

Pre-publication draft of emerging MHPProNews article on the topic as shown submitted to third-party artificial intelligence for [facts-evidence-analysis](#) (FEA) check purposes.

Covering the Manufactured Housing News or Covering Up Manufactured Home News? MHARR to FHFA on GSEs Plan. MHARR-Director Bill Pulte Letter. MHI on Pulte or FHFA-GSEs Duty to Serve Plans? FEA

For some [15 plus years, MHPProNews has provided news items](#), views, and positions that included the Manufactured Housing Institute (MHI) and its press releases. This [MHVille facts-evidence-analysis](#) (FEA) model report will provide their stance again as well as that of the smaller "watchdog" and advocacy by the [Manufactured Housing Association for Regulatory Reform](#) (MHARR). That noted, the difference suggested in the headline is difficult to ignore. MHI's website on this date (10.28.2025) at about 2:40 PM ET had no similar article or post that was public facing on their own website. It is not possible to share MHI's position in their own words when MHI has literally hidden their words behind a member's only paywall. The evidence for that is provided in the screen capture below. By contrast, MHARR has provided MHPProNews and others in media with their emailed and [MHARR website-posted](#) items about the Federal Housing Finance Agency (FHFA), the long-overdue Duty to Serve (DTS) manufactured housing which was made federal law in 2008 and has yet to be implemented as MHI board member [Sam Landy, J.D., President and CEO of UMH Properties \(UMH\)](#) has indicated in a [HousingWire op-ed recently](#). UMH CEO Landy's specific comments on the lack of practical federal and Government Sponsored Enterprises (GSEs or Enterprises) is provided in Part III. By accident and/or design, Landy's remarks reflect an arguably fascinating development that may in time prove to be significant.

About 2:40 PM on 10.28.2025 these are the posts that appear on the MHI website using the MHI search tool as shown.

About 2:40 PM on 10.28.2025 these are the posts that appear on the MHI website using the MHI search tool as shown.

Their home page 'news' section shows nothing related to the Duty to Serve or manufactured housing finance at this time, as the screen capture below reflects.



Search Results: Duty to Serve

MHI Continues Advocacy for Fannie Mae and Freddie Mac to Increase Support for Manufactured Housing

This page is available to MHI members only. If you are already

... Read More

MHI News & Updates July 26, 2023

This page is available to MHI members only. If you are already

... Read More

FHFA Releases 2025 Scorecard

This page is available to MHI members only. If you are already

... Read More

Economic Report of the President Highlights Manufactured Housing

The Council of Economic Advisors published the annual Economic Report of the ...

Read More



NEWS

Latest News

Keep current with MHI and the latest in manufactured housing. Browse the latest industry news.



home
career in
manufactured
housing!

October 18, 2023

Celebrate Careers in Construction with MHI Resources

October is Career in Construction Month, and MHI has created a series of resources to help members gain the industry by promoting the relevancy of remaining careers in production, transportation, installation, homecare and community management. Looking for a new career or new skills? (brochure, webpage, video, etc.) for a marketing campaign.

[Read More >](#)



2025 MHI NCC
FALL LEADERSHIP FORUM

November 5-7, 2025
MHI NCC Fall Leadership Forum

October 18, 2023

New Speakers Announced for MHI NCC Fall Leadership Forum

Join MHI for the only community-wide event of the year: the 2025 MHI National Community Council Fall Leadership Forum in Chicago, November 5-7. This meeting will dive into the development trends and challenges that the industry will face in 2025 and beyond.

[Read More >](#)



PHCB

October 18, 2023

4 Game-Changing Lessons You'll Learn in the New PHCB Course

Do you want to confidently guide buyers through customization, financing and the purchase process - with a building trust and adding profit along the way? The new Professional Housing Consultant (PHCB) course features two 10-minute, on-demand videos that are a trusted resource in today's housing market.

[Read More >](#)



MHI's Annual Meeting

October 17, 2023

Recognize Award Winners

During the 2023 Annual Meeting, several members were recognized for their outstanding contributions to the industry.

[Read More >](#)

[ALL NEWS >](#)



"There are many kinds of journalism, but at the heart of their constitutional responsibilities, journalists are in the business of monitoring and keeping a check on people and institutions in power." - American Press Institute.

