

Final Transcript

HUD-US DEPT OF HOUSING & URBAN DEVELOPMENT: Overview HUD Manufactured Housing

December 13, 2017/3:00 p.m. EST

SPEAKERS

Ben Yanetta Pamela Danner Demetress Stringfield Patricia McBarron Lois Starkey

PRESENTATION

Ben

Hi, everyone. Thank you, all, for joining us today for this webinar that provides an overview of the federal Manufactured Housing Program. My name is Ben Yanetta, and I'm with the HUD Office of Housing Counseling. Today, you're actually going to have presenters from the Office of Manufactured Housing Programs, and I'm just here to help out and run the webinar.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 2

So, before I turn it over to the experts, I'd like to just go over a few things

about this webinar. The first thing is that the audio is being recorded. We

do this so that we can provide a playback number along with the

PowerPoint and a transcript of the call. We put that up on our HUD

Exchange website at the link that you see on the screen, and we usually

send out a notification when we upload anything new to the webinar

archive, and that's announced through the Jerry Mayer list survey that

you're probably a member of, and it usually takes about seven to ten days

to get anything new uploaded there.

Today, the attendee lines are going to be muted throughout the

presentation, but you ask questions, and I'll go over that on the next slide

homeownership you can go about doing that. Also, right now, you can

download a copy of this presentation. If you look to your right, there's a

control panel for the webinar, and there's an option that says handouts. If

you click the arrow next to handouts, a file will display, and if you left

click on that, you can just download the presentation straight to your hard

drive.

I'll move onto how you can ask some questions on this webinar. Also on

the control panel to your right, you'll see a box labeled questions. If you

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 3

click the arrow next to the word questions, I'll open up, and you can type a

question directly into there. This will go into a queue that we'll be

monitoring throughout the presentation. We're going to save answering

the questions until the end of the presentation. We have about an hour

budgeted for your guys today. If we go a little long, that's okay, but we're

going to try to keep it to about an hour mark. We'll read through the

questions that come into the queue and answer them at the end of the

presentation. You can ask multiple questions if you like.

If you think of another question after the webinar has ended, you can

always email housing.counseling@hud.gov, and if you put the words

manufactured housing somewhere in the subject line, that will help us

route it to an expert to get a response to you as quickly as possible.

That's it for the webinar logistics. At this time, I'd like to turn it over to

Pamela Danner who's the administrator for the Office of Manufactured

Housing Programs.

Pamela

Thank you, Ben. Good afternoon. I am very pleased to be here. This is a

webinar that actually we have discussed jointly presenting with the Office

of Housing Counseling for probably about a year and a half. We're very

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 4

pleased that actually Sarah Gerecke, the deputy assistant secretary for

Housing Counseling offered to jointly work with us to provide information

to you all as housing counselors and housing counseling agencies.

I have here with me Demetress Stringfield who's going to be giving the

presentation; my deputy Teresa Payne; management analyst, Lois Starkey.

We're very fortunate to be jointly presenting this with the Office of Single

Family Housing FHA, and Patricia McBarron will be doing the finance

portion of the program.

This program started 42 years ago with the passage of the National

Manufactured Housing Construction and Safety Standards Act in 1974,

which was substantially amended in 2000.

Demetress will go over it. It will be an overview, but we are very pleased.

We know that you speak to many potential homeowners, and hopefully

some of those are actually manufactured housing homeowners. So, I will

turn it over to Demetress.

Demetress Thank you, Pamela. Good afternoon, everyone. As Pamela said, my

name is Demetress Stringfield, and I am an analyst within the Office of

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 5

Manufactured Housing Programs. Just as Pamela said, we are very glad to

share information with you about manufactured housing.

So, today we just wanted to take an opportunity to provide an overview of

the Federal Manufactured Housing Program. We know and understand as

agency aids and counselors that you provide tools to current and

prospective homeowners and renters to that they can make responsible

choices to address their housing needs in light of their financial situations.

