



July 18, 2019

The Honorable Ben Carson Secretary  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW  
Washington, D.C. 20410

**RE: Notice of a Federal Advisory Committee Meeting; Manufactured Housing Consensus Committee (Docket No. FR-6141-N-04)**

Dear Secretary Carson,

The Manufactured Housing Institute (MHI) is pleased to provide feedback to the U.S. Department of Housing and Urban Development (HUD) and the Manufactured Housing Consensus Committee (MHCC) in response to the request for public comments in preparation for the MHCC's upcoming General Subcommittee teleconferences. MHI appreciates HUD's effort to complete a comprehensive review of its regulation of manufactured housing and implement the numerous recommendations and updates to the HUD Code that have already been approved by the MHCC. Detailed below are MHI's recommendations in response to the topics on the MHCC's agenda that were delegated to the General Subcommittee.

MHI is the only national trade association that represents every segment of the factory-built housing industry. Our Members include home builders, suppliers, retail sellers, lenders, installers, community owners, community operators, and others who serve the industry, as well as 49 affiliated state organizations. In 2018, our industry produced nearly 100,000 homes, accounting for approximately 10 percent of new single-family home starts. These homes are produced by 34 U.S. corporations in 130 plants located across the country. MHI's members are responsible for close to 85 percent of the manufactured homes produced each year.

Manufactured homes are built almost entirely in a controlled manufacturing environment in accordance with the HUD Code, which provides a single regulatory framework for home design and construction of manufactured homes, including standards for health, safety, energy efficiency, and durability. This single Code has enabled manufacturers to ship homes easily across interstate lines and achieve economies of scale that have brought high quality, affordable homes to millions across the country. However, if the HUD Code is not updated on a consistent basis, manufactured home builders face constraints as they seek to provide the latest innovations, technologies, and features that consumers demand. Ensuring that the HUD Code is updated to support innovative housing solutions has never been more important, especially as the industry launches a new class of homes that are indistinguishable from site-built homes. Market data and research indicate that consumers want homes with the latest innovative features and HUD must ensure that the HUD Code is updated so that it can support the features, innovations, and amenities that consumers are seeking.

During the MHCC's most recent meeting, the Committee referred 141 DRCs to the General Subcommittee for further discussion. In order to move forward with HUD's comprehensive review and expedite updates to the HUD Code, MHI has prepared five proposals that the MHCC General Subcommittee can utilize to address the majority of DRCs on this agenda. These five proposals translate the DRC comments into actionable items for HUD to take to refine the HUD Code and improve HUD's overall administration of the building Code. In addition, to guide the General Subcommittee in its consideration of the DRCs, the attached matrix includes MHI's position for every DRC on the General Subcommittee's agenda, including where MHI's five proposals will address the concern raised by the commenter.

### **1.) HUD Must Expedite the Administrative Process for Manufactured Housing**

**MHI proposes that HUD: (1) elevate the Office of Manufactured Housing Programs (OMHP) so that it is led by a Deputy Assistant Secretary who reports directly to the Federal Housing Administration (FHA) Commissioner; (2) increase the number of staff in the OMHP and assign a dedicated staff person who focuses on manufactured housing issues in both the Office of General Counsel (OGC) and the Office of Policy Development and Research (PD&R); (3) follow the statutory timeline for updates to the HUD Code and require the OGC and PD&R to act on MHCC recommendations within 60 days; and (4) conduct thorough economic and cost-benefit analyses before implementing any regulatory change.**

Because updates to the HUD Code occur so infrequently, the Code does not adequately reflect industry trends and fails to incorporate MHCC recommendations in a timely manner. The internal process at HUD needs to be changed to ensure that its manufactured housing policies foster uniformity and ease of compliance, benefit consumers, minimize discrepancy with state and local codes, and promote innovation. To accomplish this objective, the Subcommittee should adopt MHI's proposal to ensure HUD expedites the administrative process for manufactured housing (bolded above). Adoption of this proposal would address the following DRCs: 3, 15, 23, 25, 30, 32, 34, 35, 36, 37, 42, 49, 66, 67, 77, 85, 199, 200, 201, 202, 203, 206, 207, 208, 209, 212, 213, 214, 215, 216, 217, 218, 219, 254, 255, 256, 257, 258, 259, 260, 279, 281, 282, 283, 285, and 286. MHI proposes that the MHCC adopt this administrative streamlining proposal in its entirety to expedite the administrative process within HUD so that updates to the HUD Code are made regularly.

