

State of Vermont

Fair Housing Analysis

2024
Update



Prepared by the Vermont Department
of Housing & Community
Development with assistance from
community partners and input from
the public



FAIR HOUSING ANALYSIS

State of Vermont

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Acronym List

ACCD — Agency of Commerce & Community Development

ACOP — Admissions & Continued Occupancy Plan

ADA — Americans with Disabilities Act

AI — Analysis of Impediments to Fair Housing Choice

CDBG — Community Development Block Grant

CFR — Code of Federal Regulations

CP — Consolidated Plan

DOJ — Department of Justice

DHCD — Department of Housing & Community Development

FHA — Fair Housing Analysis

HDLP — Housing Discrimination Law Project

HMDA — Home Mortgage Disclosure Act

HQS — Housing Quality Standard

HUD — Department of Housing & Urban Development

IRC — Internal Revenue Code

LEP — Limit English Proficiency

LIHTC — Low Income Housing Tax Credits

LMI — Low-to-Moderate Income

MHIR — Manufactured Housing Improvement and Repair Program

OPR — Office of Professional Regulations

PHA — Public Housing Authority

PIT — Point-in-Time Count

QAP — Qualified Allocation Plan

QCT — Qualified Census Tracts

UFAS — Uniform Federal Accessibility Standards

VAR — Vermont Association of Realtors

VBD — Vermont Banking Division

VCDP — Vermont Community Development Board

VHCB — Vermont Housing & Conservation Board

VHFA — Vermont Housing Finance Agency

VHIP — Vermont Housing Improvement Program

VHRC — Vermont Human Rights Commission

VREC — Vermont Real Estate Commission

VSHA — Vermont State Housing Authority

VTrans — Vermont Agency of Transportation

The State of Vermont Fair Housing Analysis

Executive Summary

Introduction

Equal and free access to residential housing choice is a fundamental right critical to personal, professional, and community development. If equal opportunity is to become a reality, fair housing is a goal that government, public officials, and private citizens must embrace. In 2022, the State of Vermont updated the 2012 and 2017 Analysis of Impediments to Fair Housing Choice (AI) to further the goal of fair housing and satisfy the requirements of [the Housing and Community Development Act of 1974](#) as amended. The Fair Housing Act requires any State or Entitlement Community receiving federal funds to affirmatively further fair housing. The Department of Housing and Community Development (DHCD) administers federal funds from the U.S. Department of Housing and Urban Development (HUD), including Community Development Block Grant (CDBG), Recovery Housing Program (RHP), and other funding sources.

Note: This Fair Housing Analysis builds on the previous AIs conducted in 2012, 2017, and 2022, as many of their findings, observations, and proposed actions remain valid and important for guiding our work.

DHCD is creating the Fair Housing Analysis to align with the Consolidated Plan and the Housing Needs Assessment (HNA) timelines. The Consolidated Plan and HNA are HUD Program mandates also conducted every five years. The 2025 Consolidated Plan will utilize data from the HNA and findings from this Fair Housing Analysis (FHA).

The responsibility of compliance with the Federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government that receive federal funds through the state. To carry out its responsibility to affirmatively further fair housing, once every five years, the State analyzes the impediments to fair housing in Vermont and develops an action plan to address those impediments. This FHA covers all of Vermont except the City of Burlington, which receives its own allocation of funds from HUD. However, the city of Burlington is included in the discussion of statewide issues and trends where appropriate (i.e., areas of concentration, dissimilarity indices, etc.). Therefore, references to Vermont throughout this document that exclude Burlington will be noted, otherwise, Burlington is presumed to be included in the analysis.

DHCD engaged in an extensive consultation process with local public agencies, nonprofit organizations, and other interested entities to develop a community planning process for the Fair Housing Analysis. DHCD issued two online questionnaires, one for Housing Professionals and the other for the general public, to receive public input on Fair Housing issues and potential solutions for the State. In addition, DHCD gathered and analyzed data from a variety of sources, including the US Census, fair housing complaints received by HUD and Vermont's Human Rights Commission, HMDA lending and mortgage trends, Public Housing Authorities, the Vermont Real Estate Commission, etc. Data sources are noted throughout this report and in appendices.

HUD's Interim Final Rule for Restoring Affirmatively Furthering Fair Housing

“HUD’s 2021 Interim Final Rule, [“Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,”](#) requires program participants to submit certifications that they will affirmatively further fair housing in connection with their consolidated plans, annual action plans, and PHA plans. In order to support these certifications, the IFR creates a voluntary Fair Housing Analysis process for which HUD will provide technical assistance and support.

The IFR does not require program participants to undertake any specific type of Fair Housing Analysis to support their certifications, and commits HUD to providing technical assistance to those that wish to undertake Assessments of Fair Housing (AFHs), Analyses of Impediments to Fair Housing Choice (AIs), or other forms of Fair Housing Analysis. HUD is currently providing resources to assist program participants.”¹

Staff at DHCD participated in the HUD trainings referred to above where HUD approved utilizing a hybrid of an Assessment of Fair Housing and an Analysis of Impediments to Fair Housing (AI). DHCD is titling this as a “Fair Housing Analysis” (FHA).

Lead Agency

The Department of Housing and Community Development (DHCD) prepares and implements the Fair Housing Analysis (FHA). Through grant programs and fair housing initiatives, DHCD works with an extensive network of nonprofit organizations, public agencies, and private entities. These community stakeholders were invited to participate in developing the 2024 FHA. Stakeholders helped identify barriers to fair housing choice and develop practical recommendations to eliminate impediments. Employees from DHCD and the Agency of Commerce and Community Development (ACCD) developed the 2024 FHA with input from these community stakeholders. The following individuals from these agencies were responsible for developing this document:

- Naomi Cunningham, Housing Program Administrator, DHCD
- Jayme Bauer, Community Development Specialist II, DHCD
- Shaun Gilpin, Housing Division Director, DHCD
- Maxwell Krieger, General Counsel, DHCD

Agency Consultation and Public Outreach

The Outreach Plan that DHCD developed provided a phased approach to gathering information and feedback and included:

- 1. Initial Stakeholder Outreach:** DHCD engaged with various of nonprofits, local governments, and industry leaders to better understand issues related to fair housing and inclusion. These organizations include Thriving Communities, community health professionals, property management and real estate organizations, Homeownership Centers, and Continuum of Care

¹<https://www.hud.gov/AFFH#:~:text=HUD's%202021%20Interim%20Final%20Rule,action%20plans%2C%20and%20PHA%20plans.>

organizations. [Appendix A](#) includes the comprehensive list of stakeholders DHCD engaged with while planning and writing the FHA.

2. **Housing Professional Feedback:** DHCD completed a statewide fair housing survey for nonprofit and housing professionals. The survey was launched at the November 2022 VHFA Statewide Housing Conference, and DHCD staff attended numerous other housing industry meetings and events, resulting in over 95 survey responses.
3. **Public Outreach and Feedback:** DHCD consulted with Vermont Legal Aid and CVOEO to design a statewide fair housing survey for the general public, focusing on ease of use and straightforward wording.
 - a. Met regularly with Continuum of Care organizations for input on reaching out to vulnerable Vermonters.
 - b. Partnered with community development and service organizations for the 2023 “Fair Housing Library Tour,” where DHCD staff and local nonprofit staff met with residents in libraries in 12 counties. Information on housing assistance, fair housing, and help with completing the fair housing survey was provided.
 - c. Over 200 surveys were completed statewide.
 - d. [Appendix A](#) provides details on the Fair Housing Tour and partner organizations.
4. **Coordinated Outreach to Immigrants and Refugees**
 - a. Partnered with the Vermont Landlords Association (VLA) and CVOEO for a comprehensive fair housing education and outreach Initiative that includes CVOEO Ambassadors attending multiple gatherings of refugee and immigrant groups to discuss fair housing and get feedback on the barriers they see in their respective languages.
5. **Review and Feedback on Draft FHA Executive Summary and Action Plan**
 - a. Provided a draft of the “Executive Summary” and “Impediments to Fair Housing, Corrective Action Plan and Performance Measures” to Thriving Communities and other community partners for their feedback and input. A copy of the complete draft FHA was also made available. See the Methodology section for the list of organizations that were consulted.

Demographic and Housing Observations

The following demographic and housing trends were noted throughout the Fair Housing Analysis, particularly in the [Housing](#) and [Demographics](#) sections.

- **Vermont has experienced significant population growth over the past fifty years, increasing 47.5% from 1970 to 2020.**

This growth has been notably concentrated in the most populous county in Vermont, Chittenden County. Chittenden County’s population more than doubled from 1970 to 2020, with the majority of this growth occurring in the 1980s and 1990s.
- **In the past 10 years, Communities of Color have more than doubled, increasing from 6.2% of the overall population in 2010 to 12.6% in 2020.**

Between 1990 to 2020, Communities of Color have sextupled (increased by a factor of 6) from 2.0% to 12.6% of the state’s total population. However, Vermont is still the second whitest state in the nation, with 89.8% of residents identifying as White.

- **People with disabilities were more than twice as likely to live in poverty as people without disabilities in 2021.**

In Vermont, 13.8% of the population, or approximately 1 out of every 7 Vermonters, reported at least one disability in 2021. An income disparity exists in Vermont, where 20.9% of people with disability are living below the poverty line. In comparison, only 8.8% of people without a disability live below the poverty line.

- **Areas of minority concentration are more likely to have a concentration of Low-to-Moderate Income (LMI) people.**

In Vermont, 18 of the 31 census tracts identified as concentrations of LMI people were also areas of minority concentration. Consequently, areas of minority concentration are more likely also to be areas of concentration of LMI people.

- **There is a significant disparity in the proportion of renter versus homeowner households that are transit-dependent.**

17.3% of renter households were transit-dependent, compared 2.3% of homeowner households.

- **Of the family households in Vermont only 14.4% are female-headed, but they make up nearly 50% of the family households living below the poverty line.**

- Female-headed households with children often have trouble obtaining housing, primarily as a result of lower incomes and the unwillingness of some landlords to rent their units to families with children. This is a clear violation of federal and state fair housing laws. Family households include married-couple families with or without children, single-parent families, and other families made up of related people.

- **White households had a homeownership rate of 74%, while Black Vermonters had the lowest homeownership of any racial group, at just 29%.**

There is a significant disparity in homeownership rates among different racial groups in Vermont. This is likely due to numerous historical and ongoing barriers that make it difficult for minorities to access homeownership opportunities and build generational wealth.

- **From 2020 to 2021, homeless individuals and households more than doubled. Since 2020, the number of homeless individuals has steadily climbed, increasing by 312% in just four years.**

This rapid increase is a combination of better tracking and a real increase in the number of homeless Vermonters. Vermont launched a statewide emergency hotel program to relieve economic hardships many households experienced during the onset of the COVID pandemic. Thousands of unhoused Vermonters applied for temporary hotel stays paid for through federal COVID relief funds, allowing the state to capture far better information about the scope of homelessness in the state. In addition, the number of homeless Vermonters has continued to increase post-pandemic, from 1,110 individuals pre-pandemic in 2020 to 3,458 in 2024, a 312% increase in just four years. Vermont has a per capita homelessness rate of 51 per 10,000 people, the 2nd highest nationally, according to the most recent 2023 HUD Annual Homeless Assessment Report (AHAR) report.

- **Long-term rentals have a vacancy rate as low as 1.2%. However, the high percentage of vacation/seasonal homes skew the overall rental vacancy rate.**
Vermont has the second-highest number of vacation homes per capita in the nation. 17.5% of the housing units in Vermont are vacation homes, meaning around 58,500 homes in Vermont are only used seasonally. If you were to exclude seasonal homes when calculating the Vermont vacancy rate, the rate could be as low as 1.2%.

Survey and Focus Group Findings

- **30% of respondents said that they experienced housing discrimination.**
Of those that reported discrimination, 56% cited a landlord or property manager as the source of the discrimination.
- **36% of survey respondents who experienced discrimination said it was based on disability, and 28% said it was based on receipt of public assistance.**
Additionally, 57.7% of the formal fair housing complaints made to the Vermont Human Rights Commission from 2017–2021 were based on disability.
- **50% of respondents who experienced discrimination also reported that their housing was unstable.**
- **Individuals from all of the Limited English Proficiency focus groups commented about the lack of affordability and units that are too small for their families.**

Fair Housing Achievements in Vermont

Since the publication of the last comprehensive Analysis of Impediments to Fair Housing, Vermont has accomplished the following fair housing achievements:

- **Interpret and translate “The Definitive Guide to Renting in Vermont” and Champlain Valley Office of Economic Opportunity’s (CVOEO) fair housing webinars into 9 languages.** As part of developing this Fair Housing Analysis, DHCD granted the CVOEO \$50,000 in funds for these purposes.
- **Expansions to the Vermont Housing Improvement Program (VHIP).**
 - **Forgivable Loans for Code Compliance Repairs in Occupied Units.** Like everywhere in the U.S., people in protected classes experience higher rates of poverty than the overall population. This results in protected classes living in more deteriorated housing. To help remedy this, property owners can now apply for VHIP 2.0 funding to make occupied rentals code compliant. Permanent displacement is prohibited, and there must be an agreed-upon plan between tenants and owners for temporary relocation when needed. Owners are responsible for accommodations during repairs.
 - **Fair Housing Training and Landlord Tenant Mediation for VHIP participants.** Training requirements were put in place for state-funded VHIP 2.0 participants. VHIP 2.0 was launched on March 25, 2024. As of December 23, 2024, 211 individuals have completed the fair housing training, with 271 participants registered.

- **Grants and Loans for Accessible Rentals.** The state updated VHIP to include grants or forgivable loans for up to \$70,000 per unit to rehab or create new rental housing units that meet accessibility requirements. The project can also include rehabbing or creating an accessible parking spot for individuals with disabilities. Households with at least one individual with a disability who is eligible to receive Medicaid-funded home, and community-based services can be prioritized for these units.
- **Comprehensive educational package for landlords and tenants in up to nine languages.** DHCD partnered with CVOEO and the Vermont Landlords Association (VLA) to create a comprehensive educational package for landlords and tenants in up to nine languages that includes:
 - An interactive training video on fair housing for landlords, with a quiz at the end. This video is now required for VHIP participants. VHIP is a state-funded rental housing development program.
 - Training videos for landlords and tenants on the Landlord-Mediation program funded through Emergency Rental Assistance funds. The training video for landlords is required for VHIP participants and will be provided to VHIP tenants.
 - DHCD will make the trainings publicly available for use in other programs and for general education.
- **New Farmworker Housing Supports.** In 2022, Champlain Housing Trust launched the Vermont Farmworker Housing Repair Loan Program (FWH), which allows farmers to make essential repairs and necessary improvements to their farmworker housing by offering forgivable loans of up to \$30,000. This is important for fair housing, because the majority of farmworkers who live on farms in Vermont are undocumented, and may be less likely to seek support when fair housing issues or unsafe living conditions arise for fear of deportation.
 - As of October 2023, the program has supported 35 projects improving 38 farmworker housing units in the state. The program has supported a significant number of projects in Addison and Franklin counties (37% and 14% of funded projects, respectively), which have the highest concentration of farmworker housing in the state.
- **Homes for All Toolkit.** Regulatory and financial barriers have made developing diverse homes on a small footprint harder and more complicated. As noted elsewhere in this document, housing professionals are interested in tools that help builders navigate permitting, design, and building processes for affordable housing. On March 14, 2024, the Department of Housing and Community Development launched the VT Homes for All Toolkit to a maximum-capacity crowd at the Toolkit Trainer Summit in Barre. This is the first of three phases designed to focus statewide attention on small-scale gentle infill and incremental development as a strategy to address Vermont’s housing and affordability crisis.
- **Training on accessibility standards for architects.** The 2017 Action Plan included an item stating, “The State should promote the development of training for architects and interior designers regarding compliance with the State’s accessibility standards for residential construction (20 VSA sec. 2907) as well as HUD’s Fair Housing Design Manual.” Courses on Fair Housing and Accessibility

are now available through continued education requirements for architects in Vermont ([link to training](#)).

Fair Housing Legislative Achievements

2022 and 2023 were historic years for housing-related legislation in Vermont. Through both the Omnibus Housing Bill, Act 182 of 2022, and the Rental Safety Bill, Act 181 of 2023, Vermont strengthened protections and made historic investments in fair housing. The 2024 Housing Bill H. 687 created new incentives to create or rehab affordable rental units that meet accessibility requirements.

Medicaid Permanent Supportive Housing Assistance Program

The Vermont Agency of Human Services, with the support of The Council on Housing and Homelessness, is designing and implementing a Medicaid Permanent Supportive Housing Assistance Program. The program plans to serve 100 Vermont households exiting homelessness during its first year. *Vermont Council on Housing and Homelessness, Dec. 2023, [2023 Report: Recommendations to support affordable housing development and help reduce and prevent homelessness](#).*

Expanded Protections for Harassment

The 2022 Omnibus Housing Bill, Act 182, addressed several fair housing issues, including strengthening protections against harassment and unfair housing practices. This legislation defines the term “harass” as engaging in unwelcome conduct *that detracts from, undermines, or interferes with the person’s terms, conditions, privileges, or protections in the sale or rental of a dwelling or other real estate or in the provision of services or facilities in connection with a dwelling or other real estate* based on a protected status. Additionally, this bill expanded who can report unlawful housing harassment to include third-party individuals. This means that more people can report harassment on another person’s behalf, a vital expansion of housing protection because harassment can go unreported for several reasons, including:

- A lack of awareness about how and where to file a complaint;
- To avoid confrontations with prospective landlords (especially in a tight rental market such as Vermont’s);
- People may be unaware that discrimination is occurring because they do not have the benefit of comparing their treatment with that of another home seeker;
- People may not be aware that discrimination is against the law, and that there are legal remedies to address the situation; and
- Households may be more focused on finding decent housing, and may prefer to avoid going through the process of filing a complaint.

Prospective, current, or past renters or home buyers may file complaints regarding harassment, which will be investigated and followed up based on the findings. Refer to the [Fair Housing Complaints](#) section to learn more about housing discrimination complaints in Vermont or how to file a report.

First Generation Homebuyers Program

In 2022, the Vermont Legislature passed Act 182, which provided \$1 million in funding for a First-Generation Homebuyer Program. The program offers down payment assistance to households historically sidelined from homeownership. This provides an opportunity for traditionally underserved households to build wealth through homeownership. The Vermont Housing Finance Agency (VHFA) is administering the program and has planned robust outreach to BIPOC Vermonters and individuals who have been in the foster care system.

Based on data from the 2020 U.S. Census, Vermont has a population of approximately 643,000, with about 38,500 BIPOC Vermonters (approximately 6% of the overall population).² A recent American Communities Survey (ACS) shows that homeownership for BIPOC residents ranges from 21% for Black Vermonters to 50.4% for Hispanic Vermonters. White Vermonters, however, have a significantly higher homeownership rate of 72.3%.³

The First-Generation Homebuyer Program will facilitate opportunities for underserved Vermonters to become homeowners and build wealth. “Recognizing that Black, Indigenous, and Persons of Color have historically not had access to capital for homeownership purchases and have been systemically discriminated against in the housing market,” the enabling legislation requires that this program does extensive outreach to organizations that work with BIPOC Vermonters.⁴ By supporting these historically underserved populations, this program will help to further the goals of fair housing throughout the State of Vermont.

Even with down payment assistance opportunities, significant barriers exist for BIPOC and other underrepresented first-generation homebuyers. For example, renters’ credit scores often do not reflect their rental history. This is starting to change, but in many cases, renters need to be proactive in asking landlords to report rent payments through an online service for rent to be reported to the credit bureaus.⁵ The First-Generation Homebuyers Program is a step in the right direction. However, more work needs to be done in Vermont and across the United States.

Rental Safety

Also passed in 2022, Act 181, the Rental Safety initiative, will help make rental units safer for tenants. Act 181 allows the State Division of Fire Safety to enforce rental health and safety codes in addition to completing fire safety inspections. This is critical for communities with overstretched and volunteer code enforcement teams.

While the Fair Housing Act intends to provide equitable access to housing for people in protected classes, this access has limited benefit if the housing offered isn’t in safe and decent conditions. The

² US Census: [Census.gov/Library/America Counts: Stories Behind the Numbers/STATE PROFILES: 2020 Census/VERMONT: 2020 Census](https://www.census.gov/library/america-counts/stories-behind-the-numbers/state-profiles/2020-census/vermont-2020-census)

³ The University of Vermont, Vermont Legislative Service, https://www.uvm.edu/sites/default/files/Department-of-Political-Science/vlrs/EconomicIssues/Housing_Assistance.pdf

⁴ Vermont Act Number 182 of 2022, Section 2(c).

⁵ Money.com, How to Use Rent Payments to Increase Your Credit Score, <https://money.com/how-to-build-credit-with-rent-payments/>

Rental Safety initiative will help provide safe, decent rental housing throughout the State of Vermont and benefits low-income families, the elderly, and people with disabilities.

Protected Classes

Vermont added abuse victims as a protected class under the Vermont Fair Housing and Public Accommodations Act. This protection applies to victims of abuse, sexual assault, or stalking. This update was made in 2019 under Act 48, and means Vermont now has protections for six classes that are not included under the Federal Fair Housing Act.

Potential Impediments to Fair Housing and Proposed Actions

Participants in the Limited English Proficiency (LEP) focus groups stated that clarity is needed about the Fair Housing complaint process and timeline. People want to see the results of the complaint process to trust that the system will work for them.

Proposed Action: Work with nonprofits/partners that help file complaints to create videos or other educational materials that can be shared with the public in multiple languages. Real stories from people who have filed complaints about their experience would be preferable, especially a story from a LEP Vermonter. All materials should also make it clear that there is no cost to file a complaint.

The last fair housing testing audit measuring housing discrimination in the Vermont rental market was conducted by Vermont Legal Aid’s Housing Discrimination Law Project (HDLP) in 2013. Unfortunately, a more recent Rental Discrimination Report for Vermont is not currently available.

Proposed Action: An updated Rental Discrimination Report would provide valuable information that would allow Vermont to affirmatively further Fair Housing. A report that includes discrimination based on Vermont’s protected classes and the federally protected classes would be especially helpful.

Addressing Homelessness — From 2020 to 2021, the number of homeless individuals and households more than doubled. Since 2020, the number of homeless individuals has steadily climbed, increasing by 297% in just 3 years.

Proposed Action: Increase investments in permanent affordable housing, including state funding for project-based vouchers through VSHA. Also, base fund existing programs that are successfully creating or maintaining affordable rentals units and have received multiple rounds of one-time funding, including VHIP 2.0 and the Manufactured Housing Improvement and Repair program (MHIR). This base funding will make it easier to retain staff for the program, and reduce the administrative burden related to evolving rules and funding sources.

The portion of Vermont households headed by someone who is at least 55 years old has increased steadily, from 44% in 2010 to 53% in 2020. By 2029, 54% of Vermont’s households will be headed by someone in this age group.

Proposed Action: Monitor the progress of the Medicaid Permanent Supportive Housing Assistance Program and expand the program where necessary. **Over 50% of fair housing complaints submitted to the VT Human Rights Commission, and 36% of the 2023 Statewide Fair Housing Survey respondents who experienced discrimination said it was based on disability. Disability has been the number one reason cited for housing discrimination in Vermont since the “Analysis of Impediments to Fair Housing” was released in 2013.**

Proposed Action: Provide small incentives to landlords for reasonable accommodations, perhaps through an existing program like VSHA’s Landlord Relief Program. For example, in 2024, the average cost of a wheelchair ramp ranges from \$2,500–3,500, so a grant up to \$3,500 would provide needed accommodations for a disabled tenant without an added out-of-pocket expense for the landlord.

In 2021, the Corporation for Supportive Housing described Vermont in this way, “Statewide, systems are stressed beyond capacity, hundreds, if not thousands of social service positions are vacant, emergency efforts are strained, and homeless encampments are forming and growing in a number of communities. The service needs of those individuals, families, and communities are only growing in acuity and complexity.”⁶

Proposed Action: As recommended by the Vermont Council on Housing and Homelessness, expand the Vermont Department of Mental Health Housing First program and increase recovery housing and residential therapeutic group homes. ⁶ Through the Housing First Program (as of July 2023), 870 Vermonters ended the cycle of homelessness with an 87% housing retention rate at an average cost of \$53 per night.⁷

Historically, Communities of Color have had significant barriers to homeownership opportunities that would build generational wealth. This is reflected in the vast disparity in homeownership rates among different racial groups in Vermont. For example, white households had a homeownership rate of 74%, while Black Vermonters had the lowest homeownership of any racial group at just 29%.

Proposed Action: Continue funding the First-Generation Homebuyer Program at its existing funding level of \$1 million per year. This program has assisted BIPOC Vermonters with first-time home purchases at a disproportionate rate. Although Communities of Color only make up 13 % of Vermont’s population, they comprise 20% of the households supported by this program.

⁶ Corporation for Supportive Housing, December 2021. [Strengthening the Housing and Services System: Recommendations and Strategies for Vermont.](#)

⁷ <https://www.pathwaysvermont.org/programs/housing-first/>

Vermont does not have recent or accurate data related to the number of rental and housing advertisements that include discriminatory language. More monitoring of rental and housing advertisements is needed to both assess the extent to which these advertisements include discriminatory language and to address these issues with the property owners and publishers of these materials.

Proposed Action: Provide ongoing funding to Vermont Legal Aid and the Vermont Human Rights commission to enhance their efforts to identify and address housing advertisements that include discriminatory language.

Items from 2017 Action Plan Not Completed to be Continued

The State, through DHCD, should develop a Fair Housing Training Guide for permitting officials and affordable housing developers to ensure everyone involved in the development of affordable housing is aware of their legal rights and obligations under the federal and state Fair Housing Acts.

Introduction

Fair Housing Analysis

The State of Vermont has prepared the 2024 Fair Housing Analysis (FHA) to further the goal of fair housing and satisfy requirements of the [Housing and Community Development Act of 1974](#) as amended. This act requires any community receiving Community Development Block Grant (CDBG) funds to affirmatively further fair housing. The responsibility of compliance with the Federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government that receive federal funds through the State. To carry out its responsibility to affirmatively further fair housing, once every five years, the State analyzes the impediments to fair housing in Vermont and develops an action plan to address those impediments. This FHA covers all of Vermont except the City of Burlington, which receives its own allocation of CDBG funds from the U.S. Department of Housing and Urban Development (HUD). However, the city of Burlington is included in the discussion of statewide issues and trends where appropriate (i.e., areas of concentration, dissimilarity indices, etc.). Therefore, references to Vermont throughout this document that exclude Burlington will be noted, otherwise, Burlington is presumed to be included in the analysis.

Communities receiving CDBG funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all people;
- Provide opportunities for all people to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin;
- Promote housing that is accessible to and usable by people with disabilities; and
- Comply with the non-discrimination requirements of the Fair Housing Act.

The Housing and Community Development Act requirements can be achieved, in part, by preparing a comprehensive FHA. This FHA reviews local jurisdiction's laws, regulations, administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing; and assesses public and private conditions that affect fair housing choice.

Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment, and other goals. If equal opportunity is to become a reality, fair housing is a goal that government, public officials, and private citizens must embrace. Under federal law, fair housing choice is defined as the ability of people of similar income levels to have the same housing choices, regardless of race, color, religion, sex, disability, familial status, or national origin. People protected from discrimination by fair housing laws are referred to as members of the protected classes.

The 2024 Vermont FHA includes the five following topics related to fair housing choice:

- The sale or rental of dwellings (public and private);
- The availability of financing assistance for dwellings;

- Public policies, actions, and building requirements affecting the approval and construction of publicly assisted housing;
- Administrative policies related to community development and housing activities, which affect minority household's opportunities to select housing inside or outside impacted areas; and
- Any determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) relative to assisted housing in a recipient's jurisdiction, an analysis of the actions which the recipient could take to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 57 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As a recipient of federal funds (i.e., CDBG), the State of Vermont has specific Fair Housing Analysis responsibilities, including:

- Investigating Fair Housing in the state and developing a Fair Housing Analysis;
- Developing an action plan to overcome the effects of impediments to fair housing; and
- Maintaining records to support the State's initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination and working toward its elimination;
- Promoting fair housing choice for all people;
- Providing racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to and usable by all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This FHA will:

- Evaluate population, household, income, and housing characteristics by protected classes across the state;
- Evaluate public and private sector policies that impact fair housing choice;
- Identify blatant or de facto impediments to fair housing choice, where any may exist; and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict or have the effect of limiting the availability of housing choices based on race, color, religion, sex, disability, familial status, or national origin.

This Fair Housing Analysis serves as the basis for fair housing planning. It provides essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates and assists in building public support for fair housing efforts. The State of Vermont reviewed and approved the FHA and will use the findings as a resource and guide to support future Fair Housing Analysis. The FHA will also serve as a "point-in-time" baseline against which future progress in implementing fair housing initiatives will be judged and recorded.

Fair Housing Lawsuits

In recent years, some critical lawsuits have had legal implications for the work of DHCD, the allocation of federal housing funds, and the development of affordable housing. The precedents in these cases will guide the evaluation of activities required to affirmatively further fair housing.

Westchester County V. The Anti-Discrimination Center of Metro New York, Inc.

The lawsuit brought against Westchester County, NY by the County by the Anti-Discrimination Center of Metro New York, Inc. ("Center" hereafter) has important implications for all State CDBG recipients, including Vermont. The \$180 million lawsuit charged that Westchester County failed to fulfill its obligation to affirmatively further fair housing and ensure non-discrimination in its programs.

Westchester County is an Urban County under HUD's CDBG and HOME Programs. As a condition of federal funding, all such communities receiving federal funds from HUD must certify to HUD each year that they will conduct their programs in a non-discriminatory manner that affirmatively furthers fair housing under the Civil Rights Act of 1964 and the federal Fair Housing Act. In making this certification, Westchester County was required to identify impediments to fair housing choice, take action to overcome those impediments and maintain records of its analysis and activities.

In the lawsuit, the Center charged that:

- Westchester County was a racially segregated county;
- Westchester County's Analysis of Impediments to Fair Housing Choice (AI) was flawed because it considered housing needs based solely on income and failed to fully consider racial segregation and housing needs based on race;
 - Westchester County failed to inform municipalities receiving CDBG funds of their own obligation to consider the housing needs of people living outside the communities, not just the needs of residents living within their municipal limits;
 - Westchester County failed to require municipalities receiving CDBG funds to increase the availability of affordable housing or otherwise affirmatively further fair housing; and
 - As a result of the above, Westchester County made a false claim when it certified to HUD that the County would affirmatively further fair housing.

The County had spent over \$50 million in federal and state funds to aid the construction of 1,370 affordable rental units and another 334 affordable owner units. The critical issue, in this case, was not whether Westchester County created affordable housing, but the geographic location of the housing units built within the county.

The primary allegation in this lawsuit was that the County assisted in the development of affordable housing units in lower-income communities, and, as a result, it increased the pattern of racial segregation. This lawsuit has important implications for the use of CDBG funds throughout the country.

The primary allegation of this lawsuit was the County's AI did not analyze how its placement of affordable housing affected segregation and racial diversity. It concluded that the County assisted in the development of affordable housing units in lower-income communities and, as a result, it increased the pattern of racial segregation. Furthermore, the suit charged that the County violated its cooperation agreements with local units of government, which prohibits expenditures of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

Faced with the threat of losing the \$180 million lawsuit and being cut off from another \$30 million in HUD funding, Westchester County agreed to a settlement with HUD and the Anti-Discrimination Center of Metro New York. The County paid \$21.6 million to HUD in nonfederal funds. These funds were used to build new affordable housing units in specified census tracts with populations of less than 3% Black and 7% Hispanic residents. Additionally, \$11 million was paid to HUD, the Center, and its counsel. The County also added \$30 million to its capital budget to build affordable housing in non-impacted (i.e., primarily White) areas.

This legal settlement has significance for urban counties and states throughout the U.S. that receive federal funds from HUD. This lawsuit clarified that the requirement to affirmatively further fair housing applies to all aspects of county and state government, not just HUD programs. Additionally, the case confirms that urban counties and states must ensure that each local unit of government within its boundary affirmatively furthers fair housing. Meaning when an urban county or state pledges to affirmatively further fair housing, it is making the promise not just in its own right, but also on behalf of each local unit of government within its jurisdiction. This does not necessarily mean that each municipality must finance and develop affordable housing. It does mean that no municipality may impede or obstruct the creation of such housing by other entities. Furthermore, an urban county or state should not provide CDBG and HOME funds to municipalities that impede fair housing, as such actions undermine the urban county's or state's own obligation to affirmatively further fair housing. An urban county or state must take action to eliminate barriers to fair housing wherever they may exist within its jurisdiction.

Inclusive Communities Project v. Texas Department of Housing and Community Affairs

In the *Inclusive Communities Project, Inc. v. Texas Department of Housing and Community Affairs* (N.D. Tex. 2010) lawsuit, a local affordable housing advocate challenged the Texas Qualified Allocation Plan (QAP). The lawsuit alleged that the Texas Department of Housing and Community Affairs, the housing finance agency for the State, disproportionately approved tax credits for low-income housing in minority neighborhoods while denying applications in predominantly White areas. Similar to the Westchester County lawsuit, housing advocates alleged that the Texas Department of Housing and Community Affairs' policy in awarding credit perpetuated racial segregation in violation of the Fair Housing Act. The Texas Department of Housing and Community Affairs argued that it prioritized tax credit applications for projects located in Qualified Census Tracts (QCT) in accordance with Section 42 of the Internal Revenue Code (IRC) and that, as such, it was unavoidable that tax credit projects would be in concentrated minority neighborhoods rather than White neighborhoods.

The case was decided in the [Supreme Court of the United States in 2015](#), with a 5–4 majority finding in favor of the Inclusive Communities Project. This means that the Texas Department of Housing and

Community Affairs violated the Federal Fair Housing Act, given the consequences of their actions led to discrimination by disparate impact. This finding has important implications for the review of [Vermont's QAP](#), which is the responsibility of the Vermont Housing Finance Agency.

Federal Fair Housing Act

The [Fair Housing Act](#) protects individuals from housing discrimination when renting or buying a home, seeking financial assistance, getting a mortgage, or engaging in other housing-related activities. This act applies to direct providers of housing, including landlords, real estate companies, municipalities, banks, and other lending institutions.

What types of housing are covered by the Federal Fair Housing Act?

According to the HUD, the Federal Fair Housing Act covers most types of housing. However, in very limited circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family houses sold or rented by the owner without the use of an agent, and housing operated by religious organizations and private clubs that limit occupancy to members.

Who is protected under the Federal Fair Housing Act?

The protections under the Federal Fair Housing Act apply to discriminatory practices based on any of the following protected classes:

- Race or color;
- Religion;
- Sex (including gender identity and sexual orientation);
- National origin;
- Familial status; or
- Disability.

What does the Federal Fair Housing Act prohibit?

The Federal Fair Housing Act prohibits anyone from taking any of the following actions based on race, color, religion, sex, disability, familial status, or national origin:

Sale or Rental Discrimination

- Refusing to sell or rent;
- Refusing to negotiate for housing;
- Setting different terms, conditions, or privileges for the sale of rental of housing;
- Providing different housing services or facilities;
- Falsely denying that housing is available for inspection, sale, or rental;
- Persuading owners to sell or rent (blockbusting) for profit;
- Imposing different sale prices or rental charges; or
- Evicting a tenant.

Mortgage Lending Discrimination

- Refusing to make a mortgage loan;
- Refusing to provide information regarding loans;
- Imposing different terms or conditions for a loan (interest rate, fees, etc.);
- Discriminating in the appraisal of property;
- Refusing to purchase a loan; or
- Setting different terms and conditions for purchasing a loan.

Other Prohibited Activities

- Refusing to provide or offering different terms and conditions of homeowners or renters insurance;
- Harassing a person (including sexual harassment);
- Threatening, coercing, intimidating, or interfering with anyone exercising a fair housing right or assisting others who exercise that right;
- Advertising or making any statement that indicates a limitation or preference based on a person's status in a protected class; or
- Otherwise denying or making housing unavailable, such as in the zoning or permitting processes, based on a person's status in a protected class.

Note. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing otherwise exempt from the Fair Housing Act.

Additional Protections for People with Disabilities

The Federal Fair Housing Act provides additional protections for people with disabilities. This protection applies to individuals with physical or mental disabilities, including hearing, mobility, visual impairments, chronic mental illness, learning disabilities, or drug addiction. The Federal Fair Housing Act requires that if someone has physical or mental impairments that substantially limit one or more major life activities, landlords and housing providers must make reasonable accommodations and allow appropriate modifications to dwellings so that the people with disabilities can use and enjoy their housing. For example, a building with a "no pets" policy must make a reasonable accommodation and allow visually impaired tenants or tenants with mental illness to have guide or emotional support animals.

Housing Opportunities for Families with Children

The Federal Fair Housing Act dictates that unless a building or community qualifies as housing for older people, the housing provider may not discriminate based on familial status; which means that a housing provider may not discriminate against families in which one or more children under the age of 18 live with a parent, legal guardian, or designee of the parent or guardian. These protections also apply to pregnant individuals or anyone securing legal custody of a child under 18.

Housing for older people is exempt from these clauses if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly people under a federal, state, or local government program;
- It is occupied solely by people who are 62 or older; or

- It houses at least one person who is 55 or older in at least 80% of the occupied units and adheres to a policy that demonstrates the intent to house people who are 55 or older, as previously described.

Note. A transition period permits residents living on a property on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

Vermont Fair Housing & Public Accommodations Act

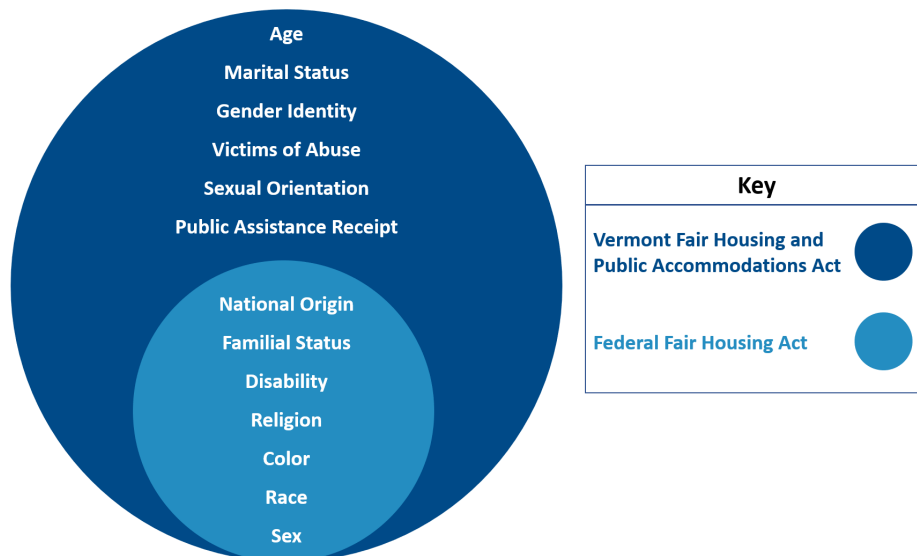
The Vermont Fair Housing and Public Accommodations Act, [9 V.S.A. Chapter 139](#), has been determined by HUD to be substantially equivalent to the Federal Fair Housing Act. The protections under the State’s fair housing law apply to discriminatory practices based on any of the protected classes under the Fair Housing Act, and include six additional protected categories:

- Marital status;
- Age;
- Sexual orientation;
- Gender identity;
- Public assistance receipts; and
- Victims of abuse.

Note. The protections for abuse victims include victims of abuse, sexual assault, or stalking. This protected class is a new addition to the Vermont Fair Housing and Public Accommodations Act as of 2019, under Act 48.

These protections apply to the same or largely equivalent activities as the Federal Fair Housing Act. As a result, people in Vermont have greater protection under the State’s fair housing law than under the federal Fair Housing Act. Figure 1 compares the protected classes under the Vermont Fair Housing and Public Accommodations Act and the Federal Fair Housing Act.

Figure 1. Statutory Comparison of Protected Classes



Responsibility for Housing Discrimination Complaints in Vermont

The Vermont Human Rights Commission (VHRC) is responsible for enforcing the State's Fair Housing and Public Accommodations Act. As a result, HUD refers any complaints of housing discrimination to VHRC. According to the VHRC, its mission is to promote full civil and human rights in Vermont. The Commission protects people from unlawful discrimination in housing, state government employment, and public accommodations. VHRC fulfills its mission by enforcing laws, mediating disputes, educating the public, providing information and referrals, and advancing effective public policies related to human rights.

Processing Housing Discrimination Complaints

Once the VHRC receives a complaint of housing discrimination, they process and investigate the report. If substantial evidence of violation of the Vermont Fair Housing and Public Accommodations Act is found, the VHRC will attempt to resolve the dispute through settlement discussions.

If settlement is not considered or reached, an Investigative Report is completed by the VHRC investigators. After reviewing the Investigative Report, written responses from both parties, and holding a Commission meeting, the VHCR Commissioners make a final determination whether there are reasonable grounds to believe that unlawful discrimination occurred. If the Commissioners make a reasonable grounds determination, the matter becomes public record, and the Commission's executive director and legal counsel attempt to have the parties conciliate their dispute within a period not to exceed six months.

Should conciliation efforts prove unsuccessful, the matter is brought back before the Commissioners, who may direct the Commission's counsel to file suit seeking compensatory and punitive damages, injunctive relief as well as attorney's fees and civil penalties. In accord with federal enforcement procedures, all Commission complaints that are dual filed with HUD (alleging violations of both state and federal fair housing law) will result in suit being filed, should the complainant so desire.

Note. The VHRC does not conduct due process hearings and is without authority to impose remedies that benefit victims of unlawful discrimination.

Comparison of Accessibility Standards

There are several standards of accessibility that impact housing development in Vermont. These standards are listed below, along with a summary of the features within each category or a direct link to the detailed standards.

Federal Fair Housing Act

The accessibility standards in the Federal Fair Housing Act apply to any building first occupied after March 13, 1991, and that have four or more units. The Federal Fair Housing Act dictates that:

- There must be an accessible entrance on an accessible route;
- Public and common areas must be accessible to people with disabilities;
- Doors and hallways must be wide enough for wheelchairs;
- All ground floor units and all units in elevator buildings must have;

- An accessible route into and through the unit;
 - Accessible light switches, electrical outlets, thermostats, and other environmental controls;
 - Reinforced bathroom walls to allow installation of grab bars; and
 - Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and was first ready for occupancy after March 13, 1991, these standards apply to ground-floor units. These requirements for new buildings do not replace more stringent standards state or local laws.

Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) is a civil rights law that helps ensure individuals with disabilities have equal access to places of public accommodation and commercial facilities. The ADA standards are to be applied during the design, construction, and alteration of such buildings. Revised ADA Title II and III Regulations were adopted by the Department of Justice (DOJ) in 2010 and included 2010 ADA Standards for Accessible Design, referred to as the “2010 Standards.” As of March 15, 2012, compliance with the 2010 Standards is required for new construction, alterations, and for places of recreation where guidance did not previously exist. These newly incorporated recreational areas include swimming pools, exercise equipment, golf courses, play areas, saunas, steam rooms, boating, and fishing platforms.

Additional changes incorporated into the 2010 Standards include:

- Revised target ranges rather than absolutes for most required elements;
- Addition of technical requirements based on children’s dimensions;
- A requirement that all direct entrances in multi-level parking garages must be accessible;
- A requirement that single-user toilet rooms must now provide both a parallel and side approach to a water closet;
- More guidance on the location of accessible seating in assembly areas;
- Revised definitions of service animals, wheelchairs, and other power-driven mobility devices;
- Updated guidance for the provision of auxiliary devices and accessible ticketing practices;
- Additional requirements that the location of accessible routes must be in general circulation paths, and if a circulation path is provided between seated areas and a stage, it must be accessible.

A complete description of the guidelines can be found online at ada.gov.

Uniform Federal Accessibility Standards (UFAS)

Uniform Federal Accessibility Standards require that federal and federally funded facilities are accessible to people with physical disabilities. These standards are applied during the design, construction, and alteration of buildings to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at access-board.gov.

Section 504

Section 504 of the Rehabilitation Act of 1973 and 24 Code of Federal Regulations (CFR) Part 8 set minimum accessibility requirements for public housing units. The minimum requirements dictate that:

- At least 5% of all public housing units be accessible to people with mobility impairments; and
- At least 2% must be accessible to people with sensory impairments.*

**This can be a mobile requirement, if the tenant with sensory impairments could stay in a standard unit.*

The outlined requirements are minimum standards; however, a higher percentage of accessible units may be required in circumstances where the Public Housing Authority (PHA) determines there is a greater need. In addition, a PHA’s administrative offices, application offices, and other nonresidential facilities must be accessible. The standards for accessibility for PHAs are either the Uniform Federal Accessibility Standards (UFAS) or other safe harbor accessibility standards.

