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November 24, 2021

U.S. Department of Energy  
1000 Independence Ave, SW  
Washington, DC 20585

RE: Comment on Docket EERE-2009-BT-STD-0021

Submitted via [regulations.gov](https://www.regulations.gov)

To whom it may concern:

Next Step® Network appreciates the opportunity to submit comments to the Department of Energy (DOE) regarding the Proposed Rule for Energy Conservation Standards for Manufactured Housing under the Energy Independence and Security Act of 2007. We understand that the current standards are set by the Department of Housing and Urban Development as stipulated in the National Manufactured Housing Construction and Safety Standards Act of 1974 (the HUD code). The energy provisions as governed by the HUD code have not changed since 1994. The current DOE proposed rulemaking is for legislation passed in 2007 that required DOE to set an efficiency standard by 2011. Next Step participated in and supported the negotiated rulemaking in 2015, which resulted in a 2016 draft standard that DOE never finalized. Therefore, we applaud you for issuing the draft standard.

Next Step offers the following considerations to strengthen the proposed rulemaking:

1. Manufactured homes are a critical component of America's affordable housing stock, and the need for increased energy efficiency in housing is particularly acute for low-income homebuyers. Data suggest that the incremental costs for energy efficiency upgrades (added to other housing costs) keep manufactured housing affordable and accessible to low-income homeowners earning less than 60 percent of median income.
2. DOE should have a single-tier standard that promotes equal access to energy efficiency. Rulemaking should not disproportionately impact residents of manufactured housing communities, persistent poverty regions, communities of color, and underserved rural areas.
3. Energy efficiency should go further than the building envelope and include efficient heating and cooling equipment, water heating, appliances, and lighting. The standard should also require good ventilation to ensure air sealing does not negatively impact indoor air quality.



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Next Step® Network, Inc., is a national, nonprofit housing intermediary that promotes expanded use of factory-built housing as a viable solution to address housing affordability. Our organization mobilizes a nationwide network of mission-driven nonprofits, leaders in the manufactured housing industry, and lending institutions serving home buyers and homeowners in their communities. Next Step's system—Manufactured Housing Done Right®—connects responsible financing, comprehensive homebuyer education, and delivery of high-quality, ENERGY STAR® manufactured homes.

America's promise of opportunity is built on the foundation of homeownership. For generations, the blueprint for wealth creation and equity building has been predicated on the financial gains afforded by owning a home. Yet millions of households – particularly those living in lower-income communities of color, on tribal lands, and in immigrant communities – have been barred from this quintessentially American path to prosperity by a lack of affordable housing and the legacy of exclusionary housing policies. This systemic failure has a multiplier effect. Three out of four low-income households are cost-burdened, paying more than 30 percent of their income on housing costs.<sup>1</sup> Cost-burdened families must make impossible trade-offs for food, healthcare, transportation, and childcare costs. Substandard housing is correlated with an increased risk of homelessness, poorer health outcomes, and lower educational attainment. Much of today's housing stock is also energy inefficient, not only raising costs for already-struggling households but also contributing to climate change. As our current housing crisis deepens, with the available housing supply at historic lows, there is an urgent need to rethink how we meet our fellow Americans' housing needs.

In 2020, the manufactured housing industry shipped 94,390 homes, 30 percent of which (29,686 homes) were certified as ENERGY STAR. Homes not certified as ENERGY STAR are more expensive to own and operate, resulting in undue strain on lower-income families who could benefit most from energy cost savings. Manufactured housing is critical to the affordable housing stock serving primarily low-income and first-time homebuyers. According to ACEEE, high energy burdens are a persistent national challenge. A 2020 ACEEE study concluded that the median energy burden of manufactured housing residents is 71 percent higher than that of

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<sup>1</sup> Joint Center for Housing Studies of Harvard University. (2020). *The state of the nation's housing 2020*. President and Fellows of Harvard College.  
[https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard\\_JCHS\\_The\\_State\\_of\\_the\\_Nations\\_Housing\\_2020\\_Report\\_Revised\\_120720.pdf](https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_The_State_of_the_Nations_Housing_2020_Report_Revised_120720.pdf)



