors, window sills and troughs respectively.

How are the actions listed above integrated into housing policies and procedures?

Because both State and federal regulations concerning lead-based paint have been in place for decades, these requirements have been successfully integrated into Vermont's housing policies and procedures. Since the inception of Vermont's law in 1994, housing assistance programs have required lead safe work practices during renovations or repairs of pre-1978 properties. The VHCB Lead Program has worked with the State's housing agencies and organizations to integrate the requirements of HUD's Lead Safe Housing Rule into their operations. Since 2010 these efforts have included compliance with EPA's Renovation, Repair and Painting (RRP) Rule.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

One in ten Vermonters experience poverty. Children are more likely than adults to live in poverty or in deep poverty (below 50% of the poverty threshold). The Agency of Human Services (AHS) supports households experiencing poverty while serving those who earn more than the threshold but still struggle to afford housing, transportation, health care, childcare, and other essentials.

AHS and primarily the Department for Children and Families (DCF) aim to reduce the number of families living in poverty. Reach Up is Vermont's Temporary Assistance to Needy Families (TANF) program which provides cash assistance, case management, coaching and support services to Vermont families whose income is generally below 50% of the Federal Poverty Level. Reach Up and related programs are critical to alleviating poverty. These programs provide nearly 6,300 Vermont children and their families with income to help provide basic needs. In addition, DCF-Office of Economic Opportunity (OEO) manages a number of grants to make housing more affordable and prevent homelessness among vulnerable Vermonters.

Below is a list of some of DCF's most effective anti-poverty program investments:

- Family Supportive Housing is an evidence-informed model that provides permanent housing and intensive case management and financial empowerment support to families who have experienced homelessness and are at-risk of child welfare involvement. Families served by FSH tend to have high rates of housing stability (62-76% over the last five years) and most families close their child welfare case during enrollment and do not have a new case after they exit.
- Fuel Assistance- The Seasonal Fuel Assistance Program helps low-income families pay a portion of their home heating bills. Assistance is for homeowners or renters who pay for heat or who have heat included in the rent. The Crisis Fuel Program-Emergency Fuel Program is available for families with monthly gross income up to 200% of poverty level.
- Financial Empowerment Program Reach Up case managers and VABIR Career Coaches use "Your Money, Your Goals" toolkit to help Reach Up recipients address financial barriers. VABIR Career Coaches pair incentivized Financial Coaching with employment, training and education goals to help families obtain bank accounts, fix credit, start saving, and feel more confident about their financial future.
- Reach Up Car Ownership Program Reach Up purchases cars for families through Good News Garage and other state agencies and assists through down payment assistance and preventing repossessions.

The Child Care Financial Assistance Program (CCFAP) helps eligible families with the cost of childcare. Payments are made directly to childcare providers and is provided through DCF-Child Development Division.

Help Me Grow : Hel Help Me Grow helps early childhood partners work together to build strong, connected communities and healthy, resilient families. Help Me Grow builds families' and service providers' understanding of early development, promotes the importance of social and emotional skill development, and connects children to the community resources and supports they need, when they need them.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

AHS and DHCD have a long history of coordinating their efforts with the Vermont State Housing Authority, Vermont Housing and Conservation Board, local Public Housing Authorities, private landlords and other housing organizations to assure that housing services reach Vermont's neediest citizens.

Examples of such collaborations include:

- Coordination through the Vermont Council on Housing and Homelessness to create and carry out a Tactical Action Plan to reduce the rate of homelessness through prevention, services, and availability of affordable housing in Vermont and look at housing policy and programs;
- Cross representation on boards of the major housing funding organizations including the Vermont Community Development Board, the Vermont Housing Finance Agency and the Vermont Housing and Conservation Board;
- Coordination with other State agencies and non-profit groups of the range of federal McKinney programs, including ESG and the CoC Supportive Housing Program; and
- AHS' active participation in the development and review of the State's Consolidated Plan.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

All Programs under the Consolidated Plan must follow **State Bulletin #5 Policy for Grant Issuance and Monitoring** which incorporates the provisions of the new "Uniform Guidance" issued by OMB.

CDBG conducts a Pre-Award Eligibility Determination and Risk Assessment is completed prior to an award to ensure no award is made to an ineligible organization and to mitigate any high-risk awards through special conditions in grant agreements and monitoring and reporting.

CDBG also takes a risk-based monitoring approach that is based on such factors as size of award; first time receiving an award; complexity of project; staff turnover; past performance; outstanding or delinquent reports; and one or more audit findings/internal control issues regarding program performance or compliance.

All grantees are monitored on a regular basis in accordance with program specific guidelines, State and federal regulations. Monitoring of all programs includes desk review of requisitions and supporting back-up documentation; review of program reports; and audit reports. CDBG monitoring also includes onsite reviews to interview program and administrative staff; and conduct onsite construction inspections.

Monitoring of the HOME and HTF projects includes annual rent and tenant income reviews of HOME/HTF designated units, on-site inspections during the project's affordability period, and review of project financial information. VHCB has developed and implemented numerous policies and procedures to comply with the revised 2013 HOME regulations and HTF regulations and guidance.

ESG subrecipients are monitored on-site every three years, including programmatic and financial, case files, and staff and board interviews.

The overall goal of monitoring is to ensure compliance, and to provide technical assistance to ensure the long-term success of our partners, programs, and the clients that they serve.

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

During the five-year period covered by this Plan, Vermont anticipates receiving annually from HUD approximately \$7.4 million in CDBG funds to be used for housing, economic development, and public services and facilities, \$3 million in HOME funds to be used for housing, \$3 million in HTF funds to be used for extremely low income housing, and approximately \$700,000 in ESG funds to be used for emergency shelter and rapid rehousing for persons experiencing homelessness. The Vermont CDBG program estimates an additional \$200,000 in CDBG program income each year.

For the 2023 AAP, the Office of Economic Opportunity reduced the goal for rapid re-housing and rental assistance using ESG funding from 400 households to 250 and proposes to maintain this as the goal for the 2025 AAP as well. ESG funds will be used primarily for emergency shelters and State funds that are better suited and more flexible will be used for repaid re-housing and rental assistance going forward.

For the 2025 AAP, DHCD plans to increase the CDBG set aside for Scattered Site Homeownership RLFs (SS-RLF) from 35% of the state's allocation to 45% of the state's allocation.

As per HUD's goals, the State will use CDBG, HOME, HTF and ESG to provide decent, affordable housing, suitable living environments, and expand economic opportunities for low and moderate-income Vermonters. CDBG, HOME and ESG will be used strategically to address priority needs and leverage other federal, State, and local resources, including federal low-income housing tax credits.

The State's LIHTC program is administered by the Vermont Housing Finance Agency (VHFA) in accordance with Vermont's Qualified Allocation Plan (QAP) which closely reflects the priorities, goals and strategies of the Consolidated Plan.

A significant source for non-housing community development is equity generated by New Market Tax Credits which are utilized by Evernorth Rural Ventures, a qualified community development enterprise. Both VHFA and Evernorth sit on the Housing and Homelessness Council and the Consolidated Plan Advisory Board ensuring close coordination. Additional resources that may be leveraged to support the goals of the Consolidated Plan include Section 8, McKinney-Vento, Vermont Housing and Conservation Trust and matching funds.

Each program will be administered according to the State's three guiding principles:

1. The first is achieving the perpetual affordability of housing resources and investments.
2. The second principle is promoting development in State designated Downtowns, Village Centers, Neighborhood Development Areas and other areas that are consistent with the state's historic settlement pattern and "Smart Growth" – including designated New Town Centers and Growth Centers.
3. The third principle is to link our homeless assistance activities with permanent housing through systems, practices and initiatives that are informed by data and proven approaches. Under all circumstances, the State is committed, and obligated, to ensuring that any project funded, and those entities responsible for administering such funds must work towards overcoming illegal housing discrimination and broadening housing options for all people.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,485,780.00	200,000.00	0.00	7,685,780.00	30,400,000.00	Assuming \$7.4 million annual allocation plus \$200,000 in program income.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,014,372.26	0.00	0.00	3,014,372.26	12,000,000.00	Assuming \$3 million small State minimum annually. HOME will be used for Multifamily rental new construction and rehab.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	722,944.00	0.00	0.00	722,944.00	2,800,000.00	ESG will be used for Overnight shelter and Rapid re-housing (rental assistance). Expected amount available assumes \$700,000 annual allocation.
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,134,373.20	0.00	0.00	3,134,373.20	12,000,000.00	Assuming \$3 million small state minimum annually.

Table 54 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

For CDBG funds, VCDP's Program Guidelines require applicants to provide a full description of how matching requirements will be met including the name and address of the source and indicate whether it is a loan, grant, cash, cash-in-kind, goods or services, etc. Matching requirements are as follows:

1. Implementation Grants (IG): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds.
 - a. Economic Development Loans: borrower must provide cash-equity of at least 10% of the total project cost. This cannot be borrowed or otherwise encumbered money. Note: The Agency may waive the 10% equity match required for a VCDP economic development project if justified.
 - b. Blighted: Cash or cash-in-kind goods or services of at least 10% of the CDBG funds. This match must directly fund remediation of the Blighted condition.
 - c. Urgent Need: Cash or cash-in-kind goods or services of at least 10% of the CDBG funds. This match must directly fund remediation of the Urgent Need.
2. Scattered Site Housing Grants (SS): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds.
3. Planning Grants (PG): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds.
4. Accessibility Modification Grants (AM): Match can consist of a loan, grant, cash or cash-in-kind goods or services of a flat 10% of the CDBG funds for Handicapped Accessibility work on municipally owned buildings and community libraries.

If a community has an inactive CDBG/HUD funded Revolving Loan Fund (RLF) as defined by Agency Procedures, at least 20% of the RLF balance on hand must be committed to the project when applying for CDBG funds.

For HOME funds, priority is given to projects with non-federal funding sources for leveraging HOME Funds to ensure the overall HOME Program meets the 25% match requirement. Projects must demonstrate leverage of resources and cost-effectiveness, which may include but is not limited to density bonuses, energy efficiency, lead paint hazard abatement, and historic preservation. Vermont Housing Conservation Board (VHCB) State funding for housing is often used as a match for the HOME Program.

ESG requires a dollar-for-dollar match. Vermont Agency of Human Services, Office of Economic Opportunity (OEO) will use State general funds appropriated for homeless assistance as a match for the ESG program.