Vermont’s Visitability Law

At the federal level, the term “visitability” applies to single-family housing and means that the unit is designed in so that it can be lived in or visited by people with disabilities. Housing is visitable when:

- The dwelling has at least one no-step entrance;
- Doors and hallways are wide enough to navigate a wheelchair through; and
- There is a first-floor bathroom that is large enough to accommodate a wheelchair (requires that you can close the door).

Vermont’s Visitability Law, 20 V.S.A. § 2907, took effect in 2001. The law applies to residential construction, including new construction of one-family or multi-family dwellings. The law provides an exemption for the construction of single-family houses built for personal occupancy of the owner and their family. The Visitability Law requires the five following standards to be met in residential construction:

- At least one first floor exterior door that is at least 36 inches wide;
- First floor interior doors must be at least 34 inches wide or open doorways that are at least 32 inches wide with a level, ramped, or beveled threshold;
- Interior hallways must be level and at least 36 inches wide;
- Environmental and utility controls and outlets must be located at heights that comply with standards adopted by the Vermont Access Board; and
- Bathroom walls must be reinforced to permit the attachment of grab bars.

Potential Impediment to Fair Housing Choice: Vermont Visitability Law does not include a requirement for a zero-step entrance and does not contain an enforcement or penalty provision.

Proposed Action: The state should consider updating the Visitability Law to address the issues outlined above.

Universal Design

The laws and regulations outlined above set important minimum standards for accessibility and fair housing practices. The concept of universal design is not a minimum standard, but a goal and guiding principle for environmental design. Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. The seven principles guiding Universal Design are:

- Equitable use (e.g., make the design appealing to all users);
- Flexibility in use (e.g., accommodate right- or left-handed use);
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations);
- Tolerance for error (e.g., provide fail-safe features);
- Low physical effort (e.g., minimize repetitive actions); and
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

Universal design makes housing more accessible to everyone and affirmatively furthers fair housing.

Mobile Home Park Statute

In 2012, the Vermont Legislature adopted changes to the Mobile Home Park Statute to protect residents and preserve mobile home parks as a source of affordable housing (Act 137, 2012). In the same bill, the Legislature enhanced protections for all by forbidding municipalities from discriminating in the permitting of housing based on any of the protected classes in the State's Fair Housing Law. In 2014, the Legislature adopted changes to the State's Land Use Law, Act 250, to facilitate affordable housing development within the State's designated downtowns, new town centers, growth centers, and village centers. Projects up to a specific size, which varies depending on the population of the town in which the project will be located, are exempted from Act 250 altogether if the project contains a specified minimum number and proportion of affordable housing units.

The Relationship Between Fair and Affordable Housing

In Vermont, fair housing choice is defined as the ability of people of similar income levels to have access to the same housing choices, regardless of race, color, religion, sex, disability, familial status, national origin, marital status, sexual orientation, gender identify, age, and receipt of public assistance. This Federal Fair Housing Act analyzes a range of impediments to fair housing issues regardless of a person's income. However, to the extent that members of the protected classes tend to have lower incomes, affordable housing is inextricably related to fair housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing.

Often, the implementation of public policies creates or contributes to the lack of affordable housing in communities, the effects of which disproportionately affect housing choices for members of protected classes. Therefore, this Federal Fair Housing Act will detail the challenges that affect affordable housing development in the state. However, this document goes well beyond an analysis of the adequacy of

affordable housing in the State of Vermont and highlights the many types of barriers that affect fair housing choice.

Methodology

Information Sources Utilized

The DHCD utilized a comprehensive approach to prepare the 2024 FHA update. The questionnaires methodology details are outlined below. The following information sources were also utilized:

- Public policies, laws, rules, and regulations affecting the siting and development of housing;
- The 2012 and 2017 [Vermont Analysis of Impediments to Fair Housing Choice](#);
- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract, county, and state levels;
 - U.S. Census Data, U.S. Census Bureau’s National Historical Geographic Information System, American Community Survey, Department of Housing and Urban Development (HUD) Open Geodata portal;
- Consolidated Plans, Annual Plans, and CAPERs from the State of Vermont;
- [Vermont Legal Aid’s 2014 Rental Discrimination Report](#);
- Articles from Seven Days “Locked Out” series and other relevant news stories;
- Vermont Coalition to End Homelessness’s Point-in-Time Counts;
- Public Housing Authorities (PHAs) Admission and Continued Occupancy Plan (ACOPs) and Administrative Plans;
- Vermont Housing & Conservation Board’s [Farmworker Housing Needs Assessment](#);
- Vermont Housing Finance Agency- Federal & State Low Income Housing Tax Credits & [housingdata.org](#);
- Vermont Association of Realtors – Market Data;
- Personal communications with Champlain Housing Trust about their Farm Worker Housing Program (Charlie Glassberg);
- Home Mortgage Disclosure Act Data;
- The Vermont Human Rights Commission fair housing complaint data;
- Vermont Real Estate Commission fair housing complaint data;
- HUD Vermont Field Office fair housing complaint data;
- 2018 Public Transit Long Range Plan; and
- Vermont Banking Division foreclosure filings.

Public Outreach

1. The Outreach Plan that DHCD developed provided a phased approach to gathering information and feedback and included: **Initial Stakeholder Outreach:** DHCD engaged with a wide range of nonprofits, local governments, and industry leaders to better understand issues related to fair housing and inclusion. Among these organizations include Thriving Communities, community health professionals, property management and real estate organizations, Homeownership Centers, and Continuum of Care organizations. [Appendix A](#) includes the comprehensive list of stakeholders that DHCD engaged with while planning and writing the FHA.
2. **In Depth Housing Professional Feedback:** DHCD completed a statewide Fair Housing Survey for nonprofit and housing professionals. The survey was launched at the November 2022 VHFA

Statewide Housing Conference and DHCD staff attended numerous other housing industry meetings and events and ask attendees to complete the survey, resulting in over 95 survey responses.

3. Extensive Public Outreach & Feedback:

- a. Consulted with Vermont Legal Aid and CVOEO to design a statewide Fair Housing Survey for the general public, with a focus on ease of use and straightforward wording.
- b. Met regularly with Continuum of Care organizations for input on reaching out to vulnerable Vermonters.
- c. Partnered with community development and service organizations for the 2023 “Fair Housing Library Tour” where DHCD staff and local nonprofit staff met with residents in libraries in 12 counties. Information on housing assistance, fair housing, and help with completing the fair housing survey was provided.
- d. Over 200 surveys were completed statewide.
- e. [Appendix A](#) provides details on the Fair Housing Tour and partner organizations.

4. Coordinated Outreach to Immigrants & Refugees:

- a. Partnered with the Vermont Landlords Association (VLA) and CVOEO for a comprehensive fair housing education and outreach Initiative that includes CVOEO Ambassadors attending multiple gatherings of refugee and immigrant groups to discuss fair housing and get feedback on the barriers they see in their respective languages.

5. Review & Feedback on Draft FHA Executive Summary & Action Plan

- a. Provided a draft of the “Executive Summary” and “Impediments to Fair Housing, Corrective Action Plan & Performance Measures” to Thriving Communities for their feedback and input. A copy of the complete draft FHA was also made available.

Survey Methodology

DHCD developed two surveys in Microsoft Forms, one for housing professionals and another for the general public. DHCD consulted with a variety of professionals on best practices, including using words and phrases that would more easily translate to other languages.

The surveys were reviewed and tested by additional DHCD members, who checked the functionality of branching questions, the flow, and the content of the survey questions (see [Appendix A. Stakeholder List](#) for a complete list of Fair Housing Committee members and list of DHCD employees who assisted with survey development).

Surveys of Housing Professionals and The General Public

Flyers were handed out at the 2022 Statewide Housing Conference, held by the Vermont Housing Finance Agency, to spread awareness about the survey for housing professionals. The survey was also distributed through Continuum of Care networks, organizations that serve homeless and vulnerable populations, Vermont Association of Realtors, local governments, as well as emails from DHCD.

To encourage a variety of Vermonters to participate in the Fair Housing survey for the general public, Jayme Bauer conducted a library tour where she shared information about the current fair housing efforts in Vermont and encouraged people to take the survey. These events were conducted with members of partner organizations that provide housing support so that participants could also be

connected with local housing resources if interested (see [Appendix A](#) for a list of partner organizations). This library tour included visits to 12 of the 14 counties in Vermont:

- April 6, 2023: Cobleigh Public Library, Lyndonville
- April 18, 2023: Morristown Centennial Library, Morrisville
- April 21, 2023: Bradford Public Library, Bradford
- April 28th, 2023: Brownell Library, Essex Junction
- May 4, 2023: Rutland Free Library, Rutland
- May 5, 2023: Bennington Free Library, Bennington
- May 8, 2023: Goodrich Memorial Library, Newport
- May 12, 2023: Rockingham Free Public Library, Bellows Falls
- May 15, 2023: Springfield Town Library, Springfield
- May 22, 2023: Ilsley Public Library, Middlebury
- June 8, 2023: Saint Albans Free Library, St. Albans
- June 20, 2023: Barre Farmers Market, Barre

Public Housing Authority Survey

DHCD reached out to the 10 Public Housing Authorities (PHA) throughout Vermont to collect data on their public housing units, section 8 vouchers, and administrative policy plans. Representatives from DHCD reached out to each of the PHA via email and email requesting that they complete a short survey and share their administrative and occupancy plans. A copy of the survey shared with the PHA is available in [Appendix D. Public Housing Authority Survey.](#)

Feedback from Vermonters with Limited English Proficiency (LEP)

In early 2024, DHCD partnered with CVOEO's Housing Advocacy Program to conduct an educational focus group with Vermonters with Limited English Proficiency (LEP). These focus groups were conducted as informal discussions with guiding questions for groups of 4 to 11 people, with interpretation. Each focus group participant received a \$25–\$50 stipend, depending on the time commitment.

Focus Groups Conducted:

- **Maay Maay:** 4 people, plus an interpreter, in person
- **Dari:** 3 people in person, 1 person and the interpreter via Zoom
- **Nepali:** 4 people, plus the interpreter, via Zoom
- **Mixed languages:** 11 CVOEO Community Ambassadors representing the following language communities - Arabic, Chinese, French, Lingala, Nepali, Somali, Spanish, Swahili

The findings of these informal focus groups show that LEP Vermonters have a wide range of experiences. For example, when asked if they or members of their community felt that it was easy, safe, and effective to file a complaint about discrimination or housing conditions, some groups unanimously said yes, others unanimously said no, and others had mixed responses. All groups commented about the lack of affordability and units being too small for their families; these issues have been highlighted elsewhere throughout this document. Although these issues need to be addressed at a systemic level,

more hands-on housing search assistance for LEP was identified as an important resource that would help these communities find suitable housing in an increasingly tight housing market.

Development of the Fair Housing Analysis (FHA)

The development of the 2024 FHA was a comprehensive project that included many stakeholders who provided essential insights, comments, and edits. The organizations included in the development of this FHA are detailed in the following sections and listed in [Appendix A](#).

Lead Agency

The Department of Housing and Community Development (DHCD) prepares and implements the Fair Housing Analysis (FHA). Through grant programs and fair housing initiatives, DHCD works with an extensive network of nonprofit organizations, public agencies, and private entities. These community stakeholders were invited to participate in developing the 2024 FHA. Stakeholders helped identify barriers to fair housing choice and develop practical recommendations to eliminate impediments. Employees from DHCD and the Agency of Commerce and Community Development (ACCD) developed the 2024 FHA with input from these community stakeholders. The following individuals from these agencies were responsible for developing this document:

- Naomi Cunningham, Housing Program Administrator, DHCD
- Jayme Bauer, Community Development Specialist II, DHCD
- Shaun Gilpin, Housing Division Director, DHCD
- Maxwell Krieger, General Counsel, DHCD

Agency Consultation

The Outreach Plan that DHCD developed provided a phased approach to gathering information and feedback and included:

- 1. Initial Stakeholder Outreach:** DHCD engaged with various of nonprofits, local governments, and industry leaders to better understand issues related to fair housing and inclusion. These organizations include Thriving Communities, community health professionals, property management and real estate organizations, Homeownership Centers, and Continuum of Care organizations. [Appendix A](#) includes the comprehensive list of stakeholders DHCD engaged with while planning and writing the FHA.
- 2. In-depth Housing Professional Feedback:** DHCD completed a statewide fair housing survey for nonprofit and housing professionals. The survey was launched at the November 2022 VHFA Statewide Housing Conference, and DHCD staff attended numerous other housing industry meetings and events, resulting in over 95 survey responses.
- 3. Extensive Public Outreach and Feedback:** DHCD consulted with Vermont Legal Aid and CVOEO to design a statewide fair housing survey for the general public, focusing on ease of use and straightforward wording.
 - a. Met regularly with Continuum of Care organizations for input on reaching out to vulnerable Vermonters.

- b. Partnered with community development and service organizations for the 2023 “Fair Housing Library Tour,” where DHCD staff and local nonprofit staff met with residents in libraries in 12 counties. Information on housing assistance, fair housing, and help with completing the fair housing survey was provided.
 - c. Over 200 surveys were completed statewide.
 - d. [Appendix A](#) provides details on the Fair Housing Tour and partner organizations.
- 4. Coordinated Outreach to Immigrants and Refugees**
- a. Partnered with the Vermont Landlords Association (VLA) and CVOEO for a comprehensive fair housing education and outreach Initiative that includes CVOEO Ambassadors attending multiple gatherings of refugee and immigrant groups to discuss fair housing and get feedback on the barriers they see in their respective languages.
- 5. Review and Feedback on Draft FHA Executive Summary and Action Plan**
- a. Provided a draft of the “Executive Summary” and “Impediments to Fair Housing, Corrective Action Plan and Performance Measures” to Thriving Communities for their feedback and input. A copy of the complete draft FHA was also made available.

A comprehensive list of all the agencies and partners that provided insights, comments, and suggestions for this document are included in [Appendix A. Stakeholder List](#).

Review of Draft FHA Document

A draft of the Executive Summary and Action Plan items were provided to the following fair housing professionals for review and comments:

- Rachel Batterson, Project Director, Housing Discrimination Law Project, Vermont Legal Aid
- Cassandra Burdyshaw, Staff Attorney and Investigator, State of Vermont Human Rights Commission
- Jessica Hyman, Fair Housing Project, Associate Director, Housing Advocacy Programs, Champlain Valley Office of Economic Opportunity
- Sean Thomas, State Director, HUD Burlington Field Office, Burlington VT

Demographic Profile

Population Trends

Vermont is a small state located in the New England region of the northeastern United States (U.S). According to the 2020 Census, Vermont is the second smallest state by population in the U.S., second only to Wyoming. It is the only New England state that does not border the Atlantic Ocean. Lake Champlain forms half of Vermont's western border with New York. The state also shares land borders with New Hampshire, Massachusetts, and Canada. The rural state is comprised of 14 counties and has few large cities.

The city of Burlington is the largest in Vermont and receives its own allocation of CDBG funds from HUD. However, the city of Burlington is included in the discussion of statewide issues and trends where appropriate (i.e., areas of concentration, dissimilarity indices, etc.).

Vermont's population has consistently increased over the last four decades. In addition, Vermont is becoming more diverse, as its population growth has been most rapid among non-White and Hispanic residents.

Figure 2. Population Trends, 1970–2020

	Year						Percentage Increase 1970-2020
	1970	1980	1990	2000	2010	2020	
State of Vermont*	405,697	473,744	523,631	569,938	583,324	598,334	47.5%
Addison County	24,266	29,406	32,953	35,974	36,821	37,363	54.0%
Bennington County	29,282	33,345	35,845	36,994	37,125	37,347	27.5%
Caledonia County	22,789	25,808	27,846	29,702	31,227	30,233	32.7%
Chittenden County*	60,498	77,822	92,634	107,682	114,128	123,580	104.3%
City of Burlington	38,633	37,712	39,127	38,889	42,417	44,743	15.8%
Essex County	5,416	6,313	6,405	6,459	6,306	5,920	9.3%
Franklin County	31,282	34,788	39,980	45,417	47,746	49,946	59.7%
Grand Isle County	3,574	4,613	5,318	6,901	6,970	7,293	104.1%
Lamoille County	13,309	16,767	19,735	23,233	24,475	25,945	94.9%
Orange County	17,676	22,739	26,149	28,226	28,936	29,277	65.6%
Orleans County	20,153	23,440	24,053	26,277	27,231	27,393	35.9%
Rutland County	52,637	58,347	62,142	63,400	61,642	60,572	15.1%
Washington County	47,659	52,393	54,928	58,039	59,534	59,807	25.5%
Windham County	33,074	36,933	41,588	44,216	44,513	45,905	38.8%
Windsor County	44,082	51,030	54,055	57,418	56,670	57,753	31.0%
Total	444,330	511,456	562,758	608,827	625,741	643,077	44.7%

Source: U.S. Census Bureau, National Historical Geographic Information System.

*Exclusive of the City of Burlington. The City is its own entitlement community and receives its own allocation of federal funds from HUD.

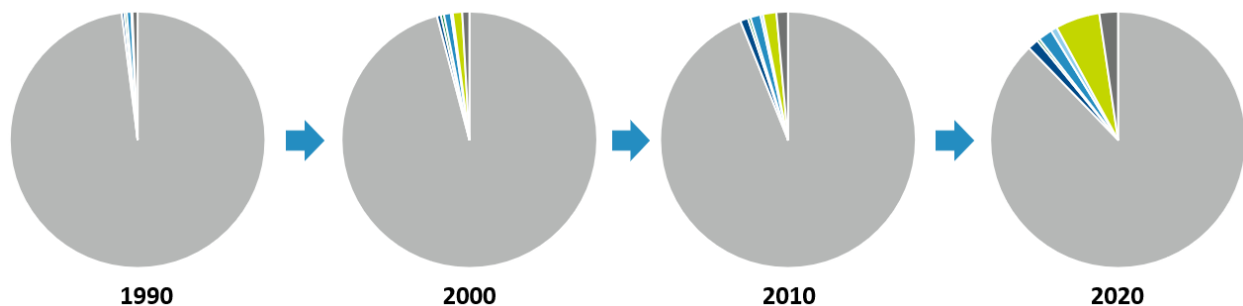
Vermont, excluding Burlington, has experienced significant population growth over the past fifty years, increasing from 405,697 people in 1970 to 598,334 in 2020, a 47.5% increase. This growth has primarily

been concentrated in the most populous county in Vermont, Chittenden County (exclusive of the City of Burlington). Chittenden County’s population more than doubled from 1970 to 2020. In 2020, over 20% of state residents lived in areas outside of Burlington in Chittenden County, and when considered as a whole, 28.1% of Vermont residents live in Chittenden County. Conversely, the state’s least populous county, Essex County, had the least growth from 1970 to 2020. Essex County is a predominantly rural area situated in the state’s Northeast Kingdom. It is home to just under 6,000 Vermont residents and has only grown by 9.3% in the last fifty years.

Vermont, excluding the city of Burlington, has experienced significant population growth over the past fifty years, increasing 47.5% from 1970 to 2020.

Population growth through Vermont has been the most rapid among Communities of Color. Between 1990 to 2020, Communities of Color have sextupled (increased by a factor of 6) from 2.0% to 12.6% of the state’s total population.

Figure 3. Race & Ethnicity Trends from 1990 to 2020



	1990 - Percent of Population	2000 - Percent of Population	2010 - Percent of Population	2020 - Percent of Population	Change 1990-2020
White	98.6%	96.8%	95.3%	89.8%	4.1%
Black	0.3%	0.5%	1.0%	1.4%	363.0%
Native American* or Alaskan Native	0.3%	0.4%	0.4%	0.4%	35.0%
Asian or Pacific Islander	0.6%	0.9%	1.3%	1.8%	264.9%
Another Race	0.1%	0.2%	0.3%	0.8%	549.4%
Two or More Races	0.0%	1.2%	1.7%	5.8%	404.8%
Hispanic	0.7%	0.9%	1.5%	2.4%	323.5%
Communities of Color	2.0%	4.1%	6.2%	12.6%	613.4%

Source: U.S. Census Bureau, National Historical Geographic Information System.

Note: Complete dataset used to calculate Figure 3 is included in Appendix E. Raw Data.

*Officially called American Indians by U.S. Census Data.

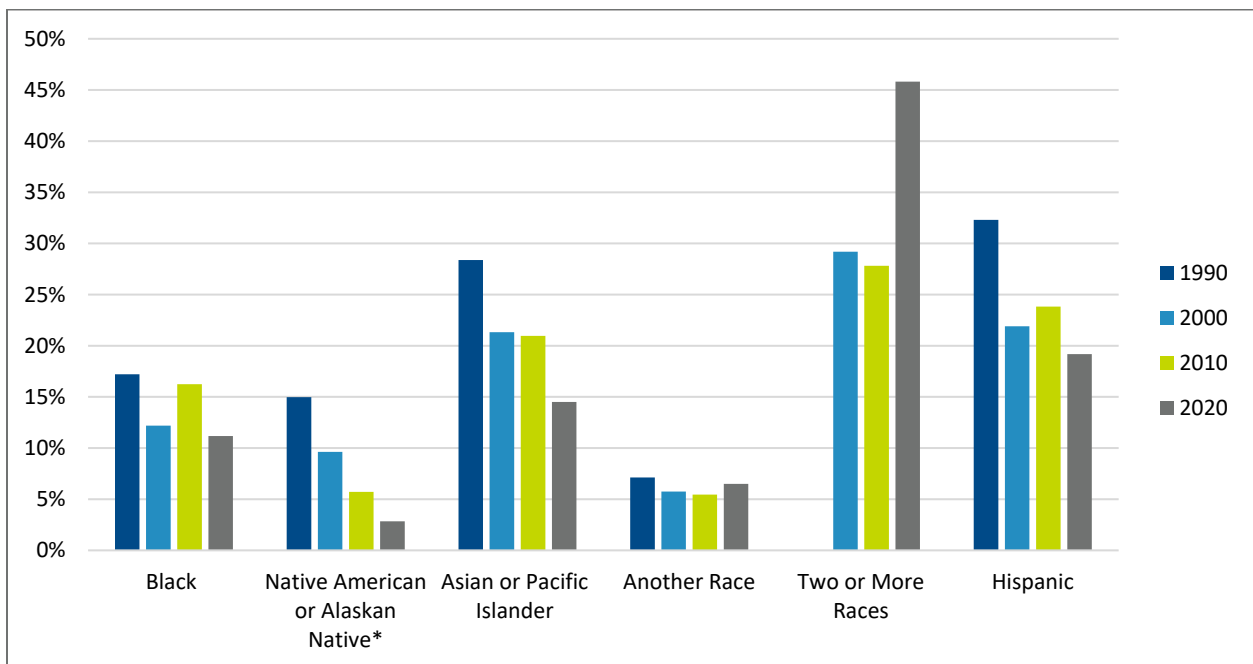
Vermont is the second whitest state in the nation, with 89.8% of residents identifying as White. However, this is also the slowest growing racial group in the state. From 1990 to 2000, the White

population only increased by 4.1%. Communities of Color, on the other hand, while still a relatively small proportion of the overall population, have grown by up to 613% during this same period. While this increase in diversity has been constant since 1990, the growth in these communities has accelerated in the last ten years. According to U.S. Census data, the proportional increase in Communities of Color was constant at 2.1% from 1990 to 2010. However, from 2010 to 2020, Communities of Color grew by 6.4%.

In the past ten years, Communities of Color have more than doubled, increasing from 6.2% of the overall population in 2010 to 12.6% in 2020.

People of two or more races are the second-largest racial group in Vermont, comprising 5.8% of the overall population. This is also the fastest-growing racial group. From 2010 to 2020, the number of people who identified as two or more races had increased by 344%, increasing from 10,753 individuals to around 37,026.

Figure 4. Racial Characteristics of Communities of Color, 1990–2020



Source: U.S. Census Bureau, National Historical Geographic Information System.

*Officially called American Indians by U.S. Census Data.

In 2020, people of two or more races comprised 45.8% of Vermont's Communities of Color. Vermont's total Hispanic population has also grown rapidly, from 0.7% of the state's population in 1990 to 2.4% in 2020. This represents a population increase of 323.5%.

Quality of U.S. Census Race & Ethnicity Data

While U.S. Census Data is the most accurate and complete dataset available to understand racial trends over time, it is not without its flaws. The 2020 census has several complicating factors, including the coronavirus pandemic and extreme weather events. Quality checks of the 2020 census data show that there was a record undercount of Hispanics, and overcounting of the Asians, whites, and people older than 50.⁸

Areas of Racial & Ethnic Minority Concentration

The State of Vermont did not define any areas of minority concentration in its 2020–2024 Consolidated Plan (CP). However, HUD requires that the State define and identify these areas. According to 24 CFR 91.210(a), local governments are required to describe areas within their jurisdiction with concentrations of racial and ethnic minorities. In addition, 24 CFR 91.210(a) dictates that the locations and degree of any concentrated areas must be identified, either in a narrative or on maps.

The FHA assists the State in understanding and directing the geographic distribution of federal funds. Defining an adequate proportion of areas of minority concentration will allow the State to gain an understanding of where the best opportunities exist to affirmatively further fair housing. Therefore, DHCD staff defined an area of racial or ethnic minority concentration as a census tract with more than double the statewide proportion of each minority group to be consistent with previous Vermont AIs and ensure an adequate proportion of areas were identified. This definition more accurately illustrates areas in Vermont where a higher number of minorities reside and thus does not dilute this statistic. Conversely, if the definition of 10% more than the statewide proportion, which is commonly used in other states, was used to define areas of concentration, this would not reflect the settlement patterns of minorities and would not accurately highlight the areas in which these populations are concentrated.

Figure 5. Defining Thresholds for Areas of Minority Concentration

Race or Ethnicity	Percent of Overall Population	Threshold for Area of Minority Concentration
Black	1.4%	2.8% or more of zip code
Asian or Pacific Islander	1.8%	3.6% or more of zip code
Native American* or Alaskan Native	0.4%	0.8% or more of zip code
Hispanic	2.4%	4.8% or more of zip code

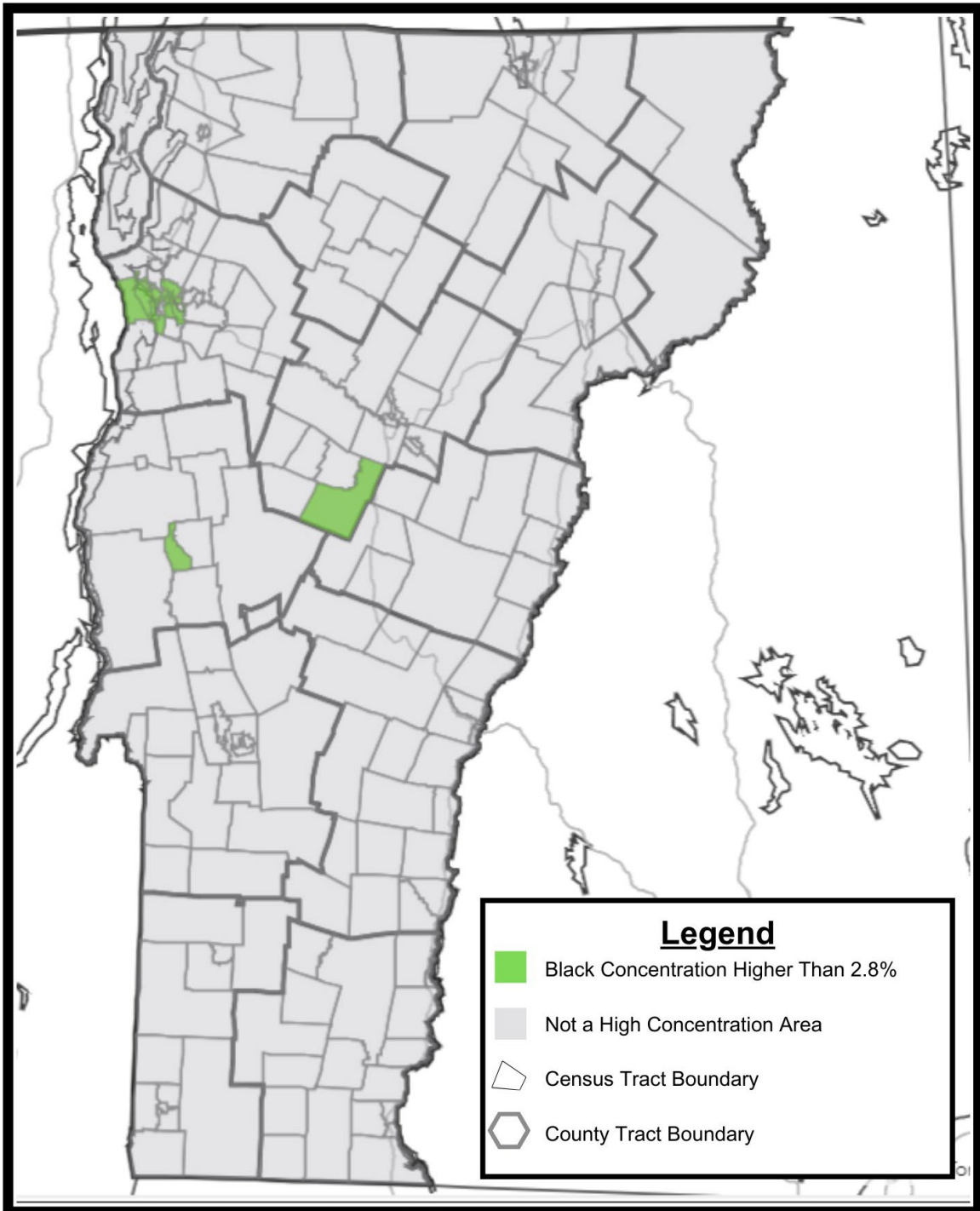
Source: U.S. Census Bureau, National Historical Geographic Information System.

*Officially called American Indians by U.S. Census Data.

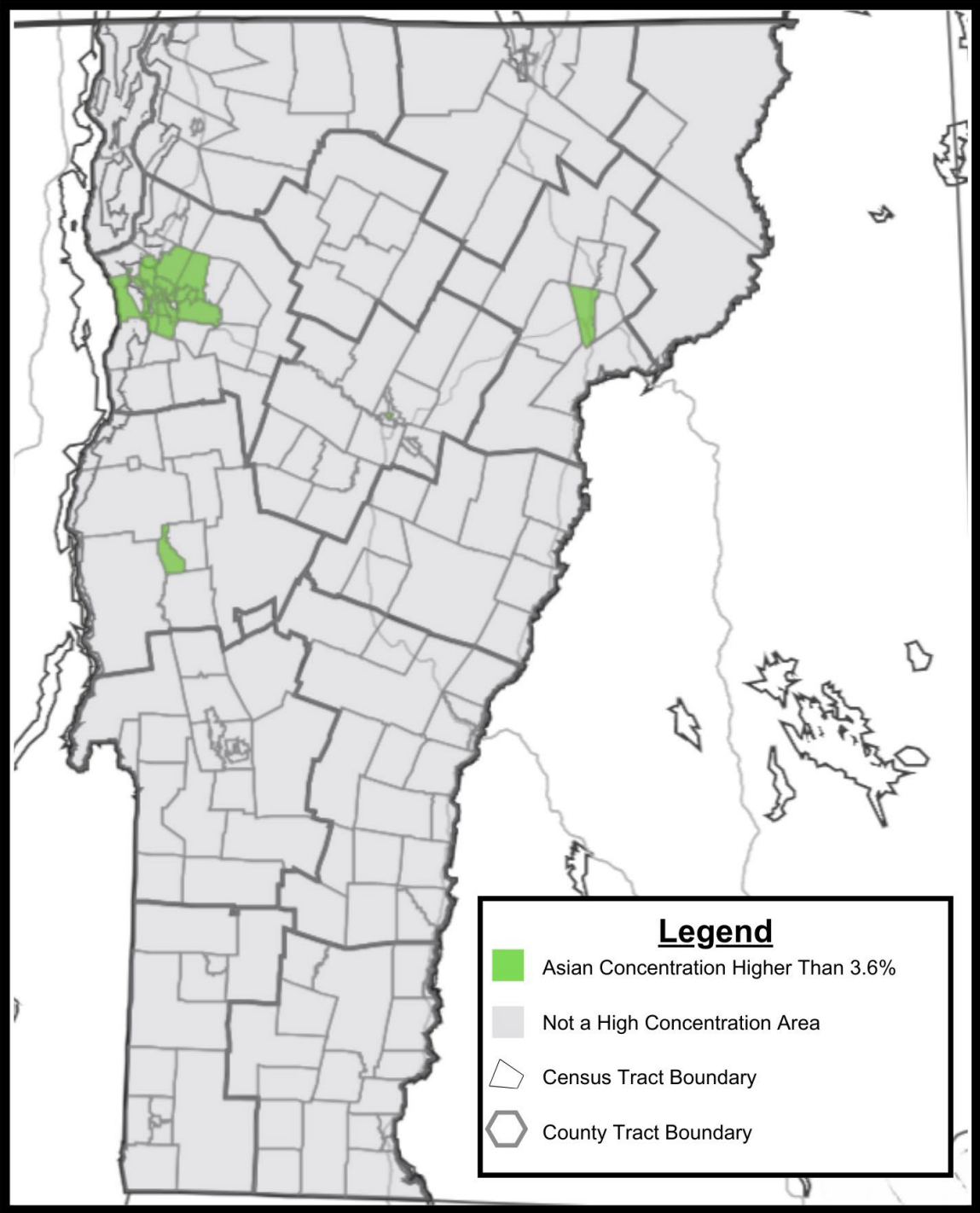
In determining areas of racial and ethnic concentration, statewide population data was more appropriate than using data exclusive of the City of Burlington, which would exclude this high-minority community. In addition, since total Statewide figures capture the complete dispersion of subpopulations, their use ensures that the areas of concentration identified across Vermont meet a threshold reflective of overall segregation patterns.

⁸ Pew Research Center, 2022. “Key facts about the quality of the 2020 census.” <https://www.pewresearch.org/short-reads/2022/06/08/key-facts-about-the-quality-of-the-2020-census/>

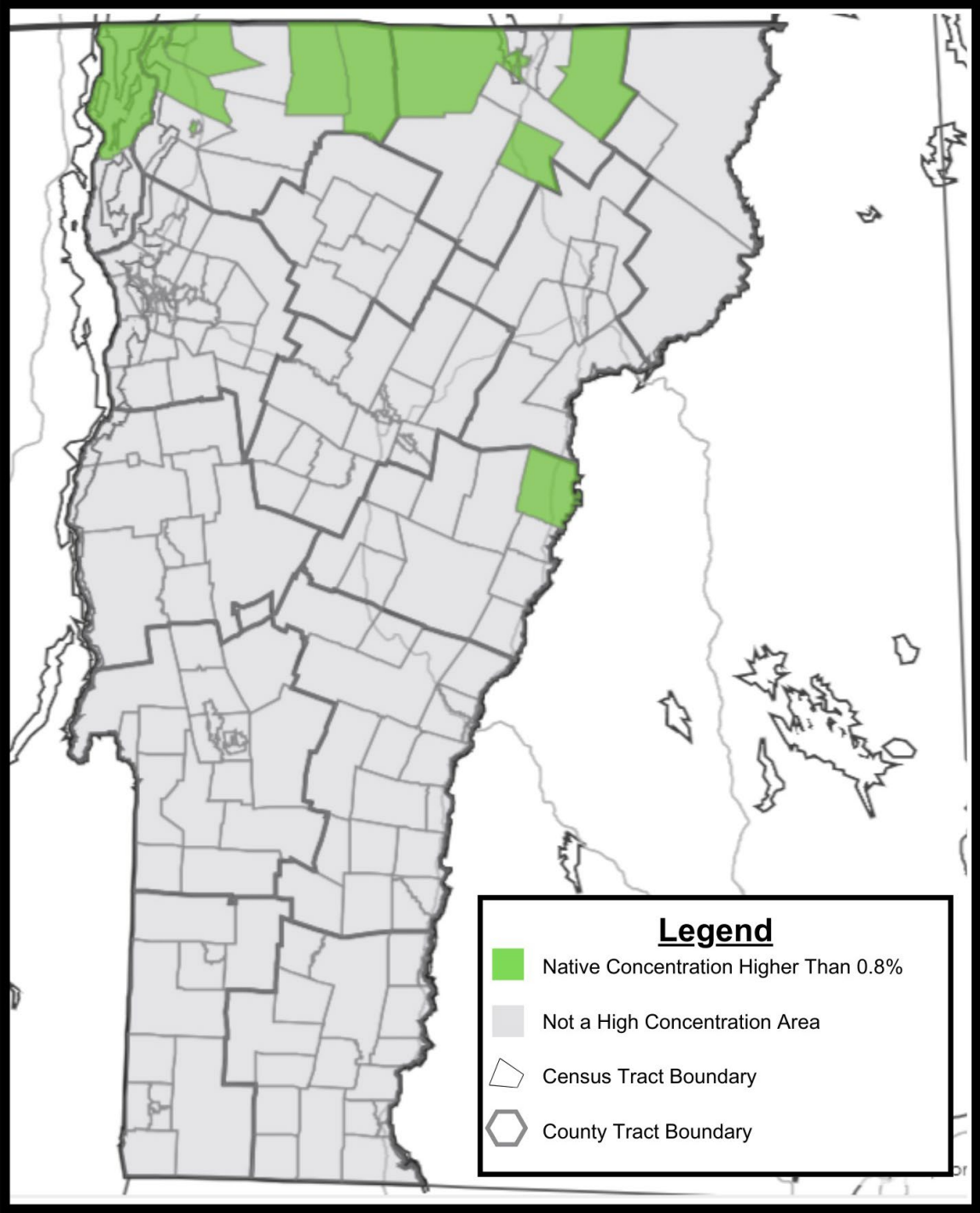
Map 1. Areas of Minority Concentration, Black Residents, 2020



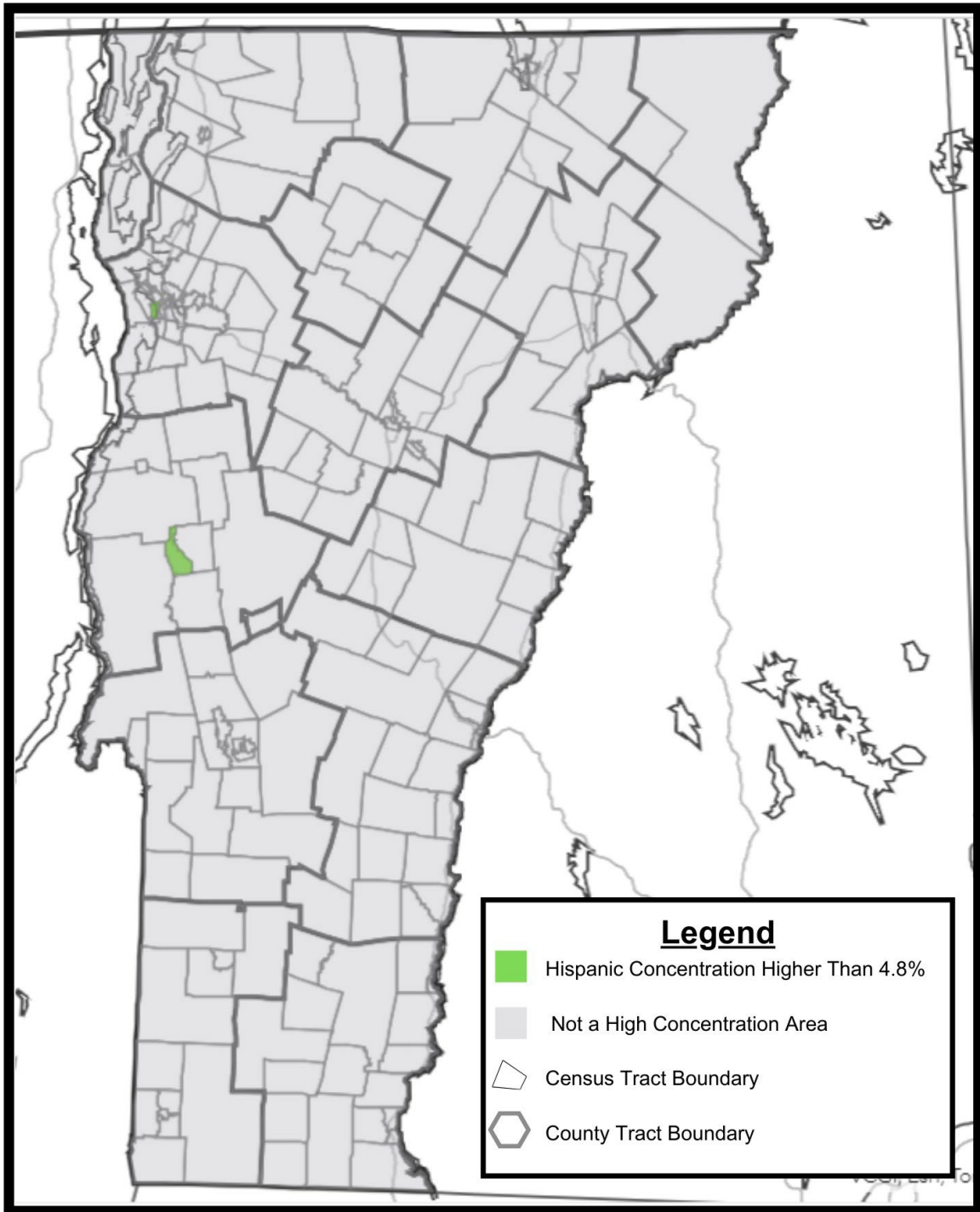
Map 2. Areas of Minority Concentration, Asian and Pacific Islanders Residents, 2020



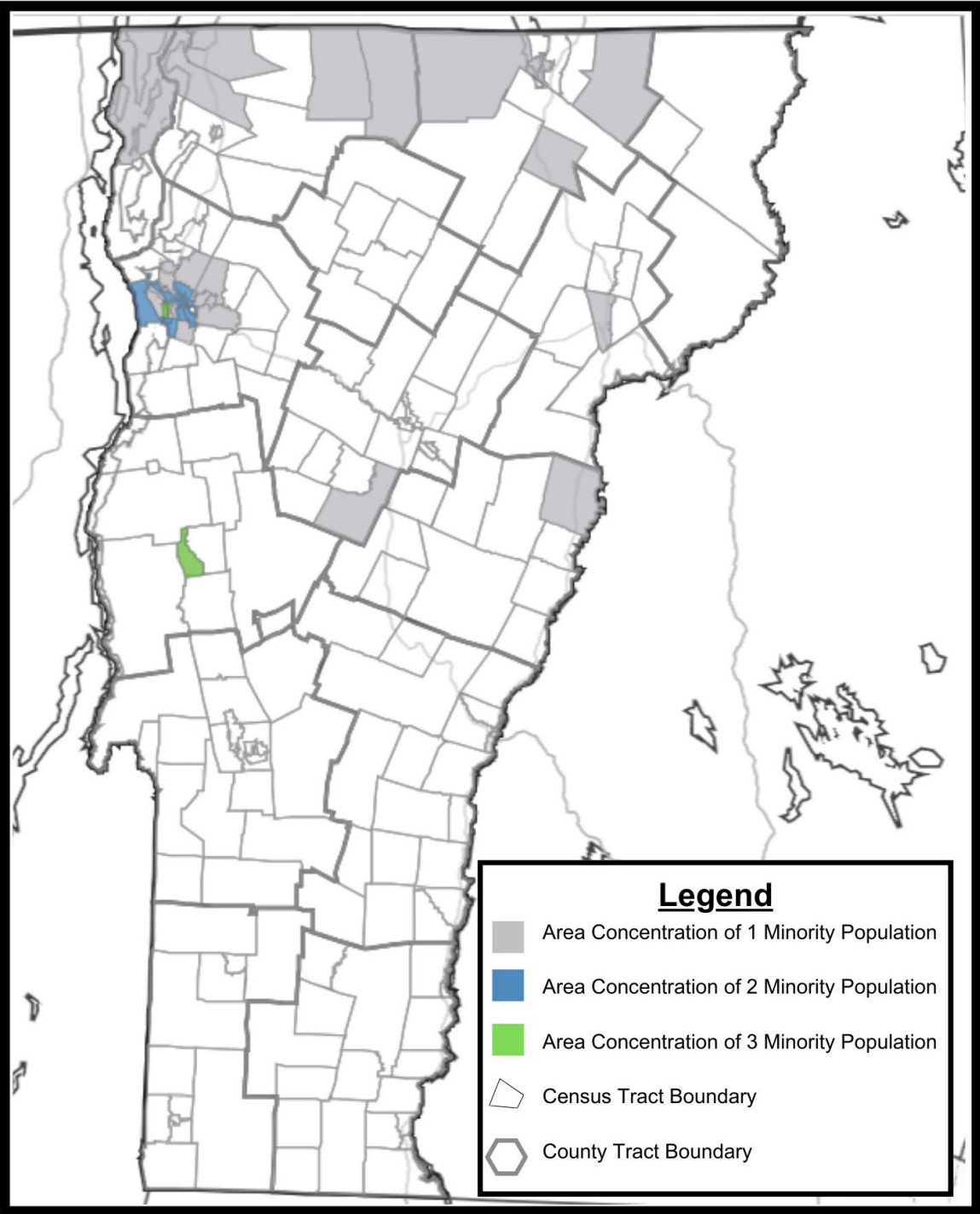
Map 3. Areas of Minority Concentration, Native American Residents, 2020



Map 4. Areas of Concentration, Hispanic Residents, 2020



Map 5. Areas of Minority Concentration Overlap, 2020



Areas of minority and ethnic concentration in the state are illustrated geographically on Maps 1 through 5 on the previous pages and are based on data from the 2020 census. Vermont has 184 census tracts, 11 of which are in the City of Burlington. There are several areas of minority concentration throughout Vermont. Most of the areas are in and around the Burlington, with the exception of Native American populations, which tended to be concentrated along the Canadian border.

