

Vermont Homelessness Response Continuum

Level Four Housing Guide

Vermont Homelessness Response Continuum Level Four Housing Guide

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100 General Information

100.1 Act 143 Purpose

- a. The Vermont Homelessness Response Continuum (VHRC) seeks to provide a coordinated response that connects people experiencing homelessness or at risk of experiencing homelessness with supportive services and emergency housing placements.

100.2 Program Components

- a. VHRC offers the following services to eligible households:
 - 1. Case management
 - 2. Level 1: Prevention and Diversion Services
 - 3. Level 2: Shelter Services
 - 4. Level 3: Specialized Service Shelters
 - 5. Level 4: Hotel or Motel Placement
 - 6. Permanent and Family Supportive Housing
 - 7. Other Emergency Housing Services

200 Application

200.1 Application

- a. Applicants may complete a VHRC application by contacting the DCF Housing Call Center.
 - 1. See *Processing a VHRC Application SOP*
- b. Applicants may complete a paper application for VHRC. The application may be submitted in person or via the Uploader.
 - 1. Applicants may go to a DCF district office and request assistance with completing the application. DCF workers would assist the applicant in completing the application.
 - 2. See *Processing a VHRC Application SOP*
- c. The application for VHRC benefits must contain the following elements:
 - 1. Applicant name and contact information;
 - 2. Household composition;
 - 3. An initial assessment that includes:
 - i. Current housing situation;
 - ii. Contact information for any current service provider;
 - iii. Agreement to engage, to the best of the applicant's ability, in a coordinated entry assessment;

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- iv. Agreement to engage, to the best of the applicant's ability, with a case manager to develop a housing plan;
- 4. Notice of fraud penalties; and
- 5. Households consent for the Department to verify and share information in accordance with these rules.

200.2 General VHRC Eligibility Levels 1 - 4

- a. To be eligible for VHRC benefits, households must be:
 - 1. Homeless (§2201(9) and §2201(13));
 - i. See [1000.1 Verifying Homelessness](#)
 - 2. Physically present and intends to reside in Vermont as evidenced by active participation in a housing, employment, or other Agency of Human Services-recognized plan (§2201(9)).
 - i. See [1000.2 Verifying Vermont Residency](#)

200.3 Coordinated Entry Referral

- a. Eligible applicants must be referred to Coordinated Entry
 - 1. See *Processing a VHRC Application SOP*

200.4 Telephonic Signatures

- a. The Department may accept telephonic signatures on applications for VHRC benefits.
- b. Workers should document the application using GAAPS
 - 1. See *Processing a VHRC Application SOP*

200.5 Application Process

- a. Households may contact the DCF Housing Call Center to initiate an application for VHRC benefits. Households may also submit a written application via the DCF document uploader, in person at a district office, or via mail.
 - 1. Completed applications can be mailed to:
 - i. DCF - Economic Services Division
Application and Document Processing Center
280 State Drive Waterbury, VT 05671-1500
 - 2. See *Processing a VHRC Application SOP*

200.5.1 Eligible Applicants

- a. If the applicant meets eligibility criteria, workers will:
 - 1. Send a Notice of Eligibility

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- i. See [700.2 Notice of Eligibility](#)
2. Refer to Coordinated Entry
3. Screen for Prioritization Categories
 - i. See [300 Health Checklist/Prioritization](#)

200.5.2 Eligibility Period

- a. Households found eligible for VHRC benefits are eligible for 12 months from the date of application.
 1. In fiscal year 2027, the period of eligibility may be shortened to transition households to VHRC benefits. This transition will not affect the number of days a household is eligible for.
- b. Because days do not “reset” under VHRC, any days of Emergency Housing used in the previous 12 months (calculated from the date of VHRC application) count towards the household’s 70 days of housing available under VHRC level 4. If a household used Emergency Housing benefits in the 12-month period prior to their VHRC application, the following eligibility periods will be reflected on their initial VHRC Notice of Eligibility:
- c. If the household has not used any days of Emergency Housing, DCF will generate a Notice of Eligibility with an eligibility period ending 12 months after the application date.
- d. If the household used 80 days of Emergency Housing benefits in fiscal year 2026 and has not used any Emergency Housing benefits in fiscal year 2027, DCF will generate a Notice of Eligibility with an eligibility period beginning with the date of the first application subsequent to September 1, 2026, and ending with the first night of housing used in fiscal year 2026.
 1. Example, household applies on 10/8/26. The household exhausted housing between July 1, 2025, and June 30, 2026, and was first housed between those dates on 11/15/25, the VHRC eligibility dates will be set as 10/8/26 to 11/15/26.
- e. If the household used 80 days of Emergency Housing benefits in fiscal year 2026 and has used Emergency Housing benefits in fiscal year 2027, DCF will generate a Notice of Eligibility with an eligibility period beginning with the date of the first application subsequent to September 1, 2026, and ending with the anniversary date of the first Emergency Housing benefit issued in fiscal year 2027.
 1. Example, a household applies on 9/29/26. The household exhausted housing between July 1, 2025, and June 30, 2026, and was first housed after July 1, 2026, on July 25, 2026, the VHRC eligibility dates would be set as 9/29/26 to 7/25/27.
- f. If the household has used some days of Emergency Housing outside of Winter Weather Services in the past 12 months and did not exhaust 80 nights of housing in SFY26, DCF will generate a Notice of Eligibility with an eligibility period beginning with the date of the first

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application subsequent to September 1, 2026, and ending the date of the first Emergency Housing benefit issued in the previous 12 months.

