

Draft below is of a pending article for publication on 6.27.2025 on MHPProNews for AI fact check purposes.

MHCC Recommends Deleting Chassis Requirement for Upper Levels on Multi-Story HUD Code Manufactured Homes-Manufactured Housing Association for Regulatory Reform Weighs In; MHI-June Topics; FEA

It is pre-dawn on 6.27.2025 as this report is being prepared and at this time there is no visible items on the Manufactured Housing Institute (MHI) website about the recent Manufactured Housing Consensus Committee (MHCC) meeting that is the topic of the Manufactured Housing Association for Regulatory Reform (MHARR) press release provided in Part I below. But in fairness to MHI, it may be more nuanced than that, which is why the facts-evidence-[analysis](#) (FEA) in Parts II and III are significant. For newcomers to the industry that may be reading this as well as for longer term readers of MHPProNews, it is useful to state that the MHCC was established as part of the legislated requirements enacted by the Manufactured Housing Improvement Act of 2000 (a.k.a.: MHIA, MHIA 2000, 2000 Reform Act, 2000 Reform Law).

Per the HUD website at this link here is the following regarding the MHCC.

The MHCC was established by the Manufactured Housing Improvement Act (the Act) of 2000, which amended the National Manufactured Housing Construction and Safety Standards Act of 1974, and required the establishment of the MHCC to: (1) Provide periodic recommendations to the Secretary to adopt, revise, and interpret the manufactured housing construction and safety standards; and (2) to provide periodic recommendations to the Secretary to adopt, revise, and interpret the procedural and enforcement manufactured housing regulations (3) be organized and carry out its business in a manner that guarantees a fair opportunity for the expression and consideration of various positions and for public participation; and (4) be deemed to be an advisory committee not composed of Federal employees.

At the Secretary's discretion, MHCC Members serve for a term of three years not to exceed two consecutive terms. A rotation of seven members will be maintained on a yearly basis within reason; however, the Secretary retains the option to remove and appoint members.

The MHCC is comprised of seven members in each of the following represented categories:

- **Producers** - Producers or retailers of manufactured housing

- **Users** - Persons representing consumer interests, such as consumer organizations, recognized consumer leaders, and owners who are residents of manufactured homes
- **General Interest and Public Officials** - General interest and public official members; three of the seven representatives must be Public Officials

More from HUD about the MHCC in Part III.

Part I (Washington, D.C.) Manufactured Housing Association for Regulatory Reform (MHARR) press release.





JUNE 25, 2025

**TO: MHARR MANUFACTURERS
MHARR STATE AFFILIATES
MHARR TECHNICAL REVIEW GROUP (TRG)**

FROM: MHARR

**RE: MHCC RECOMMENDS DELETION OF CHASSIS REQUIREMENT
FOR UPPER STORIES OF MULTI-STORY MANUFACTURED HOMES**

The statutory Manufactured Housing Consensus Committee (MHCC), at a conference call meeting on June 24, 2025, recommended the adoption, with slight modifications and additions, of a HUD-proposed amendment that would eliminate the regulatory “permanent chassis” requirement for the upper stories of multi-story HUD-Code manufactured homes. The requirement for a “permanent chassis” affixed to the ground floor, or lowest level of a multi-story manufactured home – being, at present, a statutory requirement contained in the language of the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended -- would remain under the HUD proposal considered by the MHCC,

As is normal practice in regulatory activity since the enactment of the Manufactured Housing Improvement Act of 2000 (2000 Reform Law), the MHCC-recommended proposal

will now go back to HUD for further administrative action, including possible publication of a Notice of Proposed Rulemaking (NPR) in the future.

As MHARR made clear during introductory remarks, the Association, since its inception in 1985, has historically supported regulatory modifications that provide homebuyers with greater freedom of choice, more living options, and greater flexibility, while simultaneously reducing burdens on regulated industry members including, especially, smaller businesses that are disproportionately impacted by excessive regulatory burdens.