Map 5 overlays the previous maps, showing areas of minority and ethnic concentration to demonstrate which areas have concentrations of multiple minority populations. There are 56 unique census tracts with concentrations of minority populations. 25 of those census tracts only have a concentration of one minority population, 22 have concentrations of two minority populations, and 3 have concentrations of 3 minority populations. Two of the census tracks with concentrations of 3 minority populations are in Burlington, and the other is located in Middlebury.

Figure 6. Areas of Minority Concentration in Vermont, 2020

Race or Ethnicity	Areas of Minority Concentration	Maximum Concentration
Black	17	10.1%
Asian or Pacific Islander	24	14.6%
Native American* or Alaskan Native	12	2.5%
Hispanic	3	7.2%

Source: U.S. Census Bureau.

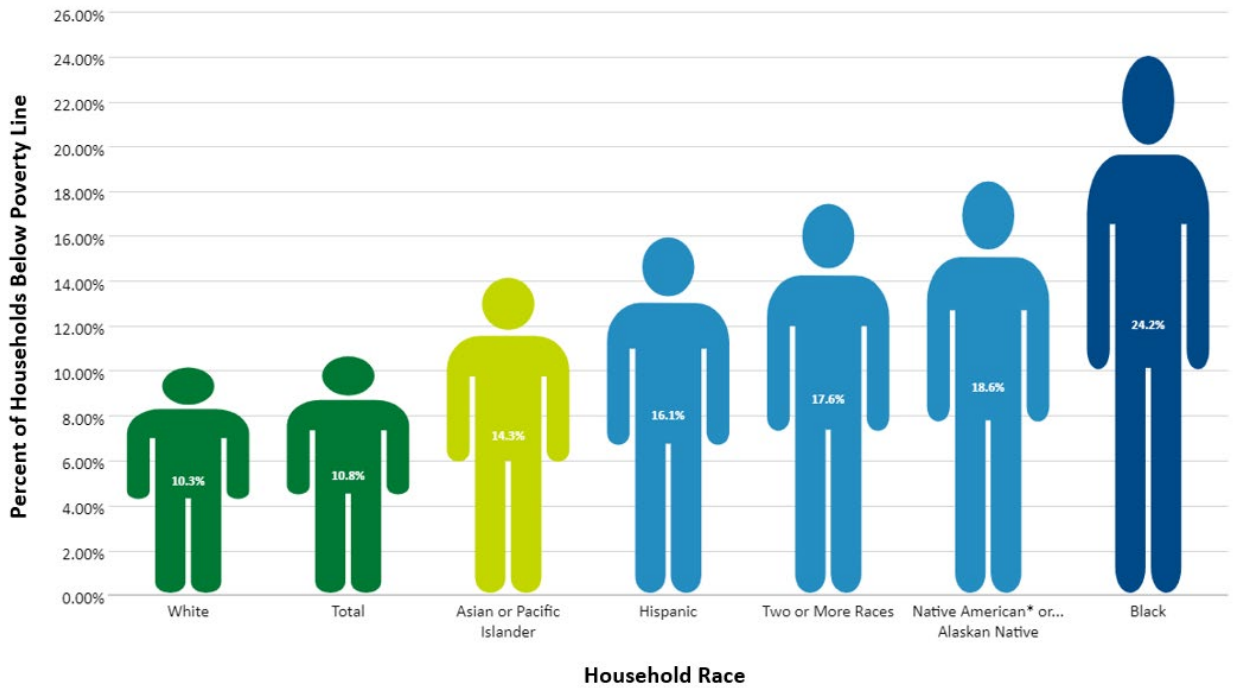
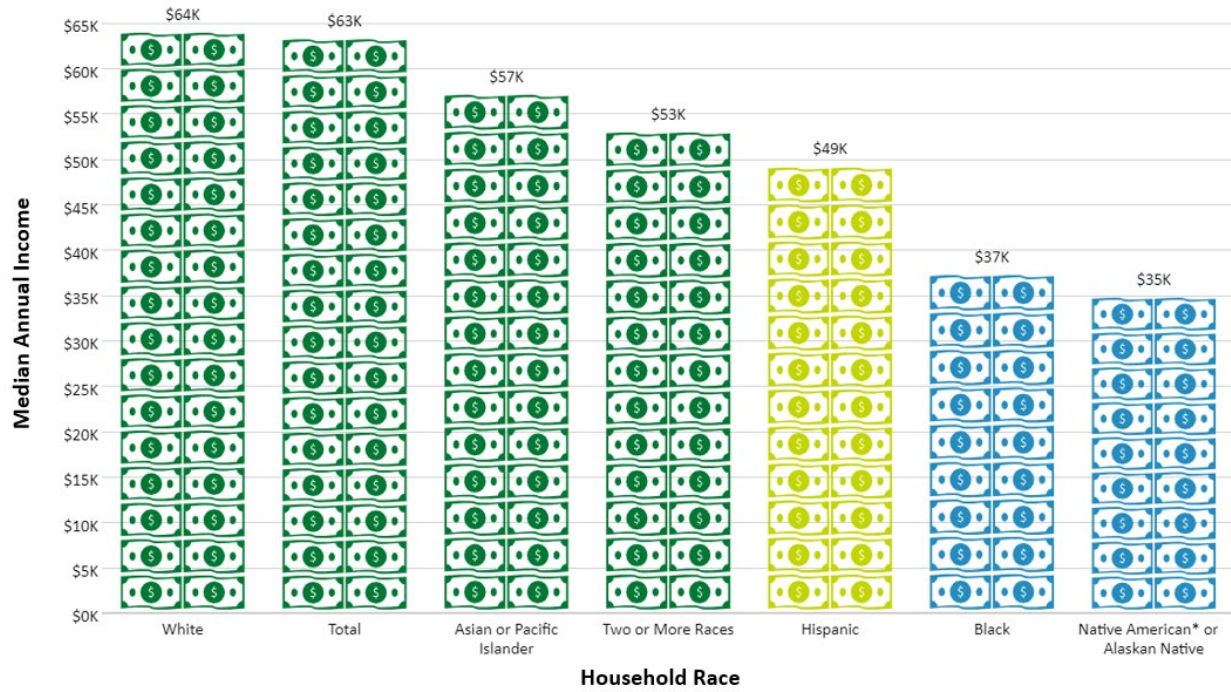
*Officially called American Indians by U.S. Census Data.

Race, Ethnicity & Income

Household income affects individuals' ability to secure housing. For example, income is one of several factors used to determine a household's eligibility for a home mortgage loan. It also affects people's ability to secure rental housing. There are two important measures related to income that will be discussed in this section: median household income and poverty status. The U.S. Census Bureau uses a set of income thresholds that vary by family size and composition to determine who is living in poverty. A complete poverty threshold table is included in [Appendix F](#). Additional Resources and References. People living in poverty tend to struggle more than the average household to pay for food, housing, and other goods and services, such as childcare and medical care.

Vermont, including the city of Burlington, had a poverty rate of 10.8% in 2020. Poverty rates were lowest among White households, with only 10.3% of households living below the poverty line. All Communities of Color had a poverty rate higher than the state average. Poverty rates were highest among Black (24.2%) and Native American households (18.6%). The median income data also reflects these trends. At \$64,205, White households had the highest median income in Vermont, followed by Asian households with a median income of \$57,362. Notably, Black and Native American households had median incomes below \$40,000 and over 40% lower than the state's median income.

Figure 7. Median Household Income and Poverty Rates by Race/Ethnicity, 2020



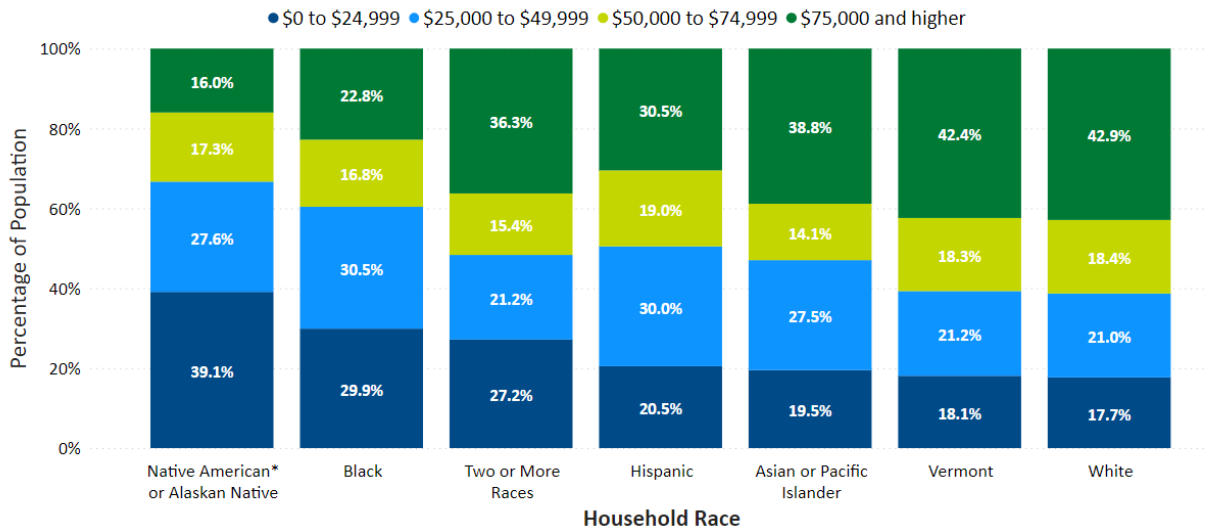
Source: U.S. Census Bureau, 2020 5-Year estimates American Community Survey (B19013, B19013A, B19013B, B19013C, B19013D, B19013E, B19013G, B19013I, B17001, B17001A, B17001B, B17001C, B17001D, B17001E, B17001G, B17001I).

* Median household income in the past 12 months (in 2020 inflation-adjusted dollars).

**Due to small sample size, the margin of error for the median household income estimate of American Indian/Alaska Natives is relatively large. Therefore, estimates should be evaluated with caution.

White households in Vermont were more likely to have an annual income over \$75,000 and less likely to be under \$25,000. All Communities of Color were more likely to be low-income. Black and Native American households, in particular, had a disproportionate number of households that made less than \$25,000 annually, with 29.9% and 39.1% in this income bracket, respectively.

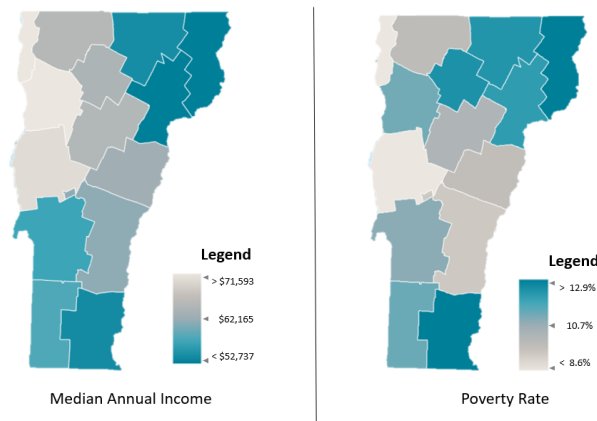
Figure 8. Household Income Distribution by Race, 2020



Source: U.S. Census Bureau, 2020 5-year estimates American Community Survey (B19001, B19001A, B19001B, B19001C, B19001D, B19001E, B19001G, B19001I). Full data set in Appendix E.

The median income in 2020 in the State of Vermont was \$63,477, with 10.8% of the population living below the poverty line. Addison, Franklin, Grand Isle, and Washington Counties had higher median incomes and fewer households living under the poverty line than the state average. The Northeast Kingdom, including Caledonia, Essex, and Orleans counties, have higher poverty rates. All three areas had lower median incomes (under \$55,000) and over 12% of their populations living below the poverty line.

Figure 9. Median Household Income and Poverty Rates by County, 2020



Source: U.S. Census Bureau, 2020 5-year estimates American Community Survey (B19013, B17001). Full data set in Appendix E.

Concentrations of LMI People

The Community Development Block Grant (CDBG) program requires that at least 70% of the funds invested benefit low and moderate income (LMI) people. To aid in that goal, HUD provides data on the percentage of LMI people in each census block group.

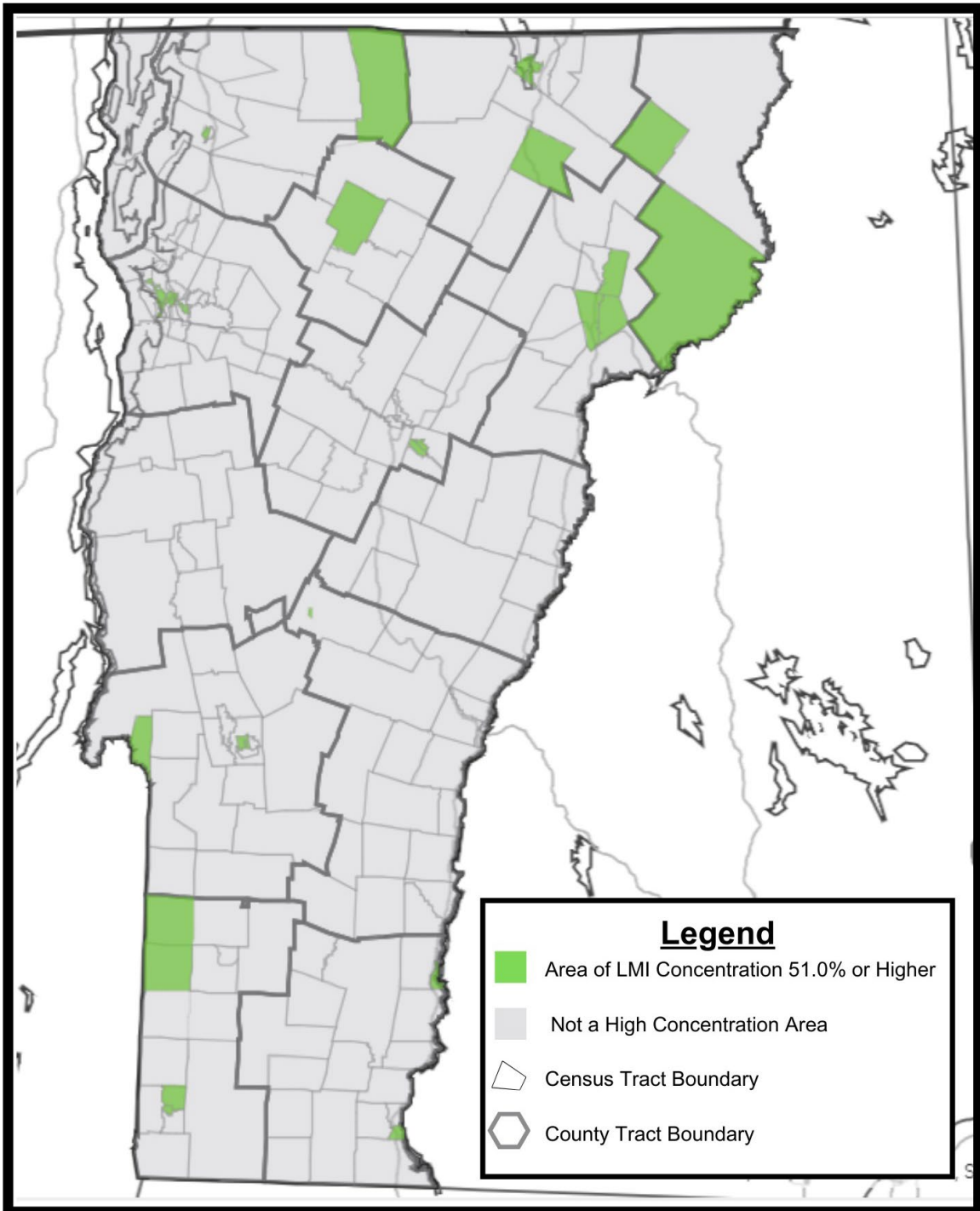
HUD data reveals that there are 31 census tracts in the state where at least 51.0% of residents (for whom this rate is determined) meet the criterion for LMI status. Of these, 18 tracts are also identified as areas of minority concentration.

In Vermont, 18 of the 31 census tracts identified as concentrations of LMI people were also areas of minority concentration. Consequently, areas of minority concentration are more likely also to be areas of concentration of LMI people.

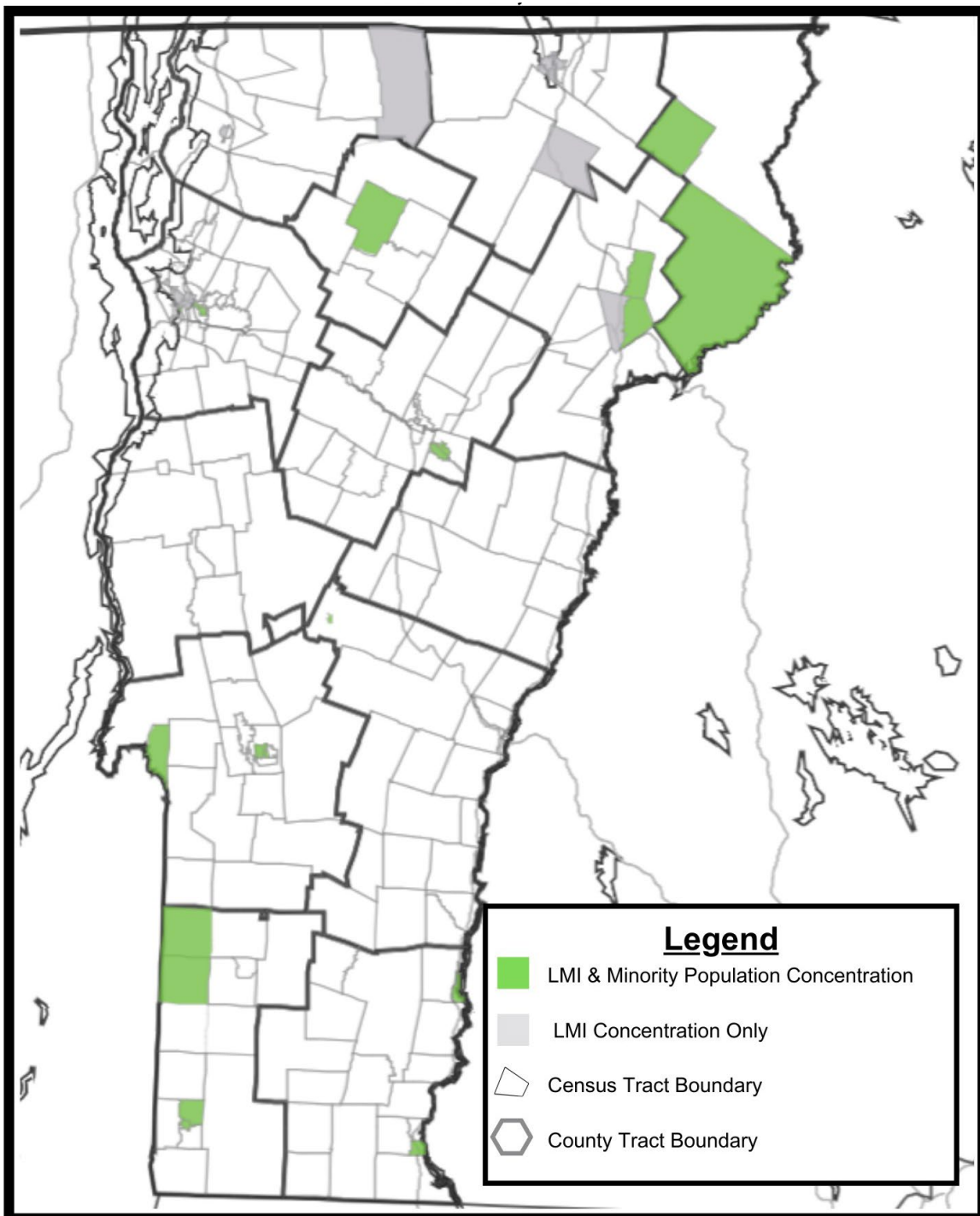
Map 6 illustrates areas of LMI concentration in the state. Areas of LMI concentration are concentrated in the state's northern region, including the rural Northeast Kingdom.

Map 7 illustrates the impacted areas in the state, which are defined as census tracts where concentrations of minority residents overlap with concentrations of LMI people. Defining and locating impacted areas is an important tool that can be used to track current investments and to guide future investments of federal and state funds allocated towards housing and community development projects throughout the state. State agencies should seek to strike a balance of investing said funds in both impacted and non-impacted, more affluent communities. The state's impacted areas are most predominantly located in Bennington, Lamoille, and Essex counties. Additional impacted areas are located in the urban centers throughout the state.

Map 6. Areas of Concentration of LMI Residents, 2020



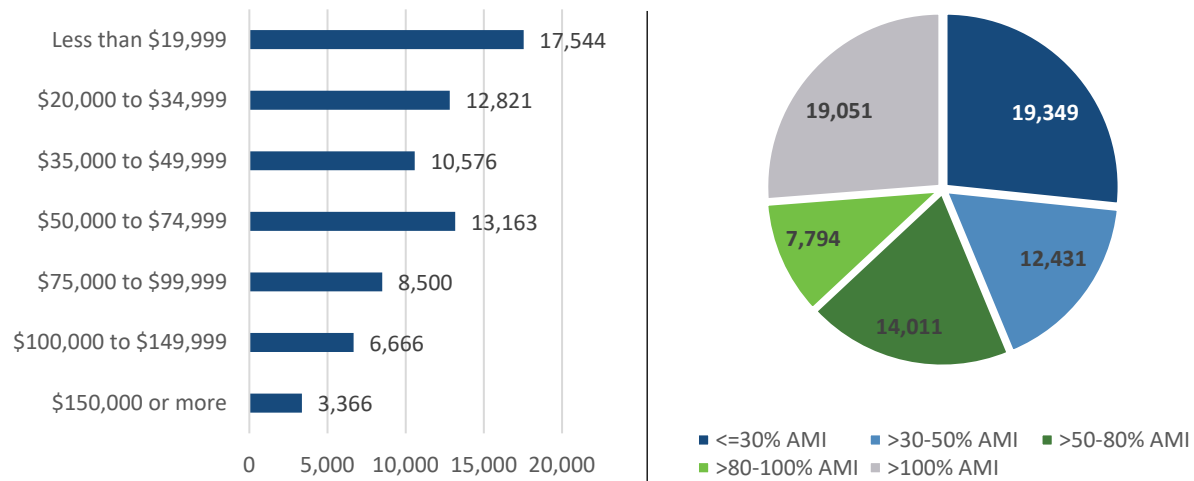
Map 7. Impacted Areas of Both Minority Residents and LMI Households, 2020



Income & Ownership Status

Renters are more likely than homeowners to fall below the Vermont area median income of \$74,014. In 2022, 58% of homeowner households had an income greater than the median. By contrast, only 26% of renter households were above the median. The overall median household income for homeowners in 2022 was \$90,311; for renters it was \$43,102—less than half the homeowner income figure.

Figure 10. Renter Households Income Level and AMI Group, 2022



Source: U.S. Census Bureau, 2018–2022 5-year estimates American Community Survey.

According to the Statewide Housing Needs Assessment, by 2029, most of the growth in renter households will be among households with the highest (>100% AMI) and lowest (<30% AMI) income levels. The increased demand for rental housing will put continued upward pressure on monthly rent, making the search for rental housing more challenging for low-income renters.

Disability & Income

The U.S. Census Bureau reports disability status for non-institutionalized people. The Census Bureau defines a disability as a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or retaining information. These conditions may also impede a person from going outside the home alone or working at a job or business.

The Fair Housing Act prohibits housing providers from discriminating against applicants or residents because of their disability or the disability of anyone associated with them. The Act also prohibits housing providers from treating people with disabilities less favorably than others because of their disability. In addition, the Act makes it unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford person(s) [with disabilities] equal opportunity to use and enjoy a dwelling. The Act also prohibits housing providers from refusing residency to people with disabilities or placing conditions on their residency because those people may require reasonable accommodations.

Reasonable accommodations may include modifications to address the needs of people with disabilities, including changes in rules, policies, practices, and procedures (e.g., permitting the use of an assistance animal). In addition, in certain circumstances, the Act requires that housing providers allow residents to make reasonable modifications to units and public/common areas in a dwelling when those modifications may be necessary for a person with a disability to fully enjoy a dwelling. Reasonable modifications include changes to the physical structure (e.g., constructing an entrance ramp). The [Comparison of Accessibility Standards](#) section of this FHA includes more detailed information on the protections for individuals with disabilities.

People with disabilities were more than twice as likely to live in poverty as people without disabilities in 2021.

In Vermont, 13.8% of the population, or approximately 1 out of every 7 Vermonters, reported at least one disability in 2021.⁹ According to the National Organization on Disabilities, a significant income gap exists for people with disabilities, given their lower employment rate. Therefore, households comprised of people with a disability, particularly those living at or below the poverty level, will struggle more than the average household to pay for housing, groceries, childcare, and other costs. This income disparity exists in Vermont, where 20.9% of people with disability are living below the poverty line. In comparison, only 8.8% of people without a disability live below the poverty line.¹⁰

Familial Status & Income

The 1988 amendment to the Federal Fair Housing Act added protection for families with children. It is unlawful to refuse to rent or sell to families with children. However, a few limited circumstances are exempt, like elderly or owner-occupied housing (see more in the [Housing Opportunities for Families with Children](#) section). The Vermont Fair Housing and Public Accommodations Act also protects against sex discrimination and prohibits discrimination based on sexual orientation, gender identity, marital status, and because a person intends to occupy a dwelling with one or more minor children, except in limited circumstances.

The U.S. Census Bureau differentiates between "family" and "non-family" households. Family households include married-couple families with or without children, single-parent families, and other families made up of related people. Non-family households are either single people living alone or two or more non-related people living together.

⁹ U.S. Census Bureau, 2021 American Community Survey (B18101). Includes the City of Burlington.

¹⁰ U.S. Census Bureau, 2021 American Community Survey (B18130). Includes the City of Burlington. Poverty line as defined by the U.S. Census Bureau.

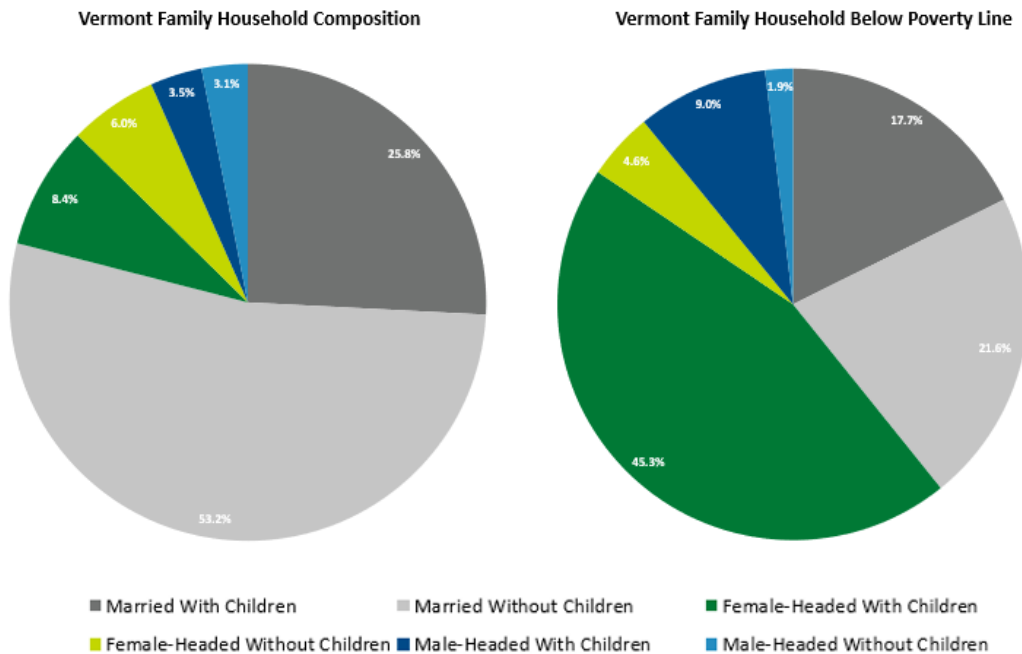
Figure 11. Households by Type and Presence of Children, 2000–2020

	2000		2010		2020	
	#	%	#	%	#	%
Total Households	195,875	100.0%	256,612	100.0%	262,852	100.0%
Family Households	138,567	70.7%	159,846	62.3%	157,105	59.8%
Married Couples	115,118	58.8%	125,678	49.0%	124,107	47.2%
With Children	56,688	28.9%	45,063	17.6%	40,563	15.4%
Without Children	58,430	29.8%	80,615	31.4%	83,544	31.8%
Female-Headed Households	17,253	8.8%	23,281	9.1%	22,555	8.6%
With Children	11,270	5.8%	14,672	5.7%	13,122	5.0%
Without Children	5,983	3.1%	8,609	3.4%	9,433	3.6%
Male-Headed Households	6,196	3.2%	10,887	4.2%	10,443	4.0%
With Children	3,489	1.8%	5,941	2.3%	5,529	2.1%
Without Children	2,707	1.4%	4,946	1.9%	4,914	1.9%
Non-Family & 1 Perons Households	57,308	29.3%	96,766	37.7%	105,747	40.2%

Sources: Census 2000 (SF-3, P10); 2006–2010 & 2016–2020 American Community Survey 5-year estimate (B11001, B11003).

Since 2000, the number of non-family households has continued to increase in Vermont, from 29.3% to 40.2%. During this same period, there has been a corresponding decrease in the proportion of married, female-headed, and male-headed households.

Figure 12. 2020 Vermont Family Household Composition V. Family Households Below the Poverty Line



Sources: 2016–2020 American Community Survey 5-year estimate (B11001, B11003), and Census Bureau 2006–2010 American Community Survey Five-Year Estimates B17012. Raw data in Appendix E.

Of the family households in Vermont only 14.4% are female headed, but they make up nearly 50% of the family households living below the poverty line.

Female-headed households with children often have trouble obtaining housing, primarily as a result of lower incomes and the unwillingness of some landlords to rent their units to families with children. Of the family households in Vermont, only 14.4% are female-headed, but female-headed households make up nearly 50% of the family households living below the poverty line.

Ancestry & Income

It is illegal for housing providers to discriminate based on national origin or ancestry, under both the Federal Fair Housing Act and the Vermont Fair Housing and Public Accommodations Act. As of 2020, 4.6% of Vermont's population was foreign-born.¹¹

Refugees are a significant portion of Vermont's foreign-born population. In the last 40 years, an estimated 8,000 refugees have resettled in Vermont, primarily in the Burlington and Winooski areas of Chittenden County.¹² Refugees face numerous challenges to fair housing choice. Refugee households may not have credit histories or references from previous landlords, limiting their options in the rental market. Refugees also may have more limited information on their housing rights and what constitutes discrimination. In addition, refugee households tend to be larger and therefore may require three-, four-, and five-bedroom units, which comprise less than one-third of the rental housing inventory in Vermont (see [Tendency of Protected Classes to Live in Larger Households](#)).

People who identify as Black living in Vermont are more than three times as likely to be immigrants as Black or African Americans living in the U.S. as a whole. Thirty-six percent of all Vermonters who identify as Black or African American are immigrants compared to only ten percent nationwide. People who identify as Asian are also very likely to be born outside of the U.S., 75% of all Asians in Vermont and 66% in the U.S. as a whole¹³.

People with Limited English Proficiency (LEP)

People with limited English proficiency (LEP) are defined as people who have a limited ability to read, write, speak, or understand English. People with LEP may encounter obstacles to fair housing due to a lack of accessible resources in their native language and cultural barriers within their new environment. LEP discrimination is related to national origin discrimination, for example, an "English only" policy would have a disparate impact on people of non-American national origin, which is illegal based on the Fair Housing Act of 1968 and Title VI of the Civil Rights Act 1964.

¹¹ U.S. Census Bureau, 2020 American Community Survey Five-Year Estimate (B05002).

¹² Catania, K. & Coburn, K. (2022). *Resettled in Vermont*. University of Vermont. <https://www.uvm.edu/news/story/resettled-vermont>

¹³ Source. U.S. Census Bureau, American Community Survey 2019.

To assist these individuals, it is essential that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon communities receiving federal funds from HUD to determine the need for language assistance to comply with Title VI of the Civil Rights Act of 1964.

Figure 13. Language Spoken at Home by Ability to Speak English, 2020

Language Group	Number of LEP Persons	Percentage of Language Group	Percentage of VT LEP Population
French	1,668	20.0%	20.0%
Spanish	1,221	17.9%	14.7%
Chinese	951	48.1%	11.4%
Serbo-Croatian	440	35.5%	5.3%
Nepali, Marathi, or other Indic languages	996	54.2%	12.0%
African Languages	601	51.1%	7.2%
Total	8,334	1.4%	-

Source: 2006-2010 American Community Survey (B16001).

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In the State of Vermont, there were 8,334 people who spoke English less than “very well” in 2020, representing 1.4% of the population. Of these, 24% were native French speakers and almost 22% were native Spanish speakers. The largest LEP populations spoke French, Spanish, an Indic language or Chinese, in that order. Of the LEP in Vermont, 20% were native French speakers and almost 15% were native Spanish speakers.

Fair Housing Achievement: Given that refugees also may have more limited information on their housing rights and what constitutes discrimination, the Vermont Housing Division granted Champlain Valley Office of Economic Opportunity (CVOEO) funds to translate and interpret essential information about the rights and responsibilities of tenants in Vermont. Access to accurate information in one’s own language is essential to securing and maintaining safe and decent housing, free from discrimination. This project entailed:

- Interpreted versions of the Tenant Skills and Finding Housing workshops in 9 languages (Arabic, Burmese, French, Nepali, Dari/Pashto, Spanish, Somali, Swahili, and Vietnamese), included translated the PowerPoint slide text and narrative for the workshops and recording the presentations in each language; and
- Translation of the “Definitive Guide to Renting in Vermont” into 9 languages (Arabic, Burmese, French, Nepali, Dari/Pashto, Spanish, Somali, Swahili, and Vietnamese), including translating the booklet (excluding the Vermont Statutes and Rental Housing Codes) and reformatting the guide for each language.

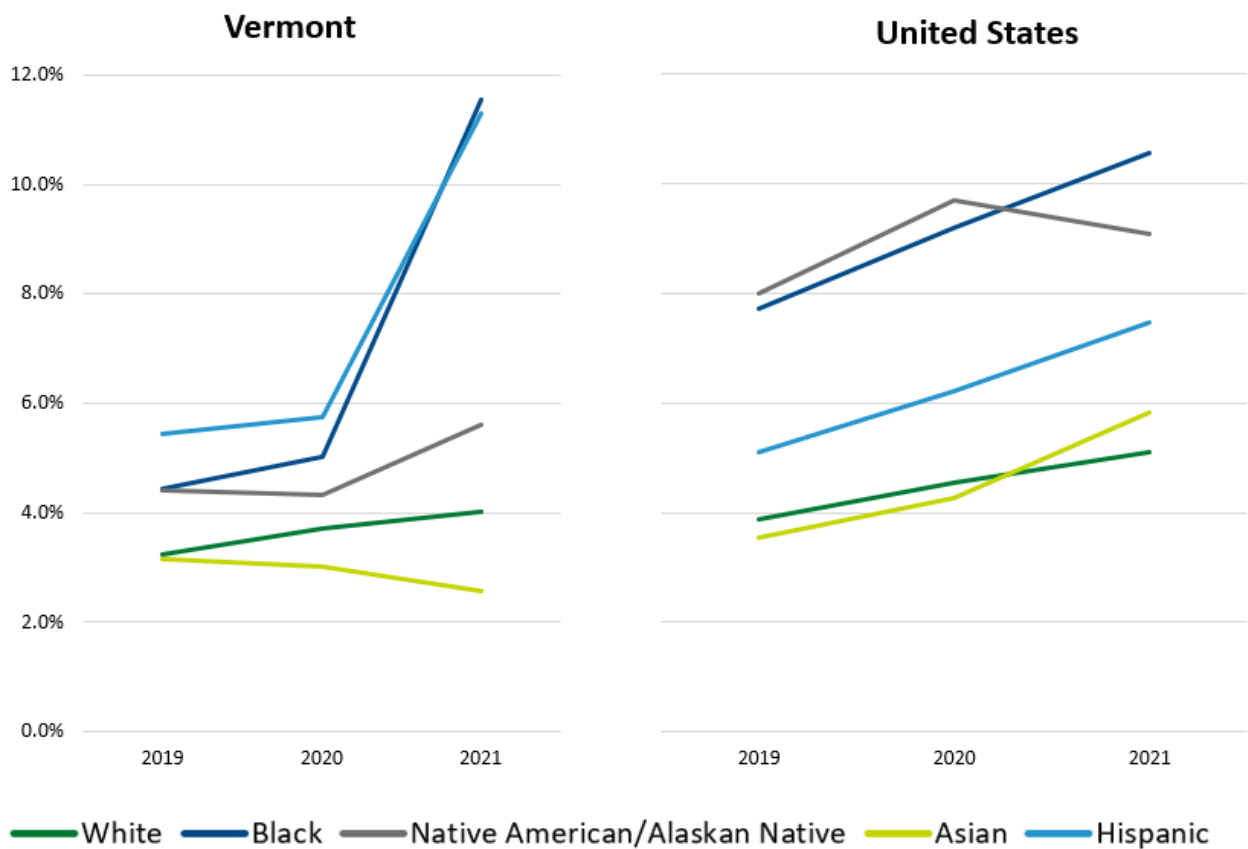
These and more resources are available at [DHCD’s Translated Housing Resource Hub](#).

Protected Class Status & Employment

In 2019 Vermont unemployment rate was 3.4%, lower than the national rate of 4.5%. This trend continued during the pandemic, with the Vermont rate spiking to 4.2% and the national average rising to 6.3% in 2021.

All subpopulations in Vermont experienced an increase in unemployment after the pandemic, except for Asians within the Civilian Labor Force (CLF). Black and Hispanic individuals in Vermont were particularly hard hit by the pandemic and saw significant increases in their employment rates from 2019 to 2021 (7.1% and 5.9% increases respectively). Among these minority populations post-pandemic, residents were less likely to be unemployed in Vermont than in the nation as a whole. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses, less housing choice, and shows the disparate impact of the pandemic.

Figure 14. Civilian Labor Force, 2019–2021



[Figure continued on the next page.]

	2019	2020	2021	Change in Employment Rate
Total Civilian Labor Force (CLF)		No Data		Total CLF
Employed	96.6%		95.8%	
Unemployed	3.4%		4.2%	0.8%
Male CLF				Male CLF
Employed	96.4%		95.2%	
Unemployed	3.6%		4.8%	1.1%
Female CLF				Female CLF
Employed	96.9%		96.4%	
Unemployed	3.1%		3.6%	0.5%
White CLF				
Employed	96.8%	96.3%	96.0%	
Unemployed	3.2%	3.7%	4.0%	0.8%
Black CLF				Black CLF
Employed	95.6%	95.0%	88.4%	
Unemployed	4.4%	5.0%	11.6%	7.1%
Native American/Alaskan Native CLF				Native American/Alaskan Native CLF
Employed	95.6%	95.7%	94.4%	
Unemployed	4.4%	4.3%	5.6%	1.2%
Asian CLF				Asian CLF
Employed	96.8%	97.0%	97.4%	
Unemployed	3.2%	3.0%	2.6%	-0.6%
Hispanic CLF				Hispanic CLF
Employed	94.6%	94.2%	88.7%	
Unemployed	5.4%	5.8%	11.3%	5.9%

Sources: 2019, 2020, 2021 American Community Survey 5-year estimate, when available, C23001, C23002A, C23002B, C23002C, C23002D, C23002I. Raw data in Appendix E.

Homeless Vermonters

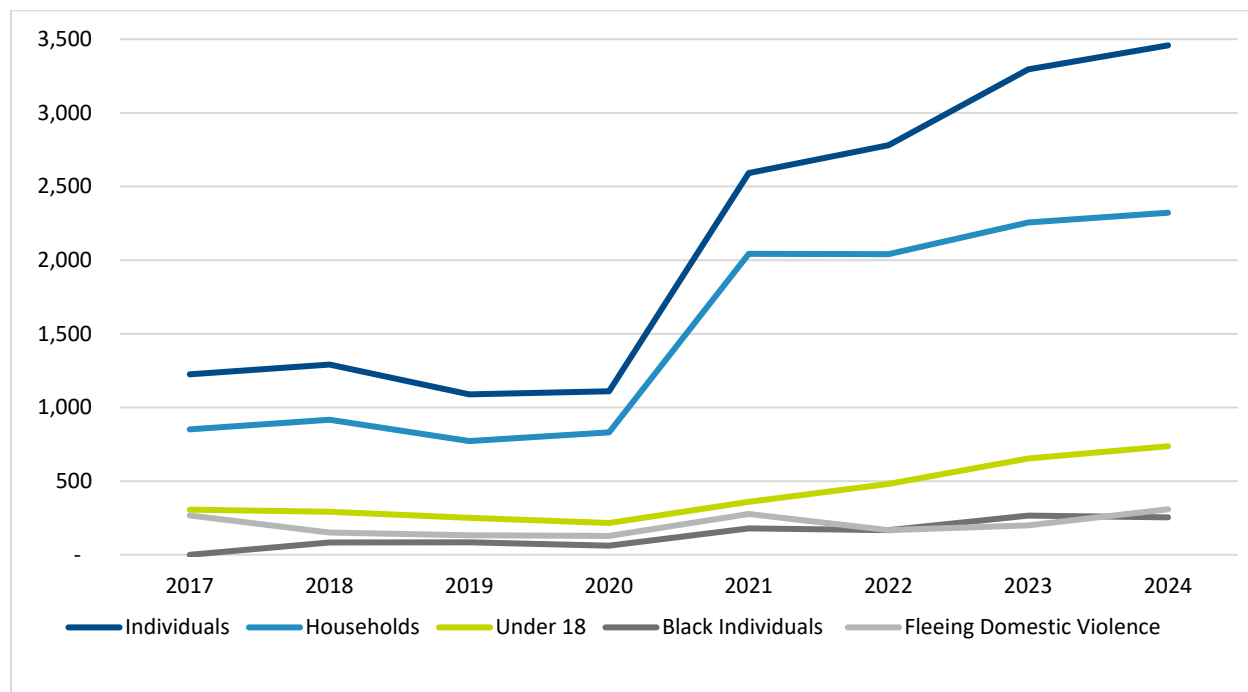
The Vermont Coalition to End Homelessness conducts an annual count of sheltered and unsheltered people experiencing homelessness during a single night called the [Point-in-Time \(PIT\) Count](#). The project is overseen by Continuum of Care organizations and is required by HUD. The PIT is one of the few data sources that provides regular data on the number of individuals experiencing homelessness in Vermont.

From 2020 to 2021, the number of homeless individuals and households more than doubled. Since 2020, the number of homeless individuals has steadily climbed, increasing by 312% in just 4 years.