1. Example, a household applies on 11/10/26. In reviewing housing from 11/10/25 to 11/10/26, the household has used 25 days of housing and was first housed on 5/5/26. The VHRC eligibility date will be set from 11/10/26 to 5/5/27.
 - i. See *Processing a VHRC Application SOP*

200.5.3 Ineligible Applicants

- a. If the applicant does not meet general eligibility criteria for the VHRC program, workers will:
 1. Send a Denial Notice
 - i. See [700.3 Denial Notice](#)

200.5.4 Action on Applications

- a. All applications for VHRC must result in a Notice of Eligibility or a Denial Notice. Workers should process applications for VHRC based on available verification.
 1. The Department does not have a provision for pending applications. Workers must act on all applications and provide notice to the applicant.
- b. If a household is unable to verify any aspect of eligibility, and does not self-attest to the information, workers should:
 1. Deny the application
 2. Complete a Denial Notice and inform the household that they should reapply when the requested verification is available.
 - i. See [700.3 Denial Notice](#)
- c. When the household obtains the necessary verification and contacts DCF to apply for VHRC benefits, workers should complete a new VHRC application.
 1. See [1000 Verification](#)

200.6 CATN

- a. Workers should CATN all action on applications and interactions with applicant households.
 1. See *Processing a VHRC Application SOP*

200.7 VHRC Households

200.7.1 Household Composition

- a. A group of individuals who reside together as one economic unit, who are married, parties to a civil union, or unmarried.

200.7.2 Changes to Household Composition

- a. If household composition changes during the household's period of VHRC eligibility, workers should:
 1. Produce a new Notice of Eligibility.
 2. Use the dates on the original Notice of Eligibility.
 3. Only list the household members that are part of the new household.
 - i. See [700.6 Service Agreement-Hotel Placement](#)
- b. If the former member(s) of the household would like to continue VHRC benefits as a new household, workers should:
 1. Produce a new Notice of Eligibility.
 2. Use the dates on the original Notice of Eligibility.
 3. Only list the household members that are part of the new household.
 - i. See [700.6 Service Agreement-Hotel Placement](#)

200.8 Authorized Representatives

- a. Households applying for or receiving VHRC benefits may designate an Authorized Representative to act on their behalf.
 1. See *Appointing an Authorized Representative SOP*

300 Health Checklist/Prioritization

300.1 Health Checklist

- a. All households must be screened using the Health Checklist.
- b. The Health Checklist determines how a household will be referred to an assessment specialist to have the HOU-SING Assessment completed.
- c. Workers should review the following Health Checklist with the household. If the answer to any of these questions is yes, the worker should stop the Health Checklist and refer the household to an assessment specialist.
 1. See *Completing HOU-SING Assessment SOP*
 2. Worker will determine through a conversation with the household if anyone in the household:
 - i. Is there a child in your household under the age of 18?
 - ii. Do you or anyone in your household require oxygen-cpap, bipap, power dependent device?
 - iii. Do you or anyone in your household have an uncontrol heart, lung, or serious chronic disease?
 - iv. Are you or anyone in your household immunocompromised (infection risk)?

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- v. Have you or anyone in your household had a recent (within past 24 hrs) medical discharge?
- vi. Do you or anyone in your household require dialysis or complex medical treatment?
- vii. Do you or anyone in your household have infectious symptoms requiring isolation?
- viii. Do you or anyone in your household have diabetes, kidney disease, or trouble keeping your energy/weight up?
- ix. Do you or anyone in your household have trouble walking that requires the use of a wheelchair, walker, or cane?
- x. Do you or anyone in your household have medication that requires refrigerated or temperature-controlled environment?
- xi. Do you or anyone in your household require wound care or sterile supplies?
- xii. Have you or anyone in your household had a recent (within past 24 hrs) psychiatric hospitalization or emergency department visit?

300.2 Priority Categories

- a. If an applicant household meets General Eligibility criteria for VHRC, workers will determine if any member of the household meets a priority category.
- b. Priority categories must be verified.
 - 1. See [1000.3 Verifying Prioritization Category](#)
- c. Priority for VHRC Level 4 benefits is based on the following categories. Workers should determine whether any members of the household meet the following criteria:
 - 1. is 65 years of age or older;
 - 2. has a disability;
 - 3. is a minor child;
 - 4. is pregnant;
 - 5. is experiencing domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening conditions;
 - 6. is under court-ordered eviction or constructive eviction due to circumstances over which the household has no control.
 - i. Situations in which a landlord has failed to provide heat, utilities, or water may constitute a constructive eviction if the landlord agreed to provide them.
 - ii. A termination of tenancy for no cause meets the criteria for constructive eviction.
 - iii. A natural disaster such as a fire, flood, storm, or other catastrophe beyond the tenant's or homeowner's control meets the criteria for constructive eviction.

400 HOU-SING Assessment

400.1 HOU-SING Assessment

- a. The HOU-SING Assessment is an interview conducted with applicants eligible for VHRC.
- b. Households will be referred for the HOU-SING Assessment based on their Health Checklist answers.
 1. See [300.1 Health Checklist](#)
- c. Workers will review the HOU-SING Assessment questions with applicants and identify a score based on the answer provided by the applicant.
 1. See *Completing HOU-SING Assessment SOP*
- d. The HOU-SING Assessment is comprised of the elements described in the following sections:

400.1.1 Health and Immediate Safety

- a. Does anyone in the household have a health condition, disability, mental-health concern, medication need, mobility issue, or other condition that affects where the household can safely stay?