MHARR cautioned, however, against the adoption of any standards or requirement based upon or driven by the proprietary designs or unique proprietary interests of any one manufacturer or group of manufacturers, an action that would be inherently prejudicial to other – and particularly smaller, independent – manufacturers. As MHARR previously asserted with respect to so-called “Cross-Mod” homes, federal manufactured home construction and safety standards should not incorporate or be tailored to align with designs that are proprietary and not generically available to or accessible to all HUD Code manufacturers.

MHARR further asked if a study of the cost-benefit impacts of the proposed rule – specifically including free market competition impacts, in the event that the proposal does track with existing proprietary designs -- has been performed by HUD (or submitted to HUD by the actual proponent of the multi-story proposal) in full compliance with section 42 U.S.C. 5403(e)(4) of the 2000 Reform Law, which requires both the MHCC and HUD to consider the cost-benefit impacts of any proposed rule, regulation or interpretation. HUD responded that it had not done (or presumably received) such a cost-benefit analysis of the proposed rule, thus exposing a major rulemaking deficiency in relation to the multi-story proposal. MHARR, therefore, will closely monitor all further rulemaking proceedings related to this proposal to determine if this deficiency is remedied by HUD during the regulatory process, especially with respect to the unique regulatory burdens shouldered by smaller industry businesses and lower and moderate-income consumers.

Accordingly, while the proposal considered by the MHCC may ultimately prove to be beneficial for the industry and consumers, it still does not address – and will not remedy – the principal bottlenecks, i.e., discriminatory zoning exclusion and the lack of available, competitive-rate consumer financing within the mainstream manufactured home consumer financing market, that have suppressed the production of mainstream HUD Code manufactured homes (which should be in the hundreds of thousands of homes annually) for decades.

Rather than tinkering “around the edges” of the manufactured housing market and mainstream manufactured housing availability, then, HUD, under the Trump Administration, should go straight to the root of the industry’s production and availability stagnation since 2000, and use the authority it already has under the 2000 Reform Law (i.e., enhanced federal preemption under 42 U.S.C. 5403(d)), to federally preempt discriminatory and exclusionary zoning edicts grounded in the refusal of such authorities to accept manufactured homes built to federal standards and the unique HUD federal building code (rather than state and/or local codes). It should also expressly support – and join – efforts to advance the availability of Duty to Serve (DTS) support, by Fannie Mae and Freddie Mac, for consumer financing loans within the mainstream manufactured housing market.

Overcoming these two crucial bottlenecks will spur production and the availability of mainstream manufactured homes (into levels in the hundreds of thousands of homes per year) as a key remedy for the nation’s affordable housing crisis – a principal objective of housing policy under both President Trump and HUD Secretary Turner.

MHARR, as always, will carefully and closely monitor this proposal and will continue to seek effective HUD involvement in relation to the two key bottlenecks which negatively impact both the industry and American consumers of affordable housing.

cc: Other Interested HUD Code Manufactured Housing Industry Members

Manufactured Housing Association for Regulatory Reform (MHARR)

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Washington D.C. 20004

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Website: www.manufacturedhousingassociation.org

The Manufactured Housing Association for Regulatory Reform (MHARR) press releases are available for re-publication in full (i.e., without alteration or substantive modification) without further permission and with proper attribution and/or [link back to MHARR](#).

Part II - What MHI has Publicly Said on MHCC, June as National Home Ownership Month, and on the Celebration of the 49th Year of the Official Start of the Production of HUD Code Manufactured Homes on 6.14.1976

1) Regarding the MHCC meeting, on the date and time shown there is nothing visible on the MHI news landing page. By contrast, as was demonstrated by the MHARR release posted in Part I above and which is linked [here](#), MHARR advised industry members of what occurred on the date in question. Note that the MHARR news item is visible on their home page at this time.