There is no match requirement for HTF funding, however, applications that include the use of non-federal funding sources will be prioritized. As with HOME, VHCB's State funds will likely serve as a source of non-federal match for HTF assisted projects.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase supply & quality of affordable housing	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Safe, Decent, and Inclusive Affordable Housing	CDBG: \$4,546,293.60 HOME: \$3,002,874.40 HTF: \$3,026,874.60	Rental units constructed: 70 Household Housing Unit Rental units rehabilitated: 70 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit Housing for Homeless added: 10 Household Housing Unit
2	Decrease the # of people experiencing homelessness	2025	2029	Homeless		Individuals and families experiencing homelessness	ESG: \$704,588.80	Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted Homeless Person Overnight Shelter: 3000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Strengthen communities & improve quality of life	2025	2029	Non-Housing Community Development		Strong Communities	CDBG: \$2,652,004.60	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4290 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 300 Households Assisted Brownfield acres remediated: 1 Acre
4	Create and retain jobs	2025	2029	Non-Housing Community Development		Economic Opportunity	CDBG: \$378,857.80	Jobs created/retained: 5 Jobs Businesses assisted: 1 Businesses Assisted

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Increase supply & quality of affordable housing
	Goal Description	This goal will increase the supply and quality of affordable housing by utilizing the strategies described in the 2025-2029 Consolidated Plan on a statewide level.
2	Goal Name	Decrease the # of people experiencing homelessness
	Goal Description	ESG funds will be fully leveraged along with State resources to reduce the number of individuals and families experiencing homelessness.
3	Goal Name	Strengthen communities & improve quality of life
	Goal Description	This goal will promote downtown preservation and revitalization, remediate and reuse of brownfields, and increase access to public facilities and services.
4	Goal Name	Create and retain jobs
	Goal Description	This goal will create and retain jobs by utilizing the strategies described in the 2025-2029 Consolidated Plan on a statewide level.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

In keeping with the State's long-standing policy, the State does not plan to target assistance to specific geographic regions or activities. State law requires that CDBG funds, dispersed through the VCDP are awarded on a competitive basis, based on an evaluation of need, impact and feasibility, and subject to HUD limitations. Likewise, VHCB allocates HOME funds on a competitive basis, except for up to 5% for general operating assistance for Community Housing Development Organizations (CHDOs) to implement HOME projects, and HTF is allocated on a competitive basis in accordance with the HTF Allocation Plan. ESG funds are awarded to eligible nonprofits, including community and/or faith-based organizations following the selection process of the Vermont Office of Economic Opportunity.

Funding Allocation Priorities

	Increase supply and quality of affordable housing (%)	Decrease the number of people experiencing homelessness (%)	Create and retain jobs (%)	Strengthening communities and improving quality of life (%)	Total (%)
CDBG	60	0	5	35	100
HOME	100	0	0	0	100
ESG	0	100	0	0	100
HTF	100	0	0	0	100

Table 56 – Funding Allocation Priorities

Reason for Allocation Priorities

The State's allocation priorities are based on historical data of previous program performance and the priority needs identified in the Housing Needs Assessment and further developed through the citizen participation and consultation process to meet the goals identified in the plan.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

The proposed distribution of funds addresses the priority needs identified by allocating funding to the most critical needs identified through the Housing Needs Assessment, market analysis, citizen participation process, and consultation with service providers, and agencies and organizations in housing and community development, job creation, and homelessness. Vermont continues to see affordable housing, reducing homelessness and job creation as a strong need for the State. These needs are clearly reflected in the State's allocation of CDBG, HOME, and HTF resources. Specifically, ESG funds will be fully leveraged along with State resources to reduce the number of individuals and households experiencing homelessness.

These funds will also focus on shortening the length of time people experience homelessness and reduce the number of individuals returning to homelessness.

This distribution is further informed by past program performance and evaluations of how CDBG, HOME, HTF, and ESG can be used most effectively and efficiently given program rules.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

This section summarizes the methods of distribution for State programs that administer HUD funds, as well as the National Housing Trust Fund. In each of the State programs described below, the State encourages applications for projects that include more than one goal or objective, or which addresses more than one Priority Need (e.g., an application for a housing project that also consists of a component of commercial space; or a public facility project that also consists of a component of public services).

Distribution Methods

Table 57 - Distribution Methods by State Program

1	State Program Name:	HOME Investment Partnership Program
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	HOME Investment Partnerships Program (HOME) allocation for FFY2025 is anticipated to be approximately \$3,000,000. The Department of Housing and Community Development (DHCD) is the agency responsible for developing the Consolidated Plan, and State statute designates the Vermont Housing and Conservation Board (VHCB) as the agency responsible for administering HOME funds. In FFY 2025, HOME funds will be used for the following programs with investments in the form of grants or long-term deferred loans: 1. Acquisition and Rehabilitation Program. HOME funds will be used for acquisition and rehabilitation of conventional rental properties to make them affordable to low-income households and to preserve existing affordable rental properties. When HOME funds are used for rehabilitation, the work must be performed according to the VHCB's written rehabilitation standards, which describe the methods and materials to be used, and the entire unit must be brought up to applicable property standards as described in 24 CFR 92.251(b).

	2. New Construction Program. HOME funds will be used for the production of conventional rental properties that serve an area or market where existing housing stock is limited and/or to provide housing for households/individuals with documented special needs. Units created under this program must be affordable to low-income households. 3. Refinancing existing debt. Multi-family rental projects developed by locally based housing organizations that receive HOME funds for rehabilitation may utilize HOME funds to refinance existing debt if there is significant rehabilitation of the property proposed in addition to the refinancing (See the HOME Refinancing Guidelines in AP-90 HOME Program Specific Requirements). Community Housing Development Organizations (CHDOs) At least fifteen percent (15%) or approximately \$450,000 of the Vermont's HOME allocation will be used for rental projects developed, owned, or sponsored by qualified Community Housing Development Organizations (CHDOs) as defined in 24 CFR 92.2. Up to five percent (5%) or approximately \$150,000 of the State's total HOME allocation may be used for general operating assistance for qualified CHDOs who are expected to receive CHDO project funds within 24 months. CHDO Operating funds will be awarded through VHCB's organizational grant application process. Statewide Allocation The State's allocation including CHDO project funds but not including Administration or CHDO Operating) will be distributed to projects on a competitive basis throughout the state, excluding the City of Burlington which has its own allocation. Program Administration The State's HOME program will be administered by VHCB pursuant to a contract with DHCD. The State recognizes that its Consolidated Plan cycle is not consistent with the ability of its agent, VHCB, to commit HOME funds. Considering the fact that Vermont's HOME Program is recognized by HUD as a national leader in achieving the goals of the HOME Program, we do not find this inconsistency to be a significant issue in program delivery. Administrative Costs
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		The State intends to use up to 10% of the HOME allocation for administrative and planning costs, distributing funds among the two entities involved with administering Vermont's HOME Program: DHCD and VHCB. The State may use approximately \$300,000 (10%) in FFY 2025 funds for eligible administrative costs.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Information about the HOME Program is available on VHCB's website, including links to the HOME Program Handbook, application deadlines and Board meeting dates, and the common housing application. VHCB works closely with a statewide network of non-profit affordable housing developers who are provided this information. In addition, VHCB provides information about the HOME Program application process and requirements to for-profit developers when inquiries are received. General Information for Applicants Seeking VHCB and/or HOME Program Funds for Affordable Housing Development is available here: https://vhcb.org/our-programs/housing/housing-applications. Eligibility to apply for HOME funds will be no more restrictive than required by HOME regulations. Consistent with the regulations, at least 15% of the annual allocation will be used for projects developed, owned, or sponsored by qualified CHDOs, as defined in 24 CFR 92.2. Applications will be accepted on a rolling basis and acted upon at regularly scheduled VHCB Board meetings based on project readiness. VHCB uses the State's Common Housing Application with an additional VHCB/HOME application supplement and checklist. Threshold Criteria The following criteria must exist in any application to be considered for a commitment of HOME funds: 1. The project must be perpetually affordable. 2. At least one of the Consolidated Plan housing related goals must be included. 3. Preference shall be given to projects located in the State's Designated Downtowns, Village Centers, neighborhood development areas and other areas that are consistent with the state's historic settlement pattern and "Smart Growth". Consolidated Plan Affordable Housing Goals

	On a competitive basis, applications that have met the threshold criteria described above will be evaluated and ranked according to how many of the Consolidated Plan Affordable Housing Strategies are addressed by the project. Efficient Use of Resources Consistent with 24 CFR Section 92.250(b), projects seeking HOME funds will require an analysis of whether the amount of HOME funds invested is reasonable to achieve affordable housing. This analysis must confirm that the project can be sustained from rent levels affordable to the targeted population while maintaining adequate levels of maintenance or repair and fully funding reserves required by lenders or grantors. This analysis will be done by VHCB for each application.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A - CDBG only
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	N/A - ESG only
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based	N/A – HOPWA only

	and other community-based organizations). (HOPWA only)	
	Describe how resources will be allocated among funding categories.	Funding will be allocated by funding category based on the merit of the proposals submitted and the demonstrated market demand.
	Describe threshold factors and grant size limits.	In order to be considered for HOME funding, all applications must meet the threshold requirements stated above. In addition, projects must meet all HOME Program and other applicable federal requirements. Vermont will utilize the HOME maximum per-unit subsidy limits published by HUD which are currently: \$181,488 for 0BRs, \$208,049 for 1BRs, \$253,994 for 2BRs, \$327,293 for 3 BRs, and \$359,263 for 4BRs+. When new limits are issued for 2025 those will be utilized.
	What are the outcome measures expected as a result of the method of distribution?	With the FFY25 HOME allocation of approximately \$3,000,000, it is estimated annually HOME will assist 5-8 rental projects, resulting in approximately 38 units affordable to low- and very-low-income households.
2	State Program Name:	Housing Opportunity Grant Program
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	OEO's Housing Opportunity Grant Program combines ESG funds with state homeless assistance funds to help nonprofit organizations work within their Continuum of Care to: • Reduce the incidence and duration of homelessness; • Shorten the length of time an individual or household is homeless; and • Prevent homelessness.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Selection of applicants for ESG funding under the consolidated Housing Opportunity Grant Program will be made based on the following: • Meeting of criteria as outlined in this document and detailed in the Notice of Funding • For renewal requests and returning applicants, previous program performance under the Housing Opportunity Grant Program.