H Anchor	Score
No known health or functional condition affects the placement decision.	1
A condition is present but stable and can be managed in most settings with routine access to care, medication, or support.	2
Unsheltered homelessness or available shelter would likely worsen the condition. Accommodation, accessible placement, or regular support is needed.	3
Serious harm or rapid deterioration is likely if the person remains unsheltered or is placed in an unsuitable setting. Or are there children under the age of 12.	4

400.1.2 Overnight Situation

- a. Where did you sleep last night? Where can you safely sleep tonight? How long is that option actually available?

O Anchor	Score
A safe and adequate place is confirmed for at least seven days.	1

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A currently safe place is available for two to six days, but it is temporary or unstable.	2
No reliable safe option is confirmed beyond the next 24 hours, or the household must leave immediately	3
No safe place is available tonight, the household is currently unsheltered.	4

400.1.3 Unsafe Conditions

- a. What makes the current place unavailable or unsafe? What are you concerned may happen if you stay there tonight?

U Anchor	Score
No identified immediate safety concern.	1
Concerns are present but can be managed briefly with a reasonable plan.	2
There is a credible risk of violence, exploitation, severe conflict, environmental harm, or loss of access to basic needs, but the danger is not immediately occurring.	3
There is an active or imminent threat of serious violence, exploitation, severe environmental exposure, or other serious harm.	4

400.1.4 Supports and Safety Net

- a. Who can safely help over the next few days? Do you have a working phone, transportation, a case manager, family, friends, or another person you trust?

S Anchor	Score
Reliable and safe supports are available and usable.	1
Some support is available, but it is limited or inconsistent.	2
Very little reliable support is available, or substantial assistance is needed to use it.	3
No safe support is available; the person is isolated, or available contacts are unsafe, controlling, or exploitative.	4

400.1.5 Individual and Household Needs

- a. What does a placement need to have in order to work safely for everyone in the household?
Are there any special placement needs for anyone in the household?

I Anchor	Score
A standard placement is likely to work without modification.	1
One or more modest accommodations or supports are needed.	2
Significant accommodations, supervision, accessibility, privacy, or specialized support are needed for the placement to succeed.	3
Multiple or complex functional needs substantially narrow the range of safe placements. An ordinary placement is likely to fail or cause harm.	4

400.1.6 Navigation Help Needed

- a. Will you need support to complete a Housing Plan? What could make it hard to complete the next steps? How much help would be useful with calls, appointments, applications, transportation, or paperwork?

N Anchor	Score
The household can complete most next steps independently.	1
One manageable barrier exists and occasional assistance is needed.	2
Multiple barriers require active case management, advocacy, transportation, interpretation, or application assistance.	3
The household cannot reasonably complete essential next steps without intensive, hands-on assistance or an accommodation.	4

400.1.7 Gap to the Next Safe Housing Option

- a. What is the next realistic safe option? Is it confirmed? When could it begin?

G Anchor	Score
A confirmed safe option is expected within seven days.	1
A realistic option is identified and is likely within 8–14 days.	2

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A possible option exists but is not confirmed or is unlikely before 15–28 days.	3
No safe and feasible next option is currently identified, or the expected wait exceeds 28 days.	4

400.2 HOU-SING Score

- A household that meets a priority category will be assigned an additional 30 points in the HOU-SING Assessment
- The household's HOU-SING Score is used to identify their risk level.
- The score is divided into two sections, H-O-U and S-I-N-G.
 - The HOU score will be between 3 and 12.
 - The SING score will be between 4 and 16.
 - The total score will be between 7 and 28.
 - Any household that meets a priority category will be assigned an additional 30 points.
- The table below describes the risk levels based on the household's score.

<u>Risk Band</u>	<u>Score</u>
Critical	56+ (Families automatically critical)
High	51-55 or HOU subtotal of 10-12 and part of priority category
Moderate	37-50
Mild	Up to 36

- Families with children are automatically critical risk.
- Use the household's risk level to determine when they will be placed in a hotel.
 - See [500.2 Placement When Space is Limited](#)

500 Initial Hotel Placement

500.1 Room Caps

- Between April 1 and November 30 of each year, the utilization of hotel or motel rooms shall be capped at 700 rooms per night.
- Between December 1 and March 31 of each year, the utilization of hotel or motel rooms shall be capped at 1,000 rooms per night.

500.2 Placement When Space is Limited

- Households should be housed according to the following risk levels:

<u>Risk Band</u>	<u>Capacity</u>
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Critical	House when any space is available.
High	House when 50 rooms or more are available
Moderate	House when 100 rooms or more are available
Mild	House when 100 rooms or more are available

- b. If a household can't be housed due to the above chart, move the household to the waitlist.
 - 1. See [1100 Waitlist](#)
 - 2. Review the Waitlist script with the household.
 - i. See *Waitlist SOP*

500.3 Placement Length

- a. The initial hotel placement should be up to 7 days to allow the household time to develop a housing plan.
- b. Once a housing plan has been established, placements may be up to 28 days.
 - 1. If a household's housing plan indicates that a placement in alternative housing option will occur in less than 28 days, the length of the hotel placement should be adjusted accordingly.
- c. A new Service Agreement- Hotel Placement must be issued for each hotel placement.
- d. See [700.6 Service Agreement-Hotel Placement](#)
- e. Households may appeal all placement decisions.