[caption id="attachment_216411" align="aligncenter" width="610"]

The screenshot shows the MHI News landing page with several red callout boxes providing context and criticism:

- Top Left Callout:** "On 6.27.2025 at about 1:55 AM ET there is no visible mention by the Manufactured Housing Institute (MHI) on their 'news landing page' to their own 'news' post dated 6.16.2025 regarding the then upcoming MHCC meeting. Someone would have to be using the search tool or doing a very specific kind of search engine use to find the MHI post about the then pending (and since then, held) MHCC meeting. There is also no publicly visible post about the MHCC meeting since it was held visible on the news landing page. Why does MHI even do a post that is difficult to find on their own website?"
- Top Right Callout:** "How can MHI claim to be offering a 'full perspective' that can 'keep you abreast' when their news focus seems self and MHI insiders focused?"

The website content includes:

- MHI News** header with a sub-header: "The latest news to give you a full perspective on the manufactured housing industry. From manufacturers to land-lease communities, retail to financial services, and suppliers to installers, we help you keep abreast of what's happening in every aspect of the industry."
- Featured Article:** "JUNE 16, 2025 Reserve Your Seat at the RV/MH Hall of Fame Induction Dinner. It is time to book your seats for the 2025 induction dinner at the RV/MH Hall of Fame! The ceremony will be held on August 18 at the Hall of Fame in Elkhart, IN. The celebration begins with a cocktail hour at 5 PM, followed by the dinner and ceremony at 6 PM. Read More >"
- Other Articles:**
 - "Learn to Connect with Today's Homebuyers at In-Person Training" (with image of a group of people).
 - "HUD's Innovative Housing Showcase 'The American Home is the American Dream' Returns to the National Mall" (with image of the American flag and text "SAVE THE DATE SEPTEMBER 6-10, 2025").
 - "NCMHA Members Rally to Help a Neighbor in Need" (with image of a fire scene).

MHProNews Note: depending on your browser or device, many images in this report and others on MHProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new

window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

2) Contrast MHI's MHARR's home page and its remarks about what the MHARR website offers to MHI misleading (or arguably false claim) on their news-landing page of presenting (bold added for emphasis by MHPProNews).

The **latest news** to give you a **full perspective** on the manufactured housing industry. From manufacturers to land-lease communities, retail to financial services, and suppliers to installers, **we help you keep abreast of what's happening in every aspect of the industry.**

MHPProNews notes that this simple contrast between what MHI claims and is shown on their website's 'news' vs. what MHARR claims and as is shown on their website arguably speaks volumes about both trade groups.

[caption id="attachment_216412" align="aligncenter" width="620"]

The screenshot shows the MHARR website. At the top left is the MHARR logo with the tagline "Preserving the American Dream of Home Ownership Through Regulatory Reform". To the right are navigation links: "MHARR Issues & Perspectives", "MHARR Accomplishments", and "MHARR Brief History and Objectives". A red text box at the top center contains the following text: "On 6.27.2025 at about 2:18 AM ET, the MHCC post by MHARR is clearly visible on the home page of their website. By contrast, there is nothing similar seen on the MHI website. Nor does MHI have news about the other topics covered by MHARR as shown." Below this, a blue banner reads "Bi-Partisan Housing Supply Framework Act Bill Seeks Zoning Reform – Could Augment Enhanced Federal Preemption". The main content area features a large image of the Washington Monument at night with the text: "MHARR is Protecting the American Dream of Home Ownership. We Bring Consumers, Industry Professionals, Public Officials and Media Common-Sense Solutions Others May Miss." To the right is a sidebar with three news items, each with a red arrow pointing to it from the main text box: 1. "MHCC Recommends Deletion of Chassis Requirement for Upper Stories of Multi-Story HUD Code Manufactured Homes" dated June 25, 2025. 2. "MHARR Addresses Deficiencies and Concerns, and Submits Proposals to Congress to Correct Pending Housing Supply Frameworks Act" dated June 18, 2025. 3. "MHARR Issues Proposed Modifications to Pending and Potential Legislation Impacting Manufactured Housing" dated June 11, 2025. A red text box at the bottom of the main content area states: "Note that MHARR's website doesn't make a misleading and unfulfilled claim, as MHI's website apparently does about their news. MHARR says they bring information and solutions others may miss."