The ability to utilize new technologies and materials, and to maintain the integrity of the uniform federal building Code, is dependent on a Code that is current. Recognizing this, in 2000 Congress passed the Manufactured Housing and Improvement Act (the Improvement Act), which was intended to improve the process for establishing, revising, enforcing, and updating the HUD Code. The law created the MHCC and included a process to facilitate updates to the HUD Code on a regular basis. Despite clear Congressional intent, HUD has failed to meet its statutory obligations when it comes to updating the HUD Code. Adoption of this proposal and implementation of it by HUD will ensure there is a better process and adequate resources for HUD to update the HUD Code regularly, reducing the significant backlog of updates approved by the MHCC that have not been implemented.

MHI believes that the delay in updating the HUD Code is the result of the OMHP's low priority placement within the Department's organizational hierarchy and the comingling of internal resources for manufactured housing Code updates with other HUD policy responsibilities. Because HUD serves as a code-setting body for manufactured home construction standards, such updates should be separate from other HUD actions and priorities. HUD Code changes must follow its own regulatory path and be prioritized separately from other unrelated HUD policy matters, so that updates to the manufactured housing building Code are not delayed by other HUD priorities. Such an approach was recommended by the Government Accountability Office in 2014 and by HUD's PD&R in 2019.<sup>1</sup> In its report five years ago, the GAO recommended that HUD "develop and implement a plan for updating construction and safety standards for manufactured homes on a timely, recurring basis to include: addressing unresolved issues related to defining and developing sufficient economic analyses tied to proposed changes to the construction and safety standards; and ensuring sufficient resources and capacity within HUD and the MHCC and its administering organization." Just this year, in its report to Congress, PD&R echoed the GAO's recommendations. It is past time for HUD to change its internal

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<sup>1</sup> U.S. Gov't Accountability Office, GAO-14-410, *Manufactured Housing: Efforts Needed to Enhance Program Effectiveness and Ensure Funding Stability* (July 2, 2014). (See also U.S. Department of Housing and Urban Development, *Report to Congress on the On-Site Completion of Construction for Manufactured Homes*.)

process for updating the HUD Code and MHI's proposal reflects the recommendations for updating HUD's process made by two government entities. Specifically:

- (1) The regulation of manufactured housing within HUD should be elevated from its current location within the Department and led by a Deputy Assistant Secretary that reports directly to the FHA Commissioner. The OMHP is not currently positioned within HUD to ensure that manufactured housing is at the center of policy discussions surrounding the Department's affordable housing mission. Because it is buried deep within HUD's bureaucracy, when discussions are held regarding the shortage of affordable housing, the important role of manufactured housing is often not a part of the conversation.
- (2) In addition to elevating the Office within HUD, it is critical that there is adequate staffing for HUD to fulfill its statutory obligation to update the Code in a timely manner. OMHP is severely understaffed and internal processes are not efficient within OGC and PD&R in prioritizing and finalizing rules, which has led to nearly a decade of delays in some circumstances. Each year, manufactured housing represents approximately 10 percent of all new single-family housing starts. However, OMHP has a staff of fewer than 15. In comparison, the Office of Single-Family Housing (SFH) has approximately 700 staff members but does not administer the building code for site-built homes. It is clear that more staff must be allocated to OMHP given the size of the manufactured housing market and HUD's responsibilities as a code-making body. In addition, HUD's OGC and PD&R should have staff members dedicated to manufactured housing so that they can process MHCC proposals to update the HUD Code according to statutory timelines.
- (3) Every major standard-setting organization in the construction and building trades updates its model code regularly; the HUD Code should be no different. To accomplish this, it is imperative that HUD follow the statutory timeline for updates to the HUD Code and explicitly require the OGC and PD&R to act on MHCC recommendations within 60 days.
- (4) While MHI believes it is imperative that timely updates are made to the HUD Code, this should not come at the expense of thorough economic and cost-benefit analyses, as required by statute. This will ensure the HUD Code reflects innovation in the industry and minimizes costly regulatory review and compliance requirements. To maintain housing affordability, no changes should be made without a clear justification that the changes will lead to improvements that are in the best interest of consumers.