500.4 Hotel Placements

- a. Each time a household is placed in a hotel, workers must complete a Service Agreement-Hotel Placement. Service Agreements are required at time of initial hotel placement and reauthorization.
- b. See [700.6 Service Agreement-Hotel Placement](#)
- c. DCF may designate hotels for specific populations, for example families with children.
 - 1. Under VHRC rules, the department shall determine which hotels and motels are approved for use under the Program.
- d. DCF will only use hotels and motels that have been approved.
 - 1. Each time a household is placed in a hotel, the worker must send a 218EHA to the hotel. The 218EHA is the invoice the hotel returns to DCF for payment and the record of the stay.
 - 2. See *Hotel Placement SOP*

600 Reauthorizations

- a. When a household contacts DCF for a reauthorization of a hotel placement, workers must:

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- b. Determine if shelter space is available to the household and make a referral if shelter space is available and appropriate. If a shelter space is not available, continue to c.
 - 1. If appropriate shelter space is available, refer the household to shelter.
 - i. Provide the household with a Service Agreement- No Hotel Placement indicating they have been referred to a shelter.
 - (1) See [700.7 Service Agreement-No Hotel Placement](#)
 - (2) See *Hotel Placement SOP*
- c. Eligible households that have been given a Level 4 hotel placement are expected to make progress toward housing goals pursuant to their agreed upon housing plan.
 - 1. Households that have an assigned case manager will meet periodically with their assigned case manager. At reauthorization, workers will verify progress towards housing goals with the household's case manager.
 - i. See *Hotel Placement SOP*
 - 2. Households that do not have a case manager assigned will be assigned an intake case manager. Working with the intake case manager, the household will develop a list of housing goals and associated tasks. Households will be responsible for working toward the goals outlined in their plan and providing verification of progress at reauthorization.
 - i. See *Hotel Placement SOP*
 - 3. If the household calls for reauthorization, DCF may not house if the capacity limit of 700 or 1000 rooms has been reached.
 - i. Provide the household with a Service Agreement- No Hotel Placement
 - (1) See [700.7 Service Agreement-No Hotel Placement](#)
 - 4. If the household is placed in a hotel, workers must complete a new Service Agreement- Hotel Placement.
 - i. See [700.6 Service Agreement-Hotel Placement](#)
- d. See [500.4 Hotel Placements](#)
- e. If a household calls for reauthorization on the day their placement ends, the household will be housed according to the risk levels outlined below. Households should be encouraged to call for housing up to 10 days in advance of their check-out date.

<u>Risk Band</u>	<u>Capacity</u>
Critical	House when any space is available.
High	House when 50 rooms or more are available
Moderate	House when 100 rooms or more are available
Mild	House when 100 rooms or more are available

700 Notices

700.1 VHRC Level 4 Client Notices

- a. To provide notice to households in as timely a manner as possible, DCF will provide notice to households using the following methods in the order of priority below:
 - 1. Email
 - 2. US mail
- b. All notices must include:
 - 1. The specific factual basis for the action;
 - 2. The specific legal basis for the action, including the applicable rule, statute, or policy;
 - 3. The effective date of the action;
 - 4. The household's right to appeal the action; and
 - 5. The procedure for requesting continuation of benefits or services pending appeal, including any applicable deadline.

700.2 Notice of Eligibility

- a. The Notice of Eligibility must be provided to eligible applicants at the time of initial VHRC application.
 - 1. The Notice of Eligibility must include the following information:
 - 2. The eligibility determination
 - 3. The eligibility dates
 - 4. The date the household must reapply
 - i. See *Processing a VHRC Application SOP*

700.3 Denial Notice

- a. The Denial Notice must be provided to applicants who do not meet VHRC General Eligibility criteria at the time of initial VHRC application.
- b. The Notice of Denial must include the following information:
 - 1. The specific reason for denial
 - 2. The date of the denial
 - i. See *Processing a VHRC Application SOP*

700.4 Notice of Termination

- a. The Notice of Termination must be provided to applicants who have lost eligibility for VHRC benefits.
- b. The notice of termination must include the following information:
 - 1. The specific reason for termination;

2. The effective date of termination;
3. Any corrective action the household may take to avoid termination, if applicable;
4. The household's right to request reinstatement and the length of time before a household is eligible for reinstatement; and
5. The household's appeal rights.
 - i. See *Notices SOP*

700.5 Notice of Reinstatement

- a. The Notice of Reinstatement must be provided to applicants who have regained eligibility for VHRC benefits.
- b. The Notice of Reinstatement must include the following information:
 1. A clear statement indicating whether the reinstatement is approved or denied;
 2. The effective date of reinstatement, if applicable;
 3. The household's appeal rights.
 - i. See *Notices SOP*

700.6 Service Agreement-Hotel Placement

- a. The Service Agreement-Hotel Placement must be provided to applicant households who have been found eligible for placement in a Level 4 hotel. This must be provided to the household every time a hotel authorization is done.
- b. The Notice of Reinstatement must include the following information:
 1. Name of the hotel where the household has been placed
 2. Address of the hotel
 3. Check-in date
 4. Check-out date
 5. The number of days used as of the check-out date
 6. The VHRC application date
 - i. See *Hotel Placement SOP*
- c. If household composition changes while the household is eligible for VHRC benefits, workers must:
 1. Create a new Service Agreement reflecting the updated household composition.
 2. If the new household composition does not contain a member of a priority category, create a Service Agreement, No Hotel Placement indicating the household does not meet a priority category.