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single-family households. A quarter of residents living in manufactured homes have severe energy burdens, meaning they spend more than 10 percent of their income on energy costs.<sup>2</sup>

While many manufacturers exceed the bare minimum energy-efficiency standards set by the HUD code, manufactured homes, particularly those at a lower price point, are significantly less energy-efficient than comparable site-built homes. The need for energy-efficient homes is particularly acute for low- and moderate-income homeowners, many of whom are cost-burdened by high utility bills. According to a study prepared by the Virginia Center for Housing Research at Virginia Tech, close to 30 percent of manufactured homeowners in Appalachia are cost-burdened by their utility bills alone, ranging between \$140 to \$240 per month.<sup>3</sup>

**In the U.S., we have a supply gap of more than seven million affordable homes.<sup>4</sup> Additionally, 37 million Millennial households are mortgage-ready<sup>5</sup> but cannot find a home due to limited supply at their price point. Manufactured housing can help solve America's affordable housing crisis, where subsidized housing is oversubscribed with four families waiting for one housing unit. It can be done with little or no subsidy, making it an attractive vehicle for affordable housing production. *However, there is a need to increase the energy efficiency of these homes to make homeownership a sustainable, long-term investment opportunity for low- and moderate-income families.***

### **Manufactured Housing: Important Share of Nation's Affordable Housing Stock**

In 1974, Congress passed the National Manufactured Housing Construction and Safety Standards Act, authorizing HUD to establish construction standards for manufactured homes – known colloquially as the HUD code. In 2000, Congress updated the 1974 Act. Through regulatory enforcement, Congress intended for HUD to protect the quality, durability, safety, and affordability of manufactured homes; to facilitate the availability of affordable manufactured homes and increase homeownership opportunities for all Americans; to provide for the establishment of uniform and performance-based construction standards for

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<sup>2</sup> Drehobl, A., Ross, L., and Ayala, R. "How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burdens across the US, September 10, 2020." American Council for an Energy-Efficient Economy, 2020

<sup>3</sup> Mobile and Manufactured Homes in Central Appalachia and Alabama: Age, Condition and Need for Replacement Table 19. [https://www.prosperitynow.org/files/resources/VCHR\\_Study\\_Final.pdf](https://www.prosperitynow.org/files/resources/VCHR_Study_Final.pdf)

<sup>4</sup> Baron, et. al, M. (2020, July). *Housing underproduction in the U.S.: Economic, fiscal, and environmental impacts of enabling transit-oriented accessible growth to address America's housing affordability challenge*. Up for Growth. [https://www.upforgrowth.org/sites/default/files/2020-07/housing\\_underproduction\\_us.pdf](https://www.upforgrowth.org/sites/default/files/2020-07/housing_underproduction_us.pdf)

<sup>5</sup> Waldron, C. (2019, December). *Future Millennial Borrowers: Challenges and Opportunities*, Freddie Mac.



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manufactured homes, and to encourage cost-effective and innovative construction techniques for manufactured homes.

The federal standards established by the HUD code preempt state and local building codes for these homes. This preemptive, single federal code allows manufacturers to standardize the building processes, inspections, and distribution channels to enable efficiencies that translate into construction cost savings. While the homes are generally not subsidized, the manufactured housing industry benefits from the federal government's oversight and regulatory enforcement. One could consider that manufactured homes make up a portion of the federal government's available, affordable housing stock, as the construction, inspection, certification, and other processes that bring homes to communities fall under the purview of the federal government.

Today 22 million Americans live in manufactured housing, a crucial part of the nation's affordable stock. Fundamentally, manufactured homes are a portfolio of housing that serves a median income of **\$38,087 for owners and \$28,280 for renters**.<sup>6</sup> The table below includes the median income and definitions for what constitutes low-income by standard HUD program definitions. Manufactured housing serves households below 60 percent for low-income owners and below 50 percent for very low-income renters.