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While MHI is fluffing their favored members and themselves via their 'news,' or are pitching ways to separate money from their readers, if possible, MHARR presents solid industry information that is not visible on the MHI website on the same date at about the same time. Note to newcomers and a reminder to others, MHI has claimed for years they represent "[all segments](#)" of the industry, production and post-production. MHARR clearly states they are a producer's trade group. So, when MHARR addresses a post-production topic, they are going 'over and above' what they need to do, based on their production-regulatory focus.

3) MHI's website has this on the MHCC meeting, in advance of the actual meeting, but which was not visible from their own news landing page. Meaning, someone has to do a specific search for MHCC meeting to even find this post.

[caption id="attachment_216413" align="aligncenter" width="605"]

manufacturedhousing.org/news/mhcc-to-address-standards-for-multi-story-manufactured-homes

Why does MHI have a post announcing the MHCC meeting, but failed to make it visible from their news/landing page? Why say the meeting is coming up, but then fail to give a post-meeting report as MHARR did?


POSTS

MHCC to Address Standards for Multi-Story Manufactured Homes

← BACK TO ALL NEWS

This is a rendering of a single story manufactured home. Why didn't MHI generate a photo or rendering of a multi-story or multi-level manufactured home in order to better illustrate their post?

This is an arguably deceptive statement by MHI. How so? 1) MHI has been 'partnering' for years with the National Association of Home Builders (NAHB), which is on record opposing this provision and has been against the removable chassis for years. 2) According to well placed industry sources, when the Hiler Amendment was pending before Congress, which MHARR supported and MHI initially said they would back, MHI later pulled their support. The Hiler Amendment could have made the removable chassis federal law some 35 years ago.



On Tuesday, June 24, the Manufactured Housing Consensus Committee (MHCC) will meet to discuss proposed standards and requirements for multi-story manufactured homes, specifically requirements for multi-story manufactured homes with upper floors built without a permanent chassis. The meeting is open to the public.

MHI has been a strong advocate for removing the permanent chassis requirement -- a change that would foster innovation by allowing a wider variety of manufactured home designs. MHI will submit formal comments ahead of the meeting to ensure industry perspectives are well represented.

Meeting Details:

- Date: Tuesday, June 24, 11:00 am - 5:00 pm ET
- Join the meeting by Zoom by following this [link](#).
- To join the meeting by teleconference, dial one of the following numbers:
 - 301-715-8592
 - 646-931-3860 and enter the Meeting ID: 823 0328 2875 when prompted.

For the full agenda and additional information, please refer to the [Federal Register](#) notice.