In order to properly inform readers, MHIProNews pivoted to FEA model journalism some years ago and that move included this evidence-based satirical but arguably editorially informative logo.

The above is not something that an objective thinker would likely be able to make up. MHI says they are advocating for "all segments" of the industry. If so, why are their remarks hidden behind a member's only login? Is that what [MHI CEO Lesli Gooch, Ph.D., who holds a doctoral degree in political science learned at the University of Oklahoma \(O.U.\)](#)? That

hardly seems likely. Gooch's dissertation was on cultivating "champions" for a given cause (or industry). Per an [MHI document at this link here](#) is the below.

...Lesli is a seasoned legislative and policy professional with proven ability to successfully execute policy and political goals.

...

Lesli has a Ph.D. in Political Science from the Carl Albert Congressional Research and Studies Center at the University of Oklahoma. Her dissertation, *When Politics is Personal: The Role of Personal Policy Interests in Legislative Activity*, was based on interviews she conducted with more than 60 members of the U.S. House of Representatives and explores the motivations of members in selecting issues to champion in Congress.

Neither Gooch nor MHI can claim ignorance. If 'politics should be personal,' is it asking too much of MHI to 'personally' provide to the public on behalf of the industry it claims to be advocating on behalf of what its current position is on DTS or what they have communicated to [FHFA director William "Bill" Pulte](#)? Hold those thoughts for Part III.

That noted, on this same date, [MHARR said the following via an email that arrived at MHIProNews at 1:18 PM Eastern on this date](#) was the following memo to the manufactured home industry and other interested parties.



OCTOBER 28, 2025

TO: HUD CODE MANUFACTURED HOUSING INDUSTRY MEMBERS

FROM: MHARR

RE: MHARR PRESSES FHFA FOR ACTION ON DUTY TO SERVE

The Manufactured Housing Association for Regulatory Reform (MHARR), in written comments to the Federal Housing Finance Agency (FHFA) and in a related October 21, 2025 communication to FHFA Director William Pulte (copies attached), has again called for FHFA to fully implement the statutory Duty to Serve Underserved Markets (DTS) mandate within the mainstream manufactured housing consumer lending market including, specifically, the personal property (chattel) lending market. MHARR encourages industry members to review this package closely, as full implementation of the DTS directive is the easier to remedy of the two main policy bottlenecks that have wrongfully suppressed the availability of inherently affordable manufactured housing for American consumers, but have not been resolved by the industry's post-production national association.

The comments, filed in connection with FHFA's Draft Strategic Plan for Fiscal Years 2026-2030 (Draft Strategic Plan), point out that the Plan mentions DTS only once, in passing, without setting out or even mentioning a timeline or framework for full DTS implementation within all segments of the manufactured housing market, including the personal property sector, which historically comprises nearly 80% of the entire manufactured housing consumer lending market.

This failure to address the full implementation of DTS – nearly 20 years since its enactment as part of the Housing and Economic Recovery Act of 2008 (HERA) -- in a market significant manner, within the largest single segment of the affordable manufactured housing market, must be unacceptable to every industry member and must be remedied as an urgent priority if FHFA, Fannie Mae and Freddie Mac policy is to be consistent with President Trump's commitment to expand the supply and availability of truly affordable housing and home ownership. Put differently, the ongoing failure to serve the vast bulk of the manufactured housing consumer financing market represented by personal property loans represents not only a failure to implement DTS in any meaningful manner, but also a de facto repudiation of Congress and its authority.

Accordingly, MHARR's comments call for the Draft Strategic Plan to be modified, in its final form, to:

1. More fully recognize DTS and its central role in the mission of FHFA, Fannie Mae and Freddie Mac;

2. More fully detail FHFA's commitment to the full and robust implementation of DTS for all segments of the mainstream manufactured housing consumer financing market; and
3. Establish a timeline for the full and robust implementation of DTS for all segments of the mainstream manufactured housing consumer financing market.

MHARR, as a representative of HUD Code industry producers and manufacturers in the nation's capital – and as it has consistently since the enactment of DTS -- will continue to seek the full implementation of DTS within the manufactured housing market, including personal property loans, and will continue to seek engagement with FHFA to advance that objective. Toward this end, MHARR has also prepared and proposed a legislative amendment to ensure the full implementation of DTS, but without the support or assistance – to date – of the industry's post-production representation in Washington.

