



March 17, 2026

The Honorable Stephen Casey
Chair, House Committee on Municipal Government & Housing
Rhode Island State House
Providence, Rhode Island 02903

Re: House bill 8021

Dear Chair Casey, First Vice Chair Fogarty, Second Vice Chair Speakman, and Distinguished Committee Members,

Rhode Island and Mortgage Finance Corporation (“RIHousing”) respectfully opposes House bill 8021, *An Act Relating to Health and Safety – State Building Code – Rhode Island Inclusive Home Design Act* as written. This bill creates the Rhode Island Inclusive Home Design Act, mandating that new single-family, townhouse, and multi-family construction include at least one level that meets ANSI Standards for Type C VISIBLE Units and that in new multi-family developments with elevators, all units meet that standard. It also requires new multi-family construction with two or more units meet the Type B adaptability standards.

Ensuring that all Rhode Islanders have access to homes they can afford and that meet their needs is a central part of RIHousing’s mission, therefore we strongly support the goal of improving the accessibility and visitability of housing for residents with mobility challenges. Many of the multi-family homes we finance already significantly exceed the accessibility requirements for market rate housing. Specifically, federal funding sources often require developments of five or more units to include 5% of the dwelling units (or at least one unit, whichever is greater) to meet full accessibility standards (Type A). An additional 2% of the dwelling units, (or at least one unit, whichever is greater) must be accessible for persons with hearing or visual disabilities. The standard in Rhode Island’s building code is that only 2% of units in properties with 20 or more units are required to meet the Type A standard.

However, RIHousing has gone well beyond the federally required minimum to expand the accessibility of the homes we finance. In 2024, RIHousing completed a comprehensive update of our Design and Construction Standards. Adopted in October 2024, the updated standards significantly expanded the accessibility features required in the developments we finance including requiring wider hallways and doorways, roll-in showers in one out of every five accessible units, in-wall blocking in all bathrooms to support the future installation of grab bars and shower seats, lever-style hardware throughout units, and appropriately positioned light switches and thermostats to ensure ease of use for all residents. RIHousing also released an Accessibility Resource Manual to assist developers receiving agency funding in meeting these enhanced requirements. We have also incorporated accessibility considerations in the prioritization of our resources. Our most recent Qualified Allocation Plan (QAP) which guides the allocation of federal Low Income Housing Tax Credits, awards an additional two points to projects that make at least 10 percent of newly created affordable units accessible.

Because limited local data exists on how increased accessibility mandates influence project costs or design, RIHousing contracted with a consultant in 2025 to analyze how different accessibility requirements may affect

the development of affordable and mixed-income housing. That analysis is currently underway, and we look forward to sharing the results once they are available.

Clearly, RIHousing is committed to increasing the accessibility of housing, however our top priority, particularly in the current critical affordable housing shortage, is to increase the supply of homes affordable to low and moderate-income Rhode Islanders. In administering state and federal affordable housing programs, RIHousing must balance important policy priorities such as accessibility, sustainability, and proximity to transit to name a few, against the need to produce as many affordable units as possible to address the serious housing shortage. Most of these policy priorities, including accessibility, can increase the cost of development which could result in fewer affordable units being developed.

We would like to recognize the improvements the bill sponsor has made to H8021 over the version of the bill that was introduced last year. We appreciate that some of the issues RIHousing raised last year have been mitigated to some degree in this year's bill language and appreciate the bill sponsor's willingness to work with us. However, there are a number of areas of concern we continue to have with the bill's requirements.

As noted above, RIHousing has contracted with a consultant to analyze how increased accessibility requirements could impact the cost or design of the developments we finance. We believe it is essential to have as clear an understanding as possible of those impacts before the State commits to increasing accessibility requirements. We anticipate that the analysis will be completed within the next month.

RIHousing appreciates that this legislation applies to all new residential developments, rather than requiring higher standards only for affordable developments. However, we do have concerns about how the bill applies the existing building code standards to building types it was not designed for. Under this legislation, the Type C standard would apply to both single family and multi-family housing, however it was designed specifically as a voluntary standard for single family housing. Similarly, the bill would apply Type B adaptability standards to new multi-family developments with two or more units. Currently the Type B standard applies to multi-family buildings with 4 or more units.

In addition, it is unclear how the requirements of the bill would be integrated into the existing building code and permitting and approval process. It is essential that there not be a separate state or local process for considering projects covered by the proposed requirements. We believe that the building code commission and local building officials should be consulted both on the process and timeline for any changes to state building accessibility requirements to ensure that any changes can be efficiently and effectively implemented and that local building officials can be adequately prepared to enforce these requirements.

RIHousing shares the sponsor's interest in increasing the accessibility of all housing in Rhode Island and we would be happy to work with the sponsor to address our concerns with the bill.

Sincerely,



Carol Ventura
Executive Director