In some cases, you may receive questions about manufactured housing,

and maybe in some instances, you may recommend manufactured housing

as a way to meet housing needs, so today we hope that our overview will

provide you a better understanding of manufactured housing and what our

role is or our office role is as it relates to manufactured housing.

We wanted to start off with talking about the purpose. Pamela kind of

touched on this. HUD Manufactured Housing Programs was established

by the National Manufactured Housing Construction and Safety Standards

Act of 1974, which was amended in 2000 as a nationwide program to

protect four critical aspects, which include quality, safety, durability, and

affordability of manufactured homes.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 6

Our office, along with construction standards and regulations, we oversee

those standards and regulations as well as the Model Installation Standards

and the Dispute Resolution Program, which we will talk more about the

Installation Program and the Dispute Resolution Program later in this

presentation.

One significant factor to note is that the act created a preemptive program

of the construction of manufactured homes. Prior to the act, states had

individual building codes for manufactured homes, but as a result of the

act, preemption now completes a uniform building code for manufactured

homes in all states, so the act made everything uniform as far as it relates

to the construction of manufactured homes.

Next slide. Our mission. The act sort of sets the precedence for what our

program mission is, and it's just like we said on the last slide. Our

mission is to emphasize the four critical traits to protect the quality,

durability, safety, and affordability of manufactured homes and also to

facilitate the availability of affordable manufactured homes. Now, when

we facilitate the availability of affordable homes, we are increasing

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 7

homeownership for all Americans, which we all know is part of HUD's

overall mission.

Next slide. Just to kind of give you an idea of the program scope,

manufactured homes provide subsidy-free affordable housing for more

than 20 million Americans. Some of the production and retail includes

manufactured homebuilders, approximately 50 corporations with 130

production facilities, manufactured home retailers, large as well,

approximately 2,000 retailers with about 4,000 locations.

Next slide. Our program standards and regulations. There are several

standards and regulations that govern our program. They are listed here

on this slide and the following slide. We all know that regulations and

standards are important.

So, starting with the first one, 24 CFR 3280 establishes manufactured

home construction and safety standards. These are the technical standard,

how to build a manufactured home.

Then, 3282 establishes manufactured home procedural and enforcement

regulations, so these are basically the procedures and the industry

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 8

participant requirements. Industry participants can include manufacturers,

retailers, regulatory partners, which we'll talk about later. They all utilize

and follow this particular regulation.

Next slide. For more program standards and regulations, 24 CFR 3285

and 3286 are our standards and regulations for installing a manufactured

home, which is very important. So, 3285 are the technical standards.

They are the how to install a manufactured home, and 3286 is the

enforcement program. It gives the responsibilities and requirements of

installers. It also discusses what is needed for a state to have and

administer a HUD-approved installation program.

Then, 24 CFR 3288 establishes our HUD Dispute Resolution Program.

Also here this particular regulation lays out what is required for a state to

administer their own dispute resolution program.

Next slide. So, we wanted to kind of just get to the basics. What is a

manufactured home? We realize there may be some confusion around

what a manufactured home is. You may have referred to manufactured

homes as trailers, which is kind of like an older term, but the official term

is manufactured home.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 9

The regulation clearly defines what a manufactured home is in the event

that there is confusion. You can read the definition on the slide, but as

you read the definition there are some areas that I would like to highlight

as it relates to the definition.

It is a structure transported in one or more sections. You may or may not

know manufactured homes come in single-wides, double-wides, triple-

wides, so they come in one or more sections. In traveling mode, it is 8

body feet or more in width or 40 or more body feet in length, or when

erected on site, it is 320 or more square feet. It's used as a dwelling with

or without a permanent foundation.

These are some of the things that highlight what a manufactured home is.