MHARR urges all industry members to submit comments to FHFA seeking the full recognition and implementation of DTS. Comments concerning the Draft Strategic Plan are due on or before November 5, 2025.

[Attachments](#)

Manufactured Housing Association for Regulatory Reform (MHARR)

1331 Pennsylvania Ave N.W., Suite 512

Washington D.C. 20004

Phone: 202/783-4087

Fax: 202/783-4075

Email: MHARRDG@AOL.COM

Website: www.manufacturedhousingassociation.org

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This [MHVille facts-evidence-analysis](#) (FEA) is underway.

FEA

FACTS-EVIDENCE-
ANALYSIS

"Analytical journalism is the highest style of journalism." - Diana Dutsyk

...the personal courage of the journalist is important, he should not be afraid to go against the bosses, should not call white black. He [the analytical journalist] cannot distort the truth.



FACTS



EVIDENCE



ANALYSIS



Part I. Per the [MHARR](#) media release to [MHProNews](#) and related attachments found at [this link here](#).

October 21, 2025

VIA ELECTRONIC SUBMISSION

U.S. Federal Housing Finance Agency
Constitution Center
400 7th Street, S.W.
Washington, D.C. 20219

Re: FHFA Draft Strategic Plan for Fiscal Years 2026-2030

Dear Sir or Madam:

The following comments concerning the Federal Housing Finance Agency's (FHFA) Draft Strategic Plan for Fiscal Years 2026-2030 are submitted on behalf of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a national trade association representing the views and interests of producers of manufactured housing regulated by the U.S. Department of Housing and Urban Development (HUD) pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000 (42 U.S.C. 5401, et seq.). MHARR was founded in 1985. Its members include independent manufactured housing producers from all regions of the United States.

On October 15, 2025, FHFA published, for notice and comment, its Draft Strategic Plan for Fiscal Years 2026-2030 (Draft Strategic Plan). At the very outset of this document, FHFA states that the "vision" underlying the Draft Strategic Plan, is to "Help restore the American Dream of homeownership for ALL Americans." Yet, the Draft Strategic Plan, in one fundamental and mandatory dimension, utterly and unacceptably fails to address a key statutory aspect of both its mission and this stated "vision." That failure, with regard to the full implementation of the statutory Duty to Serve Underserved Markets (DTS) mandate of the Housing and Economic Recovery Act of 2008 (HERA), materially undermines the entirety of the Draft Strategic Plan and simultaneously constitutes a failure to comply with – and implement – President Trump's vision of expanding the availability of affordable homeownership for Americans at all income levels.

Through the DTS mandate, Congress directed Fannie Mae and Freddie Mac -- and FHFA as their federal regulator -- to provide securitization and secondary market support for very low, low and moderate-income families in three enumerated markets, specifically including HUD-regulated manufactured housing (see, 12 U.S.C. 4565). The DTS mandate, moreover, by its express terms, applies both to mortgages for manufactured homes titled as real estate, as well as manufactured home personal property loans (see, 12 U.S.C. 4565(d)(3)). Nearly two decades later, though, the vast bulk of the mainstream manufactured home consumer financing market represented by personal property/chattel loans – historically representing nearly 80% of the entire manufactured home consumer lending market – remains completely unserved by the Government Sponsored Enterprises (GSEs).

The dimensions and devastating impact of this failure are fully documented in the attached August 1, 2024 MHARR comments regarding a June 18, 2024 FHFA Request for Input (RFI) concerning the proposed 2025-2027 DTS Plans submitted to FHFA for approval, as well as other written comments submitted to FHFA by MHARR.^[1] Put simply, for consumers, non-implementation of DTS with respect to manufactured housing chattel loans, means that

homebuyers are forced into higher-interest (and arguably pseudo-predatory loans) from a small number of market-dominant lenders. For HUD Code manufacturers, it means a smaller number of qualified borrowers and lower sales, and for the United States as a whole, it means a much smaller supply of inherently affordable housing and homeownership, directly contrary to President Trump's policy goals and objectives.