		• Ability to affirmatively reach underserved populations, including black, indigenous and people of color, people with disabilities, persons with limited English proficiency, New Americans, etc. • The applicant's history of providing effective shelter or services to the homeless. • Address an identified homeless need or gap in the district and effectively collaborate with Continuum of Care partners to improve outcomes for the homeless and those at-risk of homelessness. • Demonstrate leveraged funding to support the proposed program. • For emergency shelter applicants, ensure the continued availability of clean and safe emergency shelter. • Support the rapid transition of participants from homelessness or emergency shelter to permanent housing and shorten the length of time people experience homelessness. • Prevent homelessness for people experiencing housing crisis through targeted, coordinated, and effective prevention and diversion activities. • Provide appropriate follow-up to support stability and measure outcomes. Reduce the number of individuals and families returning to homelessness. • Support education, training, and employment activities for clients, and help participants to access other appropriate community services and mainstream benefits and support services (including medical care, mental health and substance abuse treatment, counseling, supervision, and other services essential for achieving independent living). • The applicant's engagement of homeless individuals and families in the governance or operation of programming and services, to the maximum extent practicable. • Responsibly manage public funds and reporting expectations required under a grant agreement with the State of Vermont.
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	Actual funding will be based on the following: • Requested amount (total request and spending plan) • Available funds • Strength of application demonstrating application criteria are met
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A - CDBG only
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	In April 2025, OEO will release a Request for Proposals for the Housing Opportunity Grant Program (which includes ESG program funds). Current awards (SFY2025) were reviewed and evaluated by AHS OEO based on local need, capacity, approach, and local coordination. Vermont will make ESG sub-awards with successful applicants for ESG-funded activities under Housing Opportunity Grant Program agreements. One or more grants will be awarded by OEO to Vermont municipalities, or, with municipal approval, Vermont nonprofits whose purpose is to shelter, serve, and re-house the homeless.
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A – HOPWA only
Describe how resources will be allocated among funding categories.	Decisions on how to prioritize funding categories are based on public forum input through the Consolidated Plan process, guidance and national reports released by HUD, the National Alliance to End Homelessness, and the US Interagency Council on Homelessness (USICH); the Vermont Council on Homelessness five-year plan to end homelessness; and an acknowledgement that homelessness is inherently traumatic for families and individuals. In

	addition, decisions are informed by discussions with CoC stakeholders regarding funding priorities. OEO estimates the following allocation to planned activities: • Emergency Shelter (Operations & Essential Services): 64.5% • HMIS: 22% • Rapid Rehousing (Financial & Rental Assistance): 6% • Administration: 7.5% (maximum allowed) Specific funding within the major categories of Rapid Rehousing and Emergency Shelter may shift based on the applications received and awarded.
Describe threshold factors and grant size limits.	Eligible applicants are municipalities and nonprofits including community and faith-based organizations. New applicants, and applicants who have recently relocated their operations to another municipality, must submit a completed Certification of Local Government Approval with their application. Faith-based organizations are required to have separate 501c3 status established to meet eligibility requirements. All grantees must be in compliance with program guidelines and applicable state and federal policies and procedures, including compliance with federal nondiscrimination law. This includes certification from all Emergency Shelter applicants that the assisted property will be maintained as an Emergency Shelter for the period of funded assistance. All Shelters must have passed ESG shelter habitability inspection within the past year. There are no grant size limits per se for ESG funds. Grants to subrecipients of ESG funds in the current state fiscal year range from \$228,000 to \$418,000.
What are the outcome measures expected as a result of the method of distribution?	This method of distribution will support the State's goal of serving 250 households through rapid rehousing services and providing emergency overnight shelter to 3,000 people.
State Program Name:	Housing Trust Fund

3	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	National Housing Trust Fund (HTF) dollars will be distributed statewide, including the City of Burlington. HTF funds will be awarded on a competitive basis to locally driven projects that address the criteria outlined in AP-90, the 2025 Vermont HTF Allocation plan as well as the priority housing needs as identified in the State's Consolidated Plan.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The following threshold criteria must exist in any application to be considered for a HTF award: 1) the project must include the creation or preservation of permanent rental housing (transitional housing and shelters are not eligible), 2) the housing must remain perpetually affordable after the expiration of the HTF required period via a VHCB Housing Subsidy Covenant, 3) at least one of the State's Consolidated Plan housing priorities must be addressed, and 4) there must be a reasonable expectation that the project will be ready to proceed within 18 months. Applications will be reviewed by staff according to VHCB's Affordable Housing Policy (https://vhcb.org/sites/default/files/policy/housing/housing.pdf) as well as VHCB's Underwriting Policy and Procedures, (https://vhcb.org/sites/default/files/policy/housing/Project-Underwriting-Policies--Procedures.pdf), which includes analysis in the following areas: • Development capacity and fiscal soundness of the applicant, and experience of the development team • Project location • Market demand • Budget documents • Plans and specifications • HTF and other applicable federal requirements • Developer/owner profit standard and evaluation

	In addition to VHCB's applicable policies, applications for funding submitted by eligible entities will be reviewed, and funding will be prioritized, according to how the following criteria are met: • the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner; • The extent to which the project has a mechanism or strategy to ensure deep affordability of the HTF units throughout the compliance period so that rents are affordable to extremely low-income families; • the duration of the units' affordability period; • the merits of the application in meeting the priority housing needs as identified in the State's Consolidated Plan. • safe, decent, affordable housing (increase the supply and quality of affordable housing), • individuals and families experiencing homelessness (decrease the number experiencing homelessness, increase supply and quality of affordable housing)
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A - CDBG only
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG	N/A - ESG only

only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A – HOPWA only
Describe how resources will be allocated among funding categories.	The HTF regulations allow up to 10% of HTF funds to be used for homeownership activities; however, given the extremely low income (ELI) targeting requirements of the program and the need for rental housing affordable to ELI households in the state, Vermont will use HTF program funds exclusively for rental housing to meet the priority housing needs as identified by the State's Consolidated Plan. In accordance with HTF regulations, up to 10% of the State's HTF allocation will be used for administration. HTF project funds may be used to pay for the following eligible costs: development hard costs, refinancing, acquisition, related soft costs, operating cost assistance and operating cost reserves (not to exceed 1/3 of the state's annual allocation), relocation, and costs related to payment of loans. Awards of HTF funds will be made in the form of grants or 0%, 30-year deferred loans in order to minimize project debt and maximize affordability to ELI households.
Describe threshold factors and grant size limits.	In order to be considered for HTF funding, all applications must meet the threshold requirements stated above. In addition, projects must meet all HTF and other applicable federal requirements. There is no set maximum HTF award; however, applicants should be aware that demand for HTF funds may be competitive. The maximum per-unit subsidy limits for HTF are set at HUD's applicable limits for the HOME Program. These limits are currently \$181,488 for 0BRs, \$208,049 for 1BRs, \$253,994 for 2BRs, \$327,293 for 3 BRs, and \$359,263 for 4BRs+. When new limits are issued for 2025 those will be utilized.
What are the outcome measures expected as a result of the method of distribution?	With the FFY25 HTF allocation of approximately \$3 million, it is estimated that HTF dollars will assist 2-4 rental projects, resulting in an estimated 13 units affordable to ELI households.

4	State Program Name:	Vermont Community Development Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Vermont Community Development Program (VCDP) is funded with Community Development Block Grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, as amended, 42 U.S.C. Section 5301 et seq., herein referred to as the "FEDERAL ACT." All municipalities in Vermont, except Burlington (which receives funds directly from HUD), are eligible to apply for CDBG funds. The VCDP is authorized under the Vermont Community Development Act, Title 10 V.S.A. Chapter 29, referred to in this Consolidated Plan as the "STATE ACT." The lead agency, ACCD, administers the VCDP through the Department of Housing and Community Development (DHCD). All municipalities, unless currently sanctioned, are eligible to apply for CDBG funding through a competitive, needs-based application process. Funding levels, maximum and minimum grant requests, selection criteria, State priorities, and application assistance can be found on the next pages and in more detail at the VCDP Website. The VCDP provides eligibility criteria, notices of funding availability, a Program Guide and Application Instructions on its website: https://accd.vermont.gov/community-development/funding-incentives/vcdp The Website is used to provide potential applicants and existing grantees with all the resources needed to apply for funding, receive technical assistance and successfully manage their projects. VCDP Staff are readily available to assist potential applicants, current applicants, and existing grantees. Each year, VCDP notifies (Via Email) every eligible municipality in the state of the availability of CDBG funding and the application process. This outreach and communication is critical for VCDP since funding is not directly allocated or targeted to specific communities or regions within the state. VCDP provides an open application process with applications accepted throughout the year and funding availability guaranteed throughout the year. Two VCDP Board meetings will be established for the FFY 2025 Program Year. Municipalities are encouraged to apply for funding throughout the year.

	More information on VCDP Board Meeting dates, application instructions and assistance accessing the program can be found at: https://accd.vermont.gov/community-development/funding-incentives/vcdp/applicant-guidance
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The State Act stipulates that the allocation of CDBG funds shall be competitive, ensure that a wide range of community development activities be eligible, and be based on a system that measures the need and impact of the proposed projects (10 VSA Sec.687). The VCDP has established an application process and selection criteria to meet the intent of the State Act. The VCDP uses a Web-based Application System. Applications are completed online and are submitted by municipalities. VCDP staff then review each application for eligibility and completeness, before conducting a thorough analysis of each eligible application. The VCDP Board then reviews each application, interviews and questions the applicants using the below criteria and makes funding recommendations to the ACCD Secretary on behalf of the Governor. Each of the three criteria has equal weight and staff analyses of the applications are written based on these criteria and must meet one of three HUD National Objectives (Low and Moderate Income, Slums and Blight, and Urgent Need). The selection criterion is as follows: 1. Project Need: The project must meet a documented community or regional need. Determinations will be based on evaluation of such factors as: Need documentation; Appropriate solution; Appropriate funding; Meeting Consolidated Plan priorities; Meeting local and regional plan priorities; Health/safety risks to beneficiaries; Impact if project is not funded 2. Project Impact: The project must show how well it meets a national objective and how well it impacts the community. Determinations will be based on evaluation of such factors as: Ability to meet the need Number/percentage of low and moderate-income persons directly benefiting; Longevity of the benefit; Beneficiary involvement in developing the project; Indirect benefit to low and moderate-income persons and the community

	3. Project Feasibility: The project must be attainable and the representations and commitments within the application must be believable. This will include such factors as: Readiness to start/Proposed time frame is realistic; Proposed benefit is realistic; Costs are appropriate and justified; Prior VCDP performance record Please see the VCDP Program Guide uploaded on our webpage https://accd.vermont.gov/community-development/funding-incentives/vcdp/applicant-guidance for a detailed description of the program including; selection criteria, funding levels and application instructions. All CDBG applicants seeking funding for affordable multi-family rental housing (for new units and rehabilitation of existing units) shall describe the plans and tools they have in place to achieve the goal of making available at least 15% of the units in their portfolio to those who are homeless.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	See the VCDP Program Guide uploaded on our webpage https://accd.vermont.gov/community-development/funding-incentives/vcdp/applicant-guidance for a detailed description of the program including selection criteria, funding levels, and application instructions.
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	N/A - ESG only
Identify the method of selecting	N/A – HOPWA only