Again, I know that sometimes they are confused with modular homes or

recreational vehicles, but the definition clearly defines what it is. Also,

our HUD standards only regulate manufactured homes, so we do not

regulate, or they don't apply to modular or factory-built housing or self-

propelled recreational vehicles.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 10

Next slide. Here's an example. I'm sure many of you have seen what a

manufactured home looks like. This here is a picture of a single-wide

home.

Next slide. As we said, they come in multiple sections. They can come in

one or more sections, and here is a sample or a picture of a double-wide

home.

So, we've discussed our program mission. We've given you some scope

data. We've talked about our purpose. We've discussed what a

manufactured home is. So, in the next few slides, we want to give you

some general program data. The data will hopefully give you an idea of

the impact of manufactured housing in the industry as well as the industry

activity.

So, the first bullet, we talked about the preemption and how the act gave

preemption, so it's built from America's only national preemptive building

code. There are approximately 8.5 million manufactured homes in the

United States, which is quite significant. Manufactured homes comprise

of approximately 10% of single-family detached housing.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 11

As of October '17, the industry produced over 89,000 new manufactured

homes, so the industry is very active in production and in providing

manufactured homes for consumers. This also give us somewhat a gauge

of the level of interest in manufactured homes just from some of these data

points.

Next slide. Approximately 22 million people live in manufactured homes.

The median household income for residents in manufactured homes is

slightly less than \$30,000. As housing counselors, you obviously work

with consumers with various income levels, so we're hoping that this

information can assist you in assessing consumer housing needs.

Manufactured homes can be placed on private land or can be placed in a

community where the land is leased, and that speaks to bullet three where

we say that the average selling price of a new manufactured home today is

\$68,000, and that's without land versus \$360,000 for a site-built home

with land. So, again, manufactured homes can be on private land, or they

can be a land-leased type community.

Next slide. Some more general data. The average price per square foot is

about \$47, \$48 versus \$100 for a single-family built home without land.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 12

There are approximately 3 million to 3.5 million manufactured homes in

land-lease communities, and one out of five homes in rural areas is a

manufactured home.

Next slide. We talked briefly earlier about our partnerships or regulatory

partners, and based on the information you heard thus far regarding our

mission and our purpose and some of the general data that we provide, you

can conclude that we have a pretty substantial mission without our office.

Our office is fairly small here at headquarters, about 14 people, so in order

for us to really meet this mission, we have to have regulatory partners that

assist us with administering the programs.

Our regulatory partners consist of agencies that assist us at the state level

in the various plants, and if you remember, we have 130 plants across the

United States, so that's pretty significant. Part of our role per the act is to

monitor those manufacturing plants across the United States, and we are

required to monitor them as well as inspect, so it's a pretty significant

mission.

First we have our design approval primary inspection agencies. We call

these our DAPIAs, and they assist the department by reviewing and

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 13

approving designs or building plans for manufactured homes that are

developed and submitted by the manufacturer. They ensure designs meet

the standards as well as they review the quality assurance manuals.

So, there are six agencies that assist us with these DAPIA requirements or

these design requirements. Five of those agencies are private, and one is a

unit of state government.

Our in-plant primary inspection agencies, we call these our IPIAs. These

agencies are in the plant with the manufacturers inspecting the various

stages of the manufacturing process. They assist the department by

overseeing implementation and effectiveness of quality assurance

programs. There are 14 agencies, 5 that are private, and 9 that are units of

the state government.

Each manufacturer that decides to build manufactured homes are required

to obtain services of a design approval inspection agency or a DAPIA and

an in-plant primary inspection agency, so to build manufactured homes,

they have to acquire the services of these two regulatory partners or

agencies.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 14

Next slide. Another agency that assists us with the program are known as

our state administrative agencies. We call these our SAAs. They assist

the department with administering the manufactured housing program at

the state level.

So, we have 35 states that have partnered with HUD to assist in portions

of the enforcement and regulation of the program. The state agencies are

primarily responsible for handling consumer complaints, those individuals

that may have an issue with their manufactured home, and they oversee

manufactured actions within the state. This includes going into the

manufacturing facility and performing those inspections or monitoring-

type services.