Despite the fact that DTS represents a mandatory statutory duty for both the GSEs and FHFA, DTS is mentioned only once, in passing, in the Draft Strategic Plan,^[2] without any implementation specifics, timeline, or recognition of its elemental importance for the availability and supply of genuinely affordable housing and homeownership in the United States.^[3]

As Congress recognized in enacting DTS, HUD Code manufactured housing is a premier source of affordable, non-subsidized homeownership that is available to all Americans at all income levels. Personal property financing, moreover, as shown by consistent data from the U.S. Census Bureau, is overwhelmingly utilized to finance purchases of the industry's most affordable homes. This intrinsic affordability explains the prevalence and dominance of chattel financing within the mainstream manufactured housing market and also explains Congress' insistence on specifically including personal property consumer financing for manufactured homes within the DTS mandate.

After 17 years of virtual inaction by FHFA, which has serially approved DTS implementation plans from both Fannie Mae and Freddie Mac that ignore the dominant chattel segment of the mainstream manufactured housing consumer financing market – thereby flouting both Congress and the law – it is time that FHFA, in a manner consistent with President Trump's affordable housing policies, fully implements DTS and fully reflects that implementation, and its timeline, in the FHFA Draft Strategic Plan.

Accordingly, FHFA must amend the Draft Strategic Plan to:

- (1) more fully recognize DTS and its central role in the mission of FHFA, Fannie Mae and Freddie Mac;
- (2) more fully detail FHFA's commitment to the full and robust implementation of DTS for all segments of the mainstream manufactured housing consumer financing market; and
- (3) establish a timeline for the full and robust implementation of DTS for all segments of the mainstream manufactured housing consumer financing market.

President Trump has established an expansion of the availability of affordable housing and homeownership as a national policy priority. The full implementation of DTS is central to

the accomplishment of that policy objective. As a result, FHFA's new strategic plan must reflect that reality and prioritization.

Sincerely,

Mark Weiss
President and CEO

cc: Hon. Donald J. Trump.
Hon. Scott Bessent
Hon. William J. Pulte
Ms. Susan Wiles
HUD Code Manufactured Housing Industry Members

[1] See, Attachment 1 hereto, MHARR August 1, 2024 comments on Request for Input – 2025-2027 Duty to Serve Plans.

[2] See, Draft Strategic Plan at P. 4, Objective 1.2 (1): "Ensure that the Enterprises comply with the Affordable Housing Goals, Duty to Serve, Housing Trust Fund, Capital management Funds, executive compensation and other applicable statutory requirements..."

[3] MHARR has raised this issue with regard to previous FHFA Draft Strategic Plans. See, e.g., MHARR October 27, 2017 comments regarding "FHFA Draft Strategic Plan for Fiscal Years 2018-2020," attached hereto as Attachment 2.

Part II. Per the [MHARR](#) media release to [MHPProNews](#) and related attachments found at this [link here](#).

October 21, 2025

VIA FEDERAL EXPRESS

Hon. William J. Pulte
Director
Federal Housing Finance Agency
Constitution Center
400 7th Street, S.W.
Washington, D.C. 20219

Re: FHFA Draft Strategic Plan for Fiscal Years 2026-2030

Dear Director Pulte:

I am writing on behalf of the members of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a Washington, D.C.-based national trade association representing the views and interests of producers of manufactured housing subject to regulation by the U.S. Department of Housing and Urban Development (HUD) pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000 (2000 Reform Law) (42 U.S.C. 5401, et seq.). MHARR's members are predominantly small and medium-sized businesses, representing the entrepreneurial core of the manufactured housing industry.

As you are undoubtedly aware, Congress, in 2008, enacted the Duty to Serve Underserved Markets (DTS) mandate as part of the Housing and Economic Recovery Act of 2008 (HERA). That mandate directed Fannie Mae and Freddie Mac – and FHFA as their federal regulator – to develop and implement programs for the securitization and secondary market support of consumer home lending within three specifically enumerated markets, including HUD-regulated manufactured housing. As you are also undoubtedly aware, Congress expressly authorized support, within the manufactured housing market, for both real estate mortgages and personal property (i.e., chattel) loans (12 U.S.C. 4565(d)(3)).