Data from the PIT shows that from 2020 to 2021, the number of homeless individuals in Vermont increased by 1,418, more than doubling during this period. All homeless populations, including children,

people fleeing domestic violence, and people who identify as black, increased during this period. This rapid increase in the number of homeless Vermonters is partly due to the economic hardships many households experienced during the onset of the COVID pandemic. This rapid increase is during COVID is particularly concerning given the additional risk homeless populations faced during the pandemic, especially for those living in congregate shelters, which posed a serious health risk.

Figure 15. PIT Count of Homeless Vermonters, 2017–2024



Source: Vermont Coalition to End Homelessness, Point-in-Time Counts.
 Note: Complete dataset used to calculate this figure included in Appendix E. Raw Data.

The number of homeless Vermonters has continued to increase post-pandemic, from 1,110 individuals pre-pandemic in 2020 to 3,458 in 2024, a 312% increase in four years. Vermont has a per capita homelessness rate of 51 per 10,000 people, the second highest nationally, according to the most recent 2023 HUD Annual Homeless Assessment Report (AHAR) report. This significant increase is likely due to a confluence of factors, including:

“(1) the termination in the fall of 2022 of rent subsidies provided to lower income Vermonters through the Emergency Rental Assistant program, and the end of the eviction moratorium in July 2022, both resulting in increased housing instability; (2) the extremely low vacancy rate for apartments in much of Vermont, ranging from 0.5% to 3% across the state, allowing landlords to increase rents and to be highly selective in choosing tenants; and, (3) the operation of non-congregate emergency and transitional housing opportunities in hotels and motels, allowing for

increased eligibility to emergency housing and creating a more accurate reflection of the community need.”¹⁴

Data on homelessness was not included in past comprehensive AI. However, homelessness is undeniably intertwined with fair housing concerns. A lack of affordable housing options, discriminatory practices, and economic disparities can force individuals and families into homelessness. When equitable housing opportunities are compromised, it perpetuates a cycle of instability and marginalization, highlighting the need for comprehensive efforts to ensure everyone has access to safe, stable, and affordable housing.

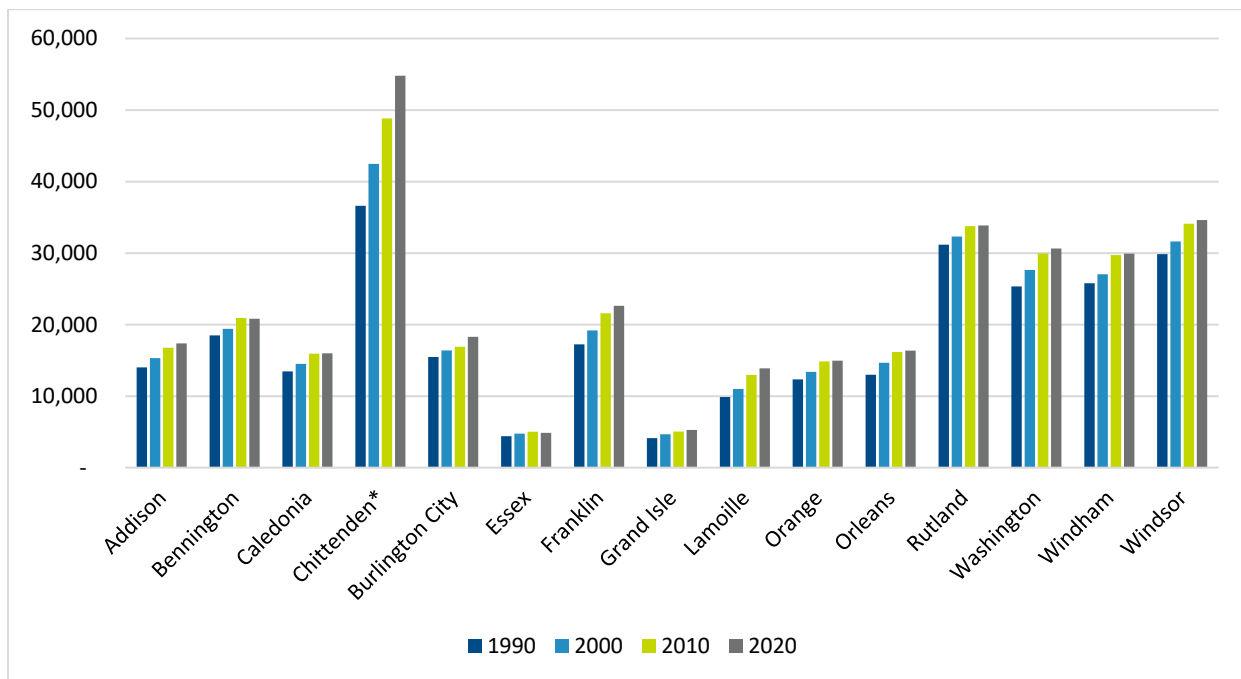
¹⁴ The Chittenden County Homeless Alliance and the Vermont Coalition to End Homelessness, 2023, 2023 Vermont’s Annual Point-In-Time Count of Those Experiencing Homelessness.

Housing Market

Housing Inventory

Vermont’s housing stock, excluding the city of Burlington, grew 23.6% between 1990 and 2020, adding 60,302 new units (Figure 16). The percentage increase in housing stock has outpaced population growth, which increased by 14.3% during the same period. At first glance, this statistic would make it seem like there is ample housing stock in Vermont, directly conflicting the evidence and the perception throughout the state that there is a severe housing shortage. However, this statistic can be deceiving, given that 18.7% of the housing stock in Vermont was vacant in 2020.¹⁵

Figure 16. Housing Trends by Vermont Counties, 1990–2020



Source: U.S. Census Bureau, 2020 (H1), 2010 (H1), 2000 (H001), 1990 (H001).

Note. Raw data used to calculate above figure is included in Appendix E.

*Exclusive of the City of Burlington.

Understanding Vermont’s Vacancy Rate

According to U.S. Census data, 18.7% of the housing stock in Vermont was vacant in 2020. This vacancy rate is far higher than the average national vacancy rate of 9.7%, and higher than what is considered a “healthy vacancy rate.” A healthy vacancy rate is typically considered to be between 4 to 6%.¹⁶ Typically, homeowners have a lower vacancy rate than rental units, which have a higher turnover rate. So how can there be a housing crisis in Vermont when we have so many vacant units?

¹⁵ Source: U.S. Census Bureau, 2020 (H1).

¹⁶ [Lincoln Institute of Land Policy](#), “The Empty House Next Door: Understanding and Reducing Vacancy and Hypervacancy in the United States”, 2018.

It is crucial to understand the underlying data and what is not captured within this one simple statistic to comprehend why this seeming contradiction exists. The U.S. Census Bureau includes vacant seasonal homes and units that need repairs (and are not currently being repaired, renovated, or cleaned) when determining the number of vacant units in the state. While some of these seasonal homes could be used as year-round homes, many properties are unlikely to change status. At least some seasonal homes are unheated hunting cabins, lakeside camps with limited septic systems, or condominiums within ski resorts that are not suitable for year-round use.

Vermont has the second-highest number of vacation homes per capita in the nation. An incredible 17.5% of the housing units in Vermont are vacation homes, meaning approximately 58,500 homes in Vermont are only used seasonally.¹⁷ If you were to exclude seasonal homes when calculating the Vermont vacancy rate, the rate could be as low as 1.2%. [Research by VHFA](#) has come to similar conclusions, suggesting that the widely available vacancy rate data for Vermont is misleading due to the large number of seasonal homes in the state. According to the 2024 Housing Needs Assessment developed by VHFA, “Although options are limited for low-income renters, renters at all income levels struggle to find an apartment due to the state’s extremely low vacancy rate. Vermont’s rental vacancy rate of 3.2% is among the lowest in the country, and well below the 5% rate of a healthy market. The most populous area, Chittenden County, had a vacancy rate estimated at just 1% in 2023.”

If you were to exclude seasonal homes, Vermont vacancy rates could potentially plummet from 18.7% to 1.2%.

Vermont also has an aging housing stock. Over a quarter of Vermont’s housing stock, 26.7%, is 80 years or older, which is double the national average.¹⁸ Since the U.S. Census includes units that need repairs and may not be habitable, this is another factor contributing to Vermont’s vacancy rate being so misleading. While there isn’t accurate or comprehensive data on the number of units that are vacant because they are uninhabitable and need repairs, given the age of Vermont’s housing stock, there could be a significant number of units that may fall into this category. At least 14,458 Vermont households live in homes with potentially serious housing quality issues, according to 2021 Census Bureau PUMS data.

Two programs through DHCD demonstrate the high level of need for repairs throughout the state. The Vermont Housing Improvement Program (VHIP) provides grants to bring vacant non-code compliant rental units back online. From January 2022 through December 2024, there were approximate 300 grants awarded to rehabilitate 525 vacant units that were no longer habitable. The home repair portion of Manufactured Housing Improvement and Repair program (MHIR) provided funding for owners of mobile homes that live in registered Mobile Home Parks to repair their existing home to prevent displacement. When MHIR launched in February of 2023, the \$750,000 originally allocated to this purpose was quickly fully applied for, leading to this portion of the program closing in May of 2023 after less than 3 short months. The home repair reopened in November of 2023, and as of early December 2024, over 300 home repair projects have been funded, totaling over \$3,700,000. This only captures

¹⁷ Source: IPX1031, [Data Reveals Vacation Home Hot Spots Across the Country](#).

¹⁸ Source: U.S. Census Bureau Data via The Vermont State Data Center, and Vermont Public Radio article [Why Does Vermont Have Such A Housing Crunch?](#)

part of the need demonstrated by the program, given that due to funding constraints, the program has needed to be paused several times due to it being oversubscribed. Given there are around 7,000 Vermont households that live in mobile home communities shows the immense need in these communities.

Trends in Vermont’s Housing Inventory

Every county experienced some level of growth in their housing stock from 1990 to 2020. However, the most significant growth in the number of units and percentage change occurred in Chittenden County outside of the City of Burlington. From 1990 to 2020, Chittenden County’s, excluding the city of Burlington, housing stock increased 49.7%, adding 18,188 new units. Lamoille county has also had significant growth in the past 30 years, adding 4,004 new units and growing the housing stock by over 40%. This growth far outpaces the average increase in housing stock throughout the state, excluding the city of Burlington, which has grown by 23.6%. Rutland County experienced the slowest growth in housing units, with an increase of 8.6% over the past 30 years.

Figure 17. Trends in Housing Inventory in Vermont Counties, 1990–2010

	Year				Percentage Increase 1990-2020
	1990	2000	2010	2020	
State of Vermont*	255,734	277,987	305,642	316,036	23.6%
Addison County	14,022	15,312	16,760	17,385	24.0%
Bennington County	18,501	19,403	20,922	20,815	12.5%
Caledonia County	13,449	14,504	15,942	15,997	18.9%
Chittenden County*	36,615	42,469	48,825	54,803	49.7%
City of Burlington	15,480	16,395	16,897	18,282	18.1%
Essex County	4,403	4,762	5,019	4,867	10.5%
Franklin County	17,250	19,191	21,588	22,642	31.3%
Grand Isle County	4,135	4,663	5,048	5,265	27.3%
Lamoille County	9,872	11,009	12,969	13,878	40.6%
Orange County	12,336	13,386	14,845	14,953	21.2%
Orleans County	12,997	14,673	16,162	16,376	26.0%
Rutland County	31,181	32,311	33,768	33,869	8.6%
Washington County	25,328	27,644	29,941	30,645	21.0%
Windham County	25,796	27,039	29,735	29,916	16.0%
Windsor County	29,849	31,621	34,118	34,625	16.0%
Total	271,214	294,382	322,539	334,318	23.3%

Source: U.S. Census Bureau, 2020 (H1), 2010 (H1), 2000 (H001), 1990 (H001).

*Exclusive of the City of Burlington.

Types of Housing Units

In 2020, the American Community Survey reported 337,214 occupied housing units in the state. Of these, 22.5% were multi-family units, 71.7% were single-family units, and 6.4% were mobile homes. These proportions have not substantially changed since the publication of the 2012 AI. Figure 18 includes details on the portion of housing types for each of the Vermont counties.

Chittenden County had the largest proportion of multi-family units. Multi-family units made up a much smaller proportion (under 10%) of the housing stock in the rural counties of Essex, Grand Isle, and Orange. These counties also tended to have more mobile homes than the rest of the state (mobile homes made up at least 9.8% of the housing stock in those areas).

Figure 18. Units in Structure by County, 2020

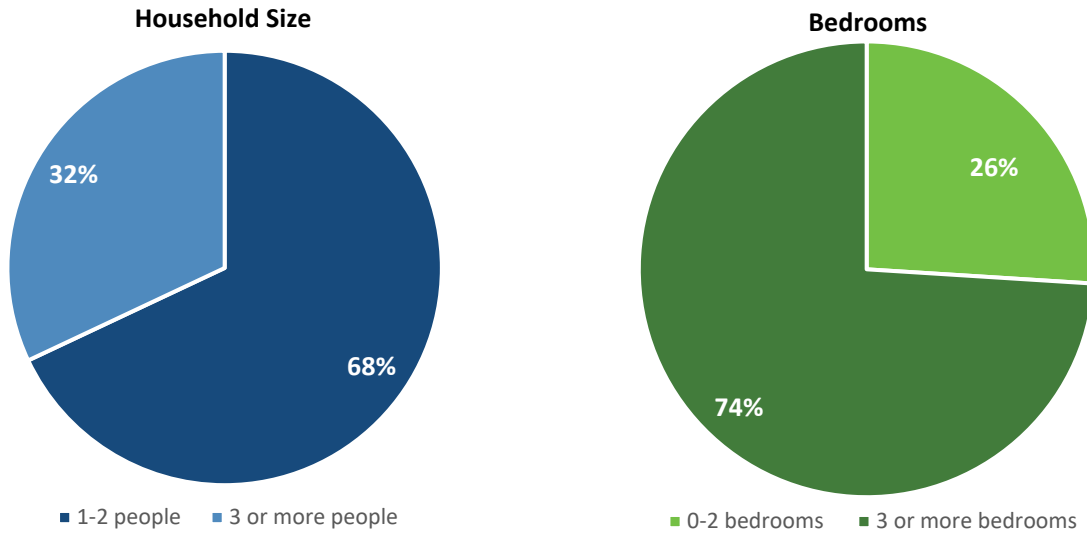
	Total Units	Single-Family	Multi-Family		Mobile Home
			2 to 9	10 or more	
State of Vermont	337,214	71.1%	16.6%	5.9%	6.4%
Addison County	17,577	77.8%	12.1%	2.4%	7.7%
Bennington County	21,189	75.2%	15.5%	4.1%	5.3%
Caledonia County	16,452	74.0%	14.1%	3.0%	8.8%
Chittenden County	70,460	60.2%	22.3%	13.0%	4.4%
Essex County	5,209	84.0%	5.7%	0.3%	9.9%
Franklin County	22,706	77.9%	11.4%	3.8%	6.8%
Grand Isle County	5,322	85.6%	4.3%	0.3%	9.8%
Lamoille County	13,817	70.0%	19.5%	1.7%	8.4%
Orange County	15,516	80.8%	7.9%	1.2%	10.2%
Orleans County	17,726	77.7%	11.5%	1.6%	9.3%
Rutland County	34,552	70.1%	16.7%	7.4%	5.8%
Washington County	30,894	68.1%	21.1%	5.4%	5.4%
Windham County	30,778	72.0%	17.9%	4.5%	5.5%
Windsor County	35,016	73.0%	16.1%	4.4%	6.5%

Source: U.S. Census Bureau, 2020 American Community Survey 5-Year Estimate (B25024).

Household size

The available housing supply is not only constrained, but also mismatched to homeowner needs. The number of people per household has been shrinking over the past few decades. The median year of construction for Vermont's homes is 1975, with 23% of homes constructed prior to 1940. These homes were built at a time when households were larger and needed more bedrooms than today's smaller households require.

Figure 19. Homeowners Household Size & Housing Stock Number of Bedrooms, 2022



Source: U.S. Census Bureau, 2018–2022 American Community Survey 5-Year Estimate.

Although 68% of the homeowner households in Vermont consist of 1 or 2 people, only 26% of the state’s homes have two bedrooms or fewer. One quarter of Vermont homeowners are individuals living alone. Too few right-sized homes for smaller households can result in families having no choice but to purchase larger homes than they need, which can inflate housing expenses, including mortgage payments, heating/cooling costs, property taxes, and repair expenses. This worsens housing affordability issues statewide.

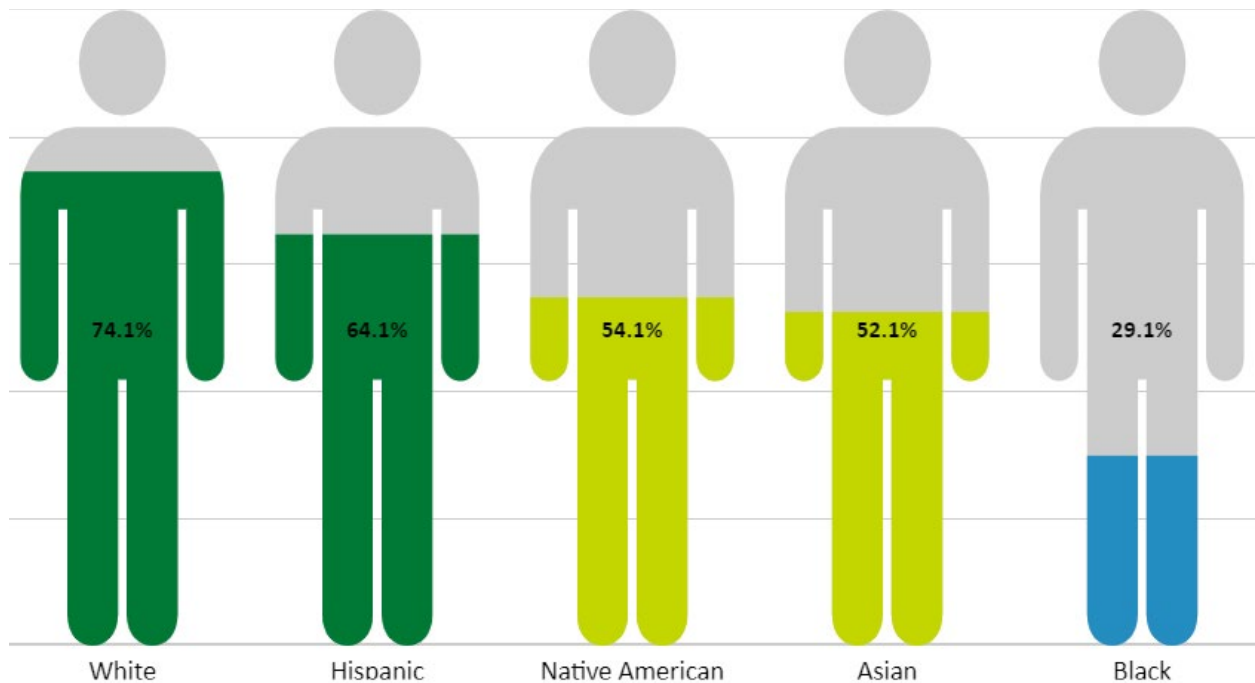
Protected Class Status & Homeownership

The value in homeownership lies in the accumulation of wealth as the owner’s share of equity increases with the property’s value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. Historically, minorities tend to have lower homeownership rates than Whites, exacerbating and engraining pre-existing racial disparities. This is due to lack of access to capital for homeownership purchases and systemic discrimination in the housing market.

Figure 20. Homeownership by Race, 2022

	White	Black	Native American	Asian	Hispanic
Owens Home	191,064	580	228	1,807	3,514
Percentage of Population	74.6%	29.9%	54.8%	52.5%	64.7%

[Figure continued on the next page]



Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimate (B25003A, B25003B, B25003C, B25003D, B25003I).

In 2022, white households had a homeownership rate of 74.1%, which was higher than any minority group in the state. Black Vermonters had the lowest rate of homeownership at a staggering 29.1%, less than half compared to their white counterparts.

White households had a homeownership rate of 74.1%, while Black Vermonters had the lowest homeownership of any racial group at just 29.1%.

Rental Discrimination in Vermont

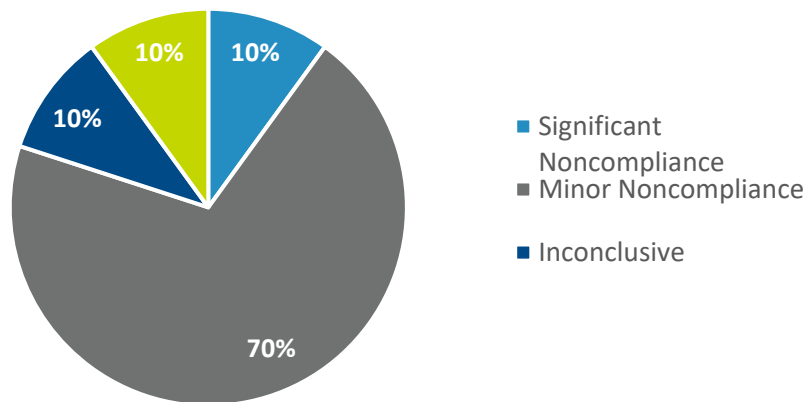
From January 1, 2012, through December 31, 2013, Vermont Legal Aid’s Housing Discrimination Law Project (HDLP) conducted fair housing testing audits measuring housing discrimination in the Vermont rental market.¹⁹ Through linguistic telephone tests, systematic audit tests, and complaint-based rental inquiry tests, the HDLP measured the differences in renters’ preliminary experiences with rental providers throughout the state. Unfortunately, a more recent Rental Discrimination Report for Vermont is not available.

Proposed Action: An updated Rental Discrimination Report would provide valuable information that would allow Vermont better affirmative further Fair Housing.

¹⁹ Vermont Legal Aid’s “Rental Discrimination Audit Report” published in May 2014.

The report found significant and blatant discrimination against people with disabilities. For example, 22% of rental visit tests indicated discrimination against the person with an apparent disability. There were two reasons HDLP rendered a finding of discrimination: 1) the housing provider unambiguously refused to rent to the tester because of their disability, or 2) the housing provider unmistakably denied the tester’s request for a reasonable modification or accommodation.

Figure 21. HDLP 2012–2013 Accessibility Audits



Adapted from Vermont’s 2014 Rental Discrimination Audit Report.

Furthermore, 80% of audits of newly constructed multi-family housing units had some level of non-compliance with Federal Fair Housing Act’s design and construction accessibility requirements (Figure 21). The level of non-compliance varied. However, only 10% of inspected units were in apartment compliance with Federal Fair Housing Act design and construction accessibility requirements. The entire 2014 Rental Discrimination Report can be found on [Vermont Legal Aid’s website](#).

Achievement: Training for Architects - Courses on Fair Housing and Accessibility are now available through continued education requirements for architects in Vermont ([link to training](#)).

The lack of compliance with Federal Fair Housing Act’s design and construction accessibility requirements presents a significant barrier to Fair Housing in Vermont. As the 2014 Rental Discrimination Report concluded, the “lack of compliance demonstrates a need for increased education of Vermont’s builders, architects, and other housing providers to learn about their duties under the Federal Fair Housing Act, particularly compliance with the Act’s design and construction standards.”

The 2017 Action Plan included an item stating, “The State should promote the development of training for architects and interior designers regarding compliance with the State’s accessibility standards for residential construction (20 VSA sec. 2907) as well as HUD’s Fair Housing Design Manual.” Courses on Fair Housing and Accessibility are now available through continued education requirements for

architects in Vermont ([link to training](#)). However, without an updated Rental Discrimination Report it is unclear if these trainings are having the desired impacts.

The [Statewide Fair Housing Survey for the General Public](#) and [Existence of Fair Housing Complaints](#) sections of this report contain more details on housing discrimination in Vermont.

Foreclosure Trends

The Vermont Banking Division (VBD) provides data on the number of foreclosure filings by county. According to VBD, the number of foreclosures throughout the state, including the City of Burlington, continued to decrease from 2019 to 2021.

Figure 22. Foreclosure Rates by County, 2019–2022

	2019	2020	2021	2022
	Foreclosures	Foreclosures	Foreclosures	Foreclosures
State of Vermont	826	377	240	496
Addison County	26	10	10	20
Bennington County	59	40	13	31
Caledonia County	30	23	13	26
Chittenden County	98	38	21	50
Essex County	9	1	2	8
Franklin County	77	52	24	46
Grand Isle County	11	5	4	21
Lamoille County	36	17	30	39
Orange County	34	21	8	26
Orleans County	37	17	8	24
Rutland County	130	41	32	60
Washington County	75	31	16	36
Windham County	88	17	23	48
Windsor County	116	64	36	61
Year-over-year change	-23.5%	-54.4%	-36.3%	106.7%

Source: Vermont Banking Division Foreclosure Data (2018, 2019, 2020, 2021 & 2022).

From 2019 to 2020, there was a 54.4% decrease in the number of foreclosures. This precipitous drop in foreclosure is most likely linked to the moratorium on foreclosure actions during the COVID emergency. On May 14th, 2020, Governor Scott signed Act 101 ([S. 333](#)) into law. Act 101 established a moratorium on ejection (eviction) and foreclosure activity. Additionally, many Vermont households became eligible for homeowner assistance through the [Mortgage Assistance Program](#) (MAP), which ran from July 2020 to June 2021, and the [Homeowners Assistance Program](#) (HAP), which started in late January of 2022. Both these COVID-related programs provide grants to eligible homeowners to help cover housing-related expenses.

This decline in foreclosures is followed by a spike in 2022, an increase of 107%. Foreclosure moratoriums lifted in the summers and fall of 2021 and are a likely cause of this significant increase. However, even

with the post-pandemic spike in foreclosures, Vermont has one of the lowest foreclosure rates in the nation, ranking 49th of 50.²⁰

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed geographically and among protected class members. Concentrated foreclosures and residential vacancies threaten the viability of neighborhoods and the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

Tendency of Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination based on race and the presence of children (familial status). If there are policies or programs that restrict the number of people that can live together in a single housing unit, there is a fair housing concern because the restriction may negatively impact protected classes' housing choices. Additionally, if there a limited housing choices for large families that may require 4 or more bedrooms, this can have a disparate impact on protected classes that tend to live in larger households. In Vermont, the vast majority of units available have 3-bedrooms or less, 93.3% of rental units and 74.6% of owner-occupied houses.

Figure 23. Families with Three or More People, 2020

Number of Bedrooms	Rent Occupied	Owner Occupied
0–1 bedrooms	37.4%	4.0%
2 bedrooms	37.3%	22.1%
3 bedrooms	18.6%	48.5%
4 bedrooms	5.0%	20.1%
5 or more bedrooms	1.7%	5.2%

Source: U.S. American Community Survey 2020 5-year estimate (B25042). Raw data in Appendix E.

In Vermont, people of color were much more likely than whites to live in large families (figure 23). Whites had the lowest proportion of households with 5 or more people, at 5.7%, followed by Hispanic households 10.7% have 5 or more people. Black, Asian, and Native American families all had at least double the portion of families with 5 or more people, compared to white families. To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary.

²⁰ [“Vermont ranks low for foreclosures, but climbing.”](#) Vermont Business Magazine, July 14, 2023.

Figure 24. Housing Units by Number of Bedrooms, 2020

Race	Families with 3 or More Persons		Families with 5 or More Persons	
	#	%	#	%
White	76,939	30.7%	14,332	5.7%
Black	1,060	42.7%	422	17.0%
Asian or Pacific Islander	1,779	53.6%	604	18.2%
Native American* or Alaskan Native	363	37.0%	135	13.8%
Hispanic	1,848	39.9%	497	10.7%

Source: U.S. Census 2020 (H12A, B, C, D, E, and H).

Fair Housing Progress and Supports: Given that protected classes tend to live in larger households, DHCD proposed that the maximum grant amount for Vermont Housing Improvement Program (VHIP) be increased for units with 3 or more bedrooms. This was adopted by the legislature in 2022, and allows the program to support the development of units with more bedrooms.

Zero to Two Bedrooms: \$30,000 maximum grant award

Three or More Bedrooms: \$50,000 maximum grant award

Cost of Housing

Increasing housing costs is not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice, as noted in [The Relationship Between Fair and Affordable Housing](#) section. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in those areas. Therefore, fair housing choice and affordable housing are inexorably linked.

From 2000 to 2020, the median household income in Vermont increased by 18.7%. During the same period median housing value increased by 38% and median gross rent increased by 58.2% (figure 25). This means that although Vermonters have more income, housing has become less affordable. As a percentage of median household income, median gross rent has increased from 16% of income in 2000 to 22% in 2020. During the same period, median housing value increased from 273% of median household income to 432%.

There was only one county in Vermont where the increase in household income outpaced the increase in housing costs, in Grand Isle County median household income increased by 45%, while median gross rent only increased by 26.4%. However, the median housing value in this county was 72%, outpacing this increase in income.

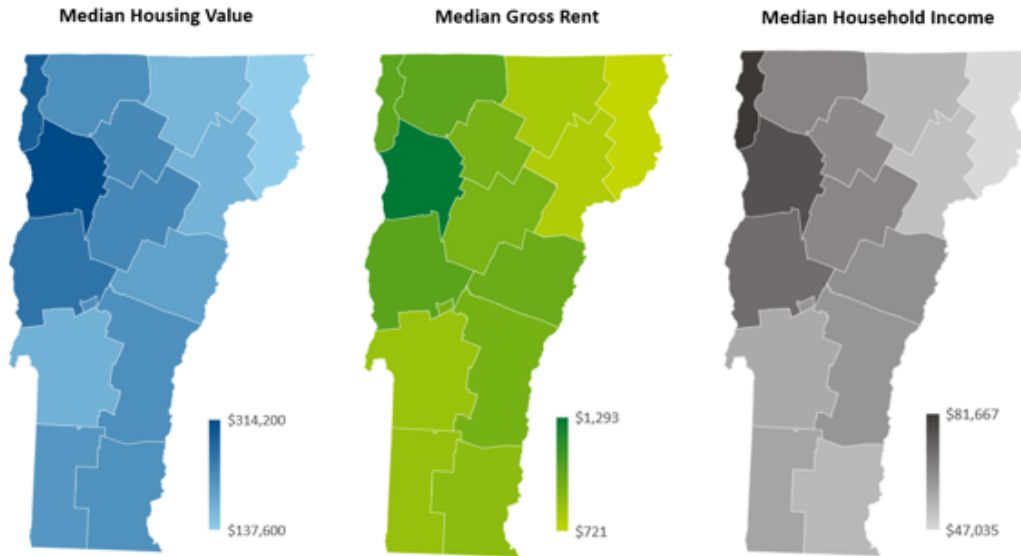
Figure 25. Trends in Median Housing Value, Rent, and Income, 1990–2020



2000 to 2020 Change



2020 by County

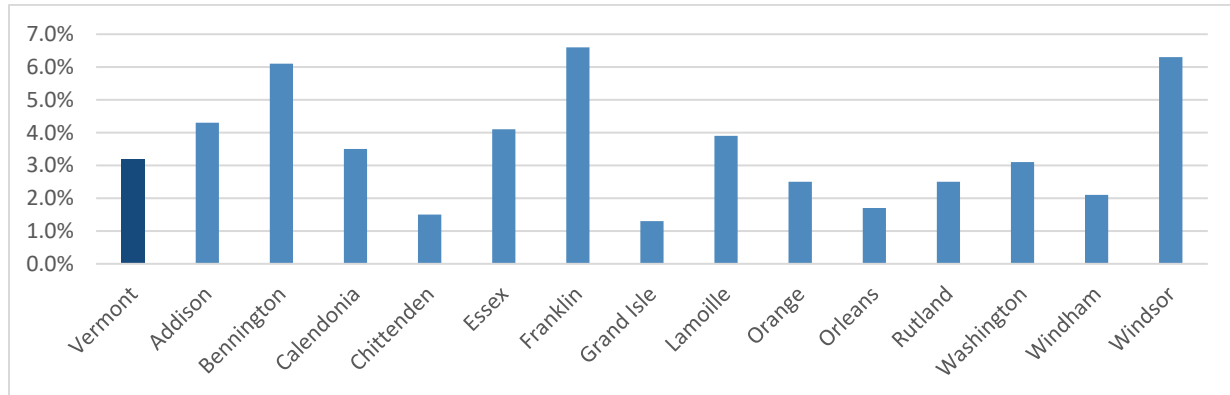


Sources: U.S. Census Bureau, Census 2000 (SF3-H76, H63, P53), 2010 & 2020 5-Year Estimate American Community Survey (B25077, B25064, B19013). Raw data in Appendix E.

Rental Housing

In 2024, Vermont’s overall vacancy rate was 3.2%, which is lower than a healthy vacancy rate of 4–6%. The rental vacancy rate varies from county to county, with Chittenden at 1.5% and Franklin at 6.6%.²¹ According to the 2025–2029 Statewide Housing Needs Assessment, if the rate of household growth continues at pandemic area levels of 1.8% a year, Vermont will need an additional 16,000 to 20,000 rental homes before 2029.

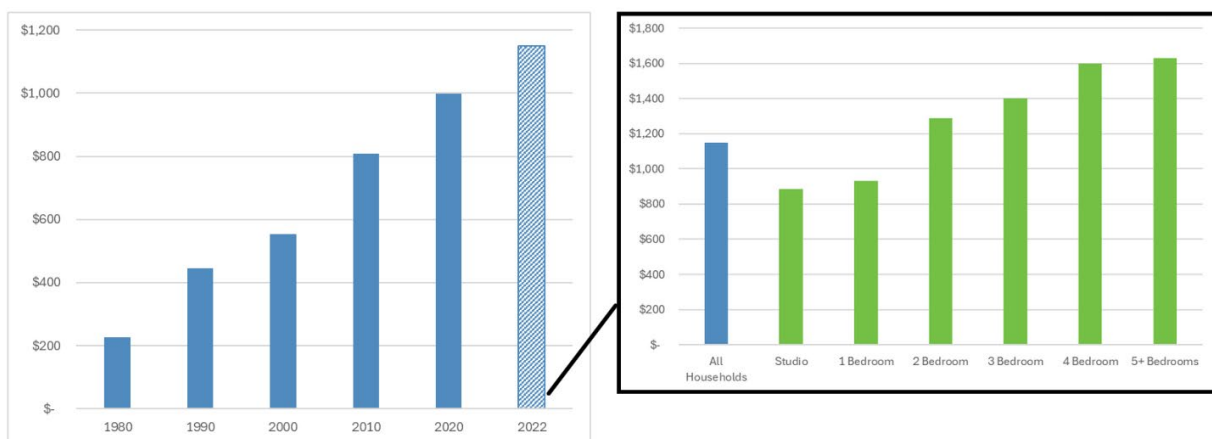
Figure 26. County Rental Vacancy Rates, 2022



Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2018–2022.

Lower vacancy rates put upward pressure on prices, and median rents in Vermont have risen steadily, reaching \$1,149 statewide in 2022. To afford rent of \$1,149 per month, a renter household would need to earn \$3,830 per month, or \$22.10 per hour, or \$45,960 annually. According to HUD, monthly rent for a safe, decent apartment in Vermont counties in 2024 is 25% to 35% higher than it was 5 years ago.²²

Figure 27. Median Gross Rent by Year & Number of Bedrooms Details, 2022



Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2018–2022.

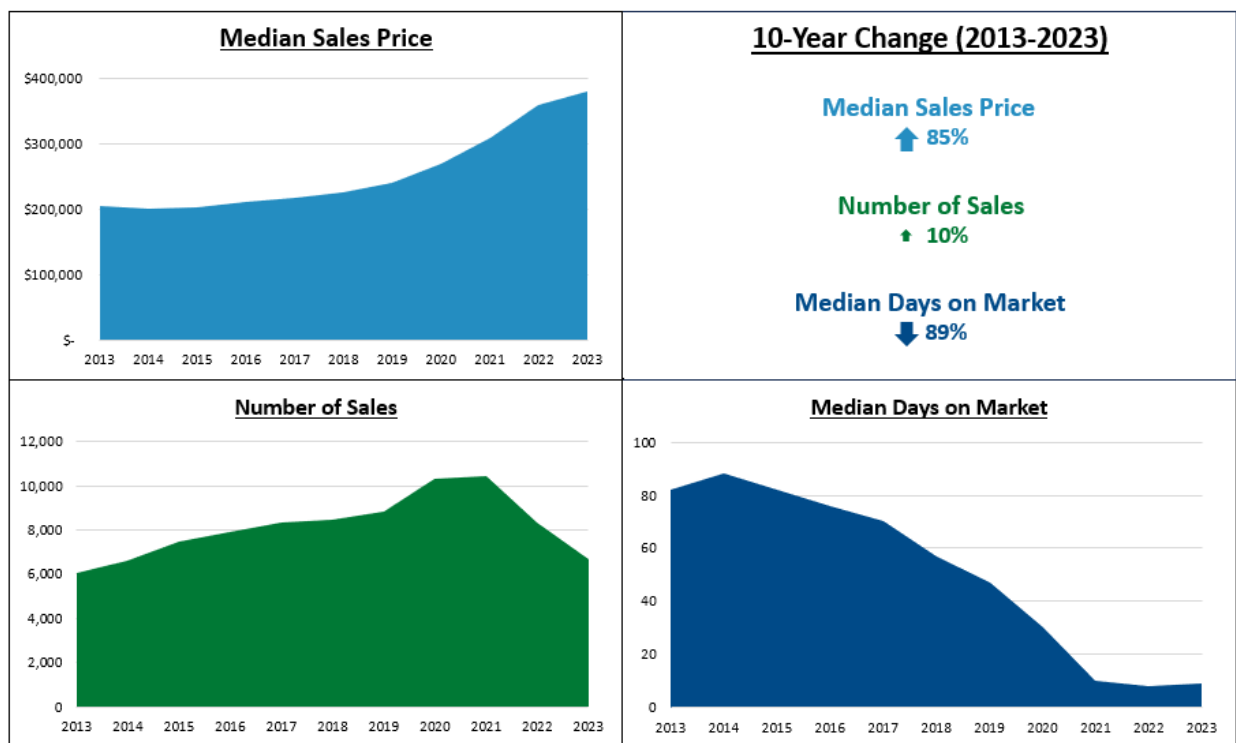
²¹ Vermont Housing Financing Agency, Vermont Housing Needs Assessment: 2025-2029.

²² U.S. Dept. of Housing and Urban Development, HUD Fair Market and 50th Percentile Rents. 2024

Sales of Housing

Since the publication of the last AI in 2012, there has been a steady increase in the median sale price of single-family homes and condominiums. During this period, the median sales price increased from a low of \$200,000 in 2014 to a high of \$380,000 in 2023. This is a 90% increase in the cost of sale housing. Comparatively, the median household income in Vermont only increased by 36% during this same period.²³ This means that housing has become significantly more expensive and less accessible to the average Vermont household. As prices have increased, the median number of days a house stays on the market has steadily decreased. At its peak in 2014, houses were on the market for an average of 88 days, but by 2023 the median days on the market had plummeted to just 9 days, a 90% decrease. This significant increase in sale prices and decrease in the number of days units stay on the market has created a “seller’s market,” where units are scarce and sellers are able to keep prices high and negotiate favorable deals.

Figure 28. Vermont Housing Market Trends, 2013–2023
Single Family Homes and Condominiums



[Figure continued on next page.]

²³ Sources: U.S. Census Bureau, Census 2014 and 2022 5-year estimates (S1903).

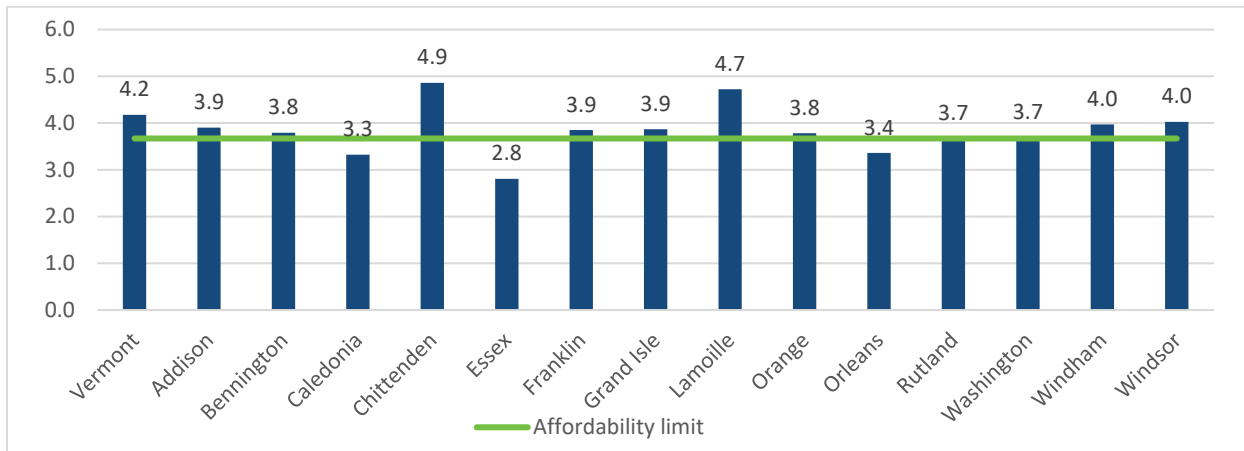
Year	Number of Sales	Median Sales Price	Median Days on Market
2013	6,077	\$205,000	82
2014	6,627	\$200,000	88
2015	7,472	\$203,000	82
2016	7,877	\$211,000	76
2017	8,309	\$217,900	70
2018	8,432	\$225,000	57
2019	8,801	\$239,500	47
2020	10,327	\$270,000	30
2021	10,430	\$310,000	10
2022	8,350	\$358,500	8
2023	6,686	\$380,000	9

Source: Vermont Association of Realtors, Market Data, Single Family Homes, and Condominiums.

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level.²⁴ A relatively affordable housing market is one in which at least 40% of the homes could be purchased by households at the median household income.

The ratio of median home price to median household income has been rising in Vermont since 2018. While homeownership rates have increased slightly, homes are less affordable in 2022 than they were 5 years ago. The price to income ratio should not exceed 3.67 for housing to be considered generally affordable. As of 2022, only Caledonia, Orleans and Essex counties had price to income ratios that fell within the affordable range.

Figure 29. Ratio of median home sale price to county median household income, 2022



Source: American Community Survey and Vermont Property Transfer Tax (PTT).

At a state level, Vermont’s home price-to-income ratio has hovered at the threshold of unaffordability since 2009. Since 2019, the ratio has exceeded the affordability threshold, and has become increasingly unaffordable from year to year.

²⁴ Joe Light, “Last of the Red-Hot Markets,” Money Magazine December 2007: 53–56.

Cost-Burdened Vermonters

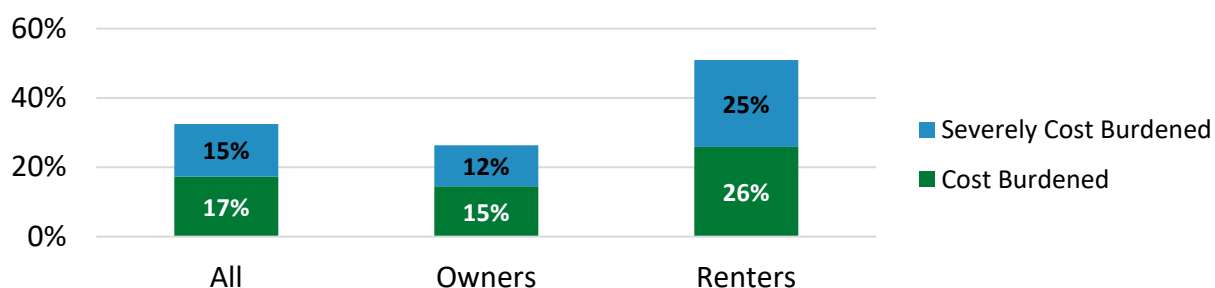
Lower Income Households and Renters are Hardest Hit. Rising rents and home prices have hit low- and middle-income Vermonters hardest. A quarter of renters are severely cost burdened, and fewer renters can afford to buy a median-priced home, further stressing the supply of rental homes. In each year since the pandemic began, rising home prices and mortgage interest rates, coupled with stagnant incomes among many Vermont renters, have drastically shrunk the portion of renters who are likely to leave the rental market by buying a home. In 2021, 32% of renters had the income needed to buy a median-priced home but this plummeted to 6% in 2023.⁹ This means that many renters who otherwise might have bought their first Vermont home were kept living in rental housing by rising prices, interest rates and other market constraints. High rents and inadequate housing quality have led to hundreds of unused tenant-based rental housing vouchers, highlighting the multi-dimensional challenges of meeting housing needs in Vermont’s current housing market.