project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	
Describe how resources will be allocated among funding categories.	The VCDP must expend at least 70% of the HUD Award over a period of three program years to fund activities that principally benefit persons of low and moderate income. Grants for Activities which aid in the prevention or elimination of slums and blight (Slums and Blight) or that are designed to meet urgent community development needs (Urgent Need) do not necessarily provide a direct benefit to persons with low and moderate incomes. Such awards, therefore, must be drawn from the remaining 30% of the CDBG award over a period of three program years. Grants for these activities combined will be limited to 13% of the total HUD Award over a period of three program years. Costs for grant activities known as General Administration may not exceed 12% of a CDBG grant award. This limitation assures compliance with the federally imposed cap of 20% of the total Annual HUD Award and program income that may be used for all VCDP planning and general administrative purposes, including both State and local costs. The federal share of State administration funding is capped at 2% of the annual CDBG award, which must be matched by a minimum of 2% in State funds, plus 1% for technical assistance and an additional \$100,000 of unmatched HUD funding for a total HUD funded State administration of 3% of the CDBG award plus \$100,000. The State does not intend to use any Program Income for State administration. For the FFY 2025 Program Year, the VCDP will set aside \$600,000 for Accessibility Modification Grants (AM) until the last funding round during the period July 1, 2025 – June 30, 2026. Any funds remaining may then be awarded to Implementation and Planning Grants (IG, PG). The Federal Act restricts the total funds that may be used to fund activities known as Public Services to 15% of the Annual HUD Award that is allocated for assistance to municipalities. The maximum allowable for public service activities is shown in Table – CDBG FFY2025 Distribution Plan. The State may use up to one percent of the Annual HUD Awards for FFY88 through FFY2024 to the extent funds remain undistributed for these program years to provide technical assistance

	to local governments and nonprofit recipients. The amount established for this Consolidated Plan is shown in Table – CDBG FFY2025 Distribution Plan. VCDP will set aside up to 45% of its annual CDBG allocation for Scattered-Site (SS) Housing Rehab Grants to be distributed at the first funding round during the period for the period July 1, 2025 – June 30, 2026. Any funds remaining may then be awarded to Implementation and Planning Grants (IG, PG) at the last funding round of the FFY 2025 Program Year. VCDP will include targets of up to \$500,000 for projects that support transitional recovery housing that includes wrap around services for individuals being served to supplement the state’s Recovery Housing and \$360,000 for planning grants. Funds for FFY 2025 to be awarded on a competitive basis against regular applications.
Describe threshold factors and grant size limits.	All applications for CDBG funds must meet the following eligibility thresholds to be considered for review. These eligibility thresholds are statutory and cannot be waived by the Agency. Failure to meet all eligibility thresholds will result in rejection of the Application. Eligible Applicant: The only eligible applicants are Vermont towns and cities, and incorporated villages chartered to function as general-purpose units of local government. A municipality may apply as a single applicant, as the lead applicant of a consortium, as a member of a consortium, but not as a single applicant and as lead applicant of a consortium. Eligible Activity: Only those activities eligible under the Federal Act may be funded under this program. Federal Objective: Each proposed VCDP activity must meet at least one national objective. The national objective claim must be fully supported, and in some cases, the AGENCY should pre-approve your approach for meeting the national objective. State Objective: Each proposed VCDP activity must meet at least one State objective. Public Hearing: Each VCDP applicant must conduct at least one (1) public hearing with notice as required by the STATE ACT, prior to application submission. HUD regulations require a minimum of two (2) public hearings, each at a different stage of the program, to obtain citizens' views and responding to proposals and questions. The VCDP complies with this regulation by requiring the first public hearing during the application stage and the second public hearing prior to the completion date of the funded grant program.

	Municipal Plan: Each VCDP applicant, including consortium members, must have a municipal plan adopted in accordance with 24 VSA Ch. 117. The plan must identify the municipality's community development needs including housing and economic development as well as the needs of low and moderate-income persons and the activities to be undertaken to meet such needs. Anti-Displacement Plan: Under the provisions of the Uniform Act, 42 USC §4601 et seq., each successful applicant, including all municipalities in joint applications, but excluding Planning Grant applicants, must submit a Residential Anti-Displacement and Relocation Assistance Plan (ADP) and state whether the proposed activity will result in displacement, relocation, property demolition, or property change of use. Please see the VCDP Program Guide uploaded on our webpage https://accd.vermont.gov/community-development/funding-incentives/vcdp/applicant-guidance for a detailed description of eligibility criteria and program thresholds. For grant size limits - see CDBG Grant Types, Funding Limits and Match Requirements.
What are the outcome measures expected as a result of the method of distribution?	This method of distribution will support the State's 2025 Annual Action Plan goals in housing, economic development, and public facilities and services. With the FFY25 allocation of \$7,485,780 million, the VCDP expects to create 45 rental units and 2 homeowner units, rehabilitate 44 rental units and 100 homeowner units, create or retain 5 jobs and assist 1 businesses, and serve approximately 4,640 Vermonters through public facility and service activities.

CDBG FFY2025 DISTRIBUTION PLAN

	FY2025 Allocation
FFY 2025 CDBG Annual HUD Award	\$7,485,780
Anticipated FFY 2025 Program Income*	\$ 200,000
Total Available	<u>\$7,685,780</u>

CDBG Allocations Based on FFY 2025 Annual HUD Award and Program Income

Implementation Grants (IG) (Includes Planning Grant Target of \$360,000 and Recovery Housing Target of \$500,000)	\$2,992,607
Scattered Site Grants (SS-HRLF) – Housing Revolving Loan Fund set-aside (1)	\$3,368,601
Accessibility Modifications Grants (AM) set-aside (1)	\$ 600,000
Anticipated Program Income	\$ 200,000
 Total State Administration	 \$ 324,572
• 2% \$149,715	
• \$100,000	
• + 1%TA \$74,857	
Total	<u><u>\$7, 685,780</u></u>

(1) FFY2020 SS & AM any remaining funds available at the time of the last funding round during the period of July 1, 2025, through June 1, 2026, may be awarded to Implementation and Planning Grants.

NOTE: Allocations are estimated based on the State's FFY 2025 Award.

- *Program Income (PI) estimate based on amounts expected.
- Funds will be allocated so that each funding cycle will have funds to award.
- The Agency reserves the right to adjust the fund categories up to \$100,000.
- Recaptured funds will be reallocated as soon as feasible.
- SS set-aside is up to 45% of VCDP's annual FFY allocation.
 - SS-HRLF set-aside is limited to up to 15% of its total annual allocation for counseling activities

Program Limitations

Public Service Limitation (15% of total allocation)	\$1,122,867
Federal 20% Cap for state & local general administration and all planning activities	\$1,497,156
• Cap for state & local general administration (IG & AM) and all planning activities	\$1,092,924
• SS-HRLF set-aside is limited to up to 12% of its total annual allocation for general administration	\$ 404,232
Limit on Slums & Blight and Urgent Need (13% of Total)	\$ 973,151

CDBG Grant Types, Funding Limits, and Match Requirements

	Implementation (IG)	Scattered Site (SS-HRLF)	Planning (PG)	Accessibility Modification (AM)	Multi-year Funding Implementation	Disaster Assistance
Annual Allocation						
	\$3,192,607 includes \$200,000 Program Income	Minimum \$3,368,601 ¹	Target amount of \$360,000	Minimum \$600,000	No amount reserved	Disaster Specific
Funding Limits						
Maximum	\$1,000,000 ²	Annual Allocation is based on performanc e	\$60,000	\$150,000	\$1,250,000 ³	Disaster Specific
Minimum	\$50,000		\$3,000	\$5,000	\$250,000	
Match Requirements						
	10% of VCDP Funds in cash or cash-in-kind for ADA and Slums & Blight; which must be applied to remediating the S&B condition.	10% of VCDP Funds in cash or cash-in- kind.	10% of VCDP Funds in cash or cash-in-kind.	10% of VCDP Funds in cash or cash-in-kind.	10% of VCDP Funds in cash or cash-in-kind for ADA and Slums & Blight; which must be applied to remediating the S&B condition.	
	Please see the VCDP Program Guide at: http://accd.vermont.gov/community-development/funding-incentives/vcdp/applicant-guidance for a detailed description of the program including; grant types, selection criteria, match requirements, funding levels and application instructions.					

Discussion:

¹ SS & AM funds not awarded by June 1 may be awarded to Implementation and Planning Grants.

² Maximum funding limit for community public service projects is \$500,000.

³ No more than \$750,000 can be forward committed for multi-year projects.

AP-35 Projects – (Optional)

Introduction:

Not applicable to State Action Plans. This is where the State of Vermont will add its Projects for the 2025 program year.

#	Project Name
1	FY25 CDBG Goal Other
2	FY25 HOME Goal Other
3	FY25 Vermont HOME
4	FY25 Vermont HTF

Table 58 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Refer to AP-25 Allocation Priorities and AP-85 Other Actions - Obstacles to addressing underserved needs.

AP-38 Project Summary

Project Summary Information

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

N/A

Acceptance process of applications

N/A

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State's Process and Criteria for approving local government revitalization strategies

N/A

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

In keeping with the State's long-standing policy, the State does not plan to target assistance to specific geographic regions. CDBG, HOME, and HTF funds will be allocated on a competitive basis to locally driven projects that address priority needs.

ESG funds are awarded as part of the statewide Housing Opportunity Grant Program (HOP). Awards are made on a competitive basis according to local needs.

Geographic Distribution

Target Area	Percentage of Funds

Table 59 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

N/A - Vermont does not allocate investments geographically.

Discussion

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

Each year, Vermont strives to provide as many affordable housing units as possible through production of new units, rehabilitation of existing units and preservation of subsidized units at risk of loss. However, the reality is the HUD funding provided to Vermont through CDBG, HOME, and HTF (approximately \$14 million) is not enough on its own to significantly address the affordable housing need in the state. The number of affordable housing units created or rehabilitated is much more dependent on the investments of Low-Income Housing Tax Credits and access to other affordable housing investments. The State will use CDBG, HOME, and HTF to leverage these resources, and ESG will provide tenant-based rental assistance / rapid rehousing to homeless households.

One Year Goals for the Number of Households to be Supported	
Homeless	50
Non-Homeless	232
Special-Needs	0
Total	282

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	40
The Production of New Units	72
Rehab of Existing Units	170
Acquisition of Existing Units	0
Total	282

Table 61 - One Year Goals for Affordable Housing by Support Type

Discussion:

Note: If funds are reduced these goals will be adjusted proportionally according to the allocation priorities outlines in this plan.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

Vermont's Public Housing Authorities continue to operate in an extremely challenging housing environment. Escalating rental costs and the lack of housing stock have impeded the ability of PHA's to fully utilize housing choice vouchers. Voucher success rates continue to be low at an unprecedented 22% while the average rental assistance payment has increased on average of 34.21% over for the past five years.

Federal funding to support the programs administered by Public Housing Authorities is seeing dramatic reductions. While we had anticipated level funding following the Continuing Resolution approved in March 2025, VSHA realized an unexpected reduction of approximately \$1 million across the Housing Choice Voucher (HCV) and Mainstream Voucher programs. During the remaining months of the calendar year, VSHA will need to reduce it's HCV program by approximately 12.65%, roughly 493 households. All local public housing authorities are facing similar reductions in funding.

For statewide PHA information go here <https://www.hud.gov/helping-americans/public-indian-housing-hcv-dashboard>. Also see the data attached.

These reductions will have long-lasting impacts, as future budgets are determined based on funds spent the prior year.

Even in this environment, none of Vermont's PHA's are considered troubled, and many are rated as high performing.