700.7 Service Agreement-No Hotel Placement

- a. The Service Agreement-No Hotel Placement must be provided to applicant households who do not meet a priority category.

- b. The Service Agreement-No Hotel Placement must include the following information:
 - 1. The specific reason the household is not being placed in a hotel
 - 2. The date of the notice
- c. The Service Agreement-No Hotel Placement must be provided to households referred to shelter.
 - 1. The Service Agreement-No Hotel Placement acts as a shelter referral
 - i. If the household is being referred to shelter, include the name of the shelter on the Service Agreement-No Hotel Placement.
 - ii. See *Hotel Placement SOP*

700.8 Annual Review Reminder

- a. The Annual Review Reminder must be provided to households as they near 12 months from the initial VHRC application. DCF will send the annual review reminder approximately 30 days in advance of the household's VHRC end date.
 - 1. See *Notices SOP*

700.9 Notice of Extension Request Approval

- a. The Notice of Extension Request Approval must be provided to households that requested an extension that has been approved.
 - 1. See *Processing Extension Requests SOP*

700.10 Notice of Extension Request Denial

- a. The Notice of Extension Request Approval must be provided to households that requested an extension that has been denied.
 - See *Processing Extension Requests SOP*

800 Termination

- c. A household's VHRC benefits may be terminated for the following reasons:
 - 1. Knowingly providing false, misleading or incomplete information regarding residency, disability status, household composition, or other eligibility criteria.
 - i. If a household provides false information, workers should provide a termination notice with a date of termination 30 days after the date the notice is provided.
 - ii. The household is not eligible for reinstatement for 12 months from the date of termination.
 - (1) See [900 Reinstatement](#)

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2. Refusing suitable housing placements, as defined by their housing plan, two or more times.
 - i. If a household refuses suitable housing placements two or more times, workers should provide a termination notice with a date of termination 10 days after the date the notice is provided.
 - ii. The household is not eligible for reinstatement for 12 months from the date of termination.
 - (1) See 900 Reinstatement
 3. Engaging in criminal activity or misconduct not related to a disability or to victimization related to abuse, sexual assault, or stalking.
 - i. Households engaged in criminal activity or misconduct are subject to immediate termination. Workers should send the household a termination notice dated for the day the notice is sent.
 - ii. The household is not eligible for reinstatement for 12 months from the date of termination.
 - (1) [See 900 Reinstatement](#)
 4. Not engaging in case management or supportive services.
 - i. If a household does not participate in case management and support services outlined in the housing plan, workers should provide a termination notice with a date of termination 10 days after the date the notice is provided.
 - ii. Households are not eligible for reinstatement until they are participating with case management or supportive services.
 - (1) See [900 Reinstatement](#)
 5. No longer meeting eligibility criteria.
 - i. If a household is no longer homeless, workers should provide a termination notice with a date of termination 10 days after the date the notice is provided.
 - ii. If a household no longer lives in Vermont, workers should provide a termination notice with a date of termination 10 days after the date the notice is provided.
 - iii. Households are eligible for reinstatement as soon as they meet eligibility criteria.
 - (1) See [900 Reinstatement](#)
- d. See [700.4 Notice of Termination](#)

900 Reinstatement

- a. A household's VHRC benefits may be reinstated if the basis for termination has been resolved within the original eligibility dates and the household is otherwise eligible.
- b. A household may request reinstatement by updating their most recent VHRC application.

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1. A request for reinstatement does not reset the household's rolling 12-month period.
2. The eligibility dates are set to the dates on the original VHRC Notice of Eligibility.
- c. Households must be provided with a Notice of Reinstatement.
 1. See [700.5 Notice of Reinstatement](#)

1000 Verification

1000.1 Verifying Homelessness

- a. DCF will accept the following as verification of homelessness:
 1. Third party verification
 - i. Examples include eviction documentation; documentation from the Red Cross or other relief agency of a fire, flood or natural disaster; or verification the household is fleeing domestic violence from a sister agency.
 2. DCF or community partner staff observation
 3. Self-attestation from the applicant
- b. Workers should not make collateral calls to verify homelessness as self-attestation is acceptable and does not need to be verified.

1000.2 Verifying Vermont Residency

- a. DCF or community partners may verify Vermont residence by receiving a copy of the applicant's:
 1. Agency of Human Services-recognized plan:
 - i. Actively enrolled in Vermont economic assistance programs, including Reach Up, General Assistance, Fuel Assistance, and 3SquaresVT.
 - (1) Verified in ACCESS,
 - (a) See *Processing a VHRC Application SOP*
 2. Housing Plan
 - i. Currently receiving housing case management services
 3. Employment plan
 - i. ICAN
 - ii. Reach Up
 - iii. Vermont Department of Labor
 - iv. Childcare assistance programs and associated service plans
 - (1) Verified by eligibility letter from assistance program
 - v. FSD case plans or safety plans
 - (1) Household may provide copies of FSD plans as verification