2020 Census Income	Income	Federal Low-Income Housing Definitions
100% Median Income	\$67,521	National Median
80% Median Income	\$54,017	Low Income
60% Median Income	\$40,513	Multifamily Tax Subsidy Income Limit
50% Median Income	\$33,761	Very Low Income

Source: Income in 2020 dollars, adjusted using the CPI-U-RS. Households as of March of the following year. Information on confidentiality protection, sampling error, non-sampling error, and definitions is available at <<https://www2.census.gov/programs-surveys/cps/techdocs/cpsmar21.pdf>>  
 Income as defined by HUD Guidance: <https://www.huduser.gov/portal/datasets/il/il21/HUD-sec8-FY21.pdf>

<sup>6</sup> Choi, J.H., and Goodman, L. (2020, August). *22 Million Renters and Owners of Manufactured Homes Are Mostly Left Out of Pandemic Assistance*. The Urban Institute. <https://www.urban.org/urban-wire/22-million-renters-and-owners-manufactured-homes-are-mostly-left-out-pandemic-assistance>.



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2020 Urban Institute Study	Median Household Income	Federal Low-Income Housing Definitions
Manufactured Homeowners <sup>3</sup>	\$ 38,087	Multifamily Tax Subsidy Income Limit
Manufactured Home Renters <sup>3</sup>	\$ 28,280	Very Low Income

Source: [2013-18 American Community Survey](https://www.urban.org/urban-wire/22-million-renters-and-owners-manufactured-homes-are-mostly-left-out-pandemic-assistance) - Urban Institute, <https://www.urban.org/urban-wire/22-million-renters-and-owners-manufactured-homes-are-mostly-left-out-pandemic-assistance>

2020 Urban Institute Study	Monthly Housing Cost
Manufactured homeowners*	\$ 505
Manufactured home renters**	\$ 670
Non-manufactured homeowners***	\$ 1,168
Non-manufactured renters***	\$ 1,079

\*For owners includes loan payments, lot rental payments, utilities, insurance, and property taxes;

Source: [2013-18 American Community Survey](https://www.urban.org/urban-wire/22-million-renters-and-owners-manufactured-homes-are-mostly-left-out-pandemic-assistance) - Urban Institute

\*\* For renters includes rental payments and utilities; Source: [2013-18 American Community Survey](https://www.urban.org/urban-wire/22-million-renters-and-owners-manufactured-homes-are-mostly-left-out-pandemic-assistance) - Urban Institute

\*\*\* Source: [2013-18 American Community Survey](https://www.urban.org/urban-wire/22-million-renters-and-owners-manufactured-homes-are-mostly-left-out-pandemic-assistance) - Urban Institute

The table above shows the monthly cost for manufactured housing occupants, which is within 30 percent of monthly income. According to the Aspen Institute, HUD's Housing Cost Burden is the longest-established and most widely used metric to determine unaffordability. HUD defines spending more than 30 percent of income on housing costs as cost-burdened. Spending more than 50 percent of income on housing costs is considered severely cost-burdened.

Manufactured housing is often considered a source of Naturally Occurring Affordable Housing (defined as unsubsidized housing that meets the affordability standard for households making 60-80 percent of AMI). Two of the most prominent affordable housing, new construction programs (the HOME Program and the Low-Income Housing Tax Credit Program), are used for individual and family household incomes below 60 percent AMI. These federal programs require affordability compliance periods for 30 years for rental new construction, serving 60 percent AMI.

**The federal government considers the long-term affordability of this housing stock, and the same principles should be applied to manufactured housing.**



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## Ensuring Long-Term Affordability: Lending and Housing Ratios

The Federal Housing Administration (FHA) and other government-backed lenders, conventional lenders, and Community Development Financial Institutions (CDFIs) generally underwrite manufactured home loans to ensure affordability by using a housing ratio of 29 percent of gross monthly income applied to housing costs, which includes the principal, interest, taxes, and insurance (PITI). The FHA's Energy Efficient Mortgage (EEM) absorbs energy savings for efficient homes and stretches the ratio to 31 percent. The premise is that the increased energy efficiency of the home allows for increased household savings so that homeowners can absorb additional PITI costs. Freddie Mac's GreenCHOICE<sup>®</sup> Program, which includes manufactured housing, weighs energy efficiency into its underwriting. Freddie Mac's research analyzed energy-efficient homes rated between 2013 and 2017 and found the following<sup>7</sup>:

- From the property value analysis, rated homes are sold for, on average, 2.7 percent more than comparable unrated homes.
- Better-rated homes are sold for 3-5 percent more than lesser-rated homes.
- From the loan performance analysis, the default risk of rated homes is not, on average, different from unrated homes (once borrower and underwriting characteristics are considered).
- Loans in the high debt-to-income (DTI) bucket (45 percent and above) that have ratings, however, appear to have a lower delinquency rate than unrated homes.