Actions planned during the next year to address the needs to public housing

The Commissioner of DHCD will continue to review PHA plans that are submitted, to certify the Plans' consistency with the State's Consolidated Plan. Additionally, the executive directors of the Montpelier Housing Authority and the Vermont State Housing Authority are members of the Department's Consolidated Plan Advisory Board, and a representative of the public housing authorities serves on the Vermont Housing Council. PHA's are eligible for CDBG funds through their municipalities.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Vermont State Housing Authority administers public housing funds in the form of rental assistance - the Section 8 Housing Choice Voucher program. VSHA does not own or operate traditional Public Housing. In Vermont, this is done exclusively by the eight local housing authorities.

VSHA's Section 8 funding includes a homeownership program for first-time homebuyers, a project-based voucher program and a variety of special purpose programs. VSHA has operated its Section 8 Homeownership program since 1999.

Each PHA in Vermont has at least one voucher participant or public housing resident serving on the PHA Board of Commissioners. This is to ensure residents have a voice on the governance/administration of

Vermont's PHAs. In addition, each PHA in Vermont has organized a Resident Advisory Board to assist in the development of each PHA's Annual Agency Plan. This ensures that residents have an adequate involvement in management.

Winooski Housing Authority has a Homeownership Program whereby Housing Choice Voucher Program clients may utilize their housing assistance to provide debt service on home mortgages. Clients who qualify must undergo Home Ownership Counseling prior to the purchase of a home.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A - None of Vermont's PHA's are designated as troubled.

Discussion:

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

This section lays out Vermont's one-year goals and actions for reducing and ending homelessness, addressing emergency shelter and transitional housing needs of homeless people, helping the homeless transition to permanent housing, helping low- and extremely-low income families and individuals avoid becoming homeless, and provide supportive housing and make housing accessible to people with disabilities.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Vermont provides outreach to homeless persons through a network of local agencies, including shelters, service agencies and housing providers. United Way 2-1-1 provides a one-stop resource and referral point for all persons. The PATH Program provides assistance to several Vermont organizations to conduct outreach efforts to people experiencing a serious mental illness or a co-occurring substance use disorder. PATH is funded by the U.S. Department of Health & Human Services and administered in Vermont by the AHS Department of Mental Health.

Addressing the emergency shelter and transitional housing needs of homeless persons

The State of Vermont leverages resources to address the needs of homeless individuals and families. These resources include those for prevention, rapid re-housing, transitional housing, and shelter operations. The statewide network of local emergency shelters, including shelters for victims of domestic and sexual violence, are often full in winter months and many have developed “overflow” capacity. Additional shelter beds are available seasonally through warming shelters in communities with increased need. When shelters are full, AHS’s Department for Children and Families pays for emergency motel stays for homeless persons who are in a vulnerable population, including elders, people with disabilities, families with children, and victims of domestic violence. As part of a larger strategy to address COVID-19, utilization of motel stays was expanded to provide non-congregate options to Vermonters in need. The State is currently assessing whether the expanded use of motel stays will continue, while simultaneously working to increase the number of shelter beds available around the state.

Member agencies of the Vermont Coalition of Runaway and Homeless Youth Programs provide emergency and transitional housing services to youth through the Runaway and Family Stabilization and Transitional Living Programs with funding from the US Department of Health & Human Services, and with support from AHS.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Through AHS and both Continua of Care, Vermont is actively engaged in developing multiple programs and strategies to shorten the duration of homelessness, ensure that people are stable after receiving assistance, and support homeless persons moving into permanent housing as rapidly as possible. ESG funds are specifically targeted to support Rapid Re-housing programs. In addition to ESG, state-funded resources administered by the Department for Children and Families include:

- Vermont Rental Subsidy program, providing 12 months of rental assistance to formerly homeless families and individuals
- Family Supportive Housing Program linking intensive supportive services and affordable housing to families with children experiencing homelessness, especially families with multiple episodes of homelessness
- Housing Opportunity Grant Program, which includes state funded short-term supported housing, rapid rehousing services, and transitional housing for youth and Veterans

Vermont has a strong relationship with the Veterans Administration's grant per diem program to provide transitional housing to veterans. Funding through the VA Supportive Services for Veterans Families supports various initiatives statewide to provide prevention and re-housing assistance. These projects are coordinated with both Continuums of Care.

Additionally, Vermont has established, through an Executive Order entitled "Publicly Funded Housing for the Homeless", a goal that at least 15% of all housing portfolios that have received publicly controlled development funds be available and serving households exiting homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Vermont leverages state resources to divert low-income individuals and families from homelessness. In addition to homelessness prevention activities funded under the OEO Housing Opportunity Grant Program, the following initiatives address discharge from publicly funded institutions and systems of care:

- The Vermont Youth Development Program with AHS Department for Children & Families funding and partnerships ensure persons being discharged from the foster care system are not routinely discharged into homelessness and are accessing mainstream resources, including the Housing Choice Voucher Program Family Unification Vouchers, and Foster Youth to Independence (FYI) Vouchers for youth in transition.
- The AHS DMH-funded Mental Health Subsidy & Care program, modeled on HUD Shelter plus Care, funds housing vouchers paired with service supports for homeless persons in higher levels of care settings, such as hospitals, who are ready for discharge.
- The AHS Department of Corrections (DOC) ensures persons being released from the corrections system of care are not routinely released into homelessness while on supervision. If suitable permanent housing in the community cannot be located for a person exiting Corrections, DOC utilizes a comprehensive statewide system of transitional housing to ensure that persons are not routinely released into homelessness.

Discussion

Vermont promotes supported housing integrated into non-specialized residential buildings or settings. This strategy is aided by promotion of universal design through the State qualified allocation plan, as well as mixed-income housing achieved through project and tenant-based rental assistance and on-site supportive services customized to a client's needs. Programs that are available to make apartments accessible for people with disabilities include:

- Flexible Family Funding, which can help eligible families of individuals with developmental disabilities pay for assistive technology and home modification.
- One Time Funding Assistive technology, for adaptive equipment, and home modifications to make the individual's home physically accessible, and other special supports and services not covered for the person under the Medicaid State Plan, and
- Home and Community-Based Services funding which can help pay for home modifications for physical accessibility in shared living, the family home that is the individual's primary residence, or the individual's own home or apartment including modifications like the cost of ramps, widening doorways, accessibility modifications to bathrooms, visual fire alarm, and plexiglass windows or alarm systems for safety.

The Support and Services at Home (SASH) program provides on-site supportive and coordination services to older Vermonters with disabilities through a statewide network of designated regional housing organizations (DRHOs). SASH services are funded primarily through Vermont's Blueprint for Health and State grant funds from the Department of Disabilities Aging and Independent Living.

Persons with disabilities have access to an array of housing and housing supports, with an emphasis on the least restrictive community setting and maximum consumer choice. The types of paid home supports are described in the State System of Care Plan for Developmental Services, the Medicaid Manual for Developmental Disabilities Services, and the Developmental

Disabilities Annual Report which can be found on the DAIL/Developmental Disabilities Services Division website.

In Vermont, Housing Choice (Section 8) rental assistance has been effectively targeted to persons with mental, physical, or developmental disabilities. The 811 Mainstream Voucher program, administered in Vermont by the Vermont State Housing Authority (VSHA) and the Burlington Housing Authority (BHA), provides rental assistance (vouchers) to assist non-elderly persons with disabilities *only* and is fully subscribed. Unfortunately, this can result in new applicants having to wait for assistance to be available. Further, given the lack of housing throughout Vermont, the unit search time can be very long.

The State of Vermont has not received HUD's Section 811 Supportive Housing for Persons with Disabilities Project-Based Rental Assistance; however, non-profit developers did apply and have utilized Section 811 capital and operating funds to provide affordable housing options and services to people with disabilities.

Beyond accessing the appropriate level of residential or outpatient treatment, persons with alcohol or other substance use disorders can access a limited number of transitional housing beds or recovery housing programs supported through grants from the AHS, Department of Health, Substance Use Programs.

In addition to the federal HOPWA program, persons with HIV/AIDS can access targeted state-funded rental subsidies and emergency financial assistance to prevent eviction or secure stable housing. This funding comes from the AHS Department of Health. Emergency Rental Assistance is delivered through one of three local AIDS Service Organizations (ASOs), and short-term rental assistance is delivered through the Vermont State Housing Authority (VSHA).

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

DHCD, AHS, and VHCBC and its housing partners, will continue efforts to lower the barriers to affordable housing identified in the 2025-2029 Housing Needs Assessment. Specific actions to be taken in the 2025 program year include:

- In coordination with VHFA, VHCBC and housing developers, examine operating costs of projects with and without services and create benchmarks for use in development and funding decisions.
- In coordination with VHFA and VHCBC, analyze timelines for funding applications and decisions to identify opportunities to reduce the administrative cost and cost of land holding for applicants.
- Provide technical assistance to developers and communities about neighborhood development areas and work with regulatory agencies on reducing permitting requirements outlined in Act 250 for our Designated Areas.
- Provide training, one on one assistance, access to financing and long-term support to help interested Vermonters become small-scale developers to build and rehab housing throughout the state through the “Homes for All” program.
- DHCD will continue to respond to complaints and concerns about conditions in mobile home parks using the authority granted by the legislature in 2015 and the rules promulgated in 2016.
- Promote fair housing by conducting trainings and supporting efforts to provide landlord-tenant education programming.
- DHCD engaged in community outreach activities including a statewide survey and community meetings / focus groups to update its 2024 Statewide Fair Housing Analysis.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Limited public resources, particularly decreasing funding for development, preservation, services, and subsidies that support affordable housing.

1. Promote the State’s commitment to perpetual affordability for projects with larger per unit investment owned by nonprofit housing providers and provide greater flexibility for programs like the Vermont Housing Improvement Program, which provides grants or forgivable loans up to private landlords for up to \$50,000 per unit with 5 and 10-year affordability requirements.
2. Maximize leveraging and seek ways to reduce operating and development costs through

programs like Homes for All.

3. Support the continuation and expansion of the State affordable housing, downtown and historic tax credits.
4. Support State resources for affordable housing such as rental subsidy programs, homelessness assistance and the Vermont Housing and Conservation Trust Fund.
5. Consider per unit development costs in funding applications
6. Consider utilization of underutilized resources such as the State's Private Activity Bond Cap and/or "4%" Low Income Housing Tax Credits.

Increasing standards for energy efficiency.

1. While supporting the State's energy goals, ensure a robust analysis of costs is considered in the development of State energy-efficiency standards and building codes.
2. Seek expanded and new sources of funding for energy improvements in both publicly supported and private single and multi-family housing.

State and local land use controls.

1. Continue to review State and local land use programs and policies for ways to strengthen environmental protection while reducing unnecessary barriers to residential development, particularly affordable housing.
2. Encourage and promote development and growth in Designated Downtowns and Village Centers, Growth Centers, Neighborhood Development Areas, and New Town Centers.
3. Provide technical assistance to municipalities to review and reform outdated and exclusionary land use restrictions.

Permitting processes and community development standards.

