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RE: Senate Bill 328, Universal Design requirements in the 802 Home Off-Site Construction Accelerator Pilot Program

TO: House General and Housing Committee

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AARP is a nonpartisan, social mission organization with 38 million members nationwide and nearly 117,000 members here in Vermont. We advocate on behalf of issues that impact older adults, and we appreciate the opportunity to testify on S. 328, specifically the provisions in the Burrows Amendment that require housing units funded through the 802 Homes Off-Site Construction Accelerator Pilot to incorporate universal design elements. AARP policy supports creating housing that is affordable, flexible, and usable across the lifespan.

AARP defines **universal design** as the design of housing that is usable by people of all ages and abilities, without the need for adaptation or specialized design. AARP policy encourages policymakers to require or incentivize universal design features in new housing, particularly when public resources are involved.

Universal Design Is Core to Housing Affordability and Cost Containment

From a cost perspective, universal design is most efficient when incorporated at the point of construction, rather than added later as a costly retrofit. AARP research finds that features such as step-free entrances, wider doorways and hallways, lever handles, and accessible bathrooms add minimal upfront cost when built in—but are far more expensive to install after the fact.

Housing that becomes inaccessible within a few years due to stairs, narrow doorways, or unsafe bathrooms shifts costs elsewhere: to Medicaid, to families, and to municipalities. Universal design is a proven strategy to avoid those downstream costs while improving resilience and marketability of housing stock.

Strong Public Demand and Clear Demographic Need

AARP research shows that most adults age 50 and older believe universal design features should be standard in newly constructed homes, and that these features support safety, independence, and quality of life as people age.

This is especially relevant for Vermont. As the population ages, the ability of residents to remain safely in their homes—rather than enter higher-cost institutional care—depends heavily on whether housing is accessible and adaptable.

Vermont has one of the oldest populations in the nation, and the aging trend is not speculative; it is well documented in state and legislative projections.

- As of the **2020 Census**, Vermonters age 65 and older made up **20.6% of the population**, up from 14.6% in 2010, representing the fastest-growing age group in the state.
- State health and aging officials project that by **2030, one in three Vermonters will be age 60 or older**, reflecting both longer life expectancy and slower growth among younger age groups.

National demographers have identified Vermont, along with Maine and New Hampshire, as likely to be among the oldest states in the country by 2030, underscoring that this trend is structural rather than temporary.

These shifts have direct consequences for housing policy. As the average household ages, the need for housing that can safely accommodate changes in mobility, balance, vision, and strength increases—particularly in a state with high homeownership and an older housing stock.

Growing Numbers of Older Households and Disability

State health and housing data show that aging in Vermont is also accompanied by higher rates of disability and living alone, both of which have housing design implications. Disability prevalence increases with age, and a substantial share of older Vermonters live alone—conditions that increase risk when homes have stairs, narrow hallways, or inaccessible bathrooms.

Why These Trends Make Universal Design Essential

As AARP policy and housing research emphasize, homes built today must function effectively for residents over multiple decades. In Vermont, a home constructed in the

next few years is statistically likely to house an older adult during its useful life. Designing homes with step-free entrances, wider doorways, accessible bathrooms, and safe circulation spaces from the outset helps ensure that residents can remain in place as their needs change.

State agencies themselves recognize this connection. Vermont's Multisector Plan on Aging (Age Strong VT) identifies housing that supports independence, safety, and aging in place as a foundational strategy for managing the state's demographic shift.

Alignment with Vermont Housing Standards: 802 Homes Catalog and VHFA Universal Design

Vermont has already taken meaningful steps to integrate universal design into publicly supported housing through both VHFA program standards and the emerging 802 Homes Catalog. Aligning legislative language with these existing frameworks ensures consistency, feasibility, and ease of implementation.

The Vermont Housing Finance Agency (VHFA) maintains a Universal Design Checklist, adapted in part from AARP Livable Communities guidance, which is used to encourage additional functionality and accessibility in funded housing beyond minimum code requirements. These design elements are explicitly intended to "provide additional functionality for residents and visitors of funded units" and to be incorporated during construction where feasible, rather than retrofitted later.

The language in S.328 aligns well with design elements VHFA already recognizes as achievable and appropriate for Vermont housing, including:

- At least one no-step entry to the building and unit
- Wider doorways and halls to allow ease of movement
- Lever-style door handles and faucets, which are easier to operate across age and ability
- Slip-resistant flooring and adequate lighting to reduce fall risk
- Bathrooms designed for usability over time, including walk-in or low-threshold showers and wall blocking for future grab bars

These features are identified by VHFA as relatively low-cost when incorporated at construction and beneficial to a wide range of residents, including older adults, people with disabilities, families with children, and visitors. Importantly, VHFA's checklist treats universal design as scalable and flexible—recognizing that not every feature will be feasible in every unit, but that design should anticipate changing needs over the life of the home.

Challenge: Universal Design Applied to a Single Program Without Statutory Definition

A key challenge with implementing universal design through a single program or pilot—such as the off-site construction accelerator or the 802 Homes Catalog—is that universal design is not currently defined or incorporated in Vermont statute or statewide building code.

Without a statutory or regulatory definition:

- There is no shared baseline for what constitutes “universal design” across agencies, municipalities, builders, or manufacturers.
- Implementation risks becoming program-specific and inconsistent, rather than predictable and scalable.
- Design expectations may vary from project to project, increasing uncertainty for private builders and modular manufacturers who rely on standardization.

As a result, embedding universal design requirements in one program—without a broader definitional framework—can unintentionally create fragmentation rather than normalization. Because Vermont does not yet define universal design in code or statute:

1. **Agencies must interpret the term independently**
Even well-intentioned agencies may apply different thresholds or feature sets, creating confusion rather than clarity.
2. **Builders lack certainty**
Private builders and manufacturers benefit from clear, repeatable standards. Program-specific interpretations increase risk and can discourage voluntary adoption.
3. **Municipal implementation becomes uneven**
Municipalities asked to align zoning, permitting, or inspection practices may not have clear guidance on what is required or expected.
4. **Market signaling is weakened**
Universal design remains perceived as a “special program feature” instead of a mainstream design standard, limiting private-market uptake.

When universal design is defined only within a pilot program or a model catalog—and not reflected in statute, building code, or broader standards—it becomes harder for private builders and manufacturers to act with confidence.

This is not an argument against universal design. It is an argument for sequencing and clarity.

802 Homes Catalog allows the state to test feasibility, gather real cost and performance data, and understand how these features work in practice. That information can then inform future legislative or code decisions.

Until universal design is clearly defined in statute or code, implementation should prioritize flexibility, align with existing VHFA guidance, and remain suitable for voluntary adoption by private builders.

Suggested Language:

The pilot is intended to inform future consideration of statewide definitions or standards related to universal design, recognizing that such standards do not currently exist in Vermont statute or building code.

Or:

Until such time as universal design is defined in statute or code, program implementation should prioritize flexibility, consistency with existing VHFA guidance, and suitability for voluntary adoption by private builders.