So, we have 35 agencies that are partnered with HUD. For the remaining

15 states that do not have an agency, HUD our office, serves as the

administrative agency, and we have the same responsibilities as the

agencies. We handle consumer complaints, and we also do monitoring

and inspections of the manufacturers within those states.

Next slide. We mentioned earlier the Dispute Resolution Program and the

Installation Program, so we want to talk right now about installation.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 15

Installation is a very key part of the manufacturing process as a whole

once a home is built. We say installation is key because if a home is built

in accordance with the standards, if it is installed incorrectly or not in

accordance with the standards, then the home absolutely will not perform.

A bad installation will lead to numerous problems with the home, so we

try to stress this as much as possible.

It's important that a homeowner knows that when purchasing a

manufactured home how important installation is and make sure that a

licensed installer is installing their home.

Next slide. So, talking about the Installation Program, as we stated earlier,

there are two regulations that kind of govern, or standards and regulations

that govern the installation program, and 3285 is the how to install a

manufactured home, and 3286 is the enforcement part. It gives the

responsibilities and requirements of installers, retailers, and what is

needed if a state wants to administer their own Installation Program.

A lot of times when the state wants to run their installation program, they

go through a process where they are approved by HUD to do so. So there

are 36 states that administer their HUD-approved installation program, and

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 16

for the remaining states, just as with the SAAs or the state administrative

agencies, for the remaining states, HUD is the office that administers the

Installation Program.

In doing that, when HUD administers an installation program, this

includes providing training to installers, licensing, random monitoring,

inspections, reviewing installation manuals, etc., so we do everything that

the regulations require within HUD.

Next slide. So, this map basically is a quick snapshot that shows you

which states are HUD administered and which states are administering

their own programs. So, again, there are 14 states where HUD is the

agency that administers the program directly. The remaining states have a

HUD-approved installation program that they administer.

Next slide. For more information about the Installation Program, you can

go to this website, www.manufacturedhousinginstallation.com. You'll

find there where you can get a program overview, some information about

the regulations and standards, so definitely if you want more information,

we encourage you to visit that site.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 17

Next slide. This is an interesting slide. Ending the blame game. There is

no resolution in the blame game. So, this leads us to the other program

that we talked about, the Dispute Resolution Program where we try to end

the blame game.

So, the HUD Manufactured Dispute Resolution Program is a program that

resolves disputes between manufacturers, which are of course the people

that build the home, retailers, those who sell the home, and installers,

those that install the home regarding who is responsible for repairing a

defect found in a manufactured home.

Dispute resolution is used when there is the blame game or the finger

pointing. Through dispute resolution, parties are notified of a dispute, and

a mediation occurs between the parties in an effort to assign responsibility

and remedy the issue with the home. This is a benefit to homeowners if

once they've purchased their home, and their home has been installed, and

they have an issue with the construction of the home.

We encourage to homeowners to first file a complaint with the state or

HUD, a consumer complaint and go through that process, but they can

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 18

also submit a request for dispute resolution if the issue is not resolved

through just the regular consumer complaint process.

There are eligibility requirements to submit a request for dispute

resolution. One of those requirements is the defect or the issue must be

reported within one year after the date of installation. The homeowner

will have to show proof that they made an effort to seek resolution of the

issue within that one year in order to be eligible.

Similar to the Installation Program and our SAAs or our state

administrative agencies, not all states have a HUD Dispute Resolution

Program. There are 25 states that administer a HUD-approved Dispute

Resolution Program. For the other states that do not, HUD again serves as

the agency or point of contact for administering the Dispute Resolution

Program.