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- vi. Health care programs, including Medicaid-related care plans, substance use disorder treatment plans, or mental health service plans
 - (1) Verified by eligibility letter from assistance program
- vii. Any other assistance or service administered or recognized by the Agency that includes participant obligations or engagement requirements

1000.3 Verifying Prioritization Category

1000.3.1 Age 65+

- a. Verified by any document that shows date of birth, if the household member's age has not already been documented by the DCF

1000.3.2 Disability

- a. Disability is defined as:
 - 1. A physical, sensory, cognitive, developmental, or mental health condition or substance use disorder that substantially limits one or more major life activities, or that requires ongoing support, accommodation, or treatment to maintain an individual's health, safety, or independence. The term includes chronic or episodic conditions that significantly impact daily functioning, regardless of whether the individual is receiving, or is eligible to receive, federal disability benefits.
- b. Disability may be verified by:
 - 1. Determination or certification from a State- or federally recognized agency or program that provides services to individuals with disabilities
 - i. SSI/SSDI benefits verified in ACCESS, by documentation from the Social Security Administration, or a collateral call to the Social Security Administration.
 - ii. VA disability rating of at least 70% combined or 100% single as determined by Veteran's Affairs and verified by the VA Disability Ratings letter received by the individual.
 - 2. Verified by VHRC Disability Verification Form or a letter from the applicant's health care provider describing how the disability limits major life activities as outlined in the definition of disability above.
 - i. Link to VHRC Disability verification form.
 - 3. Self-attestation must be verified within 30 days of the application date.

1000.3.3 Minor Child (under 18)

- a. Verified by any document that shows date of birth, if the child's age has not already been documented by the Department or community partner

1000.3.4 Pregnancy

- a. Verified by a health care provider if the pregnancy has not already been documented by the Department or community partner
 - 1. Any verification from a health care provider that reasonably establishes pregnancy.

1000.3.5 Domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening conditions

- a. Verified by a program that assists victims of domestic violence, sexual assault, stalking, human trafficking, or child abuse, restraining orders, documentation from law enforcement, a court, and health care providers, or government agency, including the Office of Economic Opportunity Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking form
 - 1. See *Hotel Placement SOP*

1000.3.6 Court-ordered eviction or constructive eviction

- a. Verified by eviction paperwork, documentation from a landlord, documentation from a housing inspector the Department of Health or another authority for cases involving habitability, or other third-party documentation showing that a dwelling has been rendered uninhabitable

1000.3.7 Refusing to Provide Verification

- a. Households have the right to refuse to provide verification of a priority category. If a household refuses to provide verification, the household will not be considered part of a priority category.

1000.4 Verifying Progress Toward Housing Plan Goals

- a. Goals towards housing will be identified in the household's Housing Plan
 - 1. Verification of progress towards housing goals can be provided by the household's case manager
 - 2. For household's not working with a case manager, the household will need to provide verification of progress towards a housing goal
 - i. Examples of verification include, but are not limited to:
 - (1) Providing a copy of an identification document if the goal was to obtain identification
 - (2) Provide a copy of an application for a subsidy if the goal was to apply for a subsidy
 - (3) Get on waiting lists for short-term shelter

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- (4) Address barriers to renting, such as attending a renter's class
- 3. See *Hotel Placement SOP*

1000.5 Verifying After Self Attestation

- a. Households may self-attest to homelessness, Vermont residency and their priority category status.
 - 1. If a household attests to Vermont residency or a priority category, that information must be verified within 30 days.
 - 2. Homelessness may be attested to and does not require third party verification.

1100 Waitlist

1100.1 Waitlist

- a. When households cannot be housed due to hotel capacity limitations, those households will be placed on a waitlist.
 - 1. Households unable to be housed for other reasons, such as geographic capacity, not having identification, or hotels not accepting the household, will not be placed on the waitlist.
 - i. Households not housed for this reason will be provided with a Service Agreement-No Hotel Placement.
 - (1) See [700.7 Service Agreement-No Hotel Placement](#)
- b. Each morning, workers will review the waitlist and may contact any households remaining on the waitlist, depending on statewide capacity.
 - 1. If there is any available capacity, workers send an email notifying households to call DCF for hotel placement, according to the following risk criteria:

<u>Risk Band</u>	<u>Capacity</u>
Critical	Contact when any rooms are available under the capacity limit.
High	Contact when 50 rooms or more are available under the capacity limit.
Moderate	Contact when 100 rooms or more are available under the capacity limit.
Mild	Contact when 100 rooms or more are available under the capacity limit.

- 2. Contact will be made by DCF according to the following schedule:
 - i. Critical risk: 8:00AM
 - ii. High risk: 9:00AM
 - iii. Moderate risk: 10:00AM

- iv. Mild risk: 12:00PM
- 3. See *Waitlist SOP*

1100.2 Purging the Waitlist

- a. DCF will note that a household on the waitlist has been contacted and advised to call DCF for a hotel placement.
 - 1. If, by the morning of the following day, the household has not contacted DCF, workers will remove the household from the waitlist.
 - i. Send the household a Service Agreement-No Placement
(1) See [700.7 Service Agreement-No Hotel Placement](#)
- b. If DCF is unable to offer a household on the waitlist a room within 10 calendar days, the household will be removed from the waitlist.
 - i. Send the household a Service Agreement-No Placement
(1) See [700.7 Service Agreement-No Hotel Placement](#)
- c. Households can added back to the waitlist by contacting DCF.