**2.) The HUD Code Must Remain a Performance-Based Standard; DRCs that Call for Specific HUD Code Changes Must Be Submitted as Log Items**

**MHI proposes rejection of all DRCs that seek to move the HUD Code toward a prescriptive standard. In addition, all DRCs that suggest a technical change to the Code but are not accompanied by a specific, technical mark-up of the Code should be rejected and resubmitted as Log Items if they are to be considered.**

The HUD Code is a performance-based standard that guarantees that all manufactured homes are built to comply with minimum design, construction, and safety requirements, while also preserving affordability.<sup>2</sup> Current HUD regulations are designed to encourage innovation and provide flexibility for alternative approaches during the design and construction of manufactured homes. This gives manufacturers, engineers, architects, and state agencies certain autonomy during the construction and installation process.

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<sup>2</sup> Id. at 5403(a)(1)(A)(iii).

As the MHCC considers DRCs, it must reject recommendations that seek to move the HUD Code toward a prescriptive standard, such as DRC 41. Congressional intent under the MHCSS Act is clear that the HUD Code should be a performance-based standard.<sup>3</sup> The MHCC should reject DRCs that suggest the Code be prescriptive and reiterate that the HUD Code is a performance-based building code.

In addition, the Subcommittee should reject all DRCs that suggest a technical change to the Code but are not accompanied by a specific technical mark-up of the Code and require that recommendations are resubmitted as Log Items if they are to be considered (DRC 38, 44, 46, 47, 50, 51, 52, 54, 56, 57, 64, 65, 68, 69, 71, 72, 73, 74, 78, 210, 268, and 277). Log Items require a specific language proposal, including mark-up of the existing Code, Reason Statement, and Cost-Benefit Explanation. This rationale is important to consider to ensure that the performance-based building Code is preserved.

### **3.) HUD Should Have Exclusive Jurisdiction Over Energy Standards for Manufactured Homes**

**MHI Proposes that HUD (1) shall insist that DOE closely consult with HUD on energy standards for manufactured housing, as required by the Energy Independence and Security Act<sup>4</sup>; (2) shall retain implementation and enforcement authority over all energy standards for manufactured housing<sup>5</sup>; and (3) shall consider the unique design and factory construction techniques specific to manufactured housing.<sup>6</sup>**

While MHI supports efforts to improve energy efficiency in homes and buildings, each regulatory change must be carefully assessed and its impact quantified. As such, MHI strongly urges the MHCC to continue to reject efforts to transfer the authority to regulate energy standards for manufactured housing to the Department of Energy (DOE). For DRC items 21, 75, 76, 296, 297, MHI recommends that HUD: (1) insist that DOE closely consult with HUD on energy standards for manufactured housing, as required by the Energy Independence and Security Act; (2) shall retain implementation and enforcement authority over all energy standards for manufactured housing; and (3) consider the unique design and factory construction techniques specific to manufactured housing when updating energy standards. Specifically:

- (1) HUD must be closely involved in any efforts by the DOE to establish energy standards for manufactured housing. The law recognizes the importance of manufactured housing as a source of affordable housing. Not only is HUD responsible for regulating the quality, durability, and safety of manufactured homes, but it is also responsible for preserving and promoting affordability. When the DOE proposed a rule in June 2016 on energy efficiency standards for manufactured homes, it failed to adequately assess the impact the associated cost increase would have on consumers. The proposed rule would have increased manufactured home prices between three and ten percent, while producing negligible cost savings for consumers. The proposed rule missed the fact that the first buyer of an energy efficient home under the regulations would likely never receive economic benefit from the new standard. The features that the proposed rule would have required a consumer to purchase as a result of the new DOE standards would instead yield a negative return over the ownership period. This would have been an unfortunate result for most buyers, and particularly unfair to the manufactured home household but such a result could have been avoided if HUD, and the MHCC were closely involved in the DOE's effort.
- (2) According to statute, HUD has exclusive jurisdiction over all manufactured housing construction standards, including standards for energy efficiency. This means that while the Department of Energy

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<sup>3</sup> Id. at § 5401(a).

<sup>4</sup> Id. at § 17071(a).

<sup>5</sup> Id. at § 5403(g).

<sup>6</sup> Id. at 17071(b)(2)(A).

(DOE) might develop energy efficiency standards, such proposals must be implemented by HUD and enforced by HUD through the HUD Code.

- (3) Given the different design and production processes that are very specific to manufactured homes, the implications of any proposed energy efficiency standard on manufactured housing must be considered. Failure to provide such specific consideration could result in vast, detrimental consequences to manufactured homeowners, buyers, and manufacturers. For example, the standard the DOE proposed in 2016 had several requirements that conflicted with HUD Code, including requirements for: ceiling insulation, floor insulation, and floor decking; truss heel height; glazing of floor area; thermal envelope; mechanical ventilation; climate zones; thermostats; hot water piping; and return air ducts.

#### **4.) HUD Must Implement and Enforce its Enhanced Preemption Authority**

**MHI Proposes that HUD shall issue a revised and updated policy statement regarding the Department’s position concerning preemption and state and local zoning, planning, or development restrictions that either severely limit or outright prohibit manufactured housing.**

HUD needs to exercise its preemption authority when local regulatory construction standards and zoning, planning, or development policies adversely affect the placement of quality, affordable manufactured housing. While HUD has pursued individual cases where local jurisdictions have introduced construction and safety standards that are not consistent with the HUD Code or have imposed zoning and planning requirements that exclude HUD-compliant manufactured homes, MHI believes HUD must play a much greater role in this effort and has a congressional mandate to do so. HUD has jurisdictional authority to move beyond case-by-case enforcement and take an official policy position opposing state and local regulatory schemes that are inconsistent with Congressional intent.

In 1997, HUD determined it has authority under the MHCSS Act to issue a “Statement of Policy 1997-1 State and Local Zoning Determinations Involving HUD Code” (the 1997 Policy Statement) that summarizes the Department’s policy position concerning preemption and certain zoning decisions being made by state or local governments.<sup>7</sup> Following passage of the Improvement Act in 2000, which significantly strengthened HUD’s preemptive authority, HUD clearly has the authority to make necessary updates to its original policy statement.<sup>8</sup> Consequently, MHI recommends that HUD update its 1997 Policy Statement because it was issued after enactment of the MHCSS Act, but before the passage of the Improvement Act, which would remedy issues raised in the following DRCs: 33, 62, 83, 84, 287, 290, 291, 298, and 299. Given that the Improvement Act expanded HUD’s authority, MHI believes it is only appropriate for the Department to update its statement. Further, updating the 1997 Policy Statement would galvanize HUD’s pledge to facilitate the availability of affordable manufactured homes and to increase homeownership for all Americans.<sup>9</sup>

#### **5.) Financing Issues Must be Referred to FHA’s Office of Single-Family Housing**

The MHCC only has jurisdiction over matters concerning the HUD Code. The financing of manufactured homes is unrelated to the HUD Code and the MHCC has no authority to act on any of the suggested changes. Because financing issues are critical, however, for those DRCs categorized as “Financing Issues” on the agenda (DRCs 229-246) MHI strongly recommends the MHCC General Subcommittee vote to refer these financing DRCs to FHA’s Office of Single-Family Housing.