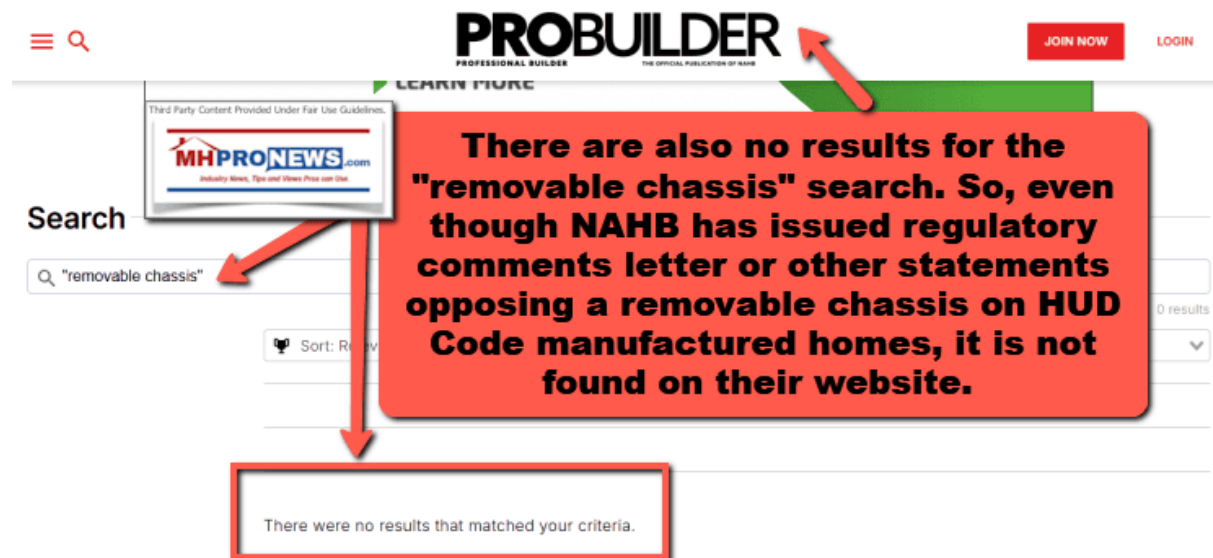
Date Published
June 16, 2025

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For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

This is an arguably deceptive statement by MHI. How so? 1) [MHI has been 'partnering' with the National Association of Home Builders \(NAHB\) on multiple topics over a period of years.](#) The [NAHB is on record opposing the removable chassis provision](#) and NAHB has been [against the removable chassis for years.](#) 2) Additionally, according to well-placed industry sources, when the Hiler Amendment was pending before Congress, which MHARR supported and MHI initially said they would back, MHI later pulled their support prior to a key vote. The Hiler Amendment could have made the removable chassis federal law some 35 years ago. More on the [Hiler Amendment is found here.](#)

[caption id="attachment_215979" align="aligncenter" width="607"]



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4) This writer for *MHPProNews* has been in multiple level manufactured homes several times and in differing states, even though they are not common. Properly done legislatively, the idea of a removable chassis is a good one. But there are risks to the pending legislation, as *MHPProNews* has repeatedly reported. Which begs the question, why has MHI advocated for legislation which MHARR deems has significant deficiencies?

[caption id="attachment_216174" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/mharr-addresses-deficiencies-and-concerns-and-submits-proposals-to-congress-to-correct-pending-housing-supply-frameworks-act/>[/caption]

[caption id="attachment_216045" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/mharr-addresses-deficiencies-concerns-by-submitting-proposals-to-congress-to-correct-pending-housing-supply-frameworks-act-on-manufactured-housing-industry-measures-what-about-mhi-mhville-fea/>[/caption]

Part III - Additional Information with More Facts-Evidence-Analysis and MHPProNews Commentary

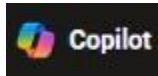
In no particular order of importance.

1) As a disclosure, *MHPProNews* has no formal ties to [Bing's](#) artificial intelligence (AI) powered Copilot, other than as a user of the online AI platform. *MHPProNews* has been using Bing's AI system for over two years, but has also tested and used other AI systems including, but not limited to, [Google's](#) Gemini and xAI's Grok. Copilot has confirmed that *MHPProNews* has no way to [bribe, cajole, or others generate a desired response from Copilot](#), or other AI systems, other than through straightforward discussion, questions, logic and evidence. Meaning, the manner *MHPProNews* has been utilizing AI like Copilot is that it can be a useful third-party response that fact-checks not only on the topic but also the evolution of an article like this one. That is one way to look at [hybrid journalism](#), where human and AI strengths can be blended together for an article with maximum accuracy, fidelity to known facts, and transparency. Hybrid journalism doesn't eliminate human reporting, as some media using AI have been doing, rather hybrid journalism strengthens human and expert reporting.

That said, the following inquiry was put to Copilot by MHPProNews.

Did the Manufactured Housing Institute (MHI or manufacturedhousing.org) publicly and robustly promote June as National Homeownership Month, as a post-production industry trade group should do if they are doing their job properly?

Did MHI publicly and robustly promote the 49th anniversary of the start of production of HUD Code manufactured housing on June 15, 1976?



Based on available evidence, the **Manufactured Housing Institute (MHI)** did *not* publicly or robustly promote either:

1. **June as National Homeownership Month**, or
2. **The 49th anniversary of the start of HUD Code manufactured housing on June 15, 1976.**

By contrast, the **U.S. Department of Housing and Urban Development (HUD)** and other trade groups like the **National Association of Home Builders (NAHB)** and **National Association of Realtors (NAR)** actively promoted National Homeownership Month with press releases, toolkits, and public-facing campaigns.