Next slide. Again, this a map, a quick snapshot that shows you what 25

states have their own HUD-approved Dispute Resolution Program. The

other states HUD is the agency that handles and administers dispute

resolution within those states.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 19

Next slide. If you want more information about the Dispute Resolution

Program, I encourage you to visit this website, www.huddrp.net. On this

website, you will get a great overview of the program. We have a video

on this website that walks through all the requirements to be eligible for

dispute resolution, FAQs. If you want us to contact you, you can go to the

contact tab, so definitely if you want more information regarding the

Dispute Resolution Program, visit that website.

Next slide. Okay, so at this point, we will turn it over to Patricia

McBarron who works in FHA, and she will go over financing of a

manufactured home.

Hello, everyone. My name is Patricia McBarron, and as Demetress said, I

work with the Federal Housing Administration and its Office of Single

Family Program Development, and I am a credit policy specialist there.

One of my assignments is to support FHA finance programs that ensure

manufactured home loans.

So, as you guys already know, FHA sets property and credit standards for

the loans it insures. As long as the loans comply with FHA standards,

lenders are free to add on any additional requirements that they want to

Patricia

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST Page 20

add on. So, FHA's flexible policies, as an example, a lender may require a

higher credit score, or they might want certain restrictive property

features.

In the case of manufactured homes, lenders tend to want to know

something about the land ownership. Manufactured homes are unique in

that the homeowner might or might not own the land underneath, and I

think as Demetress said, the land underneath the home could be owned by

the homeowner, or it could e on a family member's backyard, or it could

be in a community park. Sometimes the community parks are referred to

as mobile home parks, primarily because they don't just serve

manufactured homes, but also other housing structures such as RVs.

Next slide, please. Lenders want to know something about the land

ownership, and they look at the property and tax records for the home.

They look to the local taxing authorities to see how the property is

classified. It's either classified as real estate or chattel. When it's real

estate, the home and land are bundled together in one record, whereas with

chattel, generally speaking, the homeowner does not own the land

underneath it.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 21

However, there is a hybrid scenario that occurs where the homeowner

owns the land, and the land is taxed as real estate, and it owns the home

which has a separate record for personal property or a chattel. This occurs

for different reasons, one of which is that the home might not meet

requirements that the local government has for the definition of real estate.

Perhaps, it's not permanently attached to the land or some other reason.

Next slide, please. This slide shows different government-assisted

financing programs. These are agencies at the federal level. There are

also financing programs at a state level or other levels, but this is just

federal. In all of these cases, FHA, VA, and the USDA, they all insure

home loans to protect lenders in the event of loan default, and they all

insure manufactured homes.

FHA, to my knowledge, at the federal level is the only one who will insure

chattel manufactured homes. That program to insure those loans is know

as Title I, and it's a very small part of FHA's programs, but it's an

important program. It recognizes it does provide available support to

these home types.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 22

All the others, VA and USDA and the core FHA program known as Title

II, requires that the land and home be classified as real property. Title II is

FHA's main, core business of insurance. It's about 99% of FHA's

insurance programs.

The VA, keeping with its mission, the VA serves US service members and

eligible spouses, and similarly, USDA's mission is to serve homes located

in rural areas.

Next slide, please. Interest rates on manufactured homes tend to be higher

than other home types. Lenders consider a lot of things. In the case of

chattel, interest rates tend to be two times what the interest rate is charged

for a site-built home or other home types. But, they do consider age, size

of home, amount of down payment, the terms.

Size is a big deal. I have seen some lenders who were not willing to

finance a single-wide. They felt that it couldn't be resold, but again as I

said in the beginning, as long as lenders comply with FHA's minimum

standards, lenders are free to add on their own credit and property

requirements.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 23

So, I think that concludes my part of the slides, and I will turn this back

over to you, Ben.

Great. Thank you very much. Everyone, at this time, we would like to

really open it up for any questions that you guys have. You can use the

webinar's interface to type in your question, and it will go into a queue. I

see that we only have a couple in there right now, so here's a great time to

get any questions that you have about manufactured homes answered by

the experts.