## Consideration for Life Cycle costs for manufactured homes should be based on 30 years.

DOE's Life Cycle Cost (LCC - net present value analysis) is a cost-benefit metric that sums the costs and benefits of a code change over a specified time. Any code change resulting in a net LCC less than or equal to zero (i.e., monetary benefits exceed costs) will be considered cost-effective. The methodology considers only direct costs (and savings) to the consumer. *Secondary or societal effects, such as reductions in carbon emissions, or externalities, such as impacts on manufacturers, are not considered.* DOE uses the LCC to determine the cost-effectiveness of code change proposals, as it is the most straightforward approach to achieving the desired balance of first costs and longer-term energy savings.

**Next Step believes there is a societal effect by not increasing the energy standards for the nation's future affordable housing stock.** The result of nearsighted thinking on energy efficiency in manufactured homes will directly impact our most vulnerable communities,

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<sup>7</sup> Argento, R., Bak X. F., and Brown, L. (2019, October). *Energy Efficiency: Value Added to Properties & Loan Performance*. Freddie Mac. [https://sf.freddiemac.com/content/assets/resources/pdf/fact-sheet/energy\\_efficiency\\_white\\_paper.pdf](https://sf.freddiemac.com/content/assets/resources/pdf/fact-sheet/energy_efficiency_white_paper.pdf).



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leading to less durable homes built to a lower quality standard. Many communities with the greatest need for affordable housing face the immediate impacts of climate change, losing homes due to fire, flood, and other environmental damage. Furthermore, persistent poverty regions have a glut of older, substandard housing stock that needs to be replaced. By sacrificing energy-efficiency features in lower-cost manufactured homes, the proposed DOE rule will adversely impact lower-income communities – including immigrant communities and communities of color. By removing access to more energy-efficient housing options, individuals and families will be deprived of opportunities to purchase higher quality homes, reducing the resale value and removing the ability to build home equity.

As DOE determines how to calculate the life-cycle costs for increased energy standards, we recommend you consider the following:

- HUD's affordability compliance requirements for new housing production are up to 30 years.
- Energy savings should not be calculated based on a simple payback for the first home buyer but also subsequent purchasers who will benefit over the 40-year life expectancy of the home.
- According to the National Association of Realtors, as of 2018, the median duration of homeownership in the U.S. is 13 years. Compared to previous years, homeowners opt to spend more time holding onto their residences. Median tenure has increased by three years since 2008.
- According to the Manufactured Housing Institute, 62 percent of all residents anticipate living in their homes for more than ten years, and 38 percent do not expect to sell their homes.

### **Incremental Costs for Energy-Efficiency Upgrades Do Not Price Out Manufactured Housing Residents**

Using CFPB's median loan data in conjunction with the DOE's average incremental cost increase data, loans remain affordable to those at 60 percent median income, even accounting for increased energy-efficiency upgrades. The tables below show comparative financing for chattel loans and mortgage loans.

#### *Chattel Loans –*

<b>Chattel Loan</b>	
Loan Amount	\$ 70,731
Interest Rate	8.60%



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Term (20-23 years)		20
Payment (Principal and Interest Only)	\$	618
Source: Pricing Assumptions from CFPB: Manufactured Housing Finance: New Insights from the Home Mortgage Disclosure Act Data May 2021		

<b>Chattel Loan (including energy costs)</b>		
Incremental Energy Increase for Single-Section	\$	3,914
Chattel Loan Amount	\$	70,731
Increased Mortgage Loan Amount for Energy	\$	74,645
PITI, plus utilities with savings, the loan includes increased energy costs	\$	856
Source: DOE National Average, CFPB 2020 Median Loan Values, Taxes, Insurance and utilities, Next Step data: Assumption chattel for single-section home.		