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<sup>7</sup> 62 Fed. Reg. 24337 (May 5, 1997).

<sup>8</sup> Pub. L. § 106-569.

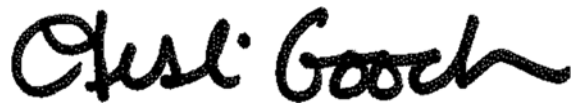
<sup>9</sup> 42 U.S.C. § 5401(b)(2).

While the MHCC does not have jurisdiction over financing matters, it is still critically important that FHA revise the FHA Title I and II Programs to remove outdated and unnecessary regulatory hurdles that make it harder for manufactured home lenders and borrowers to access financing. The FHA Title I Program is crucial to manufactured home financing because nearly 75 percent of new homes are titled as personal property. However, this program is underutilized—and loan volumes continue to shrink—because outdated rules make it impractical as a financing option. For the FHA Title II Program, as the industry begins delivery of its new class of manufactured homes, revisions are particularly important. While there are efforts underway to support these new homes with financing comparable to site-built mortgages through the Fannie Mae MH Advantage and Freddie Mac CHOICEHome programs, the FHA Title II Program must be updated to provide similar options. Without access to financing, coupled with an outdated HUD Code that stifles innovation, many families are unable to attain the dream of homeownership. MHI has submitted detailed recommendations to the FHA in various comment letters about the importance of updating the Title I and Title II programs to make the programs more viable options for lenders and borrowers.

### **Conclusion**

Manufactured homes remain the most affordable homeownership option available in the U.S. today. MHI looks forward to working with HUD to ensure that the MHCC's recommendations are integrated into the HUD Code as quickly as possible, which will not only encourage housing innovation, but also eliminate unnecessary regulatory barriers that impede consumer access to safe, affordable manufactured homes.

Sincerely,

A handwritten signature in black ink that reads "Lesli Gooch". The signature is written in a cursive, flowing style with a long horizontal flourish at the end.

Lesli Gooch, Ph.D.  
Executive Vice President

Attachment: MHI DRC Recommendations Chart

**Manufactured Housing Institute (MHI)**  
**HUD MHCC General Subcommittee Meeting Deregulation Comment (DRC) Matrix**

#	DRC Number (assigned by HUD)	DRC Category (from HUD's tentative agenda)	MHI Recommendation to the General Subcommittee
1	3	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
2	7	Regulatory Burden and Overreach	HUD should adhere to statute.
3	15	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
4	20	Regulatory Burden and Overreach	Reject. 24 CFR 3282, Subpart I, "Consumer Complaints," is on the docket of the Reg Enforcement Subcommittee.
5	21	Regulatory Burden and Overreach	Adopt MHI Proposal #3 that HUD should have exclusive jurisdiction over energy standards.
6	23	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
7	25	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
8	29	State Issue	HUD should adhere to statute.
9	30	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
10	32	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
11	33	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
12	34	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
13	35	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
14	36	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
15	37	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
16	38	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
17	39	General Comments About MH Construction and Safety Standards	Reject. HUD does not have authority to revise the International Residential Code.
18	41	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #2 to ensure HUD Code remains a performance-based building code.
19	42	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
20	43	General Comments About MH Construction and Safety Standards	Reject. See HUD Letter dated March 15, 1990, saying that the length of a fixed wall does not matter.
21	44	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
22	45	General Comments About MH Construction and Safety Standards	Reject. See Log Item 185, approved by the MHCC on Wednesday, May 1, 2019.
23	46	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
24	47	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
25	49	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
26	50	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item. Also, 24 CFR 3282.14, "Alternative Construction of Manufactured Homes," is on the docket of the Reg Enforcement Subcommittee.
27	51	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
28	52	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
29	53	General Comments About MH Construction and Safety Standards	Reject. Log 198, which proposes revising the definition of "manufactured home," is on the docket of the Reg Enforcement Subcommittee.
30	54	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.

