



OFFICE OF HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-8000

MAY 1 - 2014

**MEMORANDUM FOR:** All Primary Inspection Agencies and State Administrative Agencies

**FROM:**

Pamela Beck Danner  
Administrator  
Office of Manufactured Housing Programs

**SUBJECT:**

Tests for Attic Insulation, 24 CFR § 3280.207(c) and Effective Date for Compliance with Revisions to the Standards

Attic Insulation Tests

This is in response to a request for clarification regarding the applicability of NFPA 253-2000, Standard Method of Test for Critical Radiant Flux of Floor Covering Systems Using a Radiant Heat Energy Source, for evaluating attic insulation. This standard was incorporated by reference and included as the test protocol for evaluating attic insulation in 24 CFR § 3280.207(c) in the December 9, 2013, revisions to the Manufactured Home Construction and Safety Standards (Standards).

Upon review, we have determined this was the only test protocol available when this recommendation was being reviewed by the Manufactured Housing Consensus Committee (MHCC) that could be used to evaluate combustion characteristics of a heat source emanating from the top of a horizontal surface, or in this case attic insulation.

We have also recently been made aware of another Standard, ASTM E 970 – 2010 Edition, Standard Test Method for Critical Radiant Flux of Exposed Attic Floor Insulation Using a Radiant Heat Energy Source that would be directly applicable to this requirement. In addition, information provided to the Department indicates that most, if not all, third party certifications as to the flammability characteristics of attic floor insulation are being made to the ASTM E 970 Standard and not to NFPA 253-2000 Standard.

In view of the above, the Department will accept certification made to either the NFPA 253-2000 Standard or ASTM E 970 Standard with regard to the radiant flux characteristics of attic insulation required by 24 CFR § 3280.207(c) of the Standards.

In summary, we find the NFPA 253-2000 Standard to be an acceptable test method for evaluating attic insulation under 24 CFR § 3280.207(c) of the Standards, but will also continue to accept certifications to the ASTM E 970 Standard until such time that future recommendations to revise the Standards can be duly considered and acted upon by the Manufactured Housing Consensus Committee and the Department.

Effective Date of Standards

In response to questions received from manufacturers and PIAs, this will advise that any homes labeled on or after June 9, 2014, must comply with the revisions to the Standards that were issued on December 9, 2013.