BIPOC Vermonters and lower-income Vermonters are more likely to rent and face the challenges of rising rents and decreased availability. Black, Hispanic, and Native American Vermonters are disproportionately likely to experience homelessness, according to the most recent data available. While Black Vermonters represent 1% of the state population, they comprised 8% of the people experiencing homelessness as counted in 2023.

30% of household income spent on housing-related expenses, including rent, mortgage, insurance, taxes, and utilities, is the maximum level considered affordable for the average household. If a person pays more than 30% of their income for housing expenses, they are considered “cost burdened.” If they spend more than half their income, they are considered “severely cost-burdened.”

An estimated 88,000 Vermont households pay more than 30% of their income towards rent or their mortgage, meaning that nearly 33% of Vermont households are cost burdened or severely cost-burdened. More than 15% of households statewide pay more than half of their income for housing, leaving few funds for other necessities such as food. These households are at high risk of eviction, foreclosure, and homelessness. Vermont’s renters are more likely than homeowners to be cost-burdened. Half of all Vermont renters are cost-burdened, and one-in-four pay more than 50% of their income for housing costs, putting them at high risk of eviction.²⁵

Figure 30. Cost-Burdened Vermonters



Source: U.S. American Community Survey 2022 5-year estimate (B25070 & B25091).

²⁵ Vermont Housing Finance Agency. (2019). Housing cost burden: Vermont.

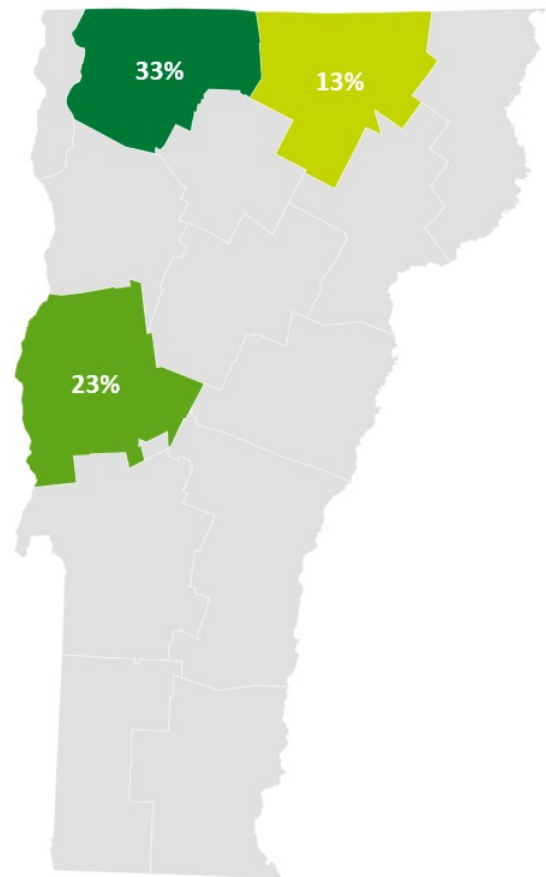
Farmworker Housing

According to a 2021 [Farmworker Housing Needs Assessment](#) prepared for the Vermont Housing and Conversation Board (VHCB), over 2,000 hired farmworkers live in housing on or immediately adjacent to farms in Vermont. Most people residing in farmworker housing in Vermont work on dairy farms and are migrant farmworkers who do not have legal U.S. work authorization. Distinct concentrations of hired farm workers, migrant workers, and on-farm worker housing exist in Addison, Franklin, and Orleans Counties.

Farmworker housing is considered rental housing under the provisions of Vermont Law (9 V.S.A. § 4457), which requires simply that the landlord “maintain, throughout the period of the tenancy, premises that are safe, clean, and fit for human habitation and that comply with the requirements of applicable building, housing, and health regulations.” However, it can be intimidating for migrant workers who are in Vermont without legal work authorization to seek assistance to ensure these requirements are met.

This is particularly difficult in the dairy industry because there is no viable year-round visa program for dairy workers. The H2A visa program, which helps farms hire seasonal foreign migrant labor, excludes year-round positions like those in the dairy industry. Migrant dairy workers make up a substantial proportion, 900, of the workers living on farms in Vermont (figure 32). This puts migrant farmworkers in a particularly precarious and vulnerable position, as they may be less likely to report discrimination, poor working, or poor housing conditions to government officials due to fear of deportation and are unable to access federal funds to support their housing needs. This is reflected in how housing for migrant workers is valued – “Farmer owners place more than three times the value of the housing they provide to domestic workers (\$14,100/ year) than to migrant workers (\$4,367).”²⁶

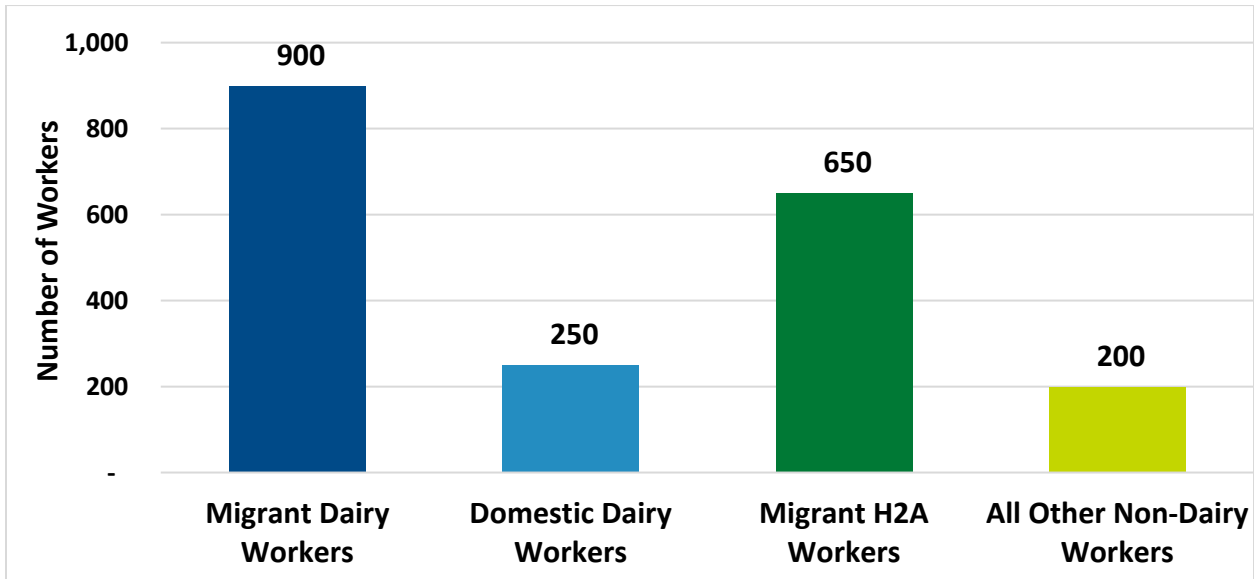
Figure 31. Workers Geographic Areas of Concentration, 2021 Estimates



Source: Vermont Housing and Conversation Board (VHCB). Farmwork Housing Needs Assessment. (April 2021).

²⁶ Vermont Housing and Conversation Board (VHCB). Farmwork Housing Needs Assessment. (April 2021).

Figure 32. Workers Living On-Farm, 2021 Estimates

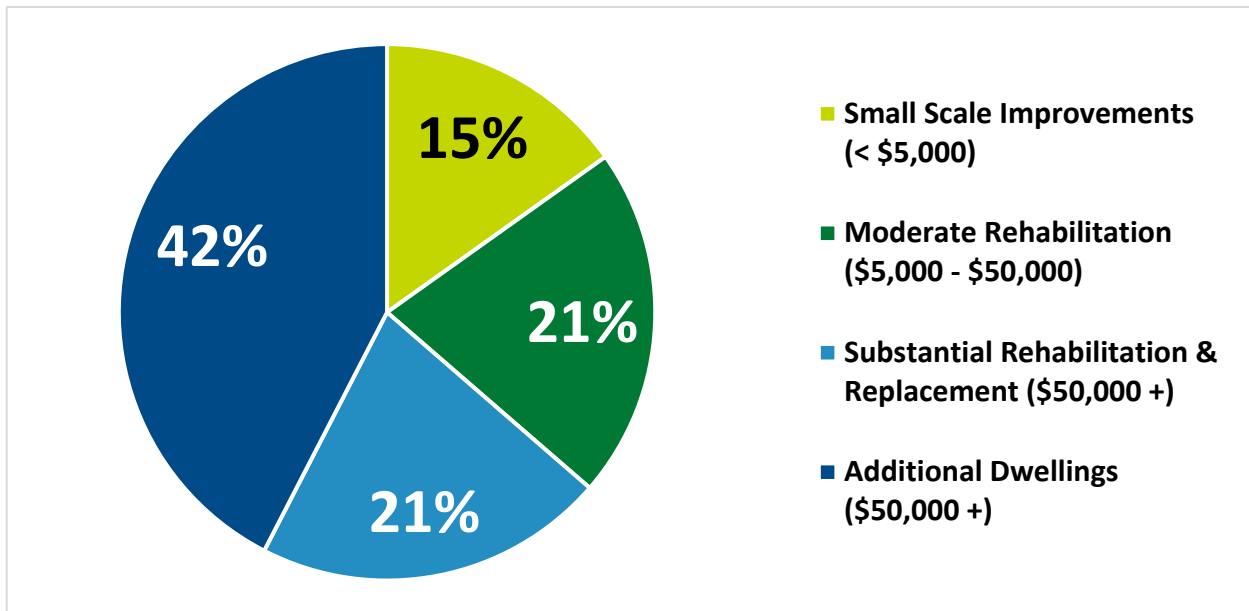


Source: Vermont Housing and Conversation Board (VHCB). Farmwork Housing Needs Assessment. (April 2021). <https://vhcb.org/sites/default/files/pdfs/pubs/Vermont-Farmworker-Housing-Needs-Assessment-Study-4-2021.pdf>

The 2021 Farmworker Housing Needs Assessment found that most of the farmworker housing, 85%, in the state, needed at least a moderate investment (needing over \$5,000 in repairs). 63% farmworker housing needed significant improvements or additional dwellings.

Figure 33. Scale of Farmworker Housing Needs, 2021 Estimated

Adapted from the Vermont Housing Conversation Board’s 2021 [Farmworker Housing Needs Assessment](#)



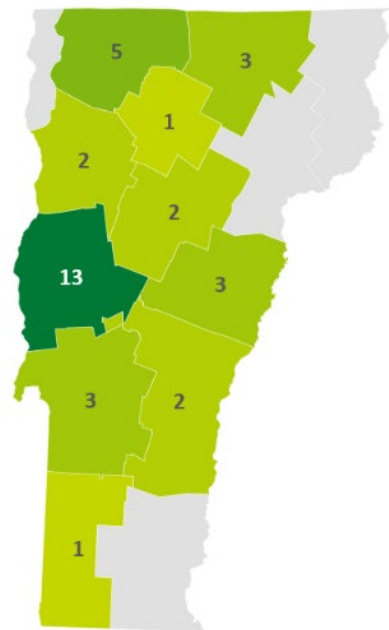
Source: Vermont Housing and Conversation Board (VHCB). Farmwork Housing Needs Assessment. (April 2021).

A survey of farmers found that at least 50 of the 2,000 farms that offer farmworker housing needed additional units. This lack of units often leads to overcrowding of farmworker housing— this was identified as one of the key problems with farmworker housing in Vermont. Although there are some major needs for improvement a series of interviews with of Latinx workers in 2016 found that overcrowding was a stressor for about 11% percent of respondents. More broadly housing was a stressor for around 1/3 of Latinx dairy farmworkers. According to a 2021 Vermont Migrant Dairy Farmworker Housing Brief, “of 173 dairy workers surveyed on 116 farms, 15 farms (13%) had at least one worker reporting extreme stress, and 43 farms (37%) had at least one worker reporting moderate or extreme stress.”²⁷

Fair Housing Progress and Supports: In 2022 Champlain Housing Trust launched the Vermont Farmworker Housing Repair Loan Program, which offer forgivable loans of up to \$30,000 to make essential repairs and necessary improvements to their farmworker housing.

As of October 2023, the program has supported 35 projects, improving 38 farmworker housing units in the state. The program has supported a significant number of projects in Addison and Franklin counties (37% and 14% funded projects, respectively), which have the highest concentration of farmworker

Figure 34. Farmworker Housing Repair Loan Program Projects



²⁷ Baker, D. (2021). Vermont Migrant Dairy Farmworker Housing Brief. *University of Vermont*. https://www.uvm.edu/sites/default/files/Community-Development-and-Applied-Economics/Vermont_Dairy_Farmworker_Housing_Brief.pdf

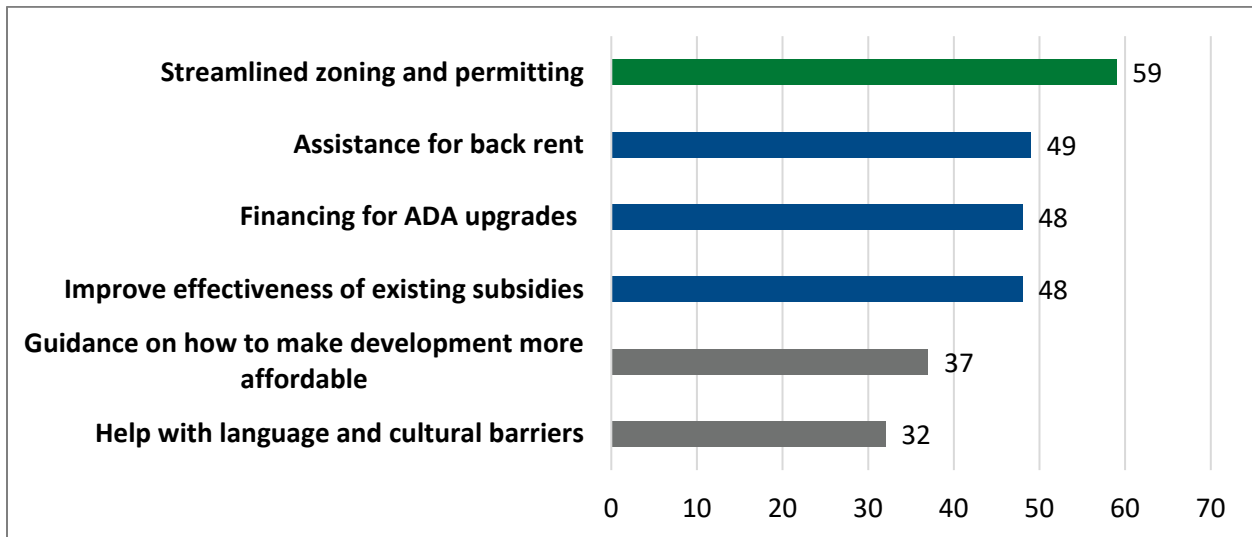
Evaluation of Fair Housing Profile

Survey of Housing & Nonprofit Professionals

The Department of Housing and Community Development completed a statewide survey of housing and nonprofit professionals from November 16, 2022 through July 31, 2023. DHCD received 95 responses from professionals throughout the state who provided a wide range of services related to housing navigation, retention, and eviction prevention. Respondents' vocations varied. Most respondents, 65%, worked for a nonprofit organization, 15% worked in the government or as an elected official, and the remaining respondents worked in Real Estate, Property Management, Property Development, or another housing related profession (raw data provided in Appendix E).

As noted throughout this study, there is a pervasive lack of affordable housing in Vermont, as well as the United States as a whole. This can impact Fair Housing in several ways, including a reduced number of formal Fair Housing Complaints for fear of retaliation or eviction because there are so few places to rent. Housing Professional and Nonprofit respondents identified financial, regulatory, and service based resources needed to develop/rehab affordable housing. Streamlining zoning and permitting regulations received the highest number of responses with close seconds for rental assistance, improving the effectiveness of existing subsidies, and financing for ADA improvements.

Figure 35. Housing & Non-Profit Professionals Survey: Resources Needed



Source: 2023 Vermont Fair Housing Survey of Housing & Nonprofit Professionals – question allowed for multiple selections. Raw data in Appendix E.

*Graphic does not include the "Other" category, which had 12 responses.

Another important finding of this survey was that many housing professionals reported that their clients had been victims of housing discrimination. 56% of respondents reported observing housing discrimination in the county or region where they worked. Respondents in certain roles were more likely to report observing housing discrimination. Individuals working for non-profits or the government were much more likely to report observing discrimination 72% and 57%, respectively, than individuals working in property management and real estate (13%). This discrepancy may be in part because people in

property management roles may be the ones discriminating—the general public survey found that 56% of respondents cited a landlord or property manager as the source of the discrimination.

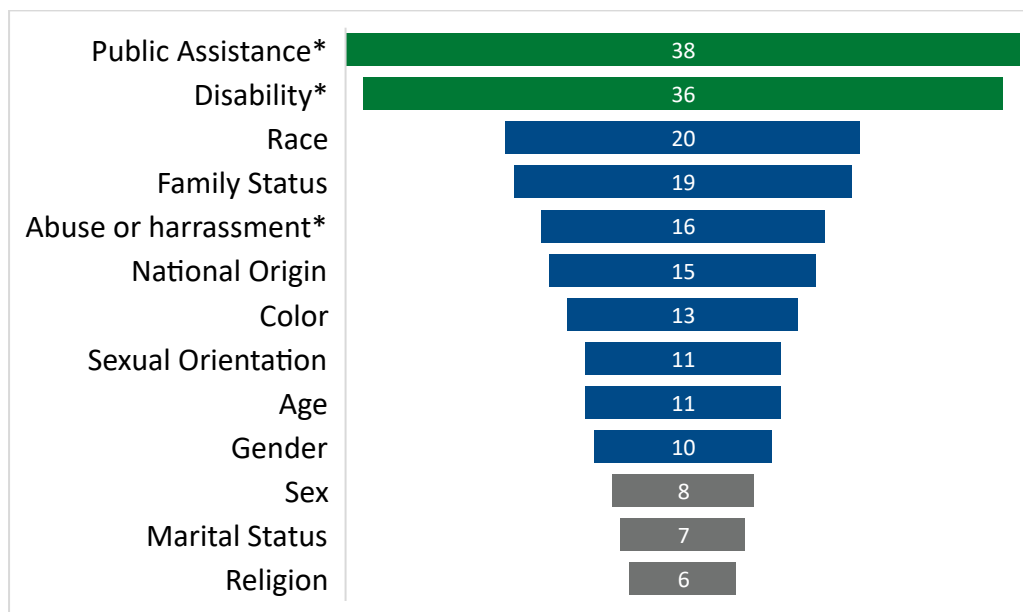
Figure 36. Housing & Non-Profit Professionals Survey: Role and Observation of Discrimination

Role	Percent Observing Discrimination
Non-profit	72%
Property/Real Estate	13%
Government	57%
Other	27%
Total	56%

Source: 2023 Vermont Fair Housing Survey of Housing & Nonprofit Professionals. See Appendix E Raw Data for how roles were classified.

Those who reported observing discrimination often indicated that they had observed discrimination based on several factors (or protected class statuses). Receipt of Public Assistance was the most common reason reported for discrimination, with 38 responses, followed by Disability/Medical Conditions as a close second with 36 responses. Race and Family Status also had significant responses (20 and 19, respectively).

Figure 37. Housing & Non-Profit Professionals Survey: Basis of Discrimination



Source: 2023 Vermont Fair Housing Survey of Housing & Nonprofit Professionals – question allowed for multiple selections.

*Receipt of public assistance, *Disability/Medical condition, *Victim of abuse, sexual assault, or harassment.

The nature of discrimination observed by housing professionals varied. However, a landlord not accepting service animal, stating the unit was not a good fit for children, or harassing someone because of they were a member of a protected class were the three most common forms of discrimination reported.

Figure 38. Housing & Non-Profit Professionals Survey: Nature of Discrimination

Nature of Observed Discrimination	Adjusted Responses
A landlord didn't allow a disabled client to have a service animal.	22
Was told that the home is not a good fit for children.	21
Harassed because of race, skin color, national origin, disability, etc.	17
Asked for a larger security deposit, a background check, etc.	14
Assumed a client didn't have money.	10
Wouldn't take Housing Choice Vouchers.	9
Refused to take a rent check late even though they accept it late from tenants not in a protected class.	5
Refused to lease to tenants with perceived addiction or mental health issues.	3

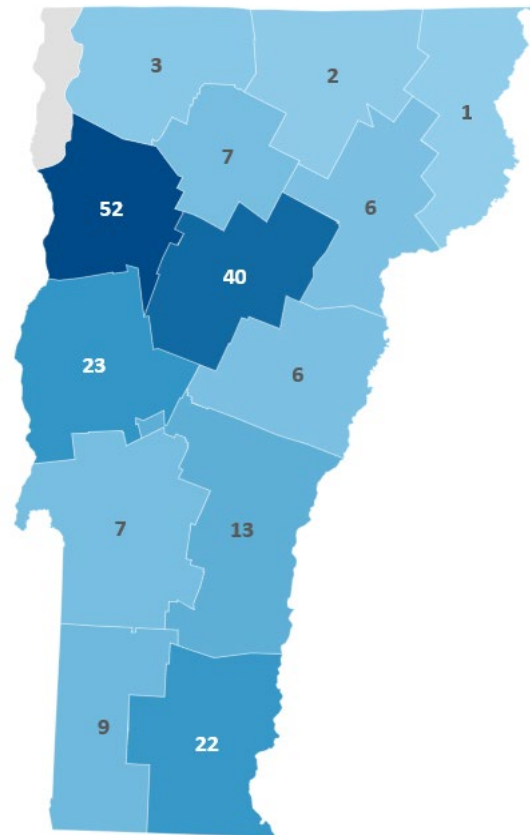
Source: 2023 Vermont Fair Housing Survey of Housing & Nonprofit Professionals – question allowed for multiple selections. 11 “other” selections were not included in this table. See Appendix E Raw Data for more details.

On a positive note, over 60% of Housing and Nonprofit Professionals went to fair housing trainings in the last 3 years and expressed great interest in training on the following topics, Eviction Process and Tenant Protections (47), Vermont’s Fair Housing Laws (43); and Conflict Resolution Strategies (40). Additionally, all the respondents want to continue the conversation with DHCD and each other regarding fair housing and housing affordability.

Statewide Fair Housing Survey for the General Public

The State of Vermont completed a statewide Fair Housing Survey for the General Public from January 7, 2023, through July 31, 2023. DHCD received 204 responses through an extensive public outreach effort. Staff at DHCD partnered with a variety of nonprofit organizations to man tables in 12 counties to talk to folks about fair housing and help them with questions about a variety of housing related issues (see [Public Input](#) section for more details). The goal of this outreach was to have true statewide feedback, and this goal was largely met, while connecting Vermonters to helpful resources related to housing. The survey received responses from 13 of Vermont’s 14 counties. Grand Isle was the only county that was not represented in the survey responses.

Figure 39. Statewide Fair Housing Survey Responses



Survey respondents were:

- More diverse than Vermont’s population overall, with differences in reported racial categories;
- Had a higher rate of disability and a lower rate of home ownership; and
- Had a higher percentage of households with children. This might be explained by having surveys completed in libraries, which often have robust programming for children.

Figure 40. Statewide Fair Housing Survey Respondents V. State Population

Population	Percent of 2023 VT Fair Housing Survey Respondents	Percent of 2020 Census Vermont Population
White Population	83.7%	89.8%
Black Population	5.7%	1.4%
Asian Population	3.6%	0.4%
Native American	2.6%	1.8%
Multi-Racial	5.2%	5.8%
People with a disability	24.5%	15.1%
Household with children	30.2%	24.2%
Homeowners	54.3%	72.1%

Sources: State of Vermont 2023 Housing Discrimination Survey. Race- U.S. Census Bureau, National Historical Geographic Information System. Disability- U.S. Census Bureau, 2019 American Community Survey (B18101). Cost Burdened- 2020 Vermont Housing Need Assessment based on data from the U.S. Census Bureau. Owner Occupancy & HH with children: <https://www.census.gov/quickfacts/VT>

Survey Findings Highlights

- 30% of respondents said that they experienced housing discrimination.
 - Of those that reported discrimination, 56% cited a landlord or property manager as the source of the discrimination.
- 36% of survey respondents that experienced discrimination said it was based on disability, and 28% said it was based on receipt of public assistance.
 - 57.7% of the formal fair housing complaints made to the Vermont Human Rights Commission from 2017–2021 were based on disability.
- 50% of respondents who experienced discrimination also reported that their housing was unstable.

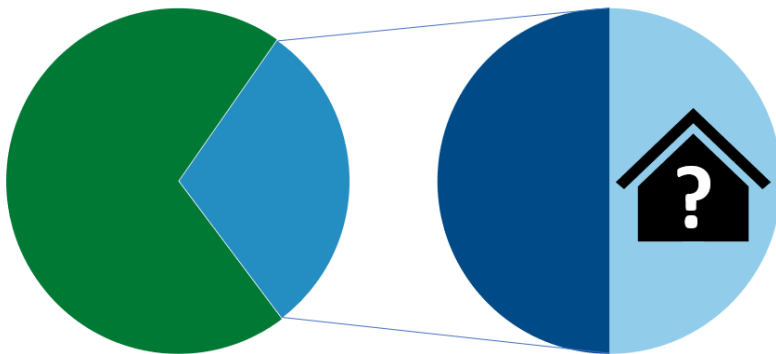
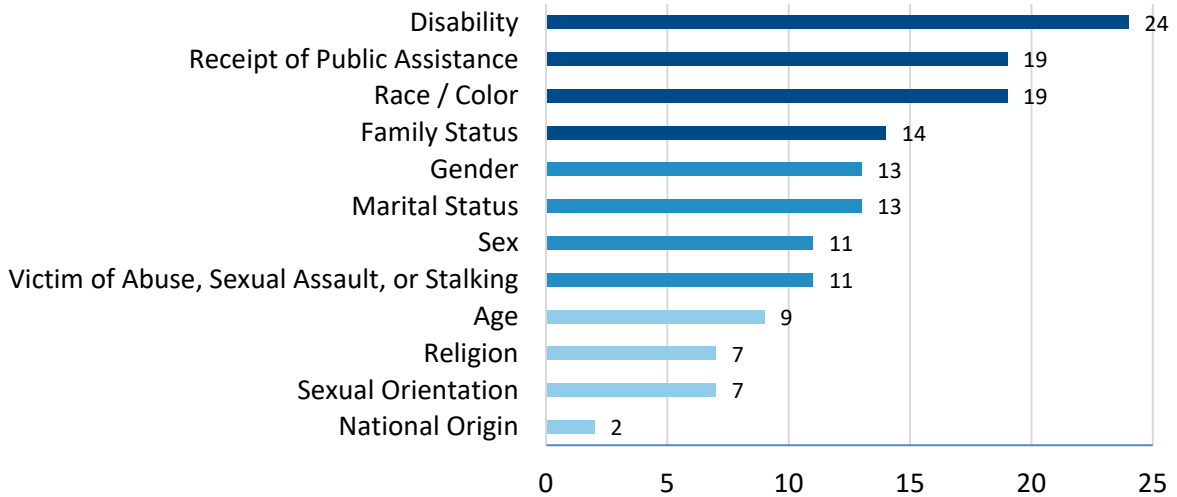
The 2023 Statewide Housing Discrimination Survey, like others conducted across the country, highlights the relationship between poverty, housing discrimination, and housing instability. Vermont’s lack of affordable housing exacerbates this population’s vulnerability.

Figure 41. Statewide Fair Housing Survey Highlights



Approximately 1 out of 3 Vermonters experienced housing discrimination. The highest rates of discrimination were against people with disabilities.

Basis of Discrimination



Half of respondents who experienced discrimination also reported that their housing was unstable.

Sources: State of Vermont 2023 Housing Discrimination Survey.

LEP Focus Group Findings

In early 2024, DHCD partnered with CVOEO's Housing Advocacy Program to conduct an educational focus group with Vermonters with Limited English Proficiency (LEP). These focus groups were conducted as informal discussions with guiding questions for groups of 4 to 11 people, with interpreters. Each focus group participant received a \$25–\$50 stipend, depending on the time commitment.

Focus Groups Conducted:

- **Maay Maay:** 4 people, plus an interpreter, in person
- **Dari:** 3 people in person, 1 person and the interpreter via Zoom
- **Nepali:** 4 people, plus the interpreter, via Zoom
- **Mixed languages:** 11 CVOEO Community Ambassadors representing the following language communities — Arabic, Chinese, French, Lingala, Nepali, Somali, Spanish, Swahili

The findings of these informal focus groups show that LEP Vermonters have a wide range of experiences. For example, when asked if they or members of their community felt that it was easy, safe, and effective to file a complaint about discrimination or housing conditions, some groups unanimously said yes, others unanimously said no, and others had mixed responses. This being said, some meaningful themes emerged from these groups about the types of barriers these communities face and potential resources that could aid them.

All groups commented about the lack of affordability and units being too small for their families; these issues have been highlighted elsewhere throughout this document. Although these issues need to be addressed at a systemic level, more hands-on housing search assistance for LEP was identified as an important resource that would help these communities find suitable housing in an increasing tight housing market.

Many of the participants also experienced some level of housing discrimination. The types of discrimination ranged from not being considered for a unit because they did not speak English or the size of their family, issues within the units not being fixed within a timely manner or being charged for repairs, to landlord asking for a large deposit than they do for other tenants. These issues can be hard to report because, as one participant noted, “it [housing discrimination] happens, but it’s not overt—it’s mostly subtle.” Additionally, even those participants who felt they could report discrimination did not have a clear understanding of the complaint process, timeless, or outcomes.

Proposed Action: Work with nonprofits/partners that help file complaints to create videos or other educational materials that can be shared with the public in multiple languages. Real stories from people who have filed complaints about their experience would be ideal, especially a story from a LEP Vermonter, and all materials should make it clear that it is free to file a complaint.

Other issues identified throughout the focus group were challenges related to effectively communicating and resolving issues with their landlord or other tenants. The groups identified several potential resources that could improve communication with their landlord, including:

- Outside person/interpreter to help with communication with landlord and other tenant to solve issues and improve relationships;
- Access to interpreted mediation sessions to help solve problems with the landlord; and
- Third-party entity to help file fair housing complaints.

Expanding existing programs, like the Vermont Landlords Association mediation program, to have the option to have an interpreter when needed (and providing the funding to do so) would be an easy way to start providing more of these services.

Existence of Fair Housing Complaints

This section provides an overview of Vermont's fair housing complaints or compliance reviews. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice (DOJ) or private plaintiffs. However, the lack of filed complaints does not necessarily indicate a lack of housing discrimination. There are numerous reasons housing discrimination can go unreported, including:

- A lack of awareness about how and where to file a complaint;
- To avoid confrontations with prospective landlords (especially in a tight rental market such as Vermont's);
- People may be unaware that discrimination is occurring because they do not have the benefit of comparing their treatment with that of another home seeker;
- People may not be aware that discrimination is against the law and that there are legal remedies to address the situation; and
- Households may be more focused on finding decent housing and may prefer to avoid going through the process of filing a complaint.

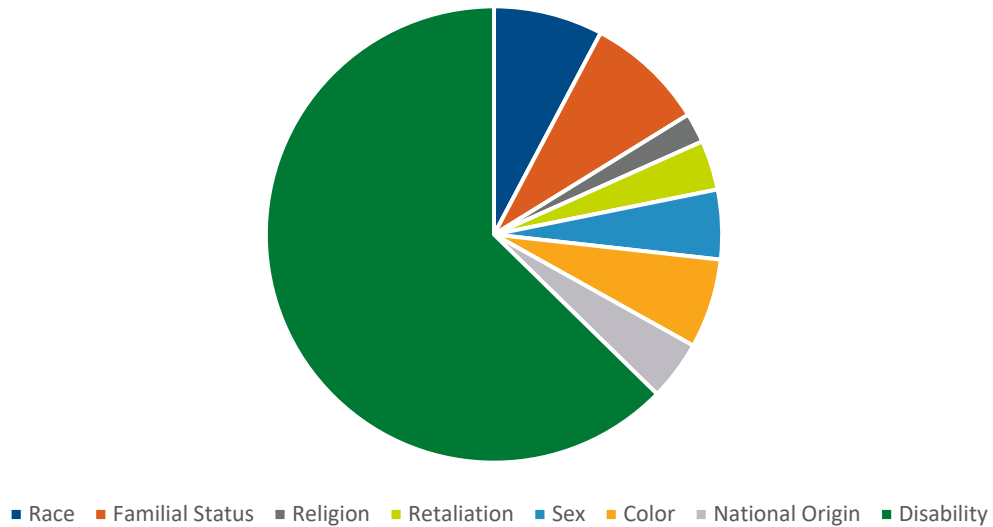
Therefore, education, information, and referral regarding fair housing issues remain critical to equip people with the ability to reduce impediments to fair housing.

HUD's Office of Fair Housing and Equal Opportunity

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD processes complaints from people regarding alleged violations of the federal Fair Housing Act. Between 2017 and 2022, 130 complaints from the State of Vermont were either directly filed with FHEO or dual-filed with the Vermont Human Rights Commission (VHRC), alleging violations of state and federal fair housing laws. VHRC processed and investigated all the complaints through the Fair Housing Assistance Program (FHAP). FHAP is a HUD program that provides state and local agencies funding to administer fair housing laws that HUD has determined to be substantially equivalent to the Fair Housing Act. The Human Rights Commission is the state partner in Vermont.

Of the 130 complaints in the state, 89 (68.4%) alleged discrimination based on disability and 12 (9.2%) based on familial status or the presence of minor children. 11 complaints alleged discrimination based on race and 9 on color. Several complaints alleged discrimination on multiple bases. Figure 42 provides a summary of the alleged bases of discrimination complaints filed through FHEO.

Figure 42. Basis of Discrimination Complaints to HUD, 2017–2022



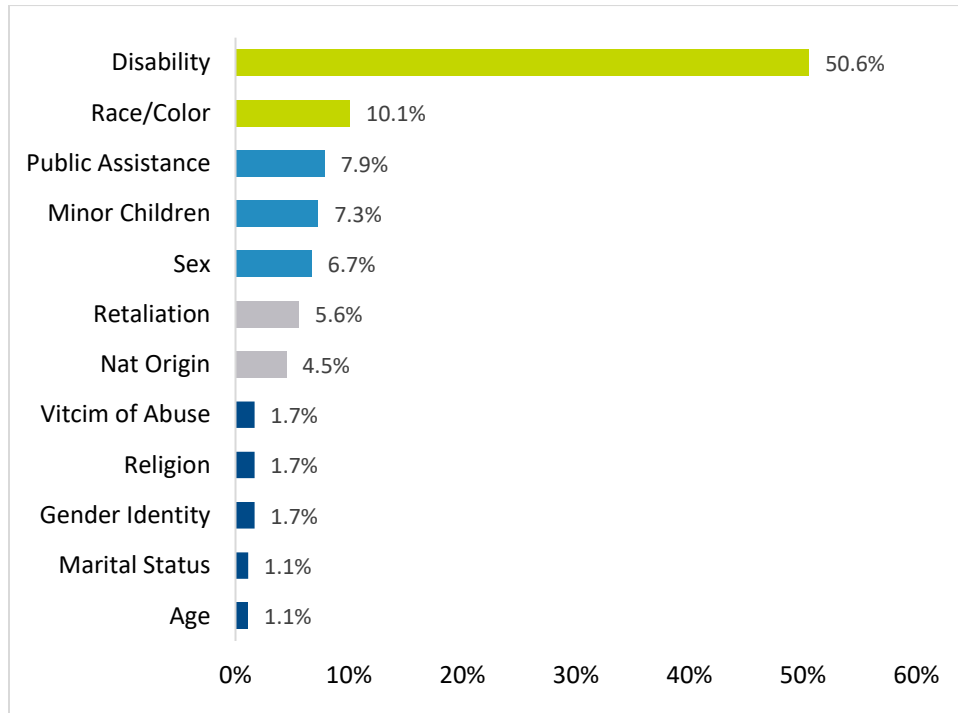
Patterns & Trends in Fair Housing Complaints

Human Rights Commission Complaints & Investigations

From 2017 to 2022, 89 formal fair housing complaints were filed to the Human Rights Commission, with a total of 123 findings. Many of the complaints filed included multiple types of discrimination, which is why there were more findings than complaints. Of those findings, 20 claims were found to have reasonable grounds for the complaint, and 33 were found not to have reasonable grounds. \$106,323.00 was awarded to complainants, and non-monetary relief included fair housing training, policy changes, and accessibility modifications.

Mirroring the results of the survey findings, over 50% of fair housing complaints to the Human Rights Commission were based on disability. However, the number of complaints based on public assistance was much lower than the survey results. The graph below highlights the basis of the complaints filed.

Figure 43. Human Rights Commission Fair Housing Complaints 2017–2022



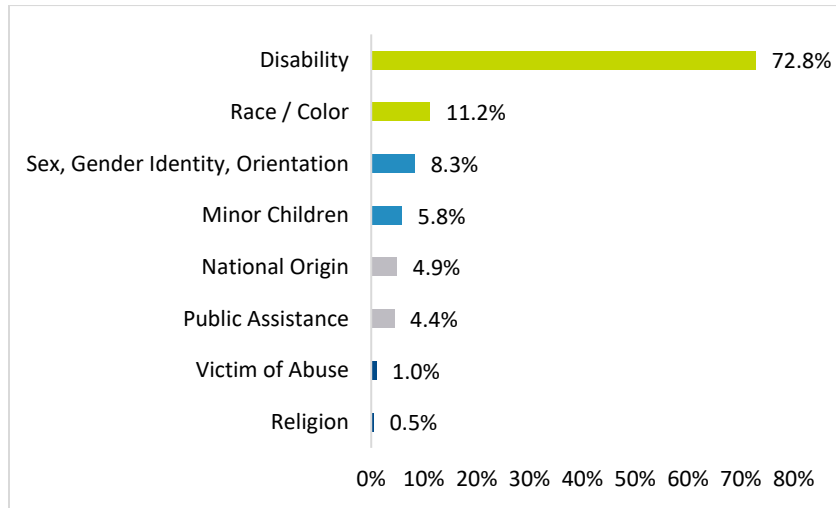
Sources: State of Vermont Human Rights Commission.

Vermont Legal Aid Complaint Data

From October 1st, 2022, through September 30th, 2024, Vermont Legal Aid received 206 official housing discrimination complaints. Similar to the complaints received by the Human Rights Commission, the vast majority of these were based on disability (72%). Most discrimination based on disability was related to the refusal to make reasonable accommodations, with fewer complaints related to the refusal to make reasonable modifications. Reasonable accommodations may include modifications to address the needs of people with disabilities, including changes in rules, policies, practices, and procedures (e.g., permitting the use of an assistance animal). Reasonable modifications include changes to the physical structure (e.g., constructing an entrance ramp). Of these complaints, 46% were based on physical disability (69), 31% were based on mental health (46), and 23% were based on both mental and physical disability (35).

There were far fewer complaints due to other bases of discrimination. The second most complaints were filed based on race and color (23). Sex, gender identity, or orientation was the third most common source of complaints (17). This data may not be reflective of all the discrimination experienced in the state. Vermont Legal Aid received Federal funds, and cannot represent people who are discriminated against solely on the basis of one of the State’s protected classes. This includes public assistance recipients, age, marital status, or being a victim or survivor of abuse, stalking, or sexual assault. Vermont Legal Aid does not do outreach on those state-only bases, and may receive more complaints related to these protected classes if they did.

Figure 44. Vermont Legal Aid Complaint Data, Basis, 2022–2024



Sources: Vermont Legal Aid.

Note. Some complaints were on the basis of multiple types of discrimination.

In addition to the basis of discrimination, Vermont Legal Aid collects information regarding the location of the complaints filed. This data demonstrates areas that may be more or less likely to have housing discrimination. Chittenden county has a significant number of complaints—82—making up a higher percentage of the filed complaints (39.8%) than the portion of the Vermont population that lives in this county, (26.2%). Other counties have smaller discrepancies that are not necessarily indicative of a trend, given the small sample size.

Figure 45. Vermont Legal Aid Complaint Data, County, 2022–2024

County	# Complaints	% Complaints	% Population
Addison	8	3.9%	5.8%
Bennington	6	2.9%	5.8%
Caledonia	6	2.9%	4.7%
Chittenden	82	39.8%	26.2%
Essex	-	0.0%	0.9%
Franklin	12	5.8%	7.8%
Grand Isle	1	0.5%	1.1%
Lamoille	8	3.9%	4.0%
Orange	6	2.9%	4.6%
Orleans	2	1.0%	4.3%
Rutland	21	10.2%	9.4%
Washington	19	9.2%	9.3%
Windham	18	8.7%	7.1%
Windsor	17	8.3%	9.0%

Sources: Vermont Legal Aid. 2020 U.S. Census, P1, Population.

Existence of Fair Housing Legal Proceedings

As of July 31, 2024, that the Human Rights Commission (HRC) has brought the following cases under the Vermont Fair Housing and Public Accommodations Act, 9 V.S.A. § 4500, *et seq.* (“Act”), alleging one or more violations of the Act in connection with housing.

Unless otherwise noted, all cases are filed in the Washington County Superior Court. In each case, HRC seeks all relief available to HRC under the Act, including civil penalties, attorneys’ fees, and declaratory judgment.

A. HRC v. Campion, Docket No. 24-CV-00701

In this case, filed in February 2024, HRC seeks compensatory and punitive damages on behalf of Alicia Appleton, an “aggrieved individual” under the Act, for the alleged acts and omissions committed by Defendant, Paul Campion, who leased a mobile home to Ms. Appleton in Franklin County in 2017. HRC alleges that Mr. Campion sexually harassed Ms. Appleton and retaliated against her after she complained about his conduct, in violation of the Act. HRC filed the case in February 2024. No trial date has been set.

B. HRC v. Bissonette Properties, LLC, Docket No. 24-CV-01958

In this case, filed in May 2024, HRC seeks compensatory and punitive damages on behalf of Christie Delpha and her mother, Bette Sears (deceased), “aggrieved individuals” under the Act, for the alleged acts and omissions committed by Defendant, Bissonette Properties, LLC, in connection with the rental of a residential apartment in Chittenden County. HRC alleges that both Ms. Delphia and Ms. Sears were people with pulmonary disability, made known to Bissonette, which HRC alleges refused to provide reasonable accommodation under the Act to prevent cigarette smoke from entering their unit. HRC further alleges that Bissonette unlawfully retaliated against Ms. Delphia and Ms. Sears following their raising complaints with local authorities. No trial date has been set.

C. HRC v. Homer Durkee, Docket No. 23-CV-01781

In this case, filed in April 2023, HRC seeks compensatory and punitive damages on behalf of Susan Demar, an “aggrieved individual” under the Act, for the alleged acts and omissions committed by Defendant, Homer Durkee, who in 2021 leased a residential unit to Ms. Demar in Franklin County. HRC alleges that Ms. Demar was a person with a disability made known to Mr. Durkee, and that, during the tenancy, Mr. Durkee discriminated against Ms. Demar in violation of the Act on the basis of her disability, sex, and receipt of public assistance. No trial date has been set.

D. HRC v. Shawn Cheney, Docket No. 23-CV-04827

In this case, filed in November 2023, HRC seeks compensatory and punitive damages on behalf of Carol LaFarr, an “aggrieved individual” under the Act, for the alleged acts and omissions committed by Defendant, Shawn Cheney, in connection with Mr. Cheney’s refusal in 2021 to rent, make available, or otherwise negotiate with Ms. LaFarr for the rental of a residential unit in Franklin County because of Ms. LaFarr’s receipt of public assistance. No trial date has been set.

E. HRC v. Stephen Polak, et al., Docket No. 21-CV-02095

In this case, filed in July 2021, HRC seeks compensatory and punitive damages on behalf of Yesica Sanchez de Ramirez and Felipe Ramirez-Diaz, “aggrieved individuals” under the Act, for the alleged acts and omissions committed by Defendants, Stephen and Kristina Polak, in connection with their alleged harassment and intimidation of, and discrimination against, their neighbors, Ms. Sanchez de Ramirez and Mr. Ramirez-Diaz on the basis of race, ethnicity, and national origin, all in violation of the Act. Jury draw is set for December 1, 2024.

F. HRC v. Town of St. Johnsbury, Case No. 23-AP-394 (Vermont Supreme Court)

In this case, pending in the Supreme Court, HRC appeals a judgment of the Superior Court dismissing HRC’s complaint alleging that Appellee, Town of St. Johnsbury, Vermont, discriminated against Nicole Stone, known to the Town to be a person with disabilities, because the Town denied Stone a reasonable accommodation sought on her behalf to modify the approved use of the home she occupies with her family. The appeal questions whether a decision of the Town’s Development Review Board may be used to preclude or bar a separate action commenced by HRC to enforce the Act. The case is fully briefed. Oral argument, yet to be scheduled, will occur before the full Court.