The presenters, if you guys don't mind, I think that I can actually handle

reading the questions. There was discussion about if I was going to do

that or not, but I think I can. The first question that came into the queue is,

"How significant of a problem is zoning and community resistance to new

manufactured housing in urban areas?"

Pamela This is Pamela Danner. I think this has, and I may have Lois assist me

with this question, over the years this has been a significant problem that

there are clearly some areas that zone out or restrict manufactured homes

to particularly zoned areas for manufactured home communities. As we

Ben

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 24

noted before, rural areas do not have the same type of zoning restrictions,

and it's many times easier to put manufactured homes in those rural areas.

I would hope that as now manufactured homes clearly have changed in

terms of aesthetics, looks, the communities now have attached garages, car

ports. We have found in Pennsylvania, these communities are very

upgraded and certainly look very, very similar to site-built communities.

Lois, did you have anything to add?

Lois Just with respect to residentially zoned areas, particularly in urban and ex-

urban communities, you'll find that zoning ordinances will have different

aesthetic requirements that will apply, so maybe that will be size or roof

pitch, and those kinds of things can be set by the community. We don't

regulate that. That's not really preemptive, so you are finding that.

It depends on the area. California, obviously, is probably the leader in

acceptance of manufactured homes in other areas, but it continues to be a

challenge.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 25

Ben Okay. Thank you, both. I'm going to read the next question in the queue,

which is, "What is the minimum square footage of a manufactured home

that FHA will accept? Also, will they loan on a single-wide manufactured

home on a foundation declared as real property?"

Patricia Let's see. I'm sorry, I have it here. I know that the construction and

safety standards require a minimum of 320, and I believe FHA's minimum

is 400 for that, and it is a slight overlay.

Pamela Is that for both Title I and Title II?

Patricia No, actually there is no minimum for Title I. Good question.

Pamela Well, Title I, the minimum has to be a HUD code home, so the minimum

for Title I would be our definition, which would be the 320 square feet as

erected, and I think Patricia was talking about the 400 for Title II

financing. Would you repeat the second part of that question?

Ben Sure. Of course. "Will they loan on a single-wide manufactured home on

a foundation that is declared as real property?"

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 26

Pamela Yes, and Patricia can back this up. If it is single-section home and meets

that 400 square feet, which isn't a very difficult size requirement, and is

classified as real estate with the home and land combined under a

mortgage, then that is financeable under Title II.

Patricia That's correct, Pamela. Thank you.

Ben Okay, great. Thank you. The next question is, "What innovations are you

seeing related to resilience?"

Pamela Let me go back on the other one. I just want to add for homes to be

financed under Title II, there are foundation requirements that are separate

from the installation standards that we cited here. There is a permanent

foundation guide, and the installation must meet that, which includes a

perimeter foundation requirement, just so you all know that part.

Then, if you would repeat the question you just asked.

Ben Sure. Absolutely. Thanks for clarifying on that. This is a general

question. "What innovations are you seeing related to resilience?"

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 27

Pamela

I think that resilience, if you're looking at it in terms of energy efficiency, we currently, the department of energy is responsible for updating the energy standards for manufactured homes, and they proposed an upgrade of a set of energy standards in 2016, and those have not been finalized yet. There are energy standards in the Manufactured Housing Construction and Safety Standards that currently are in effect.

As to any seismic-type standards, that would be something we do not currently have standards for, but if there are standards in a particular area that would be different than ours if we don't include, if we don't have something for that, then that state standard may apply.

Ben

Okay. They sent a clarification statement of that specific to disaster recovery, which you just kind of touched on, but is there anything else that you can share about disaster recovery resiliency in manufactured homes?

Pamela

Well, in terms of disaster, the FEMA homes, those are supplied by FEMA.