1200 VHRC Level 4 Benefit Limits

1200.1 Benefit Limits

- a. From April 1 through November 30 of each year, eligible households shall not receive more than 70 days per rolling 12-month period as calculated from the date of the eligible household's application through the same day of the month 12 months later.
 - 1. The date that the rolling 12-month period begins is the date applicant household is found eligible and provided a Notice of Eligibility.
- b. From December 1 through March 31, the 70-day limit does not apply, and any days used do not count towards the household's 70-day limit.
 - 1. See *Processing a VHRC Application SOP*

1200.2 Calculating the "Day Count" During Fiscal Year 2027

- g. Use the following method to determine the number of days of VHRC Level 4 eligibility available to a household during the transition period:
 - 1. If the household has not been housed in the previous 12 months, the household may have 70 days of housing available outside of Winter Weather Services from the date of the VHRC application.
 - 2. If the household used 80 days of Emergency Housing between July 1, 2025, and June 30, 2026, and used days of Emergency Housing between July 1, 2026, and August 31, 2026,

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the household will have access to 70 days of housing starting on the first date housed between July 1, 2026, and August 31, 2026.

- i. Example, if a household exhausted housing between July 1, 2025, and June 30, 2026, and was first housed after July 1, 2026, on July 25, 2026, the household will have access to 70 days of housing between 7/25/26 and 7/25/27.
3. If the household used 80 days of Emergency Housing between July 1, 2025, and June 30, 2026, but did not use days of Emergency Housing between July 1, 2026, and August 31, 2026, the household's night count will reset on the 1-year anniversary of their first night housed in the previous 12 months.
 - i. Example, if a household exhausted housing between July 1, 2025, and June 30, 2026, and was first housed between those dates on 11/15/25, the household will have access to 70 days of housing between 11/15/26 and 11/15/27.
4. If the household has used 70 days of housing available outside of Winter Weather Services in the past 12 months, the household would be eligible for a new 70 days of housing on the 1-year anniversary of their first night housed in the previous 12 months.
 - i. Example, a household applies on 9/28/26. In reviewing housing from 9/28/25 to 9/28/26 (prior 12 months) the household has used 70 days of housing and was first housed on 4/20/26. The household will have access to 70 days of housing beginning on 4/20/27.
5. If the household has some days of housing outside of Winter Weather Services in the past 12 months, the household will have access to 70 days of housing from the first date housed in the past 12 months to the 1-year anniversary of that date. The household will have access to a new 70 days of housing on the 1-year anniversary date.
 - i. Example, a household applies on 11/10/26. In reviewing housing from 11/10/25 to 11/10/26, the household has used 25 days of housing and was first housed on 5/5/26. The household will have access to 70 days of housing from 5/5/26 to 5/5/27. The household will have access to a new 70 days of housing beginning on 5/5/27.

1300 Extensions

1300.1 Extension Requests

- a. Households may request an extension to the 70-day limit. Extensions are granted at the discretion of the DCF commissioner, using the following general criteria:
 1. An eligible household actively awaiting a placement in housing, treatment, or other services.
 2. An eligible household with a member who has a medical condition for which unsheltered homelessness poses a risk to the member's health, safety, or welfare.

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3. An eligible household with a member with a disability for whom there are no reasonable alternative accessible placements.
 4. An eligible household with a member for whom unsheltered homelessness poses a documented imminent risk to the member's health or safety.
- b. The following criteria also apply:
1. The household's case manager must provide documentation to the Department that the household meets at least one of the criteria listed above and that the household is making progress toward the goals identified in the housing plan.
 2. A household must be making progress towards the goals in their housing plan.
 3. The Department shall make a determination to deny or approve the extension request within 10 calendar days.
 - i. See *Processing Extension Requests SOP*
 4. The Department may approve an extension for a period determined appropriate based on the household's circumstances, progress, and continued need for assistance.
 5. The Department shall provide written notice to the household of its decision to approve or deny the request for extension.
 6. The termination criteria apply to households receiving services pursuant to an extension.
 - i. See [800 Termination](#)
 7. See *Processing Extension Requests SOP*

1300.2 Extension Request Information Requirements

- a. The Request for Extension of 70 Night Cap can be found here:
1. <https://vermont.jotformgov.com/262073806249864>
- b. Households submitting an extension request must include the following information:
1. Name
 2. Date of birth
 3. Email address (if applicable)
 4. The name of the person and organization submitting the request (if a case manager or community partner is submitting the request on behalf of a household)
 5. The name of the housing case manager and organization assisting the client with their housing plan
 6. The date the household will exhaust their 70-day limit
 7. The number of additional days requested
 8. The reason for the extension request
 9. How the additional days of housing will assist in achieving housing goals
- c. Households must include a copy of their housing plan with the extension request

- d. Households may include documentation of progress towards housing goals and any plans they may have to stay with family, friends, etc.
- e. Any pending applications for apartments or housing subsidies
 - 1. See *Processing Extension Requests SOP*

1400 Housing Plans

- a. All households housed under Level 4 will be required to provide a copy of their housing plan within 7 days of being found eligible.