Determination of Unlawful Segregation

There are no unlawful segregation suits or court orders that have been filed and/or are pending in the State of Vermont.

Evaluation of Public Sector Policy

Public Housing Authorities (PHAs)

The requirement to affirmatively further fair housing in the administration of federal grants and programs applies not only to local, state, and county governments but also to public housing authorities (PHAs). As a result, PHA must certify that they will affirmatively further fair housing. To comply with this requirement, according to 24 CFR 903.7(o), PHAs fulfill the following obligations:

- Fulfill the requirements of 24 CFR 903.2(b);
- Examine existing and proposed PHA policies and programs identifying any impediments to fair housing choice within those programs;
- Address identified impediments in a reasonable manner given the resources available;
- Work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and
- Maintain records reflecting these analyses and actions.

HUD interprets these certifying elements to include:

- Analyzing housing discrimination patterns and working toward their elimination;
- Promoting fair housing choice for all people participating or seeking to participate in PHA programs;
- Providing racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act.

The 24 CFR 903.2(b) concerns PHA deconcentrating poverty, income-mixing, nondiscrimination, and requirements to affirmatively further fair housing. Federal regulations require PHAs to take affirmative steps to overcome the effects of conditions that limit participation in its programs based on protected class status. HUD will challenge a PHA's certification of affirmatively furthering fair housing choice if the PHA does not reduce racial and national origin concentration in developments or buildings and is determined to be perpetuating segregated housing. Furthermore, PHAs must carry out annual plans in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d – 2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (19 U.S.C. 794) and Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101).

There are ten PHAs throughout the State of Vermont, including the Vermont State Housing Authority (VSHA) and local housing authorities in the municipalities of Barre, Bennington, Brattleboro, Burlington, Montpelier, Rutland, St. Alban's City, Springfield, and Winooski. Visit the [methodology](#) section to learn more about how data was collected from Vermont's Public Housing Authorities.

Public Housing Inventory

In 2012, HUD created a method to systematically convert "legacy" programs through the Rental Assistance Demonstration (RAD). With RAD, Public Housing Program buildings and other HUD multifamily buildings can transition to the modern Section 8 platform, allowing local PHAs to streamline

reporting requirements and to access funds for deferred maintenance of older housing. Public Housing properties that convert through RAD remain perpetually affordable through long-term Section 8 contracts required to renew at each expiration unlike other older programs. Residents also gain the ability to request a tenant-based voucher after living at the property for a period.

The number of public housing units owned and managed across the state differs by each PHA. VSHA and the St. Alban's City Housing Authority do not own or manage any public housing units. Since the publication of the 2012 AI, most of the public housing units in the state have entered into HUD's Rental Assistance Demonstration (RAD) program. RAD units move to a Section 8 platform with a long-term contract that, by law, must be renewed in perpetuity.²⁸ With the exception of the units owned by the Montpelier PHA, all the public housing units in Vermont had undergone the RAD conversion process. Vermont has eight local housing authorities and one statewide housing authority who own or manage 101 properties across their housing portfolios.

Admissions & Continued Occupancy Plans (ACOPs)

PHAs that own or manage public housing must have an Admission and Continued Occupancy Plan (ACOP). An ACOP includes a PHA's policies on various topics, including the selection and admission of applicants from a waiting list, screening for tenancy, occupancy standards and policies, informal grievance hearing procedures, rent determinations, and procedural guidelines on conducting inspections. As part of the FHA process, DHCD reviewed each PHA's ACOP to ensure all they have policies that affirmatively further fair housing. Specifically, each ACOP was reviewed to determine if it included the following policies and if these policies comply with the Fair Housing Act:

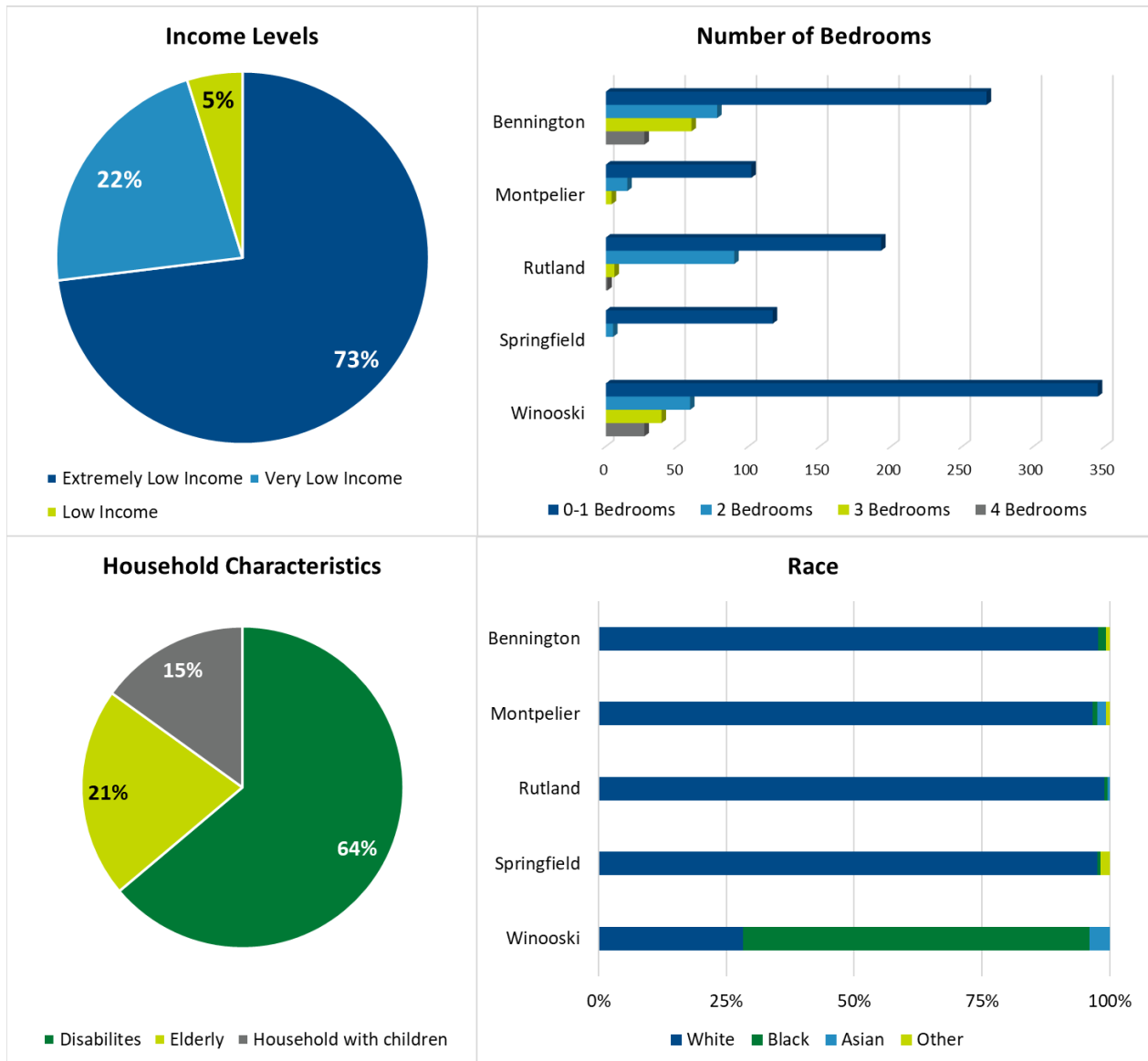
- Fair housing and equal opportunity non-discrimination clause that provides a list of protected classes within the PHA's jurisdiction;
- Reasonable accommodation policies for people with disabilities (relative to the application process, unit selection, and grievance procedures);
- Accommodations for people with limited English proficiency (LEP) and a list of services the PHA is willing to provide such people;
- Definition of "family" and whether it includes non-traditional households with unrelated individuals;
- Tenant selection policies and waiting list preferences to determine whether members of the protected classes are given any special consideration or if the local preferences restrict their housing choice;
- Accommodations for applicants who refuse a unit offered due to a disability or other special circumstance;
- Transfer policies and procedures and whether such policies impede housing choice for members of the protected classes;
- Pet policy accommodations for people with disabilities that require service or emotional support animals; and
- Grievance policies and procedures.

²⁸ U.S. Department of Housing and Urban Development. Rental Assistance Demonstration (RAD). (2023). <https://www.hud.gov/RAD>

Section 8 Housing Choice Voucher Program Inventory & Demographics

In addition to owning and managing public housing units, most PHAs throughout Vermont administer Section 8 Housing Choice Voucher Programs. Housing Choice Vouchers administered by PHAs are used by 7,300 Vermont renter households to help pay for their housing, and individuals receiving a voucher through this program also generally pay no more than 30% of their monthly adjusted income on rent.

Figure 46. Characteristics of Current Section 8 Voucher Holders Head of Household, 2023



Source: 2023 DHCD Public Housing Survey Results: Responses from Montpelier, Rutland, Springfield, Winooski, and Bennington Housing Authorities. Raw data in Appendix E.

Note: Extremely Low Income: <30% MFI. Very Low Income: >30%, <50% MFI, Low Income: >50%, <80% MFI

Section 8 Housing Choice Voucher Program Waiting List

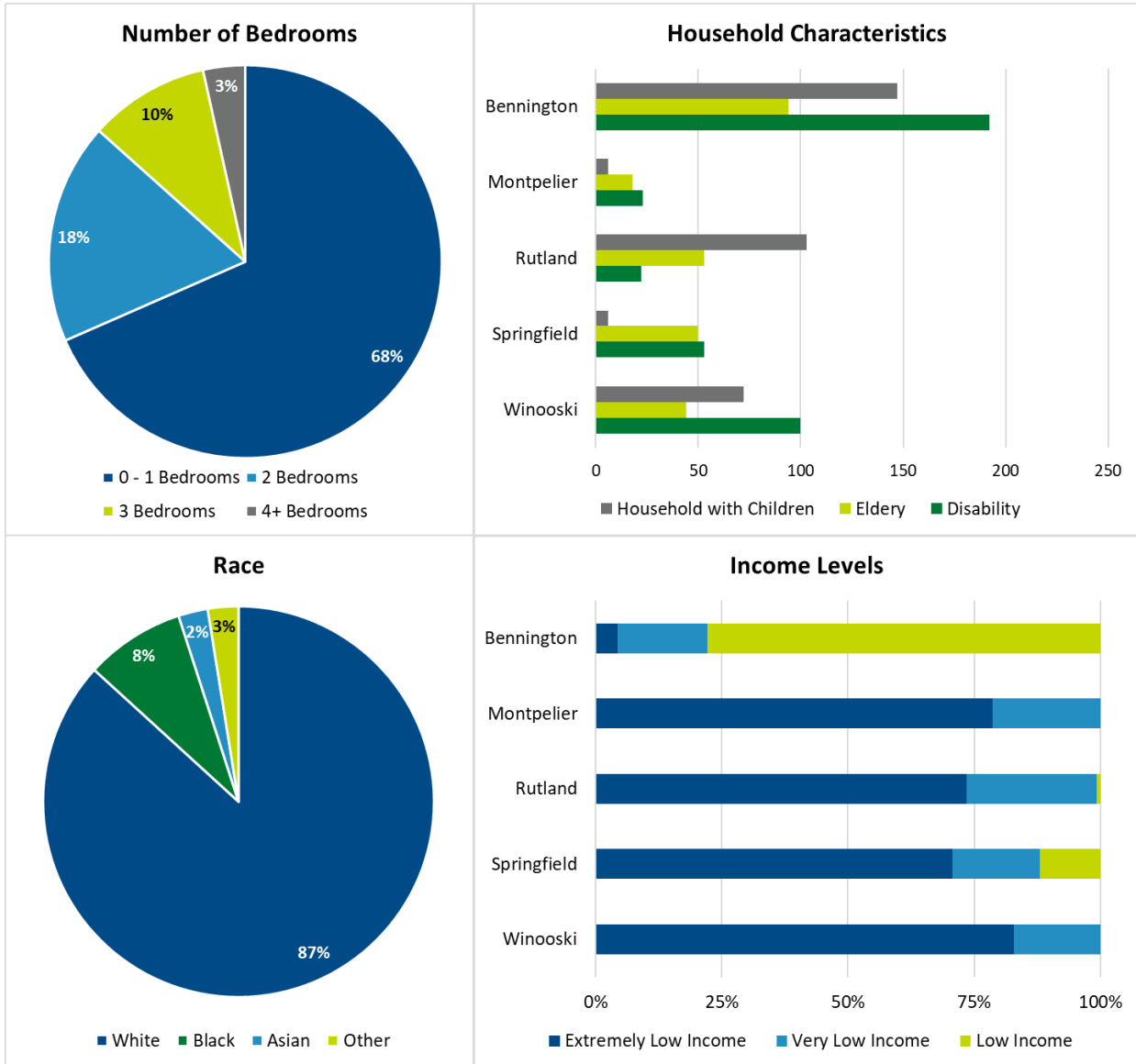
Each PHA within Vermont manages its own Section 8 waiting list. Combined there are a total of 1,106 households on section 8 waiting lists in Bennington, Montpelier, Rutland, Springfield, and Winooski. Of these households, over 49% are extremely low income, 19% are very low income, and 32% are low income. Interestingly, while the income levels served by most of the PHA surveyed had slight variations, Bennington stood as an outlier having more low-income households on its waiting list. Over 649 applicant households waiting for a section 8 voucher are either elderly or have a disability, accounting for 59% of the wait list applicants. Family households with children account for 334 or 30% of applicants. 87% of households on the section 8 waiting lists are White.

According to the 2024 Housing Needs Assessment:

“VHFA partnered with a Duke University in 2023 to assess the capacity, composition, and condition of PHA’s housing portfolios and identify the role PHAs’ housing portfolios will play in the future of affordable housing in the state. This analysis revealed that demand for housing offered by PHAs exceeds availability, that PHAs’ housing portfolios reflect the evolution of federal housing assistance, and that PHAs’ properties are aging and in need of upgrades.”

[Figure on next page, intentionally left blank]

Figure 47. Characteristics of Current Public Housing Applicants, 2023



Source: 2023 DHCD Public Housing Survey Results: Responses from Montpelier, Rutland, Springfield, Winooski, and Bennington Housing Authorities. Raw data in Appendix E.

Note: Extremely Low Income: <30% MFI. Very Low Income: >30%. <50% MFI, Low Income: >50%, <80% MFI.

Section 8 Housing Choice Voucher Program Administrative Plan

Section 8 Housing Choice Voucher Administrative Plans (Admin Plan) are the policies and procedures manual that includes the housing assistance program regulations. Generally, an Admin Plan contains policies that describe the selection and admission of applicants from the PHA waiting list, the issuance or denial of vouchers, occupancy policies, landlord participation, subsidy standards, informal hearing procedures, payment standards, the Housing Quality Standard (HQS) inspection process, and reasonable rents. As part of the FHA process, DHCD reviewed each PHA’s Admin Plan to ensure all they have policies

that affirmatively further fair housing. Specifically, DHCD reviewed each Admin Plan to determine if it included the following policies and if these policies comply with the Fair Housing Act:

- Fair housing and equal opportunity non-discrimination clause that provides a list of protected classes within the PHA's jurisdiction;
- Reasonable accommodation policies for people with disabilities (in the application process, unit search and selection, and grievance process);
- Accommodations for people with limited English proficiency (LEP) and a list of services the PHA is willing to provide such people;
- Definition of "family" and whether it includes non-traditional households with unrelated individuals;
- Tenant selection policies and waiting list preferences to determine whether members of the protected classes are given any special consideration or if the local preferences restrict their housing choice;
- Recruitment of landlords who own properties in non-impacted areas;
- Portability policies and procedures and their effect on members of the protected classes;
- Higher payment standards for units that accommodate people with disabilities; and
- Grievance policies and procedures.

Policies Governing Investment of Federal Funds

Housing choice can be affected by the allocation of staff and other financial resources to housing-related programs and initiatives. The [Westchester County fair housing settlement](#) reinforces the importance of expanding housing choice in non-impacted areas (i.e., areas outside of concentrations of minority and LMI people). This settlement implies that the State of Vermont has an obligation to affirmatively further fair housing by expanding housing choices outside of impacted areas. This obligation applies to HUD funded activities which serve a variety of goals, including:

- **Community Development Block Grants (CDBG):** This program provides annual grants to municipalities, often working in tandem with community groups, non-profit organizations, and small businesses. The primary objective of this program is to develop viable and healthy communities by providing financial and technical support, principally to serve LMI people. Funds can be used for a wide array of activities in the following areas, housing, economic development, public facilities, public services, and accessibility modifications.
- **HOME Investment Partnerships Program (HOME):** The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for LMI households. HOME funds can be used for activities that promote affordable rental housing and homeownership for LMI households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- **Flexible client-based financial assistance through the Housing Opportunity Grant Program (HOP).** The Office of Economic Opportunity (OEO) administers the Housing Opportunity Grant Program to support many activities ranging from emergency shelter to ongoing housing retention services. Over the last several years, OEO invested significant amounts of one-time state funds into HOP for client-based assistance to support housing plans for those experiencing or at risk of homelessness. Funds can be used for a wide variety of expenses, such as rental

arrears, short-term rental assistance, move-in costs, etc. This infusion of funding ensured that vulnerable Vermonters had access to financial assistance to move them out of homelessness or prevent them from becoming homeless. While much of the one-time funding is no longer available, OEO continues to support the availability of this client-based assistance through annual budget appropriations for HOP.

Qualified Allocation Plan (QAP)

As the administrator of the Low Income Housing Tax Credits (LIHTC), the Vermont Housing Finance Agency (VHFA) must create a Qualified Allocation Plan (QAP) that establishes the agency's priorities for affordable housing initiatives. In accordance with the requirements of Section 42 of the Internal Revenue Code, the QAP describes the application and allocation process. Priorities are set by the requirements of the statutory law and the housing needs of Vermont, as determined by the Joint Committee on Tax Credits, adopted by the Vermont Housing Finance Agency (VHFA) Board of Commissioners, and approved by the Governor every two years.

The purpose of this Qualified Allocation Plan (QAP) is to set forth the process and criteria under which specific housing developments will be selected to receive Housing Credits: Federal Low Income Housing Tax Credits (9% Ceiling Credits and 4% Bond Credits) and Vermont Tax Credits for Affordable Housing (Rental Housing Tax Credits, Homeownership Tax Credits, and Down payment Assistance Tax Credits). Ceiling Credit, Bond Credit, and Vermont Tax Credits for Affordable Rental Housing projects must meet the Thresholds laid out in the QAP. The QAP also establishes Evaluation Criteria to analyze the 9% Ceiling Credit project's ability to meet state housing policy goals and assist in ranking projects as part of the competitive recommendation process.

Due to competition for the 9% Ceiling Credit and limited available funding for that source, developers design their housing developments to achieve maximum scoring under the QAP's Evaluation Criteria. Therefore, the QAP has a major impact on what populations are served, the types of projects that will be undertaken, and where affordable housing is built or rehabilitated. For the purposes of this AI, VHFA's 2024–2025 QAP was reviewed to determine the extent to which it offers opportunities to expand fair housing choices for members of the protected classes.

Background & Housing Credits in Vermont

Vermont Housing Finance Agency is the state allocating agency for the State Affordable Housing Tax Credit for the development of homeownership and rental as well as for the federal Low-Income Housing Tax Credit, which is used exclusively for the development of affordable rental housing. Congress designed the federal Low Income Housing Tax Credit program to help create and preserve affordable rental housing for lower income households. It provides a direct cost-based reduction in federal tax liability over a 10-year period for owners of qualifying rental housing who agree to conform to certain operating restrictions for a 15-year period or longer. The Tax Reform Act of 1986 set a maximum housing credit allocation for each state based on population. The Internal Revenue Service (IRS) authorizes available 9% credits to states based on a per capita amount or a Small State Minimum. Vermont has received the latter since 2003, when the Small State Minimum was established. Vermont's 2024 9% Ceiling Credit allocation is \$3.36 million.

Federal Low-Income Housing Tax Credits bring substantial equity investment into Vermont's housing market. Housing Tax Credits have produced most of Vermont's affordable rental housing developed since the program's inception in 1987. Since Vermont is a rural state with little development capital available, the credits allocated have been a very effective means of raising equity capital for the construction and rehabilitation of much-needed rental housing. Thousands of apartments have been created or preserved to target households earning 60 percent of the median income or less. Tax Credits also benefit Vermont's economy. Credits allocated in Vermont have resulted in millions of dollars in acquisition, development, and construction activity, benefiting local and regional economies statewide.

The Vermont Legislature created a State Affordable Housing Tax Credit ("State Credit" or "State Tax Credit") program in 2000, which was originally intended to support the development of rental housing (\$400,000 per year) with additional gap funding. Since then, the State Credit program has expanded to include additional credits for down payment assistance programs (\$250,000 per year) and affordable homeownership development (\$675,000 per year). All affordable housing credits are awarded by VHFA annually to investors who purchase the credits in exchange for the ability to reduce their Vermont income tax liability for five years. The proceeds from the sale of these credits create more affordably housed Vermonters each year.

Public Transit

The 2012 and 2017 Vermont AIs identified the lack of public transit services outside high-density areas as an impediment to fair housing because it limited housing choice, especially for low-income Vermonters, including a disproportionate number of those in protected classes.

Households without a vehicle are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. Most often, households without a vehicle have low-to-moderate income (LMI). A lack of access to convenient and consistent transportation can put these households at risk of losing employment, jeopardizing their housing stability. Public transport provides an essential linkage between LMI households to employment opportunities.

Areas with access to public transit have a higher proportion of LMI households on average. A study published in *Regional Science and Urban Economics* found "that the local public goods such as better access to public transportation can influence the spatial distribution of low-income households in metropolitan areas and assist in the decentralization of poverty."²⁹ Given the known negative externalities associated with concentrated poverty and its linkages to racial discrimination, access to public transit provides a vital avenue to affirmatively further fair housing.

In 2022, 6.4% of households in the State of Vermont were transit-dependent, meaning they had no vehicle access (Figure 48). There was a very significant disparity in the portion of renter households that were transit-dependent, 17.3%, compared to owner-occupied households, of which only 2.3% were transit-dependent. Among the individual counties across the state, transit dependence is highest in Bennington and Washington counties, as well as the City of Burlington, at 8.5%, 7.7%, and 12.9%,

²⁹ Rahul Pathak, Christopher K. Wyczalkowski, and Xi Huang, "Public transit access and the changing spatial distribution of poverty", *Regional Science and Urban Economics*, Volume 66, 2017.

respectively. Grand Isle County had the lowest overall transit dependence, as only 2% of households had no vehicle access.

Figure 48. Percent of Transit-Dependent Households by Tenure, 2022

	Overall Population	Renter Occupied	Owner Occupied
State of Vermont	6.4%	17.3%	2.3%
Addison County	4.1%	14.0%	1.5%
Bennington County	8.5%	24.4%	3.0%
Caledonia County	7.5%	19.2%	4.0%
Chittenden County*	4.9%	8.0%	1.2%
City of Burlington	12.9%	19.0%	3.8%
Essex County	4.9%	14.2%	3.1%
Franklin County	6.2%	15.9%	3.4%
Grand Isle County	2.0%	9.4%	1.1%
Lamoille County	5.1%	9.8%	3.4%
Orange County	4.2%	11.3%	2.7%
Orleans County	6.3%	22.2%	2.4%
Rutland County	7.1%	18.7%	2.7%
Washington County	7.7%	23.6%	1.7%
Windham County	6.1%	18.5%	1.2%
Windsor County	5.1%	15.3%	2.0%

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates (B25044). Raw data in Appendix E.

*Exclusive of the City of Burlington.

There was a very significant disparity in the portion of renter households that were transit-dependent, 17.3%, compared to owner-occupied households, of which only 2.3% were transit-dependent.

Most state residents, 79.8%, drove to work. Public transportation, predominately busses, were only utilized by 0.9% of Vermonters. Compared to the data reported in the 2012 AI, there was a significant increase in the number of individuals working from home, increasing from 6.9% in 2010 to 13.2% in 2022. This reflects the larger national trend of more work from home opportunities following the COVID-19 pandemic.

Figure 49. Means of Transportation to Work for Workers 16 Years or Older, 2022

Transport Type	Number	Percentage
Car, truck, or van	263,906	79.8%
Drove Alone	236,757	71.6%
Carpooled	27,149	8.2%
Public transportation	2,898	0.9%
Bus	2,630	0.8%
Subway	235	0.1%
Other means	63,716	19.3%
Motorcycle	213	0.1%
Bicycle	2,501	0.8%
Walked	14,783	4.5%
Other means	2,439	0.7%
Worked from home	43,780	13.2%
Total	330,614	100.0%

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates (B08301).

The Public Transit Section of the Vermont Agency of Transportation (VTrans) provides financial and technical assistance to transit districts, transit authorities, municipal transit systems, and nonprofit public transit systems throughout the state. This function is carried out through the administration of both state and federal programs relating to general public transportation and transit programs specific to the needs of senior citizens and people with disabilities.

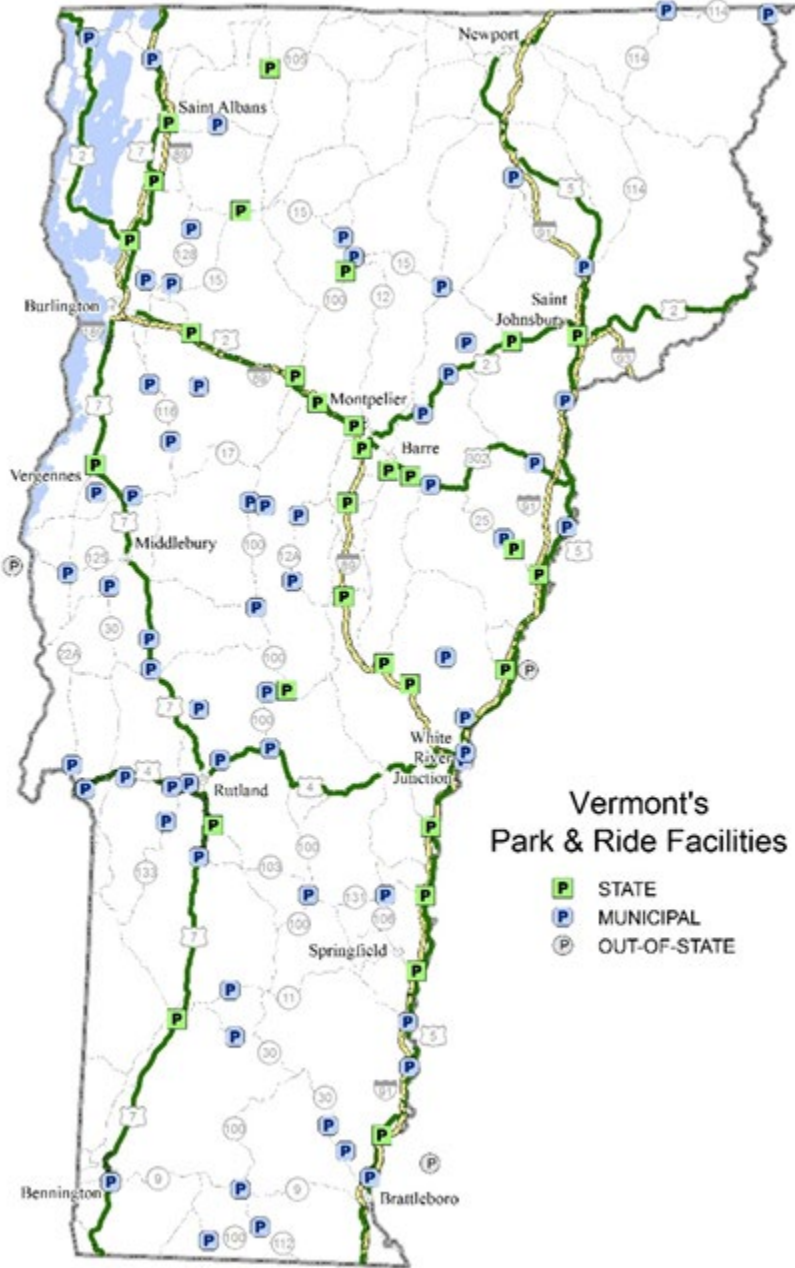
According to the 2018 Public Transit Long Range Plan:

The state operates 30 Park and Ride lots and has assisted in the development of 66 municipal lots. Non-highway infrastructure includes seven regional public transit operators providing nearly 5-million rides annually.

Maps of these public transit corridors are included below. One issue highlighted in Vermont’s 2012 AI was the lack of connectivity and service in the Northeast Kingdom. Since that publication, the Chittenden County Transportation Authority (CCTA) added a new Jeffersonville Commuter Route servicing this region. The launch of this commuter route was very successful, meeting its first-year daily ridership target of 35 passengers on its first day of operation.³⁰

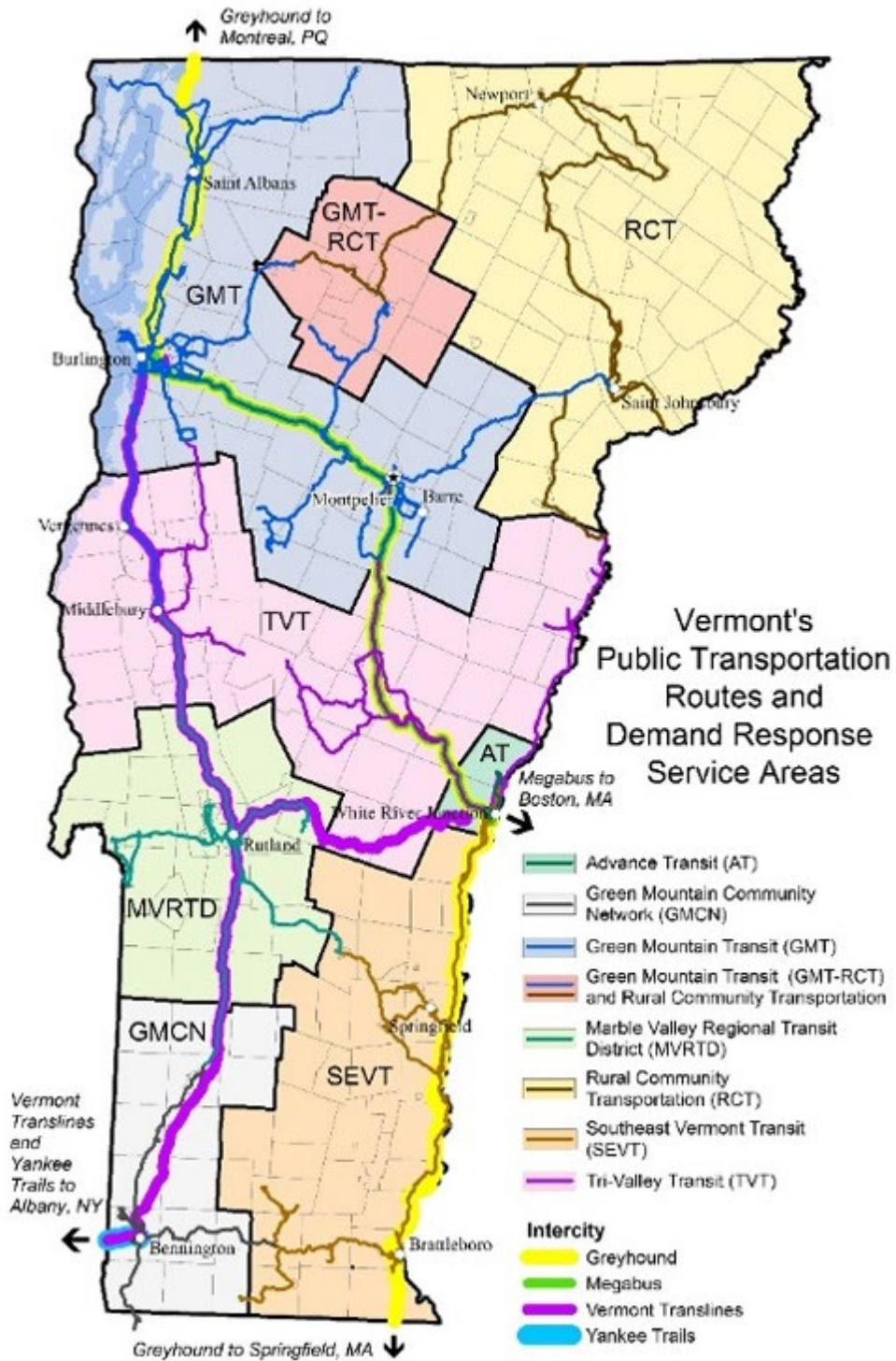
³⁰ VT Digger, “CCTA Launches New Jeffersonville Commuter Route,” October 14th, 2013.

Map 8. Park and Ride Facilities



Source: 2024 Public Transit Long Range Plan, Vermont Agency of Transportation, 2018.

Map 9. Public Transportation Services



Source: 2024 Public Transit Long Range Plan, Vermont Agency of Transportation, 2018.

Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

How the Vermont Property Tax Works

There are two types of property taxes in Vermont: local property taxes and the state education tax rate. Local property tax rates are determined by municipalities and are applied to a home's assessed value. The assessed value is determined by local assessors, who are called listers in Vermont.

The state requires a city or town to conduct a reappraisal if the assessed values in an area fall below 80% of the market value. Otherwise, there are no strict regulations on when listers need to reappraise property; it varies from one town to the next.

The education tax paid by homeowners depends on a variety of factors, including the per-pupil spending in their local schools, the type of property (residential homestead or other) and the state-determined common level of appraisal (CLA).

The state government determines the CLA for each tax district. It represents the overall level of appraised values compared to actual market values. A city with a high common level of appraisal has generally over-appraised property and therefore should pay a lower rate. This ensures that everyone pays a fair share of the education tax.

Vermont Property Tax Rates

In Vermont, rates on residential, owner-occupied property are generally lower than those on other types of property. The homestead tax rate is set each year and adjusted based on the CLA (described above) and the spending per pupil. Except in areas with a very high level of spending per pupil, the homestead rate will be lower than the general rate.

Figure 50 shows the average effective tax rate in every Vermont county, as well as their median home values and median annual property tax payments. Average effective tax rate is a good way to compare taxes across areas. It is calculated as the annual taxes paid by a typical homeowner as a percentage of home value.

Figure 50. Effective Tax Rate & Home Values

County	Median Home Value (2024)	Median Annual Property Tax Payment	Average Effective Property Tax Rate
Addison	\$351,500	\$6,537	1.86%
Bennington	\$266,900	\$5,044	1.89%
Caledonia	\$247,000	\$5,014	2.03%
Chittenden	\$498,000	\$10,009	2.03%
Essex	\$220,000	\$4,135	1.88%
Franklin	\$330,000	\$5,643	1.71%
Grand Isle	\$310,000	\$5,084	1.64%
Lamoille	\$385,000	\$7,199	1.87%
Orange	\$289,000	\$5,751	1.99%
Orleans	\$247,000	\$4,495	1.82%
Rutland	\$236,000	\$5,026	2.13%
Washington	\$239,000	\$6,744	2.05%
Windham	\$315,000	\$6,489	2.06%
Windsor	\$308,500	\$6,571	2.13%

Source: Median Sale Prices from [HousingData.org](https://www.housingdata.org/). Tax Rates from [SmartAsset.com](https://www.smartasset.com/).

Pandemics and Natural Disasters

Some of Vermont’s historic town centers are near waterways that now risk flooding more frequently as the climate changes. At least 4,000 homes were damaged in the state’s July 2023 floods, according to FEMA.³¹ An estimated 20% of all manufactured home communities in Vermont have one or more homes located in a known floodplain.³²

At the time of this writing, state and federal officials were still assessing the damage from additional flooding in July 2024. In an article published on July 31, 2024, by VT Digger, the state had received 1,500 reports of flood-related damage, ranging from “minor flooding to major structural damage.” 50 homes were reported as uninhabitable.³³

The flooding disproportionately impacted vulnerable Vermonters. According to a VT Digger article from July 2023 “...a pattern appears to be emerging: Whether it’s rental buildings in north Barre City or a manufactured home park in Berlin, some of the hardest-hit housing was also Vermont’s most affordable”.³⁴ In the same article, Kelly Hamshaw, a senior lecturer in the Department of Development and Applied Economics at the University of Vermont, noted that mobile home communities and other affordable housing created in the 1960s and 1970s weren’t usually developed on the most desirable or

³¹ Federal Emergency Management Agency, [Vermont Individual Assistance Snapshot](#), January 2024.

³² Vermont Department of Housing & Community Development (DHCD), [Mobile Home Park Risk Assessment Tool](#).

³³ <https://vtdigger.org/2024/07/16/nearly-a-week-after-the-storm-vermont-officials-have-a-clearer-picture-of-the-damage-wrought/>

³⁴ <https://vtdigger.org/2023/07/31/the-flood-waters-disproportionately-hit-vermonts-affordable-housing-stock-at-the-worst-time/>

expensive land. Unfortunately, it also turned out that the less expensive and desirable land is more flood prone, especially with the growing effects of climate change.

Additionally, Vermont's towns and villages were often built on riverways, and denser development has been concentrated there. Affluent residents often moved to larger lots uphill. Households with fewer resources remained in floodplains.

The Impact of the Pandemic on Homelessness and Communities of Color

HUD reports that 20% fewer households were accessing homelessness services during the onset of the pandemic compared to previous years. This decrease includes both adult-only households and families with children. This is due in large part to programs put in place to address safety and health concerns created by the COVID pandemic, including eviction moratoria, emergency hotel and other shelter diversion programs, and increased funding for homelessness prevention. However, the number of people entering shelter programs from other experiences of homelessness increased by 11% between 2019 and 2021.³⁵

People experiencing sheltered homelessness are disproportionately Black, Indigenous, and people of color (BIPOC). This is true of all household types. In 2021, 3% of all people with incomes below the poverty line utilized homeless shelters. However, 10% of Black heads of households in poverty and 12% of Native American or Alaska Native households in poverty used a shelter program during that time.³⁶ There was also a dramatic 73% increase in older Americans staying in shelters and experiencing chronic homelessness between 2019 and 2021.³⁷ This alarming new trend suggests that people are aging into chronic homelessness as well as experiencing homelessness for the first time when they are 65 or older.

In 2021, the Point in Time (PIT) count identified 2,591 homeless Vermonters compared to 1,100 in 2020. Black individuals are significantly overrepresented in the homeless community. Of the homeless Vermonters counted through the PIT count, 6.9% were Black. On its own, this number may not seem alarming; however, considering only 1.4% of Vermonters identified as Black this data shows Black Vermonters are disproportionately more likely to be homeless. Compared to Vermont's population, Black individuals are overrepresented in the homeless population by a factor of 5. Other BIPOC residents are likely to experience similar over representation, but the PIT count does not capture all of this data. Vermont is also seeing an increase in older people experiencing homelessness. Per the 2023 PIT count, 18.5% of all unhoused people were 55 and older.³⁸ 2023 was the first year that granular age data was gathered, but VT Digger reported that service providers were alarmed at the significant uptick in this population.³⁹

³⁵ <https://www.huduser.gov/portal/sites/default/files/pdf/2021-AHAR-Part-2.pdf>, page A-7

³⁶ <https://www.huduser.gov/portal/sites/default/files/pdf/2021-AHAR-Part-2.pdf>, page A-8

³⁷ <https://www.huduser.gov/portal/sites/default/files/pdf/2021-AHAR-Part-2.pdf>, page A-9

³⁸ Vermont Point-in-Time (PIT) Count 2023 from housingdata.org.

³⁹ <https://vtdigger.org/2023/10/18/as-vermont-ages-so-do-many-of-its-unhoused-residents/#:~:text=VTDigger%20could%20not%20locate%20comprehensive,were%20experiencing%20homelessnes%20in%20Vermont.>

Evaluation of Private Sector Policy

Private sector policies can affect the development, financing, and advertising of real estate that influence fair housing choice. While Vermont cannot be held responsible for impediments to fair housing choice identified in private sector policies, the State does have an obligation to identify such impediments and bring them to the attention of the appropriate entity. In some cases, it is reasonable and even expected that the State will attempt to communicate the existence of such impediments to the appropriate entity. For example, if real estate advertisements in a State publication are noted to contain questionable language that may be discriminatory, the State should advise the publication of its legal obligations under the Fair Housing Act.

Mortgage Lending Practices

Any commercial lending institution that makes 5 or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities and identify possible discriminatory lending practices and patterns. Figure 51 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications.

The most recent HMDA data available for the State of Vermont is from 2018 to 2022 (Figure 51). Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the state. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided, or categorized as not applicable, no analysis has been conducted due to lack of information.

The 2018–2022 HMDA data for Vermont shows an increase in the number of loan applications during the pandemic, followed by a decline. Over five years, the percentage of applications that resulted in loan originations increased slightly from 63.3% in 2018, to 64.7% in 2022. It should be noted that the sample size for non-white groups was under 200 households. However, racial disparities exist in the percentage of applications approved. White households were less likely to have their application denied than Black households at any point during the 5 years reviewed. Given the historical context, this is a statistic to continue to watch, especially as Vermont becomes more racially diverse.

Figure 51. Summary Report Based on Action Taken Mortgage Data and Race, 2018–2022

	2018	2019	2020	2021	2022
Applied	9,301	9,650	10,200	10,580	8,745
Black	41	51	70	75	103
White	6,757	6,987	6,990	7,155	6,154
Asian or Pacific Islander	133	107	122	150	165
Hispanic*	72	102	136	131	168
Other Race	188	212	189	248	224
No Information/NA	2,182	2,293	2,829	2,952	2,099
Originated	5,889	6,211	6,600	6,851	5,654
Black	65.9%	72.5%	64.3%	65.3%	63.1%
White	71.3%	71.2%	69.2%	69.8%	70.5%
Asian or Pacific Islander	72.2%	70.1%	66.4%	68.0%	64.2%
Hispanic*	70.8%	58.8%	59.6%	63.4%	63.7%
Other Race	61.2%	67.9%	75.7%	66.1%	63.8%
No Information/NA	38.2%	42.7%	52.9%	52.3%	47.6%
Denied	773	776	880	910	784
Black	12.2%	13.7%	14.3%	17.3%	14.6%
White	9.3%	8.8%	9.4%	9.2%	9.5%
Asian or Pacific Islander	8.3%	9.3%	11.5%	8.0%	15.2%
Hispanic*	20.8%	16.7%	13.2%	11.5%	12.5%
Other Race	13.3%	9.4%	6.3%	12.5%	10.3%
No Information/NA	4.7%	5.4%	6.8%	6.6%	6.5%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act, 2018-2022.

* Hispanic ethnicity is counted independently of race.

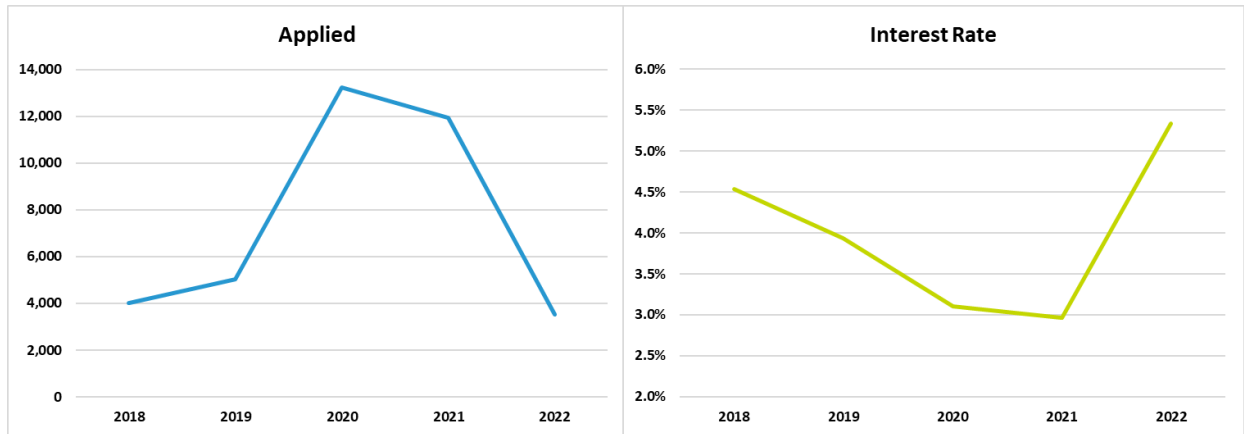
Note: Data is for home purchase loans for owner-occupied one-to-four family and manufactured units. Total applications don't include loans purchased by another institution. Other application outcomes include approved but not accepted, withdrawn and incomplete.