They must be HUD code homes, so they must meet our standards plus additional standards that are required by FEMA, so FEMA does HUD code plus in terms of specifications. Some of those include accessibility,

Host: Kristen Villalvazo December 13, 2017/3:00 p.m. EST

Page 28

and also they require fire sprinklers in all their homes. There may be

some other—

Lois I think with respect to the state and local governments, as you know, I'm

sure have requirements which manufactured homes have to meet. So, you

see a lot of homes, for example, in Louisiana in flood zones where they

have to be elevated, so the innovations that would apply to site-built

homes also apply to manufactured housing, but they aren't necessarily a

part of the HUD code.

Ben Okay, thank you. The next question that came in is asking about the

dispute process. "When there is a dispute, does this only apply to homes

financed by HUD, meaning FHA?"

Patricia No, it does not. This is all homes whether financed by FHA or not.

Ben Okay, great. Thank you. The next question that came in is, "Can

homeowners of manufactured homes apply for modifications?"

Pamela Homeowners can work with their retailers. If they want additional

features, they can as the retailers for those, and then the retailers would

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 29

work with the manufacturers to make sure that whatever modifications

would still cause the home to be in conformance with the standards, but

the retailer is required or prohibited from taking the home out of

compliance of the standards, so whatever modifications would have to still

meet or exceed the federal standards.

Ben Okay. Thank you. To all the participants on the line, I just want to let you

know there's only one question left in the queue, so if you wanted to

submit a question before we end a little bit early, it looks like we might

end a little bit early, get your question in soon so we'll be able to see it in

the queue.

A couple of questions popped up right when I said that, so here's the next

question in the queue. "Is there a particular reason why 14 states do not

handle their own installation program? Is it a lack of resources, or is it just

easier for those states to let HUD handle it?"

Pamela I think in many cases, it is a lack of resources. We have one state,

Michigan, that withdrew recently, and it was because of a lack of

resources. It also could be because it's a state that doesn't have that many

manufactured homes sited in that state, so they don't feel that really they

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 30

can have a program because of the cost if they don't have enough homes

sited. So, it's various reasons.

Ben Okay. Thank you. Another clarification question regarding

modifications. He was specifically asking about loss mitigation if they're

in a foreclosure or behind on payments. Are there any special rules related

to manufactured homes when it comes to seeking loan modifications.

Patricia The HAMP program I believe was develop by the Department of

Treasury, and they set the rules on that. It required lender cooperation for

those programs, and I read the news as well as anyone in that the lenders

do not always cooperate or can take advantage of certain borrowers in

distress.

So, I can't fully answer that, but I believe they are as eligible as any of the

homes classified as real estate. Whether or not the lender cooperates is

another discussion I think.

Thank you for that. The last question that's in the queue right now is, "Is

it possible to rehab or remodel manufactured housing?"

Ben

Host: Kristen Villalvazo December 13, 2017/3:00 p.m. EST

Page 31

Pamela

Yes. In fact, we have seen many examples of homes, older 70s homes that have been rehabbed and remodeled in various communities. They just need to make sure that when they do it that the homes comply with the standards. They can clearly always exceed the standards, but they often

are rehabbed and remodeled.

Patricia

I would add to that FHA has a rule that says if you have an addition placed on or next to or in addition to the manufactured home, FHA has some requirements for an engineer's evaluation to assure that the home is still structurally stable.

Pamela

If it's FHA financed.

Patricia

If it's FHA finance. Right. Thank you for clarifying that.

Pamela

Also, the FHA has Title I Property Improvement Program, which manufactured homes are eligible for that program to do rehab or remodeling.

Patricia

That's exactly right. Title I has a Property Improvement Program. That is usable for all manufactured homes including free HUD homes. They

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 32

don't have to meet HUD code. It's very flexible, but I don't believe we're

seeing any of those, but it's out there. We're working on a handbook that

will make that explicit so that it's understood. That's one of the rare cases

where the home doesn't have to meet HUD code and can be improved on.