1400.1 Housing Plan

1400.1.1 Housing Plan Required Elements

- a. Housing plans should include short- and long-term goals.
 - 1. Examples of short-term goals include:
 - i. Applying for a shelter bed
 - ii. Completing the Coordinated Entry Assessment
 - 2. Examples of long-term goals include:
 - i. Completing applications for housing subsidies and addressing barriers to housing such as employment or childcare

1500 Case Management and Referrals

1500.1 Coordinated Entry Referral

- a. Eligible households should be referred to Coordinated Entry at the time the Notice of Eligibility is generated.
 - 1. See *Processing a VHRC Application SOP*

1500.2 Intake Case Management

- a. Households that are not currently working with a case manager will be referred to DCF Intake Case Managers for assistance with creating an AHS-approved Housing Plan.
 - 1. See *Hotel Placement SOP*

1500.3 Level 1 Referrals (At Risk of Homelessness)

- a. If a household contacts DCF for VHRC benefits and reports that they are in danger of losing their housing but are not currently homeless, refer to local community action agencies providing equivalent Level 1 (Homelessness Prevention) services.

1. See *Level 1 Referrals SOP*

1600 Winter Weather Services

- a. Days used from December 1, and March 31 do not count towards a household's 70-day limit under Level Four.
- b. Between December 1, and March 31, the maximum number of allowable rooms increases from 700 to 1000.

1700 Appeals

- a. Households may request a hearing before the Vermont Human Services Board if:
 1. Their application for VHRC benefits is denied in whole or in part.
 2. Their VHRC benefits are reduced, suspended, or terminated.
 3. The household believes that VHRC services have not been provided in accordance with applicable rules or policies.
 4. DCF must submit all requests for a fair hearing to the Human Services Board, regardless of whether the request meets one of the categories above. The Human Services Board decides if it will hear the case.
- b. Households must request a hearing within 60 days from the date on the written notice of the decision they want to appeal.
- c. If a household requests a hearing within 14 days of receiving written notice of a decision (within 14 days of the date of the notice if the notice is mailed) to deny, reduce, suspend, or terminate benefits, DCF will continue to house the household pending the hearing.
- d. See *Filing a Fair Hearing SOP*

1800 Household Responsibilities

1800.1 Misconduct

- a. If any member of the household engages in misconduct that seriously endangers the safety of program staff, community partners, or other participants, or intentionally destroys property or criminal activity, the household could be terminated for misconduct.

1800.2 Fraud

- b. Providing false or misleading information may result in denial of assistance or termination from the program. If the Department believes there may be fraud, it can refer the case to

the Attorney General or a State's Attorney to investigate and take legal action under state law.

1900 Reasonable Accommodations

- a. A household may request a reasonable accommodation.
 - 1. Examples of reasonable accommodations include placement in a specific hotel due to accessibility needs and requests for alternative communication methods, such as an in-person fair hearing.
- b. The household does not need to use the phrase 'reasonable accommodation' for their request to be considered a reasonable accommodation. If a household requests a specific accommodation due to a disability, send the request to GA AOPs.

2000 Service Animals

- a. DCF receives occasional reports of hotels declining to accept guests due to the household requiring a service animal. If a hotel declines to accept a household due to the household having a service animal, please use the following script.
 - 1. "This animal is not a pet; it is a service animal. Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas where the public is allowed to go. DCF may withhold payment from your establishment if you are not in compliance with Vermont's public accommodations law and the ADA."
 - i. If the hotel still refuses to house the household, report this to GA AOPS.
- b. The following are talking points to use with hotels that refuse service animals.
 - 1. Under Vermont's public accommodations law and the federal Americans with Disabilities Act (ADA), people with disabilities may bring service animals to all public accommodations, including hotels/motels.
 - 2. A service animal is a dog that has been trained to perform disability-related tasks for the benefit of a person with a disability (in some cases, a miniature horse may also qualify as a service animal).
 - 3. Some examples of the type of tasks a service animal performs are: guiding people who are blind, alerting individuals who are deaf or hard of hearing, alerting and protecting an individual who is having a seizure, reminding individuals with mental illness to take their medications, interrupting self-harming behaviors, providing calming pressure during panic attacks, or alerting an individual to the presence of allergens.

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4. Service animals do not need to be professionally trained. People with disabilities have the right to train the dog themselves and are not required to use a professional service dog training program.
5. The ADA does not require service animals to wear a vest, ID tags, or specific harness.
6. In situations where it is not obvious that the dog is a service animal, staff may ask only two specific questions: (1) is the dog a service animal required because of a disability? (2) what work or task has the dog been trained to perform? Staff are not allowed to request any documentation for the dog, require that the dog demonstrate its task, or inquire about the nature of the person's disability.
7. Hotels/motels cannot assign designated rooms for individuals with a service animal. A guest with a disability who uses a service animal must be provided the same opportunity to reserve any available room at the hotel as other guests without disabilities. They may not be restricted to "pet-friendly" rooms.
8. Hotels/motels are not permitted to charge guests for cleaning the hair or dander shed by a service animal. However, if a guest's service animal causes damage to a guest room, a hotel is permitted to charge the same fee for damage as charged to other guests.
9. Service animals can be any breed of dog. The ADA does not restrict the type of dog breeds that can be service animals. A service animal may not be excluded based on assumptions or stereotypes about the animal's breed or how the animal might behave. However, if a particular service animal behaves in a way that poses a direct threat to the health or safety of others, has a history of such behavior, or is not under the control of the handler, that animal may be excluded. If an animal is excluded for such reasons, staff must still offer their goods or services to the person without the animal present.