A detailed [MHPProNews fact-check](#) confirmed that as of early June 2025, MHI had no visible or specific mention of either event on its website or in its public communications. This absence is notable given MHI's role as the self-described national trade organization for the manufactured housing industry.

This pattern—failing to leverage key public awareness opportunities—raises legitimate concerns about whether MHI is fulfilling its post-production advocacy responsibilities. It also reinforces critiques that MHI's public posture often diverges from its actual performance, especially when compared to its predecessor, the MHMA, which historically supported site development and public engagement far more actively.

Let me know if you'd like a visual timeline or side-by-side comparison of MHI's public engagement versus other housing trade groups.

MHPProNews notes that for whatever reason the links Copilot provided above have not for some time been cutting and pasting into the software-editing system of this platform, unlike the bulk of the text as shown. So, the two references provided by Copilot above are manually posted below. Following that are the screen captures to verify the accuracy of this discussion with Copilot.

- 1) <https://www.hud.gov/national-homeownership-month-2025>
- 2) <https://www.nahb.org/blog/2025/06/homeownership-month-2025>

MHPProNews annotated the screen capture above to highlight certain points raised by Copilot, but the text/response by Copilot was generated as is shown below.

[caption id="attachment_216416" align="aligncenter" width="605"]



Did the Manufactured Housing Institute (MHI or manufacturedhousing.org) publicly and robustly promote June as National Homeownership Month, as a post-production industry trade group should do if they are doing their job properly?

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¹ www.hud.gov

² www.nahb.org

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2) The photo below is of a modular section being craned into place, which is what can occur when a second-story of a HUD Code manufactured home is being lifted or craned into position.



3) The collage below is of Sterling Estates in Justice, IL a suburb of Chicago. Two of the homes shown were among the Cape Code style upper level that could significantly add to the square footage of a HUD Code manufactured home. But for the purpose discussed by the MHCC, it could be a full second story with one HUD Code multi (or single) section placed on top of another HUD Code first floor unit. *MHProNews* has been in such a full two-story HUD Code manufactured home in a Houston, TX suburb.