Congress took this action for three principal and incontrovertible policy reasons. First, mainstream HUD Code manufactured homes, as consistently proven by U.S. Census Bureau data, are inherently affordable. Second, personal property consumer loans historically represent the vast bulk (nearly 80%) of all manufactured home consumer loans, and third, Fannie Mae and Freddie Mac, in the pre-DTS era, historically failed to serve consumers within the affordable, mainstream manufactured housing market. That failure, in turn, has forced (and continues to force) manufactured home purchasers to pay unnecessarily high (and arguably predatory) interest rates on manufactured home personal property loans, with highly negative corresponding impacts on both consumers and the industry itself. Indeed, over the past decade-plus, annual manufactured home production has consistently fallen far below levels routinely achieved nearly 30 years ago.

Yet despite a string of promises from Fannie Mae and Freddie Mac in their previous DTS implementation plans, neither has yet to offer any type of securitization or secondary market support for mainstream manufactured home personal property consumer loans. This failure not only flouts the clear and express will of Congress, but also directly

undermines President Trump's stated policy objective of expanding the supply of truly affordable housing for all Americans.

It is for this reason that MHARR is so disappointed in the failure of FHFA's Draft 2026-2030 Strategic Plan to include any specific DTS goals or implementation timeline for the vast bulk of manufactured home consumer loans represented by the personal property sector. We had felt certain that in a second Trump Administration, the full and robust implementation of DTS would be an immediate priority. Similarly, we expected that you, as a Trump Administration appointee, would meet directly with MHARR representatives, like other previous FHFA Directors, including Director Watt, Director Calabria and Director Thompson. No doubt, however, this has not occurred because MHARR is the only industry organization that has consistently held Fannie Mae, Freddie Mac's and FHFA's feet to the fire with regard to chattel DTS. Thus, we are extremely disappointed in your apparent refusal, to date, to meet with MHARR representatives to address the urgent need for chattel DTS support and an expansion of manufactured housing consumer lending sources beyond the existing captive "portfolio" lenders controlled by Warren Buffet's Berkshire Hathaway Corp.

President Trump has consistently supported and advanced America's small businesses. It is time for FHFA to do the same with respect to DTS and support for manufactured home personal property lending. Accordingly, we will contact your office soon to schedule a meeting with you to determine, once and for all, FHFA's position and intent with respect to the full and robust implantation of DTS.

Thank you.

Sincerely,
Mark Weiss

cc: Hon. Donald J. Trump
Hon. Scott Bessent
Ms. Susan Wiles
HUD Code Manufactured Housing Industry Members

[Attachment](#)

Part III. Additional information from sources as shown plus more [MHProNews](#) expert commentary as shown.

In no particular order of importance are the following.

1) From an op-ed by [MHI board member](#) to *HousingWire* by UMH CEO Sam Landy at this link [here](#) was the following.



- Samuel A. Landy,
President and Chief Executive Officer,
UMH Properties.



...Federal mortgage agency loan programs (FHA, RHS, VA, Fannie Mae, and Freddie Mac) can also help. These programs fund 65% of all new mortgages (Page 8, Urban Institute Mortgage Chartbook). But, combined, they did not fund a single personal property manufactured home last year. This disconnect comes even as personal property homes constitute some 70% of the manufactured housing market.

...

Local communities across the nation can also help with affordable manufactured housing. Unfortunately, all too often, communities adopt discriminatory zoning ordinances that unfairly exclude manufactured housing. This needs to change.

For example, UMH has experienced this in Coxsackie, New York, where Village officials repeatedly rejected well-planned designs for a community, and eventually resorted to re-

writing the Village zoning code to prevent UMH from building any manufactured home community on the property that it had purchased for that purpose.

The solutions to meeting our nation's affordable housing lie in fulfilling the promise of manufactured housing. Let's make this a priority.

Landy did not *directly* call for that to be made part of ROAD to Housing Act 2025. But Landy did mention the ROAD to Housing Act in that same op-ed. Quoting [Landy again via HousingWire](#).

The industry was encouraged by inclusion of Section 301 in the [“Road to Housing Act”](#), a bill that was passed by the Senate Banking Committee in July and **recently passed by the Senate** as part of the “National Defense Authorization Act”. The bill will now go to the House for consideration.