Refinancing

Previous iterations of the Fair Housing Analysis did not include information from the HDMA refinancing data. During the COVID pandemic, 30-year mortgage interest rates plummeted to a low of 2.96%, leading to a boom in the number of homes being refinanced. Applications increased from 4,027 in 2018 to a high of 13,222 in 2020, a 300% increase in just two years. This increase in applications to refinance is correlated with the declining interest rates during this period. From 2020 to 2021, there were over 10,000 applications to refinance in Vermont. However, this rate quickly plummeted in 2022, when interest rates returned to pre-pandemic rates of 5.34%.

Over five years, the percentage of applications that resulted in loan originations increased from 57.5% in 2018 to 65.2% in 2022. The sample size for non-white groups was all under 200 households. Racial disparities exist in the percentage of applications approved. For example, White households were much less likely to have their application denied than Black households at any point during the 5 years reviewed, mirroring the trends in the applications for first-time mortgages.

Figure 52. Summary Report of Refinancing Mortgage Data and Race, 2018–2022



	2018	2019	2020	2021	2022
Applied	4,027	5,041	13,222	11,920	3,522
Black	22	10	39	50	18
White	3,372	4,103	10,148	9,137	2,866
Asian or Pacific Islander	33	53	172	131	42
Hispanic*	36	47	136	125	34
Other Race	51	82	227	223	47
No Information/NA	549	793	2,636	2,379	549
Originated	2,317	3,139	8,860	8,063	2,296
Black	27.3%	50.0%	20.5%	54.0%	50.0%
White	54.2%	64.0%	67.9%	69.2%	67.1%
Asian or Pacific Islander	42.4%	56.6%	62.2%	65.6%	47.6%
Hispanic*	30.6%	51.1%	58.1%	52.0%	73.5%
Other Race	45.1%	56.1%	70.0%	66.4%	70.2%
No Information/NA	39.5%	54.7%	63.7%	62.1%	56.6%
Denied	862	718	1,229	1,084	475
Black	36.4%	20.0%	20.5%	8.0%	22.2%
White	19.0%	14.2%	9.5%	9.4%	13.5%
Asian or Pacific Islander	6.1%	15.1%	8.7%	7.6%	21.4%
Hispanic*	27.8%	12.8%	10.3%	18.4%	8.8%
Other Race	19.6%	15.9%	9.7%	9.0%	0.0%
No Information/NA	17.5%	14.2%	8.4%	8.1%	13.8%

Sources: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act, 2018–2022. The Mortgage Reports, Mortgage Rates Chart: Historical and Current Rate Trends.

* Hispanic ethnicity is counted independently of race.

Note: Data for home purchase loans of owner-occupied 1-to-4 family and manufactured units. Total applications don't include loans purchased by another institution. Other outcomes include approved but not accepted, withdrawn and incomplete.

Conventional Loans vs. Government-Backed Loans

In 2022, HDMA reported on multiple loan types including conventional mortgage loans and government-backed loans, including Federal Housing Administration, Veteran Administration, and United States Department of Agriculture loans. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand homeownership opportunities. In the Vermont, 20.5% (1,795) of the households that applied for a mortgage loan applied for a government-backed loan, which decreased from a rate of 27.8% in 2018. Of 2022 applicants for government-backed loans, 46 (2.6%) were minority households.

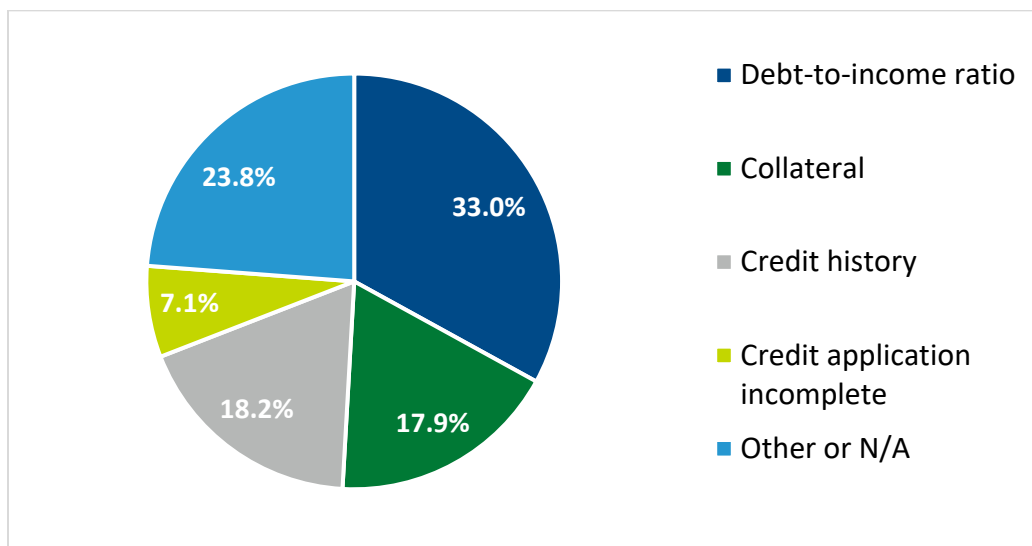
The denial rates for government-backed loans were higher overall than the denial rate for conventional loans, although denial rates for VA loans were lower higher than those for conventional loans. The 2022 denial rates for applications by loan type are as follows:

- Federal Housing Administration loans = 12.5%
- Veteran Administration guaranteed loans = 7.5%
- United States Department of Agriculture loans = 10.6%
- Conventional loans = 8.5%

Denied Applications

In 2022, the mortgage applications of 784 households in the State of Vermont were denied (9%). Denial reasons were given for 757 households (figure53). An unsatisfactory debt-to-income ratio, poor credit history, and lack of sufficient collateral are the major reasons for denial of home mortgage applications.

Figure 53. Mortgage Denial Reason, 2018–2022

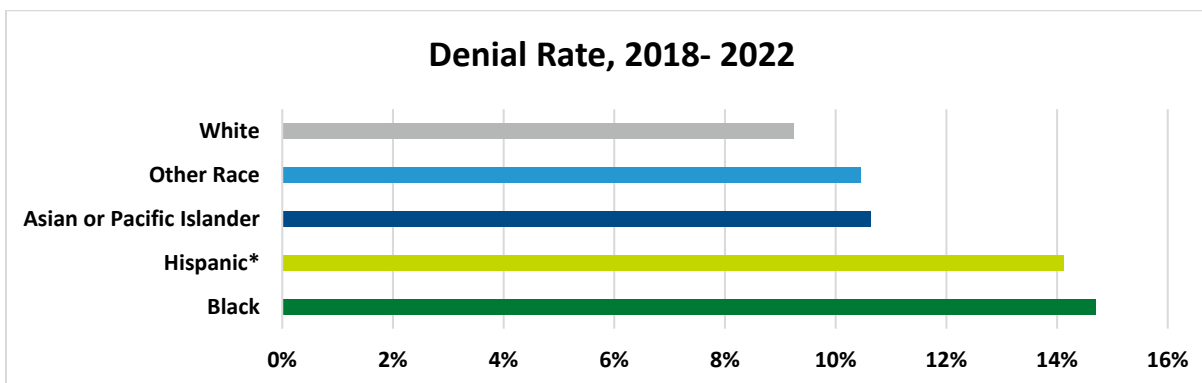


Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act, 2018-2022.

Note: Data for home purchase loans of owner-occupied 1-to-4 family and manufactured units. Total applications don't include loans purchased by another institution. Other outcomes include approved but not accepted, withdrawn and incomplete.

Between 2018 and 2022, Vermont had an average denial rate of 8.5%. The denial rates for whites increased from 9.3% to 14.6%. During the same period, the denial rates for non-white applicants (which excludes Hispanics) also increased, but they remained significantly higher than rates for whites. For all non-white applicants, the denial rate was 11.3% in 2018 compared to 12.8% in 2022. For Hispanic households, the denial rate in 2018 was 20.8%, which dropped to 12.5% in 2022.

Figure 54. Denials by Race and Ethnicity, 2018–2022



	2018	2019	2020	2021	2022	5-Years
Denied	773	776	880	910	784	
Black	12%	14%	14%	17%	15%	14.7%
White	9%	9%	9%	9%	10%	9.2%
Asian or Pacific Islander	8%	9%	11%	8%	15%	10.6%
Hispanic*	21%	17%	13%	11%	13%	14.1%
Other Race	13%	9%	6%	13%	10%	10.5%
No Information/NA	5%	5%	7%	7%	6%	6.1%
Overall Denial Rate	8.3%	8.0%	8.6%	8.6%	9.0%	

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act, 2018–2022.

* Hispanic ethnicity is counted independently of race.

Note: Data for home purchase loans of owner-occupied 1-to-4 family and manufactured units. Total applications don't include loans purchased by another institution. Other outcomes include approved but not accepted, withdrawn and incomplete.

High-Cost Lending Practices

Subprime lending is a tool designed for borrowers who are considered a credit risk and plays an important role in increasing credit availability to low-income households. However, subprime lending often exploits borrowers by piling on excessive fees, penalties, and interest rates, making it difficult for borrowers to achieve financial stability. These higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency, foreclosure, and property disrepair.

Unfortunately, some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for prime loans, but are steered towards the more expensive sub-prime mortgages. This is especially true of minority groups, who make up a disproportionate number of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination, and is illegal under the [Federal Fair Housing Act](#).

Since 2005, Housing Mortgage Disclosure Act data have included price information for loans priced above reporting thresholds set by the Federal Reserve Board. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. However, the HMDA data does provide information on which loans are considered “high cost.”

A loan is considered high cost if it meets one of the following criteria:

- First-lien loan with an interest rate at least 6.5 percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed; or
- Second-lien loan with an interest rate at least 8 percentage points higher than the standard.

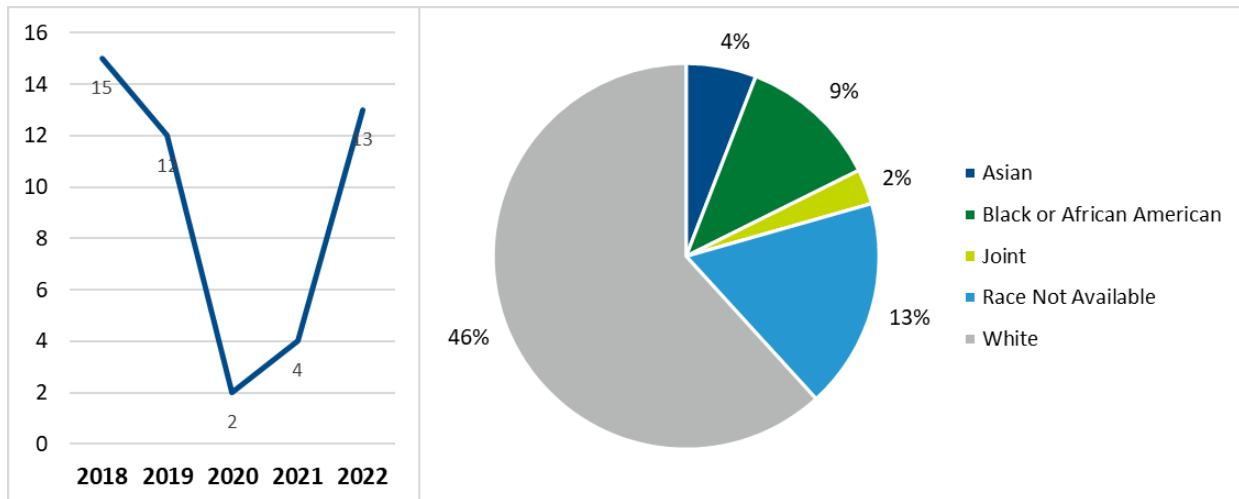
Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

Home Purchase Loans

Only 46 high-cost mortgages originated in Vermont from 2018 to 2022 (an average of just 9 per year). Given the very small number of high-cost mortgages originated in that period, determining whether minorities are overrepresented in high-cost lending cannot be reasonably reached based on an analysis of loans in Vermont by race and ethnicity. The sample sizes of these populations are too small to be statistically significant. However, it is worth noting that during this five-year period, Black households made up 9% of the high-cost mortgages originated in Vermont.

One interesting pattern to note is that the number of high-cost mortgages decreased during the COVID-19 pandemic, reaching a low of 2 in 2020, and increasing slightly to 4 in 2021 before returning to pre-pandemic numbers in 2022.

Figure 55. High-Cost Mortgage Originations, 2018–2022



Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act, 2018–2022.

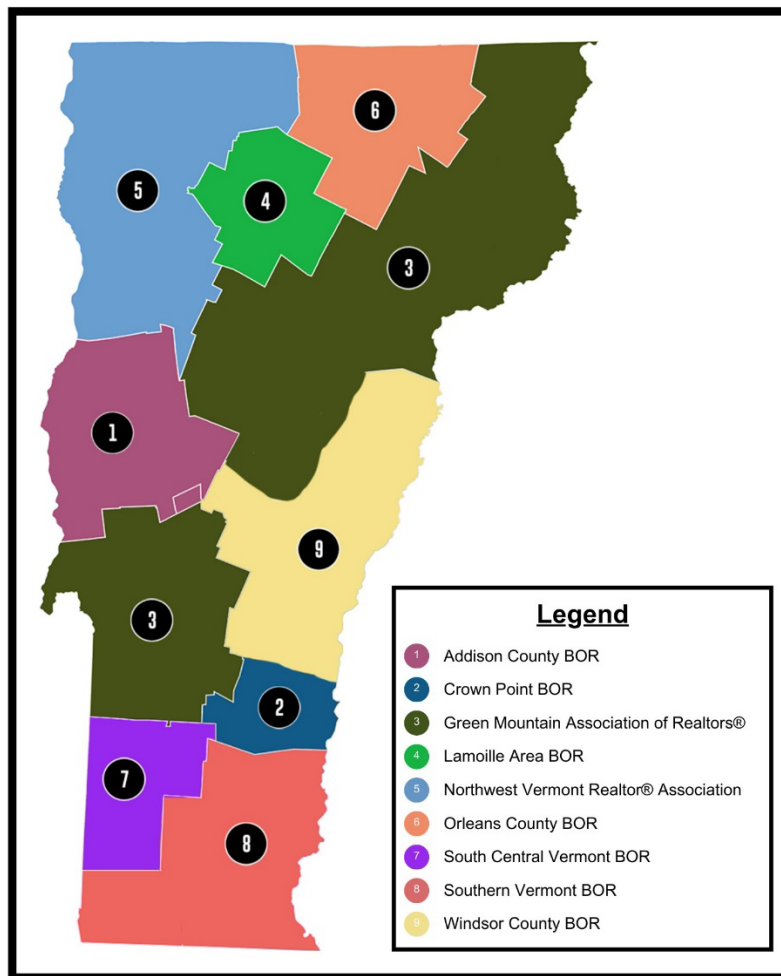
Note: Data for home purchase loans of owner-occupied 1-to-4 family and manufactured units. Total applications don't include loans purchased by another institution. Other outcomes include approved but not accepted, withdrawn and incomplete.

Real Estate Practices

The Vermont Association of Realtors (VAR) serves the state of Vermont with the assistance of nine local boards of realtors and one statewide division that specializes in commercial real estate (Map 8).

New members receive instruction in fair housing as part of the licensing requirements of the Vermont Office of Professional Regulation. To become a licensed real estate salesperson in Vermont, each applicant must complete a 40-hour salesperson pre-licensing course and pass both the national and state real estate exams. As part of the 40-hour course, there is a unit on fair housing that includes information on leasing as well as fair housing and civil rights laws. Fair housing topics fill approximately 4 hours of the 40-hour course. There are 3 chapters within the course textbook that involve fair housing topics, including the Federal Fair Housing Act and Vermont laws in relation to the State's additional protected classes.

Map 8. Vermont Local Boards of Realtors



Source: [Vermont Association of Realtors](#), Vermont Local Boards of Realtors, 2024.

Vermont Real Estate Commission

The Vermont Real Estate Commission (VREC) is a seven-member board. The Governor appoints members to the Commission to administer laws related to the real estate profession in the State of Vermont. VREC's mission is to provide public protection for people working with real estate agents, part of this work includes ensuring that Fair Housing requirements are followed. To serve this mission, the Commission performs the following functions:

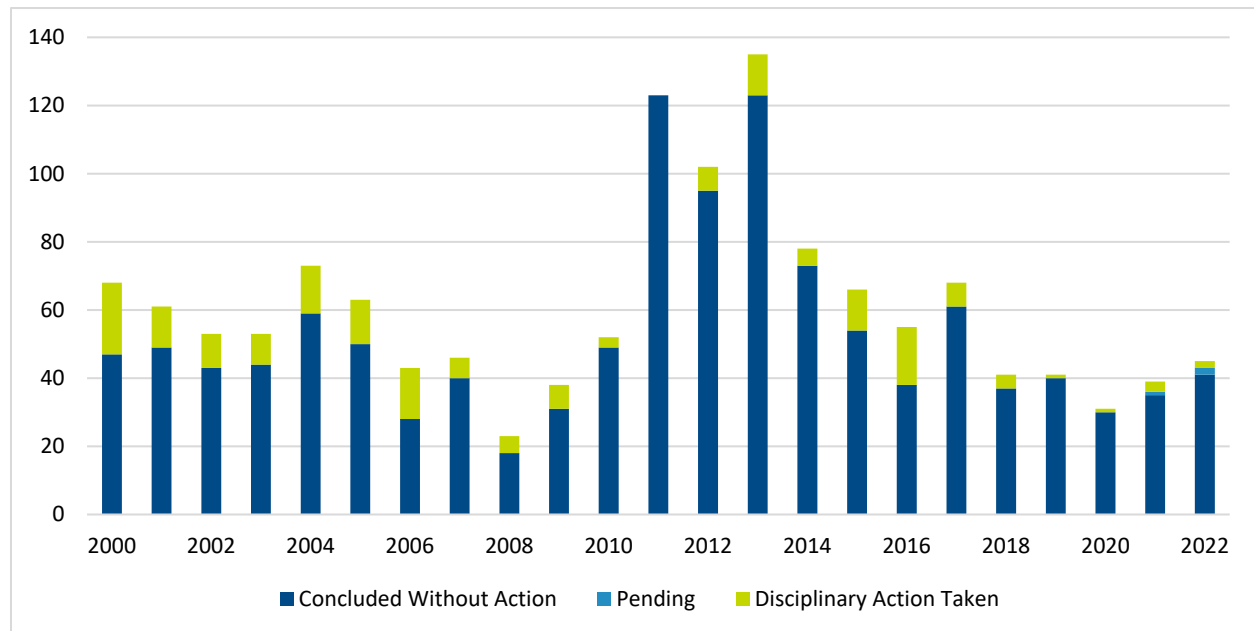
- Ensuring that applicants are qualified for licensure;
- Setting standards for the profession by proposing statutes and adopting administrative rules; and
- Investigating complaints of unprofessional conduct, taking disciplinary action against licensees, when necessary, with the assistance of the Office of Professional Regulations (OPR).

Currently, there is one vacant position on the Commission for a Broker Member who is a non-Relator.

One of the major functions of VREC is to review cases of unprofessional conduct. In the five-year period from 2018 to 2022, there were an average of 40 new complaints of unprofessional conduct a year. As of May 2023, 3 of these cases were still pending. However, the vast majority of these cases—94%—concluded without disciplinary action being taken.

Looking at the trends in complaints of unprofessional conduct in the real estate industry over time, we have seen a steady decline starting in 2014. From 2011 to 2013 there was a peak in complaints, averaging 120 new cases each year during this period. Although there was a spike in complaints during this period, there was no significant increase in the number of disciplinary actions taken. Of the 360 complaints made during that period, only 19 concluded with some type of disciplinary action (5.3%).

Figure 56. OPR VREC, Complaints, 2000–2023



In addition to their typical functions, VREC is working with the OPR to review and provide suggestions for the regulations of Real Estate Brokers and Salespeople.

Rental & Housing Advertising

Under the [Federal Fair Housing Act](#) and the [Vermont Fair Housing and Public Accommodations Act](#), it is illegal to publish any notice, statement, or advertisement that expresses a preference, limitation, or discrimination against members of a protected class, this includes recipients of public assistance. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols, or other approaches that are considered discriminatory. This prohibition applies to people and entities placing real estate advertisements.

There was no recent publicly available data at the time of this publication on the number of rental and housing advertisements that include language that is illegal under the Federal Fair Housing Act. However, rental discrimination, especially related to the receipt of public assistance and disability, is common. According to a 2020 report by the Vermont Legal Aid's Poverty Law Project:

“Discrimination in housing takes many forms. Refusal to rent to people with rental subsidies is common in Vermont. We routinely find advertisements that say, “No Section 8” or “Not Section 8 approved.” Some landlords require that a tenant demonstrate that their monthly income is three times the monthly rental amount, and refuse to include the rental subsidy or voucher or other public assistance in their income calculation. Discrimination can also take the form of different conditions or lease terms, termination of tenancy, and steering to lesser quality units and refusal to provide reasonable rule changes for people with disabilities.”⁴⁰

These problems have likely worsened since this report was published, as the housing and rental markets have become increasingly tight.

Potential Impediment to Fair Housing Choice: Vermont does not have recent or accurate data related to the number of rental and housing advertisements that include discriminatory language. More monitoring of rental and housing advertisements is needed to both assess the extent to which these advertisements include discriminatory language and to address these issues with the property owners and publishers of these materials.

Proposed Action: Provide ongoing funding to Vermont Legal Aid and the Vermont Human Rights Commission to enhance their efforts to identify and address housing advertisements that include discriminatory language.

⁴⁰ Memo to Representative Tom Stevens, Chair House Committee on General, Housing, and Military Affairs, Vermont Legal Aid's Poverty Law Project, 2020.

Fair Housing Achievements

The following fair housing achievements and observations noted here are based on the research conducted as part of this Fair Housing Plan and the outreach efforts and experts consulted for this report. The fair housing accomplishments include commendable actions, policies, and procedures already undertaken by the State of Vermont that affirmatively further fair housing. Policy recommendations included in the State's Fair Housing Action Plan will encourage the continuation and advancement of many of these accomplishments.

Since the publication of the last comprehensive Analysis of Impediments to Fair Housing, Vermont has accomplished the following fair housing achievements:

- **Interpret and translate “The Definitive Guide to Renting in Vermont” and Champlain Valley Office of Economic Opportunity’s (CVOEO) fair housing webinars into 9 languages.** As part of developing this Fair Housing Analysis, DHCD granted the CVOEO \$50,000 in funds for these purposes.
- **Expansions to the Vermont Housing Improvement Program (VHIP).**
 - **Forgivable Loans for Code Compliance Repairs in Occupied Units.** Like everywhere in the U.S., people in protected classes experience higher rates of poverty than the overall population. This results in protected classes living in more deteriorated housing. To help remedy this, property owners can now apply for VHIP 2.0 funding to make occupied rentals code compliant. Permanent displacement is prohibited, and there must be an agreed-upon plan between tenants and owners for temporary relocation when needed. Owners are responsible for accommodations during repairs.
 - **Fair Housing Training and Landlord Tenant Mediation for VHIP participants.** Training requirements were put in place for state-funded VHIP 2.0 participants. VHIP 2.0 was launched on March 25, 2024. As of December 23, 2024, 211 individuals have completed the fair housing training, with 271 participants registered.
 - **Grants and Loans for Accessible Rentals.** The state updated VHIP to include grants or forgivable loans for up to \$70,000 per unit to rehab or create new rental housing units that meet accessibility requirements. The project can also include rehabbing or creating an accessible parking spot for individuals with disabilities. Households with at least one individual with a disability who is eligible to receive Medicaid-funded home, and community-based services can be prioritized for these units.
- **Comprehensive educational package for landlords and tenants in up to nine languages.** DHCD partnered with CVOEO and the Vermont Landlords Association (VLA) to create a comprehensive educational package for landlords and tenants in up to nine languages that includes:
 - An interactive training video on fair housing for landlords, with a quiz at the end. This video is now required for VHIP participants. VHIP is a state-funded rental housing development program.
 - Training videos for landlords and tenants on the Landlord-Mediation program funded through Emergency Rental Assistance funds. The training video for landlords is required for VHIP participants and will be provided to VHIP tenants.

- DHCD will make the trainings publicly available for use in other programs and for general education.
- **New Farmworker Housing Supports.** In 2022, Champlain Housing Trust launched the Vermont Farmworker Housing Repair Loan Program (FWH), which allows farmers to make essential repairs and necessary improvements to their farmworker housing by offering forgivable loans of up to \$30,000. This is important for fair housing, because the majority of farmworkers who live on farms in Vermont are undocumented, and may be less likely to seek support when fair housing issues or unsafe living conditions arise for fear of deportation.
 - As of October 2023, the program has supported 35 projects improving 38 farmworker housing units in the state. The program has supported a significant number of projects in Addison and Franklin counties (37% and 14% of funded projects, respectively), which have the highest concentration of farmworker housing in the state.
- **Homes for All Toolkit.** Regulatory and financial barriers have made developing diverse homes on a small footprint harder and more complicated. As noted elsewhere in this document, housing professionals are interested in tools that help builders navigate permitting, design, and building processes for affordable housing. On March 14, 2024, the Department of Housing and Community Development launched the VT Homes for All Toolkit to a maximum-capacity crowd at the Toolkit Trainer Summit in Barre. This is the first of three phases designed to focus statewide attention on small-scale gentle infill and incremental development as a strategy to address Vermont’s housing and affordability crisis.
- **Training on accessibility standards for architects.** The 2017 Action Plan included an item stating, “The State should promote the development of training for architects and interior designers regarding compliance with the State’s accessibility standards for residential construction (20 VSA sec. 2907) as well as HUD’s Fair Housing Design Manual.” Courses on Fair Housing and Accessibility are now available through continued education requirements for architects in Vermont ([link to training](#)).

Fair Housing Legislative Achievements

2022 and 2023 were historic years for housing-related legislation in Vermont. Through both the Omnibus Housing Bill, Act 182 of 2022, and the Rental Safety Bill, Act 181 of 2023, Vermont strengthened protections and made historic investments in fair housing. The 2024 Housing Bill H. 687 created new incentives to create or rehab affordable rental units that meet accessibility requirements.

Medicaid Permanent Supportive Housing Assistance Program

The Vermont Agency of Human Services, with the support of The Council on Housing and Homelessness, is designing and implementing a Medicaid Permanent Supportive Housing Assistance Program. The program plans to serve 100 Vermont households exiting homelessness during its first year. *Vermont Council on Housing and Homelessness, Dec. 2023, [2023 Report: Recommendations to support affordable housing development and help reduce and prevent homelessness](#).*

Expanded Protections for Harassment

The 2022 Omnibus Housing Bill, Act 182, addressed several fair housing issues, including strengthening protections against harassment and unfair housing practices. This legislation defines the term “harass” as engaging in unwelcome conduct *that detracts from, undermines, or interferes with the person’s terms, conditions, privileges, or protections in the sale or rental of a dwelling or other real estate or in the provision of services or facilities in connection with a dwelling or other real estate* based on a protected status. Additionally, this bill expanded who can report unlawful housing harassment to include third-party individuals. This means that more people can report harassment on another person’s behalf, a vital expansion of housing protection because harassment can go unreported for several reasons, including:

- A lack of awareness about how and where to file a complaint;
- To avoid confrontations with prospective landlords (especially in a tight rental market such as Vermont’s);
- People may be unaware that discrimination is occurring because they do not have the benefit of comparing their treatment with that of another home seeker;
- People may not be aware that discrimination is against the law, and that there are legal remedies to address the situation; and
- Households may be more focused on finding decent housing, and may prefer to avoid going through the process of filing a complaint.

Prospective, current, or past renters or home buyers may file complaints regarding harassment, which will be investigated and followed up based on the findings. Refer to the [Fair Housing Complaints](#) section to learn more about housing discrimination complaints in Vermont or how to file a report.

First Generation Homebuyers Program

In 2022, the Vermont Legislature passed Act 182, which provided \$1 million in funding for a First-Generation Homebuyer Program. The program offers down payment assistance to households historically sidelined from homeownership. This provides an opportunity for traditionally underserved households to build wealth through homeownership. The Vermont Housing Finance Agency (VHFA) is administering the program and has planned robust outreach to BIPOC Vermonters and individuals who have been in the foster care system.

Based on data from the 2020 U.S. Census, Vermont has a population of approximately 643,000, with about 38,500 BIPOC Vermonters (approximately 6% of the overall population).⁴¹ A recent American Communities Survey (ACS) shows that homeownership for BIPOC residents ranges from 21% for Black Vermonters to 50.4% for Hispanic Vermonters. White Vermonters, however, have a significantly higher homeownership rate of 72.3%.⁴²

⁴¹ US Census: [Census.gov/Library/America Counts: Stories Behind the Numbers /STATE PROFILES: 2020 Census /VERMONT: 2020 Census](https://www.census.gov/library/stories/2020/04/america-counts-stories-behind-the-numbers-state-profiles-2020-census-vermont-2020-census)

⁴² The University of Vermont, Vermont Legislative Service, https://www.uvm.edu/sites/default/files/Department-of-Political-Science/vlrs/EconomicIssues/Housing_Assistance.pdf

The First-Generation Homebuyer Program will facilitate opportunities for underserved Vermonters to become homeowners and build wealth. “Recognizing that Black, Indigenous, and Persons of Color have historically not had access to capital for homeownership purchases and have been systemically discriminated against in the housing market,” the enabling legislation requires that this program does extensive outreach to organizations that work with BIPOC Vermonters.⁴³ By supporting these historically underserved populations, this program will help to further the goals of fair housing throughout the State of Vermont.

Even with down payment assistance opportunities, significant barriers exist for BIPOC and other underrepresented first-generation homebuyers. For example, renters’ credit scores often do not reflect their rental history. This is starting to change, but in many cases, renters need to be proactive in asking landlords to report rent payments through an online service for rent to be reported to the credit bureaus.⁴⁴ The First-Generation Homebuyers Program is a step in the right direction. However, more work needs to be done in Vermont and across the United States.

Rental Safety

Also passed in 2022, Act 181, the Rental Safety initiative, will help make rental units safer for tenants. Act 181 allows the State Division of Fire Safety to enforce rental health and safety codes in addition to completing fire safety inspections. This is critical for communities with overstretched and volunteer code enforcement teams.

While the Fair Housing Act intends to provide equitable access to housing for people in protected classes, this access has limited benefit if the housing offered isn’t in safe and decent conditions. The Rental Safety initiative will help provide safe, decent rental housing throughout the State of Vermont and benefits low-income families, the elderly, and people with disabilities.

Protected Classes

Vermont added abuse victims as a protected class under the Vermont Fair Housing and Public Accommodations Act. This protection applies to victims of abuse, sexual assault, or stalking. This update was made in 2019 under Act 48, and means Vermont now has protections for six classes that are not included under the Federal Fair Housing Act.

⁴³ Vermont Act Number 182 of 2022, Section 2(c).

⁴⁴ Money.com, How to Use Rent Payments to Increase Your Credit Score, <https://money.com/how-to-build-credit-with-rent-payments/>

Fair Housing Impediments & Action Plan

The following impediments were identified in the development of this Fair Housing Plan, based on data analysis, public outreach and expert consultation. Each impediment includes a proposed action that would help address the related impediment. The list of proposed action items is not comprehensive, but rather realistic ways to start to address these issues that could be accomplished in the next 5-years, before the next Fair Housing Plan is published.

Homelessness has significantly increased in Vermont since 2020.

From 2020 to 2021, the number of homeless individuals in Vermont increased by 1,418, more than doubling during this period. This rapid increase in the number of homeless Vermonters is partly due to the economic hardships many households experienced during the onset of the COVID pandemic. Since 2020, the number of homeless individuals has steadily climbed, increasing by 297% in just 3 years. Vermont has a per capita homelessness rate of 51 per 10,000 people, the second highest nationally, according to the most recent 2023 HUD Annual Homeless Assessment Report (AHAR) report.

This significant increase in homelessness is likely due to several factors, including:

- the termination of COVID-era programs that provided rental subsidies to low-income Vermonters;
- the end of the eviction moratorium;
- extremely low vacancy rates across Vermont, allowing landlords to be highly selective when choosing tenants; and
- better data on homeless communities available due to the operation of non-congregate emergency and transitional housing during COVID.

People experiencing sheltered homelessness are disproportionately Black, Indigenous, and people of color (BIPOC).

Proposed Action 1: Increase investments in permanent affordable housing, including state funding for project-based vouchers through VSHA. Project-Based Vouchers (PBV) are rental vouchers that are tied to a specific number of units in a building. The assistance stays with the unit after a tenant moves out. A PHA can generally project-base up to 20 percent of its authorized voucher units, but in certain cases can project-base additional units that exceed this cap.⁴⁵ PBVs are an important tool for creating long-term affordable housing because tying vouchers to units creates long-term stability for low income families. Housing Choice Vouchers are the traditional form of rental vouchers which are tied to tenants. Unfortunately, over 60% of Public Housing Authorities are not fully utilizing these funds because tenants cannot find a sufficient number of landlords who will accept Housing Choice Vouchers with units that

⁴⁵ https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/project

will pass HUD inspections⁴⁶. Project Based Vouchers can help alleviate this nationwide and statewide issue.

Proposed Action 2: Base fund existing programs that are successfully creating or maintaining affordable rentals units and have received multiple rounds of one-time funding, including VHIP 2.0 and the Manufactured Housing Improvement and Repair program (MHIR). This will base funding will make it easier to retain staff for the program, and reduce the administrative burden related to evolving rules and funding sources.

The Fair Market Rent cap for VHIP units increases the supply of affordable housing in Vermont, which is important for addressing factors like the low vacancy rate. Some VHIP units also have specific requirements to serve households exiting homelessness, helping specifically address the need for affordable housing units that can serve this population. This is especially critical given the extremely low vacancy rates in Vermont, which allow landlords to be highly selective and potentially discriminatory when selecting tenants.

Around 7,000 Vermont households live in mobile home communities. This is an important source of affordable housing in the state, that often serves low-income households. These communities are in particular need of support, given they have been severely impacted by natural disasters in the state, leading to many homes having significant habitability issues. While the connection between this program and addressing homelessness may not be as apparent, maintaining the habitability of these homes prevents displacement of households that may otherwise become homelessness. Additionally, many of these manufactured home communities have vacant lots, this program prepares these vacant lots for new homes, increasing the stock of affordable housing, some of which is already being used to serve households exiting homelessness or those that are impacted by flooding.

There is not accurate data about housing discrimination in Vermont rental markets.

The last fair housing testing audit measuring housing discrimination in the Vermont rental market was conducted by Vermont Legal Aid's Housing Discrimination Law Project (HDLP) in 2013. Unfortunately, a more recent Rental Discrimination Report for Vermont is not currently available. The last report significant and blatant discrimination against people with disabilities. Furthermore, 80% of audits of newly constructed multi-family housing units had some level of non-compliance with Federal Fair Housing Act's design and construction accessibility requirements. There is a need for additional data to effectively direct resources.

Additionally, Vermont does not have recent or accurate data related to the number of rental and housing advertisements that include discriminatory language. More monitoring of rental and housing

⁴⁶ <https://nlihc.org/resource/office-inspector-general-finds-hud-struggles-ensure-maximum-voucher-use>

advertisements is needed to both access the extent to which these advertisements include discriminatory language and to address these issues with the property owners and publishers of these materials.

Proposed Action 1: Provide ongoing funding to Vermont Legal Aid and the Vermont Human Rights commission to enhance their efforts to identify and address housing advertisements that include discriminatory language.

Proposed Action 2: An updated Rental Discrimination Report would provide valuable information that would allow Vermont to affirmatively further Fair Housing. A report that includes discrimination based on Vermont's protected classes and the federally protected classes would be especially helpful. Once this data is available, this data can be used to inform future efforts to prevent and address rental discrimination.

Vermonters with Limited English Proficiency need more resources about how to file a Fair Housing Complaint.

Participants in the Limited English Proficiency (LEP) focus groups stated that clarity is needed about the Fair Housing complaint process and timeline. People want to see the results of the complaint process to trust that the system will work for them. There were mixed sentiments in the focus group about if members of their community felt that it was easy, safe, and effective to file a complaint about discrimination or housing conditions.

Many of the participants also experienced some level of housing discrimination. The types of discrimination ranged from not being considered for a unit because they did not speak English or the size of their family, issues within the units not being fixed within a timely manner or being charged for repairs, to landlord asking for a large deposit than they do for other tenants. Even those participants who felt they could report discrimination did not have a clear understanding of the complaint process, timeless, or outcomes.

Proposed Action: Work with nonprofits, and other community partners that help file complaints to create videos or other educational materials that can be shared with the public in multiple languages. Real stories from people who have filed complaints about their experience would be preferable, especially a story from a LEP Vermonter. All materials should also make it clear that there is no cost to file a complaint.

Vermont Visitability Law does not contain an enforcement or penalty provision and does not include a requirement for a zero-step entrance.

Visitability applies to single-family housing and means that the unit is designed in so that it can be lived in or visited by people with disabilities. This is an important component of housing fair housing choice, as a lack of access to housing that are both habitable and visitable by persons with disabilities significantly limits housing options. Given that many people with disabilities face significant levels of housing discrimination, this exacerbates the issues persons with disabilities may face when trying to find housing and enjoy their communities. Although Vermont has a Visitability Law, it does not contain

enforcement provisions, which make it significantly less effective. Additionally, it does not include a requirement for a zero-step entrance which is essential for those with mobility related disabilities.

Proposed Action: The state should update the Visitability Law to include enforcement and penalty provisions, and a requirement for a zero-step entrance.

Vermont has an aging population and does not have the necessary housing opportunities to meet their needs.

The portion of Vermont households headed by someone who is at least 55 years old has increased steadily, from 44% in 2010 to 53% in 2020. By 2029, 54% of Vermont’s households will be headed by someone in this age group. Cognitive, ambulatory, self-care, or independent living disability are much higher among older age groups. This can make independent living more challenging.

There has been 73% increase in older Americans staying in shelters and experiencing chronic homelessness between 2019 and 2021.⁴⁷ This alarming new trend suggests that people are aging into chronic homelessness as well as experiencing homelessness for the first time when they are 65 or older.

Proposed Action 1: Monitor the progress of the Medicaid Permanent Supportive Housing Assistance Program and expand the program where necessary. Over 50% of fair housing complaints submitted to the VT Human Rights Commission, and 36% of the 2023 Statewide Fair Housing Survey respondents who experienced discrimination said it was based on disability. Disability has been the number one reason cited for housing discrimination in Vermont since the “Analysis of Impediments to Fair Housing” was released in 2013.

Proposed Action 2: Provide small incentives to landlords for reasonable accommodations, perhaps through an existing program like VSHA’s Landlord Relief Program. For example, in 2024, the average cost of a wheelchair ramp ranges from \$2,500–3,500, so a grant up to \$3,500 would provide needed accommodations for a disabled tenant without an added out-of-pocket expense for the landlord.

Vermont does not have enough supportive housing services to meet the states needs.

In 2021, the Corporation for Supportive Housing described Vermont in this way, “Statewide, systems are stressed beyond capacity, hundreds, if not thousands of social service positions are vacant, emergency efforts are strained, and homeless encampments are forming and growing in a number of communities. The service needs of those individuals, families, and communities are only growing in acuity and complexity.⁴⁸

Proposed Action 1: As recommended by the Vermont Council on Housing and Homelessness, expand the Vermont Department of Mental Health Housing First program and increase recovery housing and residential therapeutic group homes.⁶ Through the Housing First Program (as of July 2023),870

⁴⁷ <https://www.huduser.gov/portal/sites/default/files/pdf/2021-AHAR-Part-2.pdf>, page A-9

⁴⁸ Corporation for Supportive Housing, December 2021. [Strengthening the Housing and Services System: Recommendations and Strategies for Vermont.](#)

Vermonters ended the cycle of homelessness with an 87% housing retention rate at an average cost of \$53 per night.⁴⁹

Minority households in Vermont have greater difficulty becoming homeowners.

Historically, Communities of Color have had significant barriers to homeownership opportunities that would build generational wealth. This is reflected in the vast disparity in homeownership rates among different racial groups in Vermont. For example, white households had a homeownership rate of 74%, while Black Vermonters had the lowest homeownership of any racial group at just 29%.

Historically, minorities tend to have lower homeownership rates than Whites, exacerbating and engraining pre-existing racial disparities. This is due to lack of access to capital for homeownership purchases and systemic discrimination in the housing market. For example, renters' credit scores often do not reflect their rental history. This is starting to change, but in many cases, renters need to be proactive in asking landlords to report rent payments through an online service for rent to be reported to the credit bureaus.⁵⁰

Proposed Action: Continue funding the First-Generation Homebuyer Program at its existing funding level of \$1 million per year. This program has assisted BIPOC Vermonters with first-time home purchases at a disproportionate rate. Although Communities of Color only make up 13 % of Vermont's population, they comprise 20% of the households supported by this program.

The First-Generation Homebuyer Program will facilitate opportunities for underserved Vermonters to become homeowners and build wealth. "Recognizing that Black, Indigenous, and Persons of Color have historically not had access to capital for homeownership purchases and have been systemically discriminated against in the housing market," the enabling legislation requires that this program does extensive outreach to organizations that work with BIPOC Vermonters.⁵¹ By supporting these historically underserved populations, this program will help to further the goals of fair housing throughout the State of Vermont.

⁴⁹ <https://www.pathwaysvermont.org/programs/housing-first/>

⁵⁰ Money.com, How to Use Rent Payments to Increase Your Credit Score, <https://money.com/how-to-build-credit-with-rent-payments/>

⁵¹ Vermont Act Number 182 of 2022, Section 2(c).

Appendix A. Stakeholder List

Internal:

Naomi Cunningham & Jayme Bauer – Developed and tested questionnaires for the public, housing professionals, and public housing authorities. Analyzed survey, and census data for the report. Drafted the comprehensive report.

Shaun Gilpin– Reviewed questionnaires for the public, housing professionals, and public housing authorities.

Shannon Konvicka – Aided in the development of the Impediments to Fair Housing survey flyer (and helped distribute information and promote the survey).

Angela Dwyer – Tested public Impediments to Fair Housing survey.

Erin Caro Aguayo – Proofread the document.

Library Tour Partners:

Date	Location	Town	Partner
April 6	Cobleigh Public Library	Lyndonville	RuralEdge
April 18	Morristown Centennial Library	Morrisville	Lamoille Housing Partnership
April 21	Bradford Public Library	Bradford	RuralEdge
April 28	Brownell Library	Essex Junction	Champlain Valley Office of Economic Opportunity
May 4	Rutland Free Library	Rutland	NeighborWorks of Western Vermont
May 5	Bennington Free Library	Bennington	BROC Community Action
May 8	Goodrich Memorial Library	Newport	NEKCA Community Action
May 12	Rockingham Free Public Library	Bellows Falls	Windham & Windsor Housing Trust
May 15	Springfield Town Library	Springfield	Health Care and Rehabilitation Services
May 22	Ilsley Public Library	Middlebury	Champlain Valley Office of Economic Opportunity
June 8	Saint Albans Free Library	St. Albans	Champlain Valley Office of Economic Opportunity
June 20	Barre Farmers Market	Barre	Downstreet Housing & Community Development

Reviewers:

The following individuals or groups reviewed and provided input on the executive summary of this document:

- Jess Hyman, Associate Director of Statewide Advocacy Programs, Champlain Valley Office of Economic Opportunity
- Rachel Batterson, Project Director for the Housing Discrimination Law Project, Vermont Legal Aid
- Big Hartman, Executive Director, Vermont Human Rights Commission

Additional Consultation:

Agency	Partnership Role
AALV (formerly "Association of Africans Living in VT")	Provided insights on translation options for the fair housing survey for the general public.
BROC Community Action (formerly "Bennington Rutland Opportunity Council")	Partnered on Library Tour in Rutland.
Champlain Valley Office of Economic Opportunity (CVOEO)	Partnered on library tour in St. Albans. Translated information on fair housing, tenant rights, and landlord-tenant mediation in 9 languages. Worked with agencies that served refugee and Limited English Proficient (LEP) communities to do outreach and get feedback on housing discrimination and insights on how to best reach these groups.
Champlain Valley School District	Student Housing and Assessment Coordinator provided insights on homeless and housing unstable students.
Chittenden Homeless Alliance Steering Committee	Homeless and at-risk population data.
City of Burlington	Community and Stakeholder engagement.
City of Winooski	Community and Stakeholder engagement.
Department for Families and Children	Provided insights on data on homelessness, families, and youth.
Evernorth	Insights on affordable housing development in Vermont.
Greater Bennington Interfaith Community Services	Homeless and at-risk population data.
Housing Round Table (Winooski)	Community and stakeholder engagement.
HUD Burlington Field Office	Fair housing complaints, data and maps.
Human Rights Commission	Fair housing complaint data.
NeighborWorks of Western Vermont	Partnered on Library Tour in Bennington.
Northeast Kingdom Community Action (NEKCA)	Homeless and at-risk population data and provided a local Housing Needs Assessment.
Rutland Homeless Prevention	Homeless and At-Risk population data
Sash for All program Manager, Cathedral Square	Data and insights on Vermont's older adults.
Thriving Communities	Community and stakeholder engagement.
University of Vermont Community Health Improvement Department	Provided data from Community Health Assessments.
Upper Valley Haven	Homeless and at-risk population data.
Vermont Affordable Housing Coalition	Community outreach and engagement.
Vermont Association of Realtors	Fair housing survey for housing professionals.
Vermont Coalition to End Homelessness	Provided data from the 2023 and 2024 Point in Time Count of Vermont's homeless population (PIT count).
Vermont Department of Health	BIPOC data and healthy homes
Vermont Department of Libraries	Fair Housing Tour to promote our survey, and education on fair housing in libraries 12 of 14 counties.
Vermont Housing Finance Agency (VHFA)	First Generation Program—BIPOC outreach. Completing the 2025–2029 Statewide Housing Needs Assessment. The FHA utilized data and charts/graphs from the HNA.