**Manufactured Housing Institute (MHI)**  
**HUD MHCC General Subcommittee Meeting Deregulation Comment (DRC) Matrix**

#	DRC Number (assigned by HUD)	DRC Category (from HUD's tentative agenda)	MHI Recommendation to the General Subcommittee
31	55	General Comments About MH Construction and Safety Standards	Reject. See Log Item 185, approved by the MHCC on Wednesday, May 1, 2019.
32	56	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
33	57	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
34	60	General Comments About MH Construction and Safety Standards	Reject. The HUD Code is specific to manufactured housing.
35	61	General Comments About MH Construction and Safety Standards	Reject. The HUD Code is specific to manufactured housing.
36	62	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
37	64	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
38	65	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item. Also, 24 CFR 3282.14, "Alternative Construction of Manufactured Homes," is on the docket of the Reg Enforcement Subcommittee.
39	66	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
40	67	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
41	68	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
42	69	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
43	70	General Comments About MH Construction and Safety Standards	Reject. The Manufactured Home Construction and Safety Standards Act and the HUD Code do not apply to homes built prior to June 15, 1976.
44	71	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
45	72	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
46	73	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
47	74	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
48	75	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #3 that HUD should have exclusive jurisdiction over energy standards.
49	76	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #3 that HUD should have exclusive jurisdiction over energy standards.
50	77	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
51	78	General Comments About MH Construction and Safety Standards	Reject. DRC should be resubmitted as a Log Item.
52	79	General Comments About MH Construction and Safety Standards	Reject. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
53	82	General Comments About MH Construction and Safety Standards	Reject. 24 CFR 3282.14, "Alternative Construction of Manufactured Homes," and 24 CFR 3282, Subpart M, "On-site Completion," are on the docket of the Reg Enforcement Subcommittee.
54	83	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
55	84	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
56	85	General Comments About MH Construction and Safety Standards	Adopt MHI Proposal #1 to streamline the process.
57	198	Regulatory Burden and Overreach	Reject. The HUD Code is specific to manufactured housing.
58	199	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.



**Manufactured Housing Institute (MHI)**  
**HUD MHCC General Subcommittee Meeting Deregulation Comment (DRC) Matrix**

#	DRC Number (assigned by HUD)	DRC Category (from HUD's tentative agenda)	MHI Recommendation to the General Subcommittee
59	200	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
60	201	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
61	202	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
62	203	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
63	204	Regulatory Burden and Overreach	HUD should adhere to statute.
64	205	Regulatory Burden and Overreach	HUD should adhere to statute.
65	206	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
66	207	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
67	208	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
68	209	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
69	210	Regulatory Burden and Overreach	Reject. DRC should be resubmitted as a Log Item.
70	211	Regulatory Burden and Overreach	Reviewed and considered. No further action needed.
71	212	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
72	213	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
73	214	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
74	215	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
75	216	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
76	217	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
77	218	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
78	219	Regulatory Burden and Overreach	Adopt MHI Proposal #1 to streamline the process.
79	228	State Issue	Reject. HUD clarified the RV exemption in its Final Rule published in the Federal Register last November. See 83 Fed. Reg. 57677 (November 16, 2018).
80	229	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
81	230	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
82	231	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
83	232	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
84	233	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
85	234	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
86	235	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
87	236	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
88	237	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
89	238	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
90	239	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.