1. Provide technical assistance to communities, developers and property owners seeking to provide affordable housing.
2. Provide technical assistance and funding to municipalities around zoning and land use planning.
3. Promote exemptions and streamlining of State permitting processes in areas designated for growth.

Limited funding to promote Fair Housing and address discrimination in rental and sales market housing markets.

1. Continue to undertake the actions recommended in the 2024 Fair Housing Analysis.
2. DHCD engaged in community outreach activities including a statewide survey and community meetings / focus groups to develop a comprehensive Fair Housing Analysis in 2024.
3. Support efforts of the Vermont Human Rights Commission, the Fair Housing Project, Vermont Legal Aid, and others to secure additional funding for fair housing activities.
4. Work with landlord and tenant organizations to increase awareness of State and federal

housing law and ensure the rights and responsibilities of both are appropriately balanced in changes to State statutes.

Federal funding regulatory requirements such as the National Environmental Policy Act, Davis-Bacon, procurement standards and BABA.

1. Continue to provide technical assistance and update guidance to grantees as requirements expand and change.
2. Access and seek additional training opportunities for State administrators and grantees.
3. Provide federal funding and regulatory agencies with information on the benefits and challenges of statutory and regulatory requirements and recommendations for improvements.

Discussion:

AP-85 Other Actions – 91.320(j)

Introduction:

This section describes actions that will be pursued in addition to the actions described elsewhere in this plan.

Actions planned to address obstacles to meeting underserved needs

Feedback from the 2025 Outreach Meetings and survey responses, several needs first raised in the 2024 Consolidated Plan update were amplified, including the growing need for more affordable childcare as well as the need for decent, safe, and affordable housing for agricultural farm workers. There was also widespread support to provide more shelters and rapid rehousing for unhoused Vermonters and to build more service enriched housing for seniors and fund adult day care services. Actions taken or planned to address these concerns include:

The Farm Worker Housing program was created in 2021 to develop and rehab critically needed farm working housing; it is managed by the University of Vermont Extension and Champlain Housing Trust. To date the FWH Repair program has repaired 21 units, housing 74 farm workers. An additional 23 units are currently being renovated, housing 93 farm workers. There are over 50 units in the active pipeline, benefiting over 200 workers.

Champlain Housing Trust has also utilized their Replacement program to build 3 new Zero Energy or equivalent homes at farms. These 3 projects house 10 workers. There are 2 additional replacement projects nearing completion.

There have been two notable modifications to the repair and replacement programs. For the repair program, after the program launched Champlain Housing Trust staff quickly realized that many farms had multiple units of housing, all with significant repair needs. They increased the amount of forgivable debt a farm could apply for to \$60,000, with a maximum of \$30,000 per unit.

In addition, DHCD is continuing to increase investments in housing affordable to low- and moderate-income households and will encourage applications from municipalities that have high levels of agricultural activity to address the needs of community members who are employed in area farm work.

The Vermont Agency of Human Services, with the support of The Council on Housing and Homelessness, is designing and implementing a Medicaid Permanent Supportive Housing Assistance Program. The program plans to serve 100 Vermont households exiting homelessness during its first year.

Actions planned to foster and maintain affordable housing

The Vermont Housing Finance Agency (VHFA) has a list of all assisted housing projects in the state, including when various affordability contracts expire. The state housing funders work to maximize the renewal of affordability contracts and maintain housing assistance. This is discussed at the Preservation Council, which aims to strategize and prioritize efforts throughout the state to preserve existing affordable housing. These efforts will continue over the next year and into the foreseeable future to preserve housing affordability.

Actions planned to reduce lead-based paint hazards

Vermont's ongoing activities to reduce lead-based paint hazards in housing, eliminate childhood lead poisoning, and integrate lead poisoning prevention and home health and safety efforts into affordable housing programs include:

1. Continue to implement activities of the state-wide Lead-Based Paint Hazard Reduction Grant Program in the private housing stock, administered by the Vermont Housing & Conservation Board; and implementation of a HUD-funded Lead Hazard Control Program in Burlington.
2. Continue to implement activities of the State and community-based Healthy & Lead Safe Homes Program, administered by the Vermont Department of Health through a cooperative agreement with the U.S. Centers for Disease Control (CDC).
3. Implement the recommendations of the 2008 Get the Lead Out of Vermont Task Force.
4. Continue to implement provisions of Act 94 (an Act Relating to Childhood Lead Poisoning Screening and Lead Hazard Abatement), passed by the Vermont General Assembly in 1993.
5. Continue to develop and implement appropriate recommendations of Act 94 (passed in 1993) and Act 165 (passed 1996), including the development of financial strategies for lead hazard reduction in future years; and pursue further legislative action to reduce lead paint hazards. The Vermont Legislature is currently considering a bill that will have the State take over administration of the Renovation, Repair and Painting (RRP) Rule and integrate it into Vermont's lead paint laws'
6. Administer HUD funds received in 2022 to address the on-going need for lead-based paint hazard reduction in thousands of Vermont housing units.
7. Maintain regular contact with the National Center for Healthy Housing (formerly the National Center for Lead Safe Housing).
8. Continue participation on the New England Lead Coordinating Committee, convened by the Tufts University School of Medicine and the University of Connecticut.

9. Evaluate and amend policies of the Vermont Housing Finance Agency and the Vermont Housing & Conservation Board regarding lead-based paint, health, safety, or toxic and hazardous materials, as appropriate.
10. Coordinate procedures with the Department of Health, the Vermont State Housing Authority and local Public Housing Authorities regarding childhood poisoning in owned and assisted units, as needed.
11. Continue to build a database in the Department of Health regarding incidences of childhood lead poisoning and presence of lead hazards in housing stock.
12. Coordinate lead hazard reduction efforts with activities of the State Office of Economic Opportunity Weatherization Assistance Program in low-income housing units.
13. Continue public information, education, and outreach efforts.
14. Continue to develop public and private financial resources for lead-based paint hazard control activities in Vermont's housing stock.
15. Coordinate with the Department of Health and affordable housing funders and developers in implementing the Healthy Homes strategic plan promoted by HUD and promote the incorporation of healthy homes principles into ongoing practices and programs.
16. Coordinate efforts with all housing groups, agencies, and stake-holders to create sustainable delivery of healthy homes services to reduce health and safety hazards in housing in a comprehensive and cost-effective manner, with a focus on protecting the health of children and other sensitive populations in low-income households.
17. Continue coordination and collaboration among health, housing, and historic preservation agencies and interest groups.

Actions planned to reduce the number of poverty-level families

One in ten Vermonters experience poverty. Children are more likely than adults to live in poverty or in deep poverty (below 50% of the poverty threshold). The Agency of Human Services (AHS) supports households experiencing poverty while serving those who earn more than the threshold but still struggle to afford housing, transportation, health care, childcare, and other essentials.

AHS and primarily the Department for Children and Families (DCF) aim to reduce the number of families living in poverty. Reach Up is Vermont's Temporary Assistance to Needy Families (TANF) program which provides cash assistance, case management, coaching and support services to Vermont families whose income is generally below 50% of the Federal Poverty Level. Reach Up and related programs are critical to alleviating poverty. These programs provide nearly 6,300 Vermont children and their families with income to help provide basic needs. In addition, DCF-Office of Economic Opportunity (OEO) manages a number of grants to make housing more

affordable and prevent homelessness among vulnerable Vermonters.

Below is a list of some of DCF's most effective anti-poverty program investments:

- Family Supportive Housing is an evidence-informed model that provides permanent housing and intensive case management and financial empowerment support to families who have experienced homelessness and are at-risk of child welfare involvement. Families served by FSH tend to have high rates of housing stability (62-76% over the last five years) and most families close their child welfare case during enrollment and do not have a new case after they exit.
- Fuel Assistance- The Seasonal Fuel Assistance Program helps low-income families pay a portion of their home heating bills. Assistance is for homeowners or renters who pay for heat or who have heat included in the rent. The Crisis Fuel Program-Emergency Fuel Program is available for families with monthly gross income up to 200% of poverty level.
- Financial Empowerment Program Reach Up case managers and VABIR Career Coaches use "Your Money, Your Goals" toolkit to help Reach Up recipients address financial barriers. VABIR Career Coaches pair incentivized Financial Coaching with employment, training and education goals to help families obtain bank accounts, fix credit, start saving, and feel more confident about their financial future.
- Reach Up Car Ownership Program Reach Up purchases cars for families through Good News Garage and other state agencies and assists through down payment assistance and preventing repossessions.
- The Child Care Financial Assistance Program (CCFAP) helps eligible families with the cost of childcare. Payments are made directly to childcare providers and is provided through DCF-Child Development Division.
- Help Me Grow helps early childhood partners work together to build strong, connected communities and healthy, resilient families. Help Me Grow builds families' and service providers' understanding of early development, promotes the importance of social and emotional skill development, and connects children to the community resources and supports they need, when they need them.

AHS works closely with the State's affordable housing community to ensure that the lowest income families in Vermont can access quality housing. The regional housing non-profits were encouraged through Vermont State Executive Order No. 3-73 to "make available at least 15% of their housing portfolio to homeless families and individuals including those with special needs...". AHS provides direction to the new projects that are funded through participation in the Vermont Housing and Conservation Board, prioritizing units for the lowest income Vermonters.

Actions planned to develop institutional structure

1. Continue to encourage closer coordination between housing and human service providers, particularly with the Agency of Human Services, to better serve our lowest income population; and continue coordination with the Department of Labor to ensure that unemployed or under-employed Vermonters are connected to progressive employment programs.
2. Continue to require Economic Development Projects with job creation elements to enter into a hiring agreement with the Department of Labor career resource center.
3. Continue to encourage closer communication with the Agency of Transportation to encourage integrated transportation systems that link housing with jobs and services.
4. Continue efforts to simplify and to coordinate application requirements for various funding sources including quarterly meetings between DHCD, VHCB, and VHFA to discuss varying funding priorities and timelines.
5. Streamline service delivery and enhance local effectiveness by continuing to build and enhance the capacity of community-based homeless assistance providers and nonprofit housing providers.

Actions planned to enhance coordination between public and private housing and social service agencies

Continue the Department's leadership of the Vermont Housing and Homelessness Council and formation of State policy to assist housing providers, State agencies, and others, to ensure the availability of safe and affordable housing for all Vermonters.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

As reported throughout this plan, the State will strive to; increase the supply and quality of affordable housing, decrease the number of persons experiencing homelessness, create and retain jobs, strengthen communities, and improve the quality of life for all Vermonters. CDBG, HOME, HTF, and ESG funding are often leveraged with other funds to maximize the available resources.