<b>Chattel Affordability Analysis based on 30% Income</b>		
Chattel Loan Payment and Utilities, including cost for energy upgrade	\$	856
Income needed to afford loan	\$	34,240
60% of National Median Income	\$	40,513

<b>Mortgage Loan</b>		
Loan Amount		\$127,200
Interest Rate		4.90%
Term (30 years)		30
Payment (Principal & Interest only)	\$	675
Source: Pricing Assumptions from CFPB: Manufactured Housing Finance: New Insights from the Home Mortgage Disclosure Act Data May 2021		

<b>Mortgage Loan including Energy Costs</b>		
Incremental Energy Increase for Multi-Section	\$	5,289
Mortgage Loan Amount	\$	127,200





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Increased Mortgage Loan Amount for Energy	\$ 132,489
PITI, plus utilities with savings, the loan includes increased energy costs	\$ 1,010
Source: DOE National Average, CFPB 2020 Median Loan Values, Taxes, Insurance and utilities, Next Step data: Assumption chattel for single-section home.	

### Mortgage Affordability Analysis based on 30% Income

Mortgage Loan Payment & Utilities, including cost for Energy upgrade	\$ 1,010
Income Needed to Afford Loan	\$ 40,400
60% of National Median Income	\$ 40,513

### Comparing Manufactured Housing with Other HUD Housing Programs

The Energy Independence and Security Act of 2007 enacted substantial updates to federal energy building performance standards for new construction projects supported by HUD's housing programs. However, manufactured housing lags woefully behind on energy efficiency compared to other housing programs overseen by HUD.

HUD must "meet or exceed" the International Energy Conservation Code (IECC) for new construction, public housing, assisted housing, single-family, and multifamily residential housing (other than manufactured homes) subject to mortgages insured under the National Housing Act. New construction and rehabilitation of HOPE VI projects are to "meet or exceed" revisions to these codes subject to certain determinations. The law gave more flexibility for energy code improvements for manufactured housing. It required DOE, in consultation with HUD, to establish standards for energy efficiency in manufactured housing within four years based on the most recent IECC except where code is not cost-effective. The energy standards under the HUD code have not been updated since 1994, placing it far behind all other HUD housing programs.

The LIHTC program provides a suitable comparator for manufactured housing (as both rely heavily on the private sector for production), and efficiency standards for homes constructed under that program far outpace manufactured homes. The LIHTC Program is a well-established new construction program driven mainly by the private sector to build affordable multifamily housing. It targets the 60 percent AMI and below income bands that manufactured housing serves, with similar monthly housing costs for their residents. The LIHTC program began in 1987



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and initially required a minimum affordability period of 15 years. In 1990 the program was changed to require an extended use period of affordability for 30 years. Between 1987 and 2009, 2.2 million LIHTC units were produced, and HUD says an average of 106,500 units were produced annually. For comparison, the total manufactured homes shipped in 2020 was 94,401.<sup>8</sup>

The Housing and Economic Recovery Act of 2008 (HERA) required energy efficiency in the LIHTC Program Qualified Allocation Plans (section 3004). The law required state housing finance agencies to consider energy efficiency in tax credit allocations and include energy efficiency considerations in state plans for allocating credit among projects.

According to Enterprise Community Partners, 33 states (66 percent) require or encourage developers seeking these projects to follow the [Enterprise Green Communities Criteria](#). All residential units must certify through the ENERGY STAR Residential New Construction Program using ENERGY STAR Multifamily New Construction (MFNC), ENERGY STAR Manufactured Homes, and ENERGY STAR Certified Homes. Furthermore, HUD's HOME Program requires all new construction to comply with the International Energy Conservation Code.

Virtually all other forms of affordable housing stock have seen a dramatic increase in energy-efficiency requirements over the past 30 years except for manufactured housing. If manufactured homes remain a viable, affordable housing solution in our communities, they must meet efficiency standards comparable to other housing choice options.

