



April 9th, 2026

The Honorable Jacob Bissaillon
Chair, Senate Housing & Municipal Government Committee
Rhode Island State House
Providence, Rhode Island 02903

Re: Senate bill 2584

Dear Chair Bissaillon, Vice Chair DiMario, Secretary Rogers, and Distinguished Committee Members,

Rhode Island and Mortgage Finance Corporation (“RIHousing”) respectfully opposes Senate Bill 2584, *Relating to Towns and Cities – Home-Fit Dwellings* as written. This bill would require certain publicly subsidized affordable housing developments to increase the number of units that meet accessibility and adaptability standards over the level which is currently required under the state building code or state and federal housing financing programs.

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 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. 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) that meet the Uniform Federal Accessibility Standards (UFAS) which is similar to the Type A standard of accessibility referenced in this legislation. 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, increase the cost of development. Accessible units also must generally be larger than typical units to accommodate a wheelchair, so a proposed development might not be able to include as many units if a larger number of those units must be handicapped accessible. Therefore, requiring more accessible units could result in fewer affordable units being developed.

We would like to recognize the improvements the bill sponsor has made to SB2584 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. However, we continue to have serious concerns with a number of the bill's provisions and the impacts we believe they could have on the housing that we finance.

First, if increasing the number of accessible units is a priority for the State, we believe that goal could more easily, and equitably, be achieved by a smaller increase shared across all building sectors, rather than being limited to state subsidized developments. Affordable developments already must generally include more than three times the number of accessible units required in market rate developments due to federal financing requirements. And affordable developments make up only a small segment of overall residential development activity.

Next, 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.

Finally, while the more punitive provisions from last year's legislation have been removed, it continues to be unclear how the requirements of the bill would be integrated into the existing building permitting and approval process. As any developer knows, time is money. Therefore, it is essential that there not be a separate state or local process for considering projects covered by the proposed requirements. In particular, RIHousing strongly objects to the language in the bill explicitly prohibiting waivers solely due to increased costs that might result from the new accessibility 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, however we believe that this legislation as drafted could in fact increase challenges for persons with disabilities by reducing housing production thereby exacerbating the current shortage of affordable and market rate housing. RIHousing is happy to work with the sponsor to address our concerns with the bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Ventura". The signature is fluid and cursive, with the first name "Carol" and last name "Ventura" clearly distinguishable.

Carol Ventura
Executive Director