Specific priorities and goals for CDBG, HOME, HTF, and ESG funding are identified in the annual goals and objectives contained in this plan.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	200,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	200,000

Other CDBG Requirements

1. The amount of urgent need activities	973,151
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

N/A – No other forms of investment will be used.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

N/A – Vermont will not be using HOME funds for homebuyer assistance programs.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

N/A – Vermont will not be using HOME funds for homebuyer assistance programs.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Multi-family projects developed by locally based housing organizations that receive HOME funds for rehabilitation may utilize HOME funds to refinance existing debt consistent with 24 CFR 92.206(b)(2), if they meet the following guidelines:

- Refinancing is necessary to permit or to continue affordability under section 92.252;
- Rehabilitation is the primary eligible activity. A minimum of \$7,500 of rehabilitation per unit is required;
- The grantee must demonstrate that disinvestment in the property has not occurred;
- The grantee must demonstrate management capacity and practices that ensure that the long term needs of the project can be met and the targeted population can be served over an extended affordability period;
- The grantee must demonstrate that the new investment is being made to maintain current affordable units, to create greater affordability in current affordable units, or to create additional affordable units;
- Refinancing will be limited to projects that have previously received an investment of public funds;
- The minimum HOME affordability period shall be 15 years and all HOME assisted projects are required to be perpetually affordable via a VHCB Housing Subsidy Covenant;
- HOME funds may be used for refinancing anywhere in the State of Vermont with the exception of the City of Burlington;

- HOME funds cannot be used to refinance multifamily loans made or insured by any Federal program, including CDBG.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

See Vermont's HOP - Standards for Provisions of Assistance. The State requires that all ESG grantees submit to the Office of Economic Opportunity (OEO) written standards (policies and procedures) for providing ESG assistance. OEO approves only those standards that are in compliance with ESG regulations and are consistent with state and federal goals.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Both the Chittenden County CoC and the Balance of State CoC adopted coordinated entry policies and procedures in January 2018. OEO participates in the Chittenden County CoC coordinated entry committee and chairs the Balance of State CoC coordinated entry committee. OEO is also the recipient of HUD CoC Coordinated Entry project funds, which it pairs with state funding to support implementation in the Balance of State. All ESG grantees are required to participate in the coordinated entry system in their region.

Both coordinated entry systems incorporate a screening form to assist a range of partners with making a referral for homeless assistance and a uniform housing assessment tool, which evaluates severity of service need and/or vulnerability in order to support prioritization of scarce resources. In Chittenden County, the assessment form is varied for subpopulations of single adults, families, youth, and victims of domestic violence. Both CoCs use a hybrid model which includes partner agencies serving as a hub or an assessment partner, and both use HMIS and a master list review process. 2-1-1 provides access to coordinated entry across the geographic area.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

OEO administers the Emergency Solutions Grants program (ESG) as part of the Housing Opportunity Grant Program (HOP). The Housing Opportunity Grant Program blends federal and state funding to help nonprofit organizations, including community and faith-based organizations: provide emergency overnight and day shelter; provide transitional housing where appropriate; offer supportive services for homeless families and individuals; and implement effective homeless prevention and rapid re-housing initiatives within the local continua of care. Vermont has chosen to allocate ESG resources towards Emergency Shelter (Operations and Essential Services), HMIS and Rapid Re-housing (medium-term Rental Assistance). Other activities, such as Street Outreach, Shelter Renovation, Homelessness Prevention and Rapid Rehousing Services will be funded through other funding sources and coordinated locally and/or as part of the consolidated Housing Opportunity Grant Program.

In April 2025, OEO will release a Request for Proposals for the Housing Opportunity Grant Program (which includes ESG program funds). Recipients of State Fiscal Year 2025 (July 1, 2024-June 30, 2025) funds will be considered for SFY 2026 funding, with the option for applicants to submit requests adjusting projects and/or funding. Current awards (SFY 2025) were reviewed and evaluated by AHS OEO based on local need, capacity, approach, and local coordination.

Eligible applicants are municipalities and nonprofits including community and faith-based organizations. Faith-based organizations are required to have separate 501c3 status established to meet eligibility requirements. Part of the selection process can involve a site visit of the finalists at which time documentation listed in the application will be reviewed. All Emergency Shelter applicants must certify that the assisted property will be maintained as an Emergency Shelter for the period of funded assistance. New applicants, and applicants who have recently relocated their operations to another municipality, must submit a completed Certification of Local Government Approval with their application. Vermont makes ESG sub awards under the Housing Opportunity Grant Program. One or more grants will be awarded by OEO to Vermont municipalities, or, with municipal approval,

Vermont nonprofits whose purpose is to shelter, serve, and re-house the homeless. All sub awards are made on the State Fiscal Year calendar (July 1 – June 30). Please see the Methods of Distribution for selection criteria.

Spending plans will be negotiated based on ineligible activities, where activities are not in alignment with state and federal goals, when there are inadequate funds to meet all requests, and/or where proposed grantees are either ineligible or lack the capacity to carry out proposed activities. Additional guidance on eligible and ineligible uses of ESG funds are contained in the Department of Housing and Urban Development's ESG program guidelines, the Request for Proposal and in grant agreements between the state of Vermont and its subrecipients. This includes the ESG requirements for faith-based organizations.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

N/A. The Grantee is a State and not subject to § 576.405(a).

5. Describe performance standards for evaluating ESG.

Performance measures will be evaluated on both the grantee and statewide level. In addition to measuring the number of persons and families in emergency shelter, the number of shelter bed nights provided, the number of households receiving rapid rehousing assistance – Vermont uses performance-based contracting, outcome measures, indicators and targets, consistent with the goal of decreasing the incidence and duration of homelessness. OEO tracks performance measures for grantees quarterly. If a grantee's performance falls below 75% of a stated target, OEO in conjunction with the grantee may require a performance improvement plan. Continued failure to meet performance measures may result in loss of funding or cancellation of the grant agreement. An ability to meet or exceed performance targets will be a consideration for renewal of the grant agreement. Current performance standards for ESG include:

Emergency Shelter, Operations

Maintain shelter facilities that are staffed, insured, and clear of safety violations.

At least 90% of homeless households entering the shelter meet with a case manager or program equivalent within 3 days of shelter entry.

The percentage of households exiting shelter to stable permanent or transitional housing, and the average length of stay.

Emergency Shelter, Essential Services - Case Management

At least 90% of homeless households referred for case management meet with a case manager or program equivalent for intake and assessment within 3 days of referral.

Of those homeless households receiving case management:

- at least 70% subsequently attain employment OR are enrolled in an educational or training program, OR qualify for cash or non-cash benefits (e.g., Reach Up, SSI or General Assistance, VA, 3SquaresVT, etc.) within 90 days of referral;
- at least 70% subsequently are stabilized in transitional or permanent housing within 90 days AND at least 70% of these formerly homeless households continue to be stably housed for at least 90 days.

Rapid Re-Housing for Homeless Families & Individuals

The number and percentage of households who are in stable permanent housing, and the average length of time from project entry until is stabilized. At least 70% of formerly homeless households continue to be stably housed for at least 90 days.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligibility to apply for HTF funds will be no more restrictive than required by HTF regulations. Eligible applicants/recipients of HTF funds include nonprofit and for-profit developers, public housing agencies, and municipalities. In accordance with the definition at 24 CFR 93.2, recipients must:

- Make acceptable assurances to the grantee (VHCB) that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;
- Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
- Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and,
- Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Entities seeking HTF dollars for eligible projects may submit applications for funding to VHCB using the Common Housing Application. A HTF application supplement, available on VHCB's website, must also be completed and submitted to VHCB.

Applications will be accepted on a rolling basis, however, funding decisions shall be made by the VHCB Board at regularly scheduled meetings. VHCB board meeting and application due dates are published at www.vhcb.org.

The following threshold criteria must be met by an application to be considered for a HTF award: 1) the project must include the creation or preservation of permanent rental housing (transitional housing and shelters are not eligible), 2) the housing must remain affordable in perpetuity after the expiration of the HTF required period via a VHCB Housing Subsidy Covenant, 3) at least one of the State's Consolidated Plan housing priorities must be addressed, and 4) there must be a reasonable expectation that the project will be ready to proceed within 18 months.

Applications must include a description of the eligible activities to be conducted with the HTF funds in accordance with 24 CFR 93.200 (Eligible activities), and must contain a certification (included in the HTF application supplement) by each eligible recipient that housing units assisted with the HTF will comply with HTF requirements.

All HTF applicants seeking funding for affordable multi-family rental housing (for new units and rehabilitation of existing units) shall describe the plans and tools they have in place to achieve the goal of making available at least 15% of the units in their portfolio to those who are experiencing homelessness.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Selection Criteria

On a competitive basis, applications that have met the threshold criteria described above will be evaluated according to how and the extent to which they meet the HTF criteria listed below. These criteria will carry equal importance and weight. The HTF criteria, together with the criteria and considerations in the VHCB Affordable Housing Funding Policy and the Underwriting Policy and Procedures will be used to determine "Need," "Impact," and "Quality" scores (up to 10 points each) for a project's funding recommendation to the VHCB Board of Directors.

HTF Criteria

1. The applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner

- Applicants will be evaluated on their development capacity (do they have experienced development staff, are they using a development consultant, are they partnering with another development entity?); their experience with federal affordable housing

programs (what other federally-funded affordable housing projects have they developed?); and their track record for developing projects within a reasonable timeframe (were those projects successfully completed in a timely manner?)

2. The extent to which the project has a mechanism or strategy to ensure deep affordability of the HTF units throughout the compliance period so that rents are affordable to extremely low-income families.

- While project-based rental assistance is not a HTF requirement, applications will be evaluated based on whether any of the units in the project, including the HTF units, will have project-based rental assistance to ensure residents do not pay more than 30% of their income towards rent and utilities. The type of project-based rental assistance and the length of commitment for the assistance will also be considered.
- Other mechanisms that ensure affordability for extremely low-income households, such as cross-subsidization or operating assistance reserves, will be considered.

3. The duration of the units' affordability period

- All HTF funded projects will be subject to a minimum 30-year affordability period. Consideration will be given to projects that propose a HTF affordability period greater than the minimum 30 years.
- After the expiration of the HTF period, all projects will be subject to perpetual VHCB affordability requirements at less restrictive income and rent levels, and every reasonable effort must be taken to structure the project in a manner that avoids displacement. The proposed number of VHCB restricted units and the level of the VHCB restrictions will be considered.

4. The merits of the application in meeting the priority housing needs as identified in the State's Consolidated Plan; i.e.

safe, decent, affordable housing (increase the supply and quality of affordable housing)

- Does the project increase the supply and quality of affordable housing?
- How many of the following Consolidated Plan Affordable Housing strategies are addressed by the application?

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A - there will be no geographic priority

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The following threshold criteria must be met by an application to be considered for a HTF award:

- The project must include the creation or preservation of permanent rental housing (transitional housing and shelters are not eligible),
- The housing must remain affordable in perpetuity after the expiration of the HTF required period via a VHCB Housing Subsidy Covenant,
- At least one of the State's Consolidated Plan housing priorities must be addressed, and
- There must be a reasonable expectation that the project will be ready to proceed within 18 months.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The extent to which the project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families

- While project-based rental assistance is not a HTF requirement, applications will be evaluated based on whether any of the units in the project, including the HTF units, will have project-based rental assistance to ensure residents do not pay more than 30% of their income towards rent and utilities. The type of project-based rental assistance and the length of commitment for the assistance will also be considered.
- Other mechanisms that ensure affordability for extremely low-income households, such as cross-subsidization or operating assistance reserves, will be considered.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The duration of the units' affordability period will be considered when evaluating applications for HTF funding:

- All HTF funded projects will be subject to a minimum 30-year affordability period. Consideration will be given to projects that propose a HTF affordability period greater than the minimum 30 years.