**Manufactured Housing Institute (MHI)**  
**HUD MHCC General Subcommittee Meeting Deregulation Comment (DRC) Matrix**

#	DRC Number (assigned by HUD)	DRC Category (from HUD's tentative agenda)	MHI Recommendation to the General Subcommittee
91	240	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
92	241	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
93	242	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
94	243	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
95	244	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
96	245	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
97	246	Financing Issues	Adopt MHI Proposal #5. Refer to FHA Office of Single-Family Housing. The MHCC only has jurisdiction over matters concerning the HUD Code, not requirements related to financing.
98	254	OMHP Administration	Adopt MHI Proposal #1 to streamline the process.
99	255	OMHP Administration	Adopt MHI Proposal #1 to streamline the process.
100	256	OMHP Administration	Adopt MHI Proposal #1 to streamline the process.
101	257	OMHP Administration	Adopt MHI Proposal #1 to streamline the process.
102	258	OMHP Administration	Adopt MHI Proposal #1 to streamline the process.
103	259	OMHP Administration	Adopt MHI Proposal #1 to streamline the process.
104	260	State Issue	Adopt MHI Proposal #1 to streamline the process.
105	261	State Issue	Reviewed and considered. No further action needed.
106	262	State Issue	HUD should adhere to statute.
107	263	State Issue	Reviewed and considered. No further action needed.
108	264	State Issue	Reviewed and considered. No further action needed.
109	265	State Issue	Reviewed and considered. No further action needed.
110	266	Regulatory Benefits	Reject. The HUD Code should not include special provisions based on the homeowner or tenant's age.
111	267	Regulatory Benefits	Reject. The HUD Code is specific to manufactured housing.
112	268	Regulatory Benefits	Reject. DRC should be resubmitted as a Log Item.
113	269	Regulatory Benefits	Reviewed and considered. No further action needed.
114	271	Regulatory Benefits	Reviewed and considered. No further action needed.
115	273	Regulatory Benefits	Reviewed and considered. No further action needed.
116	274	Regulatory Benefits	Reviewed and considered. No further action needed.
117	275	Regulatory Benefits	Reject. The HUD Code is specific to manufactured housing.
118	276	Regulatory Benefits	Reject. The HUD Code is specific to manufactured housing.
119	277	Regulatory Benefits	Reject. DRC should be resubmitted as a Log Item.
120	278	Regulatory Benefits	Reviewed and considered. No further action needed.
121	279	Regulatory Benefits	Adopt MHI Proposal #1 to streamline the process.
122	280	Regulatory Benefits	Reviewed and considered. No further action needed.
123	281	MHCC Issues	Adopt MHI Proposal #1 to streamline the process.
124	282	MHCC Issues	Adopt MHI Proposal #1 to streamline the process.
125	283	MHCC Issues	Adopt MHI Proposal #1 to streamline the process.
126	284	MHCC Issues	See written statements submitted by the Mississippi Manufactured Housing Association on April 5, 2007, and February 26, 2018.
127	285	MHCC Issues	Adopt MHI Proposal #1 to streamline the process.

**Manufactured Housing Institute (MHI)**  
**HUD MHCC General Subcommittee Meeting Deregulation Comment (DRC) Matrix**

#	DRC Number (assigned by HUD)	DRC Category (from HUD's tentative agenda)	MHI Recommendation to the General Subcommittee
128	286	MHCC Issues	Adopt MHI Proposal #1 to streamline the process.
129	287	Land Issues	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
130	288	Land Issues	Reject. The MHCC does not have jurisdiction over manufactured home communities and owner/operators.
131	289	Land Issues	Reject. The MHCC does not have jurisdiction over manufactured home communities and owner/operators.
132	290	Land Issues	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
133	291	Land Issues	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
134	292	Land Issues	Reject. The MHCC does not have jurisdiction over manufactured home communities and owner/operators.
135	293	Land Issues	Reject. The MHCC does not have jurisdiction over manufactured home communities and owner/operators.
136	294	Miscellaneous	Reject. The MHCC does not have jurisdiction over manufactured home communities and owner/operators.
137	295	Miscellaneous	Reject. The MHCC does not have jurisdiction over manufactured home communities and owner/operators.
138	296	Miscellaneous	Adopt MHI Proposal #3 that HUD should have exclusive jurisdiction over energy standards.
139	297	Miscellaneous	Adopt MHI Proposal #3 that HUD should have exclusive jurisdiction over energy standards.
140	298	Miscellaneous	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.
141	299	Miscellaneous	Adopt MHI Proposal #4 encouraging HUD to utilize its enhanced preemption authority.