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DATE: April 24, 2026
TO: Representative Mihaly, Chair, House Committee on General and Housing
FROM: Michael Desrochers, Executive Director, Division of Fire Safety
SUBJECT: S.328- Proposed Amendment "Universal Design"

Thank you Chair Mihaly and please extend a sincere thank you to the committee for allowing me to discuss the Division's responsibility regarding handicap accessibility and for allowing me to offer my thoughts on Universal Design.

There were a couple of follow up questions you asked me to respond to (1) the difference between prefabricated construction and manufactured construction (2) inspections on out of state construction.

The key idea: **"prefabricated" is a broad category, and "manufactured homes" are one specific type within it.**

Manufactured are:

Homes built entirely in a factory and constructed on a **permanent steel chassis**, then transported to the site.

Key traits:

- Built to the federal **HUD Code (not local building codes)**
- Usually installed on **piers, slabs, or tie-down systems** (can be permanent, but not always)
- Often still called "mobile homes" (technically pre-1976)
- Typically more **cost-efficient** than other housing types
- Financing can be **more limited** (especially if not on owned land)

Prefabricated are:

Any home that is **built off-site in a factory** and then transported to where it will be installed.

This includes:

- **Manufactured homes** (HUD-code)
- **Modular homes** (built to state/local code)
- **Panelized homes** (walls/parts assembled on-site)



- **Kit / pre-cut homes**
- Tiny homes, prefab cabins, etc.

The Real Differences (what actually matters)

Feature	Manufactured Homes	Prefabricated Homes (General)
Definition	One specific type	Broad category
Building Code	Federal HUD Code	Varies by type
Structure	Built on steel chassis	Varies
Foundation	Often non-permanent or semi-permanent	Varies
Financing	Often more restrictive	Depends on subtype
Cost	Typically lowest	Wide range
Perception	More stigma	Depends (modular = higher acceptance)

Simple way to think about it

- **Prefab = “built in a factory” (big umbrella)**
- **Manufactured home = a specific prefab type with its own federal code and chassis**

Out of State Construction

The Division of Fire Safety has issued numerous construction permits for housing projects where the structure is pre-built out of state and then assembled on site here in Vermont. The applicant always requests from us information pertaining to the codes and standards we adopt. The codes and standards are then implemented into the construction project. It is important for the structures to comply with our provisions.

- Visitable and adaptable requirements
- Snow loads and footing depth
- Licensing of gas and oil technicians
- Licensing of Plumbers and Electricians
- Floor loading/structural loading
- Fire Prevention/Life Safety

We accept third party inspection reports validating compliance with our rules. Many of these manufacturing companies have contracts with third party inspection agencies. The buildings receive inspections here in Vermont by our licensed/certified inspectors.

I hope you find this information useful if you should have additional questions please let me know more than happy to assist you and the committee.