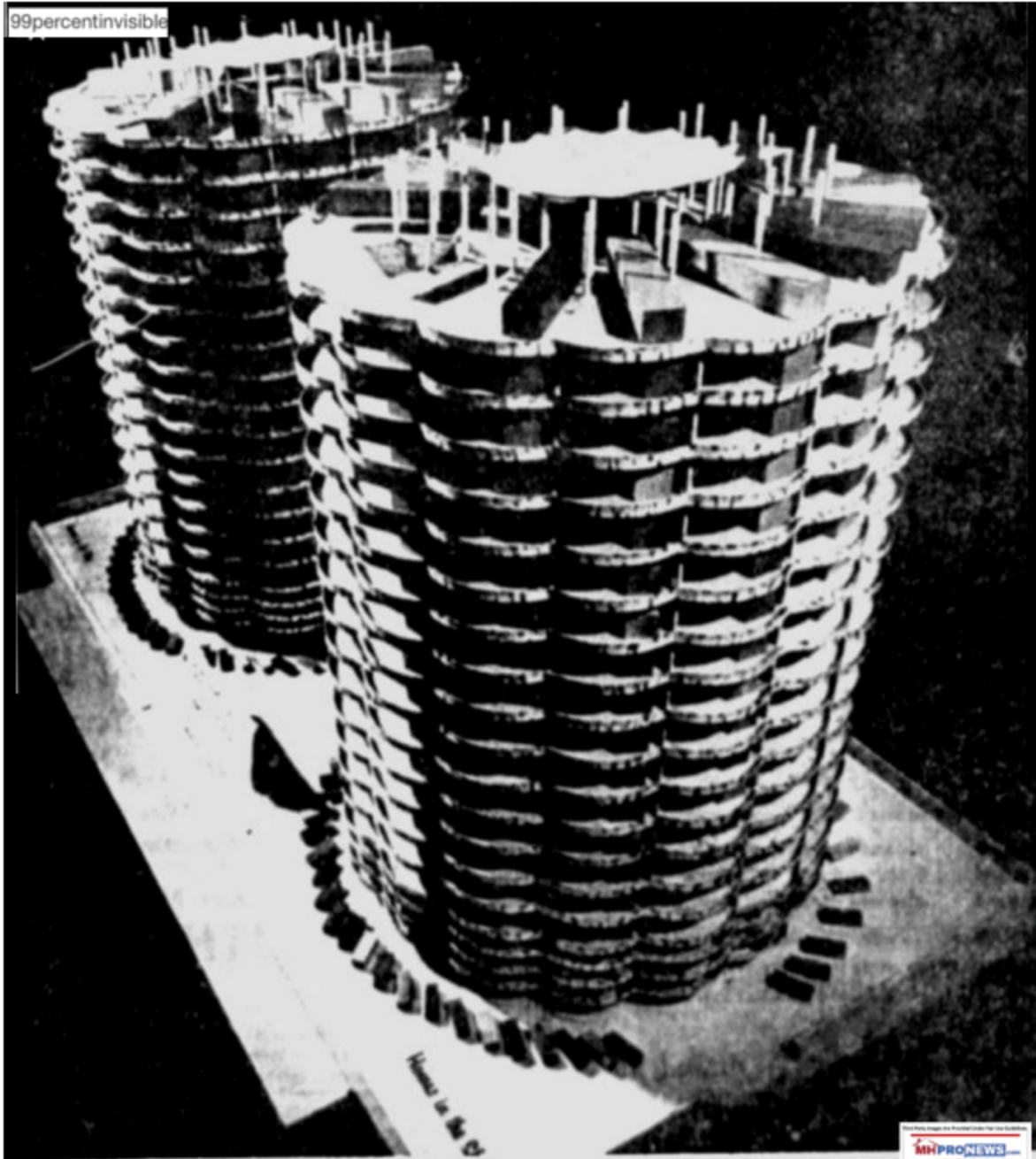
[caption id="attachment_54819" align="aligncenter" width="567"]



White

manufactured housing is often thought of as 'rural,' the sprawling 800 home site manufactured home land-lease community of Sterling Estates, in metro Chicago, is an example of how manufactured homes are found in cities and urban areas too. Perhaps the only place that modern manufactured housing could not be easily used in a city environment is in the densest high-rise parts of a city. That said, designs for multi-story factory built (then, pre-HUD Code mobile homes) housing using concrete and steel framing were once part of the 'reach of the sky' mindsight of factory-builders back in the late mobile home and early HUD Code manufactured housing era. [/caption][caption id="attachment_80268" align="aligncenter" width="598"]

99percentinvisible



THESE TWIN TOWERS WILL PROVIDE SPACE FOR 504 MOBILE HOMES



—Sentinel Photo

One of several highrise designs during the mobile home era, others were post HUD Code.

<https://www.manufacturedhomepronews.com/high-rise-manufactured-home-stackable-towers-compete-with-modular-prefabs-density-at-lower-cost/>[/caption]

Which begs the question. Why isn't MHI promoting some of those facts and relevant history? Why did MHI show a rendering of a single story manufactured home in a largely hidden post (not visible from their news page, as shown in Part II above) instead of showing - at a minimum - a rendering of a two-story HUD Code manufactured home, or perhaps a two-story HUD Code duplex unit? Aren't they failing to fuel in the imagination, as the some involved in the former Mobile Home Manufacturers Association (MHMA) once used to do? See the historic report linked below, which Copilot obliquely referenced.

[caption id="attachment_216400" align="aligncenter" width="530"]



<https://www.manufacturedhomepronews.com/historic-revealing-production-retailers-dealers-data-mobile-home-parks-and-finance-facts-from-mobile-home-history-when-mobile-homes-were-30-vs-10-of-all-single-family-housing-units-fea/> [/caption]

4)

5)