## Recommendations for Final Rulemaking:

- 1. Next Step supports a single-tier standard for energy conservation based on the 2021 IECC standard as required by the Energy Independence and Security Act of 2007. Homebuyers purchasing single-section homes should not be subjected to the pitfalls of lower-quality, inefficient homes.** Typically, single-section homes are priced lower, and lower-income homebuyers will purchase these homes. Those who can least afford to pay high energy bills would continue to needlessly waste thousands of dollars on energy costs and live in draftier, less safe, and less comfortable homes for decades to come. Additionally, the lesser quality of these homes will reduce resale value, perpetuating cycles of poverty for families – as opposed to creating the opportunity to

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<sup>8</sup> The Edge. What Happens to LIHTC Properties After Affordability Requirements Expire? Policy Development & Research, U.S. Dept. of Housing and Urban Development.  
[https://www.huduser.gov/portal/pdredge/pdr\\_edge\\_research\\_081712.html#:~:text=Once%20the%2015year%20affordability%20period%20is%20over%2C%20LIHTC,local%20financing%20that%20comes%20with%20longer%20use%20restrictions.](https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html#:~:text=Once%20the%2015year%20affordability%20period%20is%20over%2C%20LIHTC,local%20financing%20that%20comes%20with%20longer%20use%20restrictions.)



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build generational wealth. Moreover, these homes are more likely to be shipped into manufactured housing communities, persistent poverty regions, and lower-income rural areas, contributing to an already existing glut of older, poor-quality housing stock.

- 2. Rulemaking should be considered under President Biden's January 20, 2021, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.** The DOE must recognize the level of inequity that would be perpetuated in underserved communities by adopting a two-tiered approach in this rulemaking, particularly for communities of color and other underserved communities, residents of manufactured housing communities in rural and farmworker regions. In the persistent poverty regions of Appalachia, the Delta, the Colonias, and Native Lands, more than 20 percent of residents have lived in poverty for at least 30 years. Often, manufactured housing provides a higher percentage of the overall affordable housing stock in these regions. A lesser standard will disproportionately affect these communities, given the concentration of smaller homes.
- 3. A two-tiered approach would further stratify the growing homeownership gap for underserved communities, depriving individuals and families of quality, energy-efficient housing choices. Therefore, we support a single-tier standard for energy conservation based on the 2021 IECC standard as required by the Energy Independence and Security Act of 2007.**
- 4. The standard should include cost-effective energy-saving measures, including equipment.** The draft rule does not have the efficiency package options that account for much of the energy savings in the most recent International Energy Conservation Code. Measures beyond increasing the efficiency of the walls and roof (including efficient lighting, heating and cooling, water heating, appliances, and ducts) would yield sizeable cost-effective energy savings. Increased usage of heat pumps in construction could be especially beneficial by avoiding the cost of a furnace, air conditioner, and other ductwork while providing significant carbon savings. Like the model code, the standard should ensure additional savings through prescriptive requirements and efficiency package options, tailored as needed for manufactured homes.
- 5. The standard should protect residents' health and safety.** Indoor air quality should be a concern for the residents of manufactured homes. The standard should include ventilation and moisture control measures, if needed, to ensure that air sealing improves the health of residents.
- 6. This standard for manufactured housing energy efficiency is long overdue and should be issued and implemented as soon as possible.** We request expedited rulemaking and full implementation of the regulations. Moving forward, we recommend that the HUD



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should be the lead agency to implement the rules. Compliance must be addressed in the final rule to ensure synchronicity between DOE's authority and the HUD code. Compliance could be adopted through HUD's regulatory and inspection processes. DOE should also consider the existing methods to certify ENERGY STAR homes, with some field testing for quality control. **HUD and the manufactured housing industry should implement the law within one to two years, with allowance for exceptions.**

Thank you for the opportunity to provide comments on the proposed rule. Energy efficiency for manufactured homes is a core tenant of Next Step's mission to sustainable homeownership opportunities for more individuals and families. Our communities, nation, and the planet will benefit from robust energy-efficiency standards for all homes.

Sincerely,

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