Vermont Housing Managers Association	Assisted with getting word out about survey for Housing and Nonprofit Professionals.
Vermont Landlords Association	Community outreach and action plan follow up. Translated information on fair housing, tenant rights, and landlord-tenant mediation in 9 languages. Worked with agencies that served refugee and Limited English Proficient (LEP) communities to do outreach and get feedback on housing discrimination and insights on how to best reach these groups.
Vermont Legal Aid	Fair housing complaint data and advertising violations.
Vermont State Housing Authority (VSHA)	Housing Authority questionnaires and community engagement.

Appendix B. Fair Housing Surveys

DISCLAIMER: These surveys were conducted using Microsoft Forms (MS Forms). This document is based on a download of the survey documents. The following information is provided to show the wording of the questions and the structure of the surveys. However, since this is not in MS Forms the aesthetics and formatting may differ slightly from the original surveys. For example, MS does not use columns, but they have been used in this document to save space.



Fair Housing Survey: Housing & Nonprofit Professionals

The State of Vermont is conducting this survey as part of updating its Fair Housing Analysis i.e. "Analysis of Impediments to Fair Housing". This survey is designed for housing professionals who work in Vermont to help us better understand the housing landscape across the state. **Individual survey responses will be anonymous**; reporting will be done in the aggregate. Thank you in advance for taking time to complete this survey, your feedback will provide valuable insight about barriers and opportunities for fair access to quality housing in our communities.

Federal and State Fair Housing Laws prohibit discrimination in all aspects of housing including home sales, rentals, housing policies and financing. Every Vermonter is entitled to equal access to housing opportunities regardless of race, national origin, marital status, family status, color, sex, source of income, religion, gender, age, disability, being a victim of abuse, or any other arbitrary reason.

Professional Role

1. What County/s do you work in or serve? (Please select all that apply.)

- | | |
|-------------------------------------|-------------------------------------|
| <input type="checkbox"/> Statewide | <input type="checkbox"/> Lamoille |
| <input type="checkbox"/> Addison | <input type="checkbox"/> Orange |
| <input type="checkbox"/> Bennington | <input type="checkbox"/> Orleans |
| <input type="checkbox"/> Caledonia | <input type="checkbox"/> Rutland |
| <input type="checkbox"/> Chittenden | <input type="checkbox"/> Washington |
| <input type="checkbox"/> Essex | <input type="checkbox"/> Windham |
| <input type="checkbox"/> Franklin | <input type="checkbox"/> Windsor |
| <input type="checkbox"/> Grand Isle | |

2. What best describes your role in the housing market?

- Nonprofit Community Service Organization
- Nonprofit Housing Agency
- Property Manager
- Nonprofit Developer
- Private Developer
- Real Estate Agent
- Elected Official
- Government Employee
- Other

3. How many housing units do you sell per year?

- Less than 10 units per year
- Between 11 and 20 units per year
- Between 21 and 50 units per year
- Over 50 units per year

4. How many rental property units do you manage?

- 1–5 units
- 6–15 units
- 16–30 units
- 31–50 units
- 51–100 units
- Over 100 unit

5. What types of services do you provide? (Please select all that apply.)

- Application Assistance
- Housing Retention Support
- Legal Assistance
- Investigate Fair Housing complaints
- Credit, Home Buyer and/or Tenant Training
- Eviction Prevention
- Utility Assistance
- Food Assistance
- Specialized services for unhoused and at-risk Vermonters
- Other

6. How many for sale and/or rental units do you develop per year? (Please check all that apply.)

- 1–10 for sale housing units
- Over 10 for sale housing units
- 1–10 rental housing units
- Over 10 rental housing units
- Other

7. At what level of government do you serve?

- Local
- State
- Federal
- Other

8. How long have you worked in the housing or public service sector?

- Less than 5 years
- 5–10 years
- Over 10 years

9. How do you advertise your available housing and/or services? (Please check all that apply.)

- | | |
|--|---|
| <input type="checkbox"/> Word of mouth | <input type="checkbox"/> Social Media/Craig's List |
| <input type="checkbox"/> Sign in yard | <input type="checkbox"/> Company/Organizational website |
| <input type="checkbox"/> Referrals | <input type="checkbox"/> Radio or TV ads |
| <input type="checkbox"/> Real Estate agent | <input type="checkbox"/> Posters/Flyers |
| <input type="checkbox"/> Property Management company | <input type="checkbox"/> Other |
| <input type="checkbox"/> Governmental agency | |

Community Resources

10. What resources would help you and/or your community develop housing affordable to low-middle income Vermonters? (Please check all that apply.)

- Financing for ADA upgrades and/or reasonable modifications for those with disabilities.
- Streamlined Zoning and permit approvals for desired housing types in places where households want to live.
- Tweaks to existing subsidies so they are more effective and/or simpler to use.
- Assistance with language and/or cultural barriers to better serve New Americans.
- Statewide guidance on using innovative designs, materials, etc. to help make development more affordable and/or simpler to execute.
- Provide assistance for back rent.
- Other

11. What resources would help you keep vulnerable households stably housed? (Please check all that apply.)

- Classes for tenants on landlord-tenant laws, expectations, etc.
- Ongoing follow up with at risk households for a set period of time.
- Training for property managers and staff on best practices for helping at risk households successfully stay in their homes.
- Additional subsidies for inhouse services.
- Other

Housing Discrimination

12. Have you observed housing discrimination in the county or region where you work?

- Yes
- No
- Other

13. If yes, what is the discrimination based on? (Please select all that apply.)

- | | |
|---|---|
| <input type="checkbox"/> Race | <input type="checkbox"/> Religion |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Gender |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Age |
| <input type="checkbox"/> Family Status | <input type="checkbox"/> Disability/Medical condition |
| <input type="checkbox"/> Color | <input type="checkbox"/> Victim of abuse, sexual assault, or harassment |
| <input type="checkbox"/> Sexual Orientation | <input type="checkbox"/> Sex |
| <input type="checkbox"/> Receipt of public assistance | |

14. Please describe the nature of the discrimination you observed. You may choose from the examples below, but this list is by no means comprehensive.

- A real estate agent didn't show a house because they assumed a client didn't have money to buy it because of race or the color of skin, or because of a disability.
- A landlord asked for a larger security deposit, a background check or asked more questions than others who are outside of your client's race, gender, gender identity, without children, without disability, etc.
- A landlord refused to take a rent check late even though they accept it late from other tenants who are outside of your client's race, gender, gender identity, without children, without disability, etc.
- A landlord told your client that the home is not safe or is too small or not a good fit for children.
- A landlord didn't allow a disabled client to have a service animal because they have a no-pet policy or charged a pet deposit.
- A landlord, property manager, realtor, or other housing professional harassed your client because of race, skin color, national origin, disability, etc.
- Other

Fair Housing Training & Workshops

15. Have you participated in a Fair Housing Training in the last 3 years?

- Yes No

16. If yes, who provided the training? (Please select all that apply.)

- Vermont Human Rights Commission
- Vermont Dept. of Housing & Community Development
- CVOEO
- Local government
- Vermont Association of Realtors
- Other

17. What Fair Housing Training topics would you find most helpful? (Please select all that apply.)

- Fair Housing Basics
- Vermont Fair Housing Laws
- Reasonable Accommodations & Modifications for Vermonters with Disabilities.
- Best Practices in Affirmative Marketing
- Best Practices in Tenant Screening and Leasing
- A Closer Look- Source of Income Discrimination
- A Closer Look- New Housing Protections for Victims of Abuse, Sexual Assault or Stalking
- A Closer Look- Sex, Gender, & Sexual Orientation
- Conflict Resolution Strategies
- Eviction Process & Tenant Protections
- Best practices for Addressing Discrimination when it is Observed
- Other

18. Are there other housing related workshop topics you would find helpful?

19. Which training formats would be most helpful? (Please check all that apply.)

- In person trainings
- In person trainings with an online option
- Online trainings with an instructor
- Self-guided online trainings
- Customized trainings for your organization
- Other

20. For additional information about Vermont's fair housing report, fair housing trainings, etc. please provide us with your email. Your contact information is confidential and will not be used for any purposes other than potential follow up on this survey.

21. Thank you for taking our survey! Please feel free to add any additional comments below.

-----END-----



Housing Discrimination Survey

The State of Vermont is updating its Fair Housing Analysis. We want to hear your experience with looking for housing, including housing discrimination.

Discrimination is treating a person or a particular group of people unfairly, or differently than how other people are treated, because of race, national origin, marital status, family status, color, sex, source of income, religion, gender, sexual orientation, age, disability, or being a victim of abuse.

Your feedback will help shape this report's findings.

The report will be used to help government officials, educators, housing providers, and advocates create programs and plans to strengthen fair and equitable housing choices for everyone in the state of Vermont.

Only grouped results will be reported; individual results will be confidential.

You are not required to answer any questions that you prefer to leave blank.

Learn More about Fair Housing & How to Get Help With Discrimination:

<https://youtu.be/TvbbAZGAFfo>

Fair Housing & Discrimination

Federal and State Fair Housing Laws prohibit discrimination* in all aspects of housing including home sales, rentals, housing policies and financing. Every Vermonter is entitled to equal access to housing opportunities regardless of race, national origin, marital status, family status, color, sex, source of income, religion, gender, sexual orientation, age, disability, or being a victim of abuse.*Discrimination is treating a person or a particular group of people unfairly, or differently than how other people are treated, because of race, color, disability, etc. (the list above)

1. What zip code do you live in?

2. Have you been discriminated against, when renting, buying, financing an apartment or house, or while living in your home? Answer "Yes" if you were discriminated against for belonging in any of the groups listed above. Here are some examples of discrimination, but this list is not complete:

- A real estate agent doesn't show you a house because they assume you don't have money to buy it.
 - A landlord refuses to take your rent check late even though they accept it late from other tenants.
 - A landlord tells you that the house is not safe or is too small or not a good fit for children.
 - A landlord asks you for a larger security deposit, a background check, etc. than others.
 - A bank refuses to lend you money because the house you want to buy is in a minority neighborhood.
 - A landlord says you can't have an assistance animal because they have a no-pet policy or charges you a pet deposit.
 - A landlord, property manager, realtor, or other housing professional harasses you.
 - Any other situation where you have been treated differently than others, been denied housing or financing, or been harassed.
- No
 - Yes
 - Other

3. Who discriminated against you? (check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Landlord/Property Manager | <input type="checkbox"/> Insurance Broker/Company |
| <input type="checkbox"/> Real Estate Agent | <input type="checkbox"/> Service Provider |
| <input type="checkbox"/> Mortgage Lender | <input type="checkbox"/> Other |
| <input type="checkbox"/> Government Staff Person | |

4. Where did the discrimination occur? (check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Apartment Complex | <input type="checkbox"/> Public or Subsidized Housing |
| <input type="checkbox"/> House with 2–6 rentals | <input type="checkbox"/> When Applying for Assistance Programs |
| <input type="checkbox"/> Single-family House | <input type="checkbox"/> Insurance Broker/Company |
| <input type="checkbox"/> Mobile Home Park | <input type="checkbox"/> Other |
| <input type="checkbox"/> Condo/Townhome Development | |

5. On what basis do you believe you were discriminated against? (check all that apply)

- | | |
|---|---|
| <input type="checkbox"/> Race | <input type="checkbox"/> Gender |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Age |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Disability |
| <input type="checkbox"/> Family Status | <input type="checkbox"/> Victim of Abuse, Sexual Assault, or Stalking |
| <input type="checkbox"/> Color | <input type="checkbox"/> Sex |
| <input type="checkbox"/> Sexual Orientation | <input type="checkbox"/> Other |
| <input type="checkbox"/> Receipt of Public Assistance | |
| <input type="checkbox"/> Religion | |

6. How were you discriminated against? (check all that apply)

- Not Shown Apartment/house
- Delayed Repairs or Repairs not Made

- Higher Rent
- Provided Different Housing Services or Facilities
- Assistance Animal Deposit charged
- Denied Reasonable Modification
- Denied Reasonable Accommodation
- Harassment
- Denied Home Loan or other Financing
- Other

7. Did you report the incident?

- Yes
- No

8. If NO, why?

- Don't know where to report
- Don't believe it makes any difference
- Afraid of retaliation
- Too much trouble
- Other

9. If YES, who did you file the complaint with?

- Vermont Legal Aid
- Vermont Human Rights Commission
- Vermont Real Estate Commission
- HUD
- Other

10. If you reported the complaint, what is the status?

- Unresolved
- Resolved via Mediation
- Unresolved, Pending Resolution
- In Litigation
- Other

11. Reasonable modifications and reasonable accommodations allow for certain changes or flexibility in the rules, policies, or procedures set by housing providers. This allows a resident with a disability an equal opportunity to use and enjoy a housing unit. A reasonable modification is a structural change made to the premises such as installing a wheelchair ramp. A reasonable accommodation is a change, exception or adjustment to a rule, policy, practice or service such as making an exception to an existing "no pet" rule and allowing an assistance animal.

Have you been denied a request for a reasonable modification or accommodation?

- Yes: Reasonable Modification or Accommodation
- No/Unsure

12. If YES, what was your request? (Please check all that apply.)

- Assigning an accessible parking space for a person with limited mobility
- Permitting a tenant to transfer to a ground-floor unit

- Adjusting a rent payment schedule to accommodate when an individual receives income assistance
- Adding a grab bar to a tenant's bathroom
- Permitting an applicant to submit a housing application via a different means
- Permitting an assistance animal in a "no pets" building for a person who has a disability.
- Other

Housing Stability

Stable housing is having a home that you can afford and having choice over when and under what circumstances you want to move.

13. Do you have stable housing?

- Yes
- No

14. What is the reason for not having stable housing? (Please check all that apply.)

- My housing is not affordable. (paying more than 30% of your income)
- My housing unit is/will be going up for sale.
- My current employment is not stable.
- Health issues.
- Other

15. Have you ever had to leave your home against your wishes because of a lease termination or eviction? This includes leaving after receiving a termination notice, at any point in the appeal process, or following a court ordered eviction.

- Yes
- No
- Don't Know

16. What were the reasons for your lease termination or eviction?

- Non-payment of rent
- Neighbor complaints (noise, property conditions, etc.)
- Broke the terms of the lease (an illegal pet, roommate, etc.)
- Property was sold
- No cause eviction
- Other

17. Did any agencies and/or nonprofits help keep you in your home or find new housing?

- Yes
- No
- Other

18. If so, what governmental agency and/or nonprofit assisted you? (Please select all that apply.)

- The State of Vermont
- Local government

- Vermont Legal Aid
- Vermont Human Rights Commission
- CVOEO (Champlain Valley Office of Economic Opportunity)
- Local Community Action Agency
- Other

Demographic Questions

The following questions are optional; however, your responses will allow us to better serve the community. Your individual responses will be confidential.

19. Are you of Hispanic, Latino, or of Spanish origin?

- Hispanic or Latino
- Not Hispanic or Latino

20. How would you describe yourself? (Please select all that apply.)

- | | |
|---|---|
| <input type="checkbox"/> White | <input type="checkbox"/> Native Hawaiian/Pacific Islander |
| <input type="checkbox"/> Black/African American | <input type="checkbox"/> Multi-Racial |
| <input type="checkbox"/> Asian | <input type="checkbox"/> Other |
| <input type="checkbox"/> Native American | |

21. Do you own or rent your home?

- Rent
- Own

22. What is your age?

- 18–24
- 25–34
- 35–44
- 45–54
- 55–64
- 65+

23. Do you have a disability?

- Yes
- No

24. Do you have children under the age of 18 in your home?

- Yes
- No

25. Have you ever seen or heard a Fair Housing Public Service Announcement on TV/Radio/Online?

- Yes
- No

26. For additional information about Vermont's fair housing report, fair housing workshops, etc. please provide us with your email. Your contact information is confidential and will not be used for any purposes other than potential follow up on this survey.

27. How did you hear about this survey?

28. Thank you for taking our survey! Please feel free to add any additional comments below.

-----END-----

Appendix C. Impediments to Fair Housing Survey Flyer

HOUSING HARDSHIPS?
We want to know.

YOUR FEEDBACK INFORMS POLICY AND SPENDING DECISIONS.

SCAN TO TAKE SURVEY

FAST & EASY

1 → **2** → **3**
SCAN CODE - TAKE QUICK SURVEY - SUBMIT

DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

VERMONT

Appendix D. Public Housing Authority Survey

Analysis of Impediments to Fair Housing Public Housing Authority Questionnaire

Introduction

What is the Analysis of Impediments to Fair Housing (AI)?

The State of Vermont's Analysis of Impediments to Fair Housing Choice is a report required by the U.S. Department of Housing and Urban Development (HUD) that identifies various factors that may affect fair housing choice in the region. The Analysis of Impediments is conducted every 5 years in connection with the State's programs funded by HUD. The Analysis of Impediments provides detailed information on Fair Housing Legislative achievements, population and housing trends, Fair Housing complaints, and strategies to combat impediments.

Five years ago, the State published a condensed AI update that did not survey the Public Housing Authorities. However, it has been ten years since the State of Vermont has conducted a comprehensive Analysis of Impediments to Fair Housing. Public Housing Authorities play an essential role in housing choice, especially for low-income Vermonters. Therefore, it is important that we provide complete and accurate information for this update, including updated information on Public Housing Authorities and your work.

When does this need to be complete by?

We are hoping to have the Public Housing Authority data collected by late September 2022.

Who should I share this with at the Department of Housing and Community Development?

Please send completed questionnaires or questions to Naomi Cunningham and Shaun Gilpin.

Emails: Naomi.Cunningham@vermont.gov and Shaun.Gilpin@vermont.gov

****We want to make this process as easy as possible for you, while still capturing the relevant information. If completing this form is not the easiest way to share**

Total Units						

Please provide the following information about the characteristics of **current public housing residents**:

Income Level	# of Households
Extremely Low Income (<30% MFI)	
Very Low Income (>30%, <50% MFI)	
Low Income (>50%, <80 % MFI)	
Total Households	

Familial Status	# of Households
Families with Children	
Elderly Households (1 or 2 persons)*	
Individuals/Families with Disabilities	
Total Households	

*An elderly family is a family whose head, spouse or sole member is a person who is at least 62 years of age.

Race	# Heads of Household
Black	
White	
Asian	
Other Racial Composition	
Total Households	

Please provide information about the characteristics of **public housing applicants on your waitlist**:

Income Level	# of Applicants
Extremely Low Income (<30% MFI)	
Very Low Income (>30%, <50% MFI)	
Low Income (>50%, <80 % MFI)	
Total Households	

Familial Status	# of Applicants
Families with Children	
Elderly Households (1 or 2 persons)*	
Individuals/Families with Disabilities	
Total Households	

*An elderly family is a family whose head, spouse or sole member is a person who is at least 62 years of age.

Number of Bedrooms	# of Applicants
0 Bedrooms	
1 Bedroom	
2 Bedrooms	
3 Bedrooms	
4 + Bedrooms	
Total Households	

Race	# of Applicants
Black	
White	
Asian	
Other Racial Composition	
Total Households	

Please continue to the next page, which contains questions about Housing Choice Vouchers.

Section 3. Housing Choice Vouchers (Section 8) Inventory & Demographics

Please provide the following information about the characteristics of **current Housing Choice Voucher holders**:

Income Level	# of Households
Extremely Low Income (<30% MFI)	
Very Low Income (>30%, <50% MFI)	
Low Income (>50%, <80 % MFI)	
Total Households	

Familial Status	# of Households
Families with Children	
Elderly Households (1 or 2 persons)	
Individuals/Families with Disabilities	
Total Households	

*An elderly family is a family whose head, spouse or sole member is a person who is at least 62 years of age.

Number of Bedrooms	# of Households
0 Bedrooms	
1 Bedroom	
2 Bedrooms	
3 Bedrooms	
4 + Bedrooms	
Total Households	

Race	# Heads of Household
Black	
White	
Asian	
Other Racial Composition	
Total Households	

Please provide the following information about the characteristics of **Housing Choice Voucher applicants**:

Income Level	# of Applicants
Extremely Low Income (<30% MFI)	
Very Low Income (>30%, <50% MFI)	
Low Income (>50%, <80 % MFI)	
Total Households	

Familial Status	# of Applicants
Families with Children	
Elderly Households (1 or 2 persons)*	
Individuals/Families with Disabilities	
Total Households	

*An elderly family is a family whose head, spouse or sole member is a person who is at least 62 years of age.

Number of Bedrooms	# of Applicants
0 Bedrooms	
1 Bedroom	
2 Bedrooms	
3 Bedrooms	
4 + Bedrooms	
Total Households	

Race	# of Applicants
Black	
White	
Asian	
Other Racial Composition	
Total Households	

Please provide any additional comments you think would be relevant to the Analysis of Impediments to Fair Housing:

Thank you for taking the time to complete this questionnaire!

Please remember to share your Accommodations and Continued Occupancy Plan and Section 8 Housing Choice Voucher Administrative Plan with this form.

Appendix E. Raw Data

Figure 3. Race & Ethnicity Trends from 1990 to 2020— Raw Data

	1990		2000		2010		2020		Proportional Change 1990-2020
	#	%	#	%	#	%	#	%	
Total Population	562,758	100%	608,827	100%	625,741	100%	643,077	100%	0%
White	555,088	98.6%	589,208	96.8%	596,292	95.3%	577,751	89.8%	-8.8%
Black	1,951	0.3%	3,063	0.5%	6,277	1.0%	9,034	1.4%	1.1%
Native American or Alaskan Native*	1,696	0.3%	2,420	0.4%	2,207	0.4%	2,289	0.4%	0.1%
Asian or Pacific Islander	3,215	0.6%	5,358	0.9%	8,107	1.3%	11,730	1.8%	1.3%
Another Race	808	0.1%	1,443	0.2%	2,105	0.3%	5,247	0.8%	0.7%
Two or More Races	-	-	7,335	1.2%	10,753	1.7%	37,026	5.8%	4.6%
Hispanic	3,661	0.7%	5,504	0.9%	9,208	1.5%	15,504	2.4%	1.8%

Source: U.S. Census Bureau, National Historical Geographic Information System.

*Officially called American Indians by U.S. Census Data.

Figure 7. Median Household Income and Poverty Rates by Race/Ethnicity, 2020 – Raw Data

	Median Household Income	Poverty Rate
Total	\$63,477.00	10.8%
White	\$64,205.00	10.3%
Black	\$37,489.00	24.2%
Native American* or Alaskan Native	\$35,000.00	18.6%
Asian or Pacific Islander	\$57,362.25	14.3%
Two or More Races	\$53,217.00	17.6%
Hispanic	\$49,349.00	16.1%

Source: U.S. Census Bureau, 2020 5-Year estimates American Community Survey (B19013, B19013A, B19013B, B19013C, B19013D, B19013E, B19013G, B19013I, B17001, B17001A, B17001B, B17001C, B17001D, B17001E, B17001G, B17001I).

* Median household income in the past 12 months (in 2020 inflation-adjusted dollars).

**Due to small sample size, the margin of error for the median household income estimate of American Indian/Alaska Natives is relatively large. Therefore, estimates should be evaluated with caution.

Figure 8. Household Income Distribution by Race, 2020 – Raw Data

	Total	\$0 to \$24,999	\$25,000 to \$49,999	\$50,000 to \$74,999	\$75,000 and higher
All Households	262,852	18.1%	21.2%	18.3%	42.4%
White Households	251,021	17.7%	21.0%	18.4%	42.9%
Black Households	2,131	29.9%	30.5%	16.8%	22.8%
Native American* or Alaskan Native Households	960	39.1%	27.6%	17.3%	16.0%
Asian or Pacific Islander Households	2,886	19.5%	27.5%	14.1%	38.8%
Two or More Races Households	5,071	27.2%	21.2%	15.4%	36.3%
Hispanic Households	3,884	20.5%	30.0%	19.0%	30.5%

Source: U.S. Census Bureau, 2020 5-year estimates American Community Survey (B19001, B19001A, B19001B, B19001C, B19001D, B19001E, B19001G, B19001I).

Figure 9. Median Household Income and Poverty Rates by County, 2020 – Raw Data

	Median Household Income	Poverty Rate
State of Vermont	\$63,477.00	10.80%
Addison County	\$70,262.00	7.10%
Bennington County	\$58,200.00	11.30%
Caledonia County	\$52,481.00	12.10%
Chittenden County	\$76,316.00	11.20%
Essex County	\$47,035.00	14.10%
Franklin County	\$65,314.00	9.80%
Grand Isle County	\$81,667.00	6.30%
Lamoille County	\$64,179.00	12.40%
Orange County	\$62,737.00	9.70%
Orleans County	\$54,390.00	12.30%
Rutland County	\$57,176.00	10.90%
Washington County	\$64,862.00	10.20%
Windham County	\$54,188.00	13.40%
Windsor County	\$61,503.00	9.40%

Source: U.S. Census Bureau, 2020 5-year estimates American Community Survey (B19013, B17001).

Figure 12. 2020 Vermont Family Household Composition V. Family Households Below the Poverty Line – Raw Data

Family Household Type	Population	Poverty
Married With Children	25.8%	17.7%
Married Without Children	53.2%	21.6%
Female-Headed with Children	8.4%	45.3%
Female-Headed Without Children	6.0%	4.6%
Male-Headed with Children	3.5%	9.0%
Male-Headed Without Children	3.1%	1.9%

Sources: 2016–2020 American Community Survey 5-year estimate (B11001, B11003), and Census Bureau 2006–2010 American Community Survey Five-Year Estimates B17012.

Figure 14. Civilian Labor Force, Vermont, and the United States, 2019–2021 – Raw Data

Vermont								
	2019		2020		2021		Change in Employment Rate	
	#	%	#	%	#	%		
Total Civilian Labor Force (CLF)	342,799				347,783		Total CLF	
Employed	331,247	96.6%	Data Not Available		333,135	95.8%		
Unemployed	11,552	3.4%		14,648	4.2%	-0.8%		
Male CLF	176,406			178,200		Male CLF		
Employed	170,010	96.4%		169,717	95.2%			
Unemployed	6,396	3.6%		8,483	4.8%	-1.1%		
Female CLF	166,393			169,583		Female CLF		
Employed	161,237	96.9%		163,418	96.4%			
Unemployed	5,156	3.1%		6,165	3.6%	-0.5%		
White CLF	321,621			321,106		318,993		White CLF
Employed	311,200	96.8%		309,181	96.3%	306,152	96.0%	
Unemployed	10,421	3.2%	11,925	3.7%	12,841	4.0%	-0.8%	
Black CLF	4,651		4,537		3,695		Black CLF	
Employed	4,445	95.6%	4,309	95.0%	3,268	88.4%		
Unemployed	206	4.4%	228	5.0%	427	11.6%	-7.1%	
Native American/Alaskan Native CLF	973		830		641		Native American/Alaskan Native CLF	
Employed	930	95.6%	794	95.7%	605	94.4%		
Unemployed	43	4.4%	36	4.3%	36	5.6%	-1.2%	
Asian CLF	6,102		5,875		6,298		Asian CLF	
Employed	5,909	96.8%	5,698	97.0%	6,137	97.4%		
Unemployed	193	3.2%	177	3.0%	161	2.6%	0.6%	
Hispanic CLF	6,468		6,831		7,593		Hispanic CLF	
Employed	6,116	94.6%	6,438	94.2%	6,734	88.7%		
Unemployed	352	5.4%	393	5.8%	859	11.3%	-5.9%	

United States								
	2019		2020		2021		Change in Employment Rate	
	#	%	#	%	#	%		
Total Civilian Labor Force (CLF)	166,274,373				166,900,336		Total CLF	
Employed	158,758,794	95.5%	Data Not Available		156,380,433	93.7%		
Unemployed	7,515,579	4.5%		10,519,903	6.3%	-1.8%		
Male CLF	87,079,894			87,772,192		Male CLF		
Employed	83,061,060	95.4%		82,206,546	93.7%			
Unemployed	4,018,834	4.6%		5,565,646	6.3%	-1.7%		
Female CLF	79,194,479			79,128,144		Female CLF		
Employed	75,697,734	95.6%		74,173,887	93.7%			
Unemployed	3,496,745	4.4%		4,954,257	6.3%	-1.8%		
White CLF	120,878,557			117,538,415		103,530,970		White CLF
Employed	116,194,737	96.1%		112,184,656	95.4%	98,243,408	94.9%	
Unemployed	4,683,820	3.9%	5,353,759	4.6%	5,287,562	5.1%	-1.2%	
Black CLF	20,618,342		20,140,801		19,485,137		Black CLF	
Employed	19,024,948	92.3%	18,287,426	90.8%	17,425,294	89.4%		
Unemployed	1,593,394	7.7%	1,853,375	9.2%	2,059,843	10.6%	-2.8%	
Native American/Alaskan Native CLF	1,278,577		1,189,964		1,491,835		Native American/Alaskan Native CLF	
Employed	1,176,380	92.0%	1,074,567	90.3%	1,356,126	90.9%		
Unemployed	102,197	8.0%	115,397	9.7%	135,709	9.1%	-1.1%	
Asian CLF	10,221,070		9,884,554		10,403,108		Asian CLF	
Employed	9,859,923	96.5%	9,463,533	95.7%	9,796,951	94.2%		
Unemployed	361,147	3.5%	421,021	4.3%	606,157	5.8%	-2.3%	
Hispanic CLF	29,717,065		28,856,220		30,689,402		Hispanic CLF	
Employed	28,204,501	94.9%	27,064,848	93.8%	28,394,287	92.5%		
Unemployed	1,512,564	5.1%	1,791,372	6.2%	2,295,115	7.5%	-2.4%	

Sources: 2019, 2020, 2021 American Community Survey 5-year estimate, when available, C23001, C23002A, C23002B, C23002C, C23002D, C23002I.

Figure 15. PIT Count of Homeless Vermonters, 2017–2024– Raw Data

	2017	2018	2019	2020	2021	2022	2023	2024
Individuals	1,225	1,291	1,089	1,110	2,591	2,780	3,295	3,458
Households	852	917	772	831	2,043	2,041	2,256	2,322
Under 18	306	292	251	216	360	481	654	737
Black Individuals	-	84	85	62	179	167	266	254
Fleeing Domestic Violence	267	151	133	128	277	237	200	309
Unsheltered	134	82	114	114	-	38	109	166

Figure 17. Trends in Housing Inventory in Vermont Counties, 1990–2020 – Raw Data

	Year				Percentage
	1990	2000	2010	2020	Increase 1990-2020
State of Vermont*	255,734	277,987	305,642	316,036	23.6%
Addison County	14,022	15,312	16,760	17,385	24.0%
Bennington County	18,501	19,403	20,922	20,815	12.5%
Caledonia County	13,449	14,504	15,942	15,997	18.9%
Chittenden County*	36,615	42,469	48,825	54,803	49.7%
City of Burlington	15,480	16,395	16,897	18,282	18.1%
Essex County	4,403	4,762	5,019	4,867	10.5%
Franklin County	17,250	19,191	21,588	22,642	31.3%
Grand Isle County	4,135	4,663	5,048	5,265	27.3%
Lamoille County	9,872	11,009	12,969	13,878	40.6%
Orange County	12,336	13,386	14,845	14,953	21.2%
Orleans County	12,997	14,673	16,162	16,376	26.0%
Rutland County	31,181	32,311	33,768	33,869	8.6%
Washington County	25,328	27,644	29,941	30,645	21.0%
Windham County	25,796	27,039	29,735	29,916	16.0%
Windsor County	29,849	31,621	34,118	34,625	16.0%
Total	271,214	294,382	322,539	334,318	23.3%

Figure 23. Families with Three or More People, 2020 – Raw Data

Number of Bedrooms	Rent Occupied	Owner Occupied	Percentage
0-1 bedrooms	28,222	7,548	13.6%
2 bedrooms	28,126	41,492	26.5%
3 bedrooms	14,142	90,911	40.0%
4 bedrooms	3,739	37,601	15.7%
5 or more bedrooms	1,249	9,822	4.2%
Total	75,478	187,374	100%

Source: U.S. American Community Survey 2020 5-year estimate (B25042).

Figure 25. Trends in Median Housing Value, Rent, and Income, 1990–2020 – Raw Data

	Median Housing Value	Median Gross Rent	Median Household Income
2000			
State of Vermont	\$145,934	\$724	\$53,473
Addison County	\$145,672	\$740	\$56,465
Bennington County	\$151,431	\$704	\$52,256
Caledonia County	\$108,763	\$560	\$45,547
Chittenden County	\$181,926	\$866	\$62,396
Essex County	\$89,916	\$550	\$39,906
Franklin County	\$129,967	\$705	\$54,524
Grand Isle County	\$167,006	\$810	\$56,323
Lamoille County	\$150,384	\$710	\$51,510
Orange County	\$123,422	\$669	\$52,163
Orleans County	\$103,135	\$550	\$40,684
Rutland County	\$125,647	\$677	\$48,090
Washington County	\$134,154	\$679	\$53,625
Windham County	\$143,316	\$723	\$50,002
Windsor County	\$142,007	\$705	\$53,253
2010			
State of Vermont	\$208,400	\$809	\$51,841
Addison County	\$219,000	\$831	\$55,800
Bennington County	\$198,800	\$720	\$47,396
Caledonia County	\$154,200	\$601	\$42,706
Chittenden County	\$254,700	\$959	\$59,878
Essex County	\$124,300	\$581	\$37,734
Franklin County	\$202,800	\$822	\$53,623
Grand Isle County	\$235,600	\$787	\$57,436
Lamoille County	\$211,100	\$867	\$52,232
Orange County	\$182,700	\$766	\$52,079
Orleans County	\$149,200	\$647	\$40,202
Rutland County	\$172,100	\$727	\$47,027
Washington County	\$197,600	\$780	\$55,313
Windham County	\$204,600	\$731	\$46,714
Windsor County	\$209,900	\$839	\$50,893
2020			
State of Vermont	\$230,900	\$999	\$63,477
Addison County	\$257,100	\$1,028	\$70,262
Bennington County	\$210,600	\$854	\$58,200
Caledonia County	\$172,700	\$781	\$52,481
Chittenden County	\$314,200	\$1,293	\$76,316
Essex County	\$137,600	\$721	\$47,035
Franklin County	\$219,200	\$1,023	\$65,314
Grand Isle County	\$287,200	\$1,024	\$81,667
Lamoille County	\$228,200	\$941	\$64,179
Orange County	\$196,900	\$977	\$62,737
Orleans County	\$169,400	\$804	\$54,390
Rutland County	\$174,800	\$843	\$57,176
Washington County	\$230,400	\$938	\$64,862
Windham County	\$217,600	\$883	\$54,188
Windsor County	\$219,500	\$944	\$61,503

Sources: U.S. Census Bureau, 2000 (SF3-H76, H63, P53), American Community Survey 5-Year Estimate 2010 & 2020 (B25077, B25064, B19013).

Figure 44. Characteristics of Current Section 8 Voucher Holders Head of Household, 2023 – Raw Data

	Bennington	Montpelier	Rutland	Springfield	Winooski	Total
Income						
Extremely Low Income	323	86	145	115	166	512
Very Low Income	83	33	53	45	39	170
Low Income	26	2	2	7	18	29
Bedroom Number						
0 Bedroom	35	8	0	25	0	68
1 Bedroom	232	94	103	137	98	664
2 Bedrooms	78	15	90	5	59	247
3 Bedrooms	60	4	6	0	39	109
4+ Bedrooms	27	0	1	0	27	55
Household Characteristics						
Head of Household with disability	323	70	83	108	133	584
Elderly Head of Household	83	31	26	51	46	191
Household with Children	26	20	31	3	89	80

Note: Extremely Low Income: <30% MFI. Very Low Income: >30%. <50% MFI, Low Income: >50%, <80% MFI. RAD: Rental Assistance Demonstration.

Source: DHCD Public Housing Survey Results: Responses from Montpelier, Rutland, Springfield, Winooski, and Bennington Housing Authorities.

Figure 46. Percent of Transit-Dependent Households by Tenure, 2022 – Raw Data

	Overall Population	Total Renter	Renter s No Vehicle	Owner Total	Owner No Vehicle
State of Vermont	265,858	72,636	12,558	193,222	4,418
Addison County	14,416	2,961	415	11,455	174
Bennington County	14,566	3,743	915	10,823	323
Caledonia County	12,819	2,928	563	9,891	393
Chittenden County*	51,870	25,385	2,022	43,933	515
City of Burlington	17,448	10,481	1,994	6,967	263
Essex County	2,667	436	62	2,231	70
Franklin County	19,233	4,268	680	14,965	513
Grand Isle County	3,027	308	29	2,719	31
Lamoille County	11,176	2,963	291	8,213	281
Orange County	12,690	2,229	252	10,461	281
Orleans County	11,528	2,300	511	9,228	220
Rutland County	25,334	7,020	1,311	18,314	498
Washington County	25,166	6,881	1,623	18,285	313
Windham County	19,382	5,472	1,014	13,910	163
Windsor County	24,536	5,742	876	18,794	380

Survey of Housing & Nonprofit Professionals

Roles

What best describes your role in the housing market?	Original Responses	Adjusted "Other"*	Adjusted Responses	Categorized
Nonprofit Community Service Organization	40	5	45	Non-profit
Nonprofit Housing Agency	12	1	13	Non-profit
Property Manager	4	1	5	Property/Real Estate
Nonprofit Developer	3		3	Non-profit
Private Developer	3		3	Property/Real Estate
Real Estate Agent	1		1	Property/Real Estate
Elected Official	3		3	Government
Government Employee	11		11	Government
Other	15	-5	10	Other
Total	92		94	

"Other" responses include Finance, Municipal Housing Committee, Quasi State Agency, Low-income credit union, Mutual Aid Organizer, Energy efficiency, Quasi Public Employee - Housing Finance Agency. Some "other" responses were reclassified—responses of Shelter staff, Non-profit Legal Services, Community Development Program Services, Resident Services Coordinator CHW, Nonprofit Community Service Organization (SASH) were reclassified as Non-Profit Community Service Organization. One respondent also included multiple selections including Nonprofit Housing Agency, Property Manager, which were included in the adjusted responses.

Services Provided

Types of Services Provided	Original Responses	Adjusted "Other"*	Adjusted Responses
Application Assistance	23	3	26
Housing Retention Support	23	2	25
Legal Assistance	13	1	14
Investigate Fair Housing complaints	3		3
Credit, Home Buyer and/or Tenant Training	2		2
Eviction Prevention	15		15
Utility Assistance	8		8
Food Assistance	10	1	11
Specialized services for unhoused and at risk Vermonters	21	1	22
Other	7		7
Total	125		133

"Other" responses include participants that selected multiple services that were added to the adjusted responses. Other responses include Fair housing consultations, referrals, conciliation, and support; Rights & responsibilities info, education & resources; Addressing barriers to their housing; Information, referral and system navigation; Specialized services for unhoused and at-risk Vermonters; Immigration aid; YHDP; Services for people with disabilities; and Long term care assistance.

Figure 35. Resources Needed – Raw Data

What resources would help you and/or your community develop housing affordable to low-middle income Vermonters? (Please check all that apply.)	Original Responses	Adjusted "Other"*	Adjusted Responses	Response Title
Financing for ADA upgrades and/or reasonable modifications for those with disabilities.	47	1	48	Financing for ADA upgrades
Streamlined Zoning and permit approvals for desired housing types in places where households want to live.	56	3	59	Streamlined zoning and permitting
Tweaks to existing subsidies so they are more effective and/or simpler to use.	46	2	48	Improve effectiveness of existing subsidies
Assistance with language and/or cultural barriers to better serve New Americans.	31	1	32	Help with language and cultural barriers
Statewide guidance on using innovative designs, materials, etc. to help make development more affordable and/or simpler to execute.	37		37	Guidance on how to make development more affordable
Provide assistance for back rent.	48	1	49	Assistance for back rent
Other	19	-7	12	Other
Total	284		285	

*"Other" responses include participants that selected multiple services that were added to the adjusted responses.

Other responses include (aggregated):

- Remove regulatory barriers to developing affordable housing.
- Strengthen fair housing protections and enforcement of existing laws.
- Provide additional funds for affordable housing, support services, and emergency homeless shelters.
- Strengthen tenant protections i.e., eliminate no cause evictions, month-to-month rental leases, etc.

Figure 38. Nature of Discrimination – Raw Data

Nature of Observed Discrimination	Original Responses	Adjusted "Other"*	Adjusted Responses
A real estate agent didn't show a house because they assumed a client didn't have money to buy it because of race or the color of skin, or because of a disability.	10		10
A landlord asked for a larger security deposit, a background check, or asked more questions than others who are outside of your client's race, gender, gender identity, without children, without disability, etc.	14		14
A landlord refused to take a rent check late even though they accept it late from other tenants who are outside of your client's race, gender, gender identity, without children, without disability, etc.	5		5
A landlord told your client that the home is not safe or is too small or not a good fit for children.	20	1	21
A landlord didn't allow a disabled client to have a service animal because they have a no-pet policy or charged a pet deposit.	20	2	22
A landlord, property manager, realtor, or other housing professional harassed your client because of race, skin color, national origin, disability, etc.	17		17
Other	26	-15	11
A Landlord Wouldn't take Housing Choice Vouchers and/or wouldn't provide a one-year lease to tenants with vouchers. *NOT A DROP-DOWN OPTION*		9	9
A landlord refused to lease to and/or charged higher rents to tenants with perceived addiction or mental health issues. *NOT A DROP-DOWN OPTION*		3	3

"Other" responses include participants that selected multiple services that were added to the adjusted responses. Based on similar "other responses two new categories were added to the table.

Appendix F. Additional Resources and References

U.S. Census Bureau 2020 Poverty Thresholds by Family Size & Number of Related Children

Size of Family Unit	Related children under 18 years of age								
	None	One	Two	Three	Four	Five	Six	Seven	Eight or More
One person (unrelated individual):									
Under age 65	\$13,464.52								
Aged 65 and older	\$12,412.61								
Two people:									
Householder under age 65	\$17,330.81	\$17,838.91							
Householder aged 65 and older	\$15,643.78	\$17,771.42							
Three or more people:									
Three people	\$20,244.42	\$20,831.90	\$20,851.75						
Four people	\$26,694.85	\$27,131.49	\$26,246.29	\$26,337.59					
Five people	\$32,192.60	\$32,661.00	\$31,660.68	\$30,886.63	\$30,414.26				
Six people	\$37,027.44	\$37,174.31	\$36,408.20	\$35,673.84	\$34,582.23	\$33,935.20			
Seven people	\$42,604.58	\$42,870.53	\$41,953.58	\$41,314.49	\$40,123.64	\$38,734.32	\$37,210.04		
Eight people	\$47,649.80	\$48,070.57	\$47,205.22	\$46,447.05	\$45,371.31	\$44,005.81	\$42,584.73	\$42,223.51	
Nine people or more	\$57,319.49	\$57,597.36	\$56,831.24	\$56,188.19	\$55,132.30	\$53,679.47	\$52,365.56	\$52,040.06	\$ 50,035.47

Source: U.S. Census Bureau