- After the expiration of the HTF period, all projects will be subject to perpetual VHCB affordability requirements at less restrictive income and rent levels, and every reasonable effort must be taken to structure the project in a manner that avoids displacement. The proposed number of VHCB restricted units and the level of the VHCB restrictions will be considered.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The merits of applications in meeting the following priorities is evaluated during the underwriting process:

- Does the project increase the supply and quality of affordable housing?
- How many of the following Consolidated Plan Affordable Housing strategies are addressed by the application?
- House lower income families and individuals, with special preference to projects housing extremely low income families and individuals at or below 30% of area median income.
- Increase the supply of affordable rental housing through the acquisition and/or rehabilitation of existing units especially in communities where there are tight housing markets, very low vacancy rates or there is a high incidence of distressed housing.
- Increase the supply of affordable rental housing through the construction of new units especially in communities where there are tight housing markets, very low vacancy rates or there is a high incidence of distressed housing.
- Promote mixed income developments to create integrated communities.
- Promote the development of new rental housing designed and built to a level of energy efficiency that meets or exceeds the levels required to qualify for the Energy Star label.
- Preserve existing affordable housing projects in a manner consistent with prudent investment criteria.
- Redevelop existing properties with consideration given for projects that leverage other resources specific to the preservation of historic structures.
- Redevelop foreclosed properties for affordable rental housing.
- Provide accessible or adaptable housing for persons with disabilities.
- Provide service enriched housing serving persons with disabilities.
- Produce affordable senior rental units in regions where a market analysis identifies a shortage of elderly housing affordable to lower income seniors.
- Provide service enriched housing that allows seniors the opportunity to age in place.

- Locate affordable rental housing in close proximity to public transportation services with access to employment centers, services, recreational opportunities, and schools.
- Specific to the preservation of historic structures.
- Redevelop foreclosed properties for affordable rental housing.
- Provide accessible or adaptable housing for persons with disabilities.
- Provide service enriched housing serving persons with disabilities.
- Produce affordable senior rental units in regions where a market analysis identifies a shortage of elderly housing affordable to lower income seniors.
- Provide service enriched housing that allows seniors the opportunity to age in place.
- Locate affordable rental housing in close proximity to public transportation services with access to employment centers, services, recreational opportunities, and schools.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The extent to which the application makes use of non-federal funding sources is considered during the application process.

- Does the applicant plan to apply for and/or anticipate a commitment of non-federal sources of funding?
- How much, and from what source(s)?
- What percentage of the total development cost do the non-federal funding sources represent?

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in

its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

For FFY25 the maximum per- unit subsidy limits for HTF will again be set at HUD's applicable limits for the HOME Program. They will be applied statewide and are adjusted by the number of bedrooms per unit.

These limits are currently: \$181,488 for 0BRs, \$208,049 for 1BRs, \$253,994 for 2BRs, \$327,293 for 3 BRs, and \$359,263 for 4BRs+. When new limits are issued for 2025 those will be utilized.

The decision to use the HOME subsidy limits and apply them statewide is based on an analysis of the actual total development costs of affordable multifamily rental housing properties in Vermont. While there is significant difference in individual project costs, there is relatively little variation in the averages across the State's counties. The averages for the counties with the highest and lowest total development cost per unit both differ by less than 20% compared with the statewide average. The data do not support consistently higher development costs in some geographic areas over others.

Setting the HTF maximum per-unit subsidy limits at the existing HOME limits is allowed by HUD and cost data indicate the use of the HOME limits is appropriate as the initial baseline cap for the amount of HTF investment that may be put into any HTF-assisted unit. However, it is important to note that the cap is not the only mechanism VHCB will use to allocate no more HTF funds than allowable and necessary for project quality and affordability. Each application for HTF funding will be reviewed and analyzed in accordance with VHCB's Policy & Procedures for Project Underwriting, which includes a subsidy layering review. VHCB staff has extensive experience in this area, including through its administration of HOME. The review includes an

examination of sources and uses (including any operating or project-based rental assistance) and a determination that all costs are reasonable.

Through its underwriting process, VHCB will ensure that the level of HTF subsidy provided: 1) does not exceed the actual HTF eligible development cost of the unit, 2) that the costs are reasonable and in line with similar projects across the State, 3) the developer is not receiving excessive profit, and 4) HTF funding does not exceed the amount necessary for the project to be successful for the required 30-year affordability period.

As required by HUD, the HTF maximum subsidy limits will be assessed and adjusted annually as needed.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

VHCB's HTF Rehabilitation Standards shall apply to HTF assisted projects. The standards provide details on what work is required, how that work should be performed (methods), and what materials should be used. The standards refer to applicable codes and in some circumstances establish requirements that exceed the minimum requirements of codes. Methods and materials are specified in some of the incorporated applicable codes referenced on pages 1-2, including International Building Code (IBC). In addition, VHCB's HTF Rehabilitation Standards include language that provides detail on methods and materials.

The rehabilitation standards address the following categories: health and safety; major systems; lead-based paint; accessibility; disaster mitigation; State and local codes, ordinances, and zoning requirements; and inspectable areas and observable deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing.

Applicants must be able to demonstrate compliance with these standards. If any particular element of the project does not meet the standards, applicants must bring this to the attention of VHCB staff. Waivers may be requested in accordance with VHCB procedures.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

While Vermont’s HTF Program is not limiting beneficiaries to a particular segment of the extremely low-income population, VHCB will give funding preference to projects that include the creation of permanent supportive housing (PSH) with rental assistance and support services for persons who are homeless or at risk of homelessness. VHCB is establishing this preference in accordance with its long-term commitment to creating housing for the most vulnerable, the priorities of the State’s Consolidated Plan, results of the most recent Point in Time Count, and HUD’s emphasis on permanent (over transitional) housing. It is also consistent with Vermont’s 2016 Executive Order (No. 03-16) which establishes the following goal: “owners of publicly-funded housing [shall] make available at least 15% of their affordable housing portfolio to homeless families and individuals, including those with special needs who require service support and rental assistance to secure and maintain their housing.”

In accordance with the State’s Consolidated Plan guiding principle of “promoting development in State designated downtowns, village centers, neighborhood development areas and other areas that are consistent with the State’s historic settlement pattern and ‘Smart Growth,’” VHCB shall give funding preference to projects located in these areas.

Preference shall also be given to projects that 1) create new units or 2) preserve affordable, subsidized units in properties acquired from private owners.

Owners of housing funded with HTF dollars may (but are not required to) limit occupancy or provide preference to the following populations:

- Homeless families or individuals
- People with disabilities (including people with mental illness)
- Victims of domestic violence
- Frail elders
- Veterans

However, any limitation or preference must not violate the nondiscrimination requirements in the HTF interim rule at 24 CFR 93.350, and the applicant must have affirmative marketing procedures and requirements that apply in the context of the limited/preferred tenant eligibility for the project. Preferences and/or limitations may not be given to students.

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

Multi-family projects developed by locally based housing organizations that receive HTF funds for rehabilitation may utilize HTF funds to refinance existing debt consistent with 24 CFR 93.201(b) if they meet the following guidelines:

- Refinancing is necessary to reduce the overall housing costs and to make the housing more affordable and proportional to the number of HTF-assisted units in the rental project.
- Rehabilitation is the primary eligible activity. A minimum of \$7,500 of rehabilitation per unit is required. The proportional rehabilitation cost must be greater than the proportional amount of debt that is refinanced;
- The grantee must demonstrate management capacity and practices that ensure that the long-term needs of the project can be met and the targeted population can be served over an extended affordability period;
- The grantee must demonstrate that the new investment is being made to maintain current affordable units, to create greater affordability in current affordable units, to

create additional affordable units, or to continue the affordability of units that could be lost;

- Refinancing will be limited to projects that have previously received an investment of public funds;
- The minimum HTF affordability period shall be 30 years. All HTF assisted projects are required to remain affordable in perpetuity after the expiration of the HTF required period via a VHCB Housing Subsidy Convent;
- HTF funds may be used for refinancing anywhere in the State of Vermont including the City of Burlington;

HTF funds cannot be used to refinance multifamily loans made or insured by any Federal program, including CDBG.

Discussion:

Appendix - Alternate/Local Data Sources

1	Data Source Name Vermont Housing Needs Assessment
	List the name of the organization or individual who originated the data set. Vermont Housing & Financing Agency Maura Collins, Executive Director and Leslie Black-Plumeau, Lead Researcher
	Provide a brief summary of the data set. The Vermont Housing Needs Assessment is a statewide assessment of existing housing conditions, demographics and market demands with an assessment of present and future unmet housing demand for the next 5-year period (2025-2029) including data on current housing types and trends within each of the state's 14 counties. The Vermont Housing Needs Assessment projects future demographics and any changes in housing trends and includes data related to the housing conditions, challenges and opportunities in the state and counties and provides recommendations and strategies for meeting those needs.
	What was the purpose for developing this data set? The purpose for developing the Vermont Housing Needs Assessment was to meet all HUD requirements for the State's completion of its 5-Year HUD Consolidated Plan (2025-2029) and to include data for all tables required by HUD's Integrated Disbursement and Information System (IDIS) Consolidated Plan template.

	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Data collection covered the entire state of Vermont and each of its 14 counties. Specifically, the scope of work completed included; • A housing survey and/or inventory of over 400 multifamily rental properties with over 12,000 rental units, inventory of nearly 300 non-conventional rentals (e.g. single-family homes, duplexes, etc.), analysis of approximately 243 mobile home parks, evaluation of for-sale housing data. Approximately 4,000 homes were on the market per month from 2016-2019, compared to 2,000 a month after 2020. The housing data evaluated includes rents/price points, vacancy levels, wait lists, year built, and quality. • An evaluation of numerous demographic trends and characteristics of the individual counties and overall state. Data for the population, households and incomes for each study area with an emphasis on 2015, 2020 and 2022. • Economic metrics population and other special needs populations was conducted. The housing alternatives provided to these special needs groups. • Housing gap and housing needs estimates for both rental and for-sale housing by various income levels for the overall state and each county. • Recommendations on the housing needs priorities of the state and the individual counties and for general strategies for meeting the overall housing needs of Vermont residents. • More than 250 individuals completed online surveys, and five public engagement meetings were held across the state to obtain local perspectives and insights on housing issues at the county and/or state level.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? The data covers 2010, 2020 and projections for 2022 and 2024.
	What is the status of the data set (complete, in progress, or planned)? The statewide Vermont Housing Needs Assessment was completed in June 2024.