Lois Most state weatherization programs, that's where you see a lot of upgrades

to existing manufactured homes to upgrade for energy efficiency to some

of the older homes, the pre-'76 homes. Most state weatherization

programs do allow manufactured homes to be modified.

Ben There's a couple of follow-up questions regarding rehabbing homes. One

is if it started out as a manufactured home, and it has a remodel that added

on to it, will it be still considered a manufactured home?

Pamela Yes, it will. That's a good question. Thank you.

Ben Another question on that topic is, "If you upgrade," I may not know the

terminology here correctly, but, "Can you upgrade a pre-HUD home to

current HUD standards to be financeable?"

Host: Kristen Villalvazo December 13, 2017/3:00 p.m. EST

Page 33

Pamela

No. You can't—no. Other than the Property Improvement Program, because it really can't obtain—there's a certification label of the manufactured called a HUD label. It's a red label on each section of each manufactured home, so that's not something that can be obtained after the fact.

Patricia

Yes. As Pamela said, those are construction and safety standards meaning that these homes are actually constructed to comply with HUD code. So, if you have a pre-HUD code, you would have to reconstruct it, and it really doesn't make sense to reconstruct an existing home. You can improve on it, but you can't really reconstruct it.

Ben

The last question that's currently in the queue is actually more of a comment about the prices that you listed for the average cost for a manufactured home, and she specifically states that many new ones in Washington State are over \$100,000 for a double-wide, and install in the community costs another \$50,000 on top of that. Is there anything that you want to talk about, the discrepancies and the locations of the housing, how you came to the estimate, the average cost? I think we said it was \$60,000, I think. I can't remember.

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 34

Pamela

It was \$68,000. Yes, that's the average according to the Census Bureau, so clearly, and Washington is a perfect example, California where you have high markets, the manufactured homes tend to be built to meet those markets, so clearly you have a wide range, and you have very high-end. You have million-dollar manufactured homes in California, so it does just depend on the market. We were just giving you an average price, and of course, that's without land.

The square footage cost that we gave you is pretty—again, that's average, so if you're in a high-end market and you're competing with granite countertops and high-end features, that certainly can be applied in the case of manufactured housing.

Ben

Okay, great. Thank you, all, very much. That actually ends the questions that are in the queue. I always ask if the presenters have anything left to share, but don't feel like you have to. Do any of you presenters want to have any closing remarks?

Pamela

First of all, I want to thank you all for participating. I think your questions were excellent, and we really appreciate this opportunity given to us by the Office of Housing Counseling to reach out to you all, but if you have

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 35

questions in the future or of any of your potential homeowners, we would

certainly love for you to reach out to us. You can go on the HUD website.

We have a manufactured housing portion of that website, and if you go

to—do you have the link?

You could actually Google it under manufactured housing, but you could

also go to a link that we could probably even provide. Oh, it's in the

slides. You can email us at mhs@hud.gov if you want to email us, and

then the website—I'm not sure this link still works, so you may just have

to go the HUD website. The slide link I think there's been some changes,

and the MHS shortcut doesn't work anymore, but you can certainly go to

the website and put in manufactured housing, and it's under the Office of

Housing.

Thank you very much for everything you guys have shared today, and the

last thing I'll share with the audience before we go is if you do think of a

question related to manufactured housing or anything housing counseling-

related, we do have our email address that's housing.counseling@hud.gov.

Shoot us an email with your question. Put a term in the subject line so we

know what it is you're asking about, and we'll shoot it over to an expert.

Ben

Host: Kristen Villalvazo

December 13, 2017/3:00 p.m. EST

Page 36

Our response time on that is actually pretty impressive. I think that we're

averaging less than two days per every email received. If you have a

really sophisticated question, it might take us a little bit more time to find

an answer, but please use that, and if you send us something that's related

to manufactured housing, we have the ladies that were willing to join us

today to answer any really complex questions that you may have.

So, thank you, all, for attending. That concludes our webinar for the day.

Patricia

Thank you.