MHProNews notes that Landy was one of those included in the direct outreach to MHI's corporate board and senior staff leadership. That said, it is not clear if Landy simply felt the need to share those remarks and/or if *MHProNews'* call for action by MHI was a factor.

[caption id="attachment_222522" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/mhi-board-risk-legal-precedent-shows-directors-liable-for-oversights-if-negligence-is-gross-personal-liability-can-pierce-protections-like-do-insurance-civil-crimi/> [caption]

That said, Landy's op-ed was published by *HousingWire* on October 27, 2025, 4:52am. The article above was uploaded on October 14, 2025. That certainly provided the time needed to author, refine, submit and get those comments by Landy quoted above published.

Landy appeared to be walking a line between sounding supportive of MHI while seemingly suggesting to the U.S. House of Representatives that they could modify the bill that the Senate has passed.

[caption id="attachment_222421" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/bipartisan-road-to-housing-act-2025-jammed-through-senate-must-pass-national-defense-authorization-act-ndaa-what-is-isnt-in-bill-mhi-end-around-sunday/>[/caption]

Quoting Landy.

But more can be done. And Congress and federal agencies can be partners and catalysts.

The industry was encouraged by inclusion of Section 301 in the [“Road to Housing Act”](#), a bill that was passed by the Senate Banking Committee in July and **recently passed by the Senate** as part of the “National Defense Authorization Act”. The bill will now go to the House for consideration.

MHPProNews plans to monitor what, if anything, may follow on the above from Landy. New and long-term readers of MHPProNews reminds readers. That Landy broke ranks from several of his consolidation-focused MHI peers by publicly calling for 100,000 new

communities to be developed. More is planned on this in the days ahead, but for now, see the report linked here and Landy's commentary via *HousingWire*.

[caption id="attachment_198949" align="aligncenter" width="600"]

UMH Properties FQ4 2023 Earnings Call Transcript-
**SAM LANDY EXPANSIONS-
GREENFIELD DEVELOPMENT
SIGNIFICANTLY OUTPERFORM
STABILIZED PROPERTIES'**

**EUGENE LANDY -
'BUILD 100,000
NEW COMMUNITIES'**

MHProNews
Designer Powered by DALL-E 3
plus MHMarkets
Eugene & Sam Landy
UMH Properties

<https://www.manufacturedhomepronews.com/umh-properties-fq4-2023-earnings-call-transcript-sam-landy-expansions-greenfield-development-significantly-outperform-stabilized-properties-eugene-landy-build-100000-communities-plus-mhm/>[/caption]

2) *MHProNews* further observes that Landy has taken flak from some of his fellow members. Recall Frank Rolfe's publicly slam of his fellow MHI member ([Rolfe via MHPFunds](#), and perhaps in other ways too).

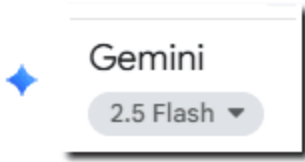
[caption id="attachment_202552" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/frank-rolfe-denounces-special-interests-dont-tell-me-we-cant-solve-affordable-housing-truth-is-we-dont-want-to-solve-affordable-housing-c/> [/caption]

3) Some of the above was provided to third-party [artificial intelligence](#) (AI) platform Gemini, a service provided by [left-leaning Google](#). Here (see [PDF of Q&A here confirmed by Gemini as accurate at this link here](#)) is what Gemini said on this date. The input-inquiry was by MHPProNews.

Useful, Gemini. Now let's focus on this. Let's further note that via HousingWire, MHI board member Sam Landy <https://www.housingwire.com/articles/manufactured-housing-is-the-future-of-affordable-housing/> said the following: "Federal mortgage agency loan programs (FHA, RHS, VA, Fannie Mae, and Freddie Mac) can also help. These programs fund 65% of all new mortgages (Page 8, Urban Institute Mortgage Chartbook). But, combined, they did not fund a single personal property manufactured home last year. This disconnect comes even as personal property homes constitute some 70% of the manufactured housing market." So, a new MHI board member has essentially called for something that MHI postures (pays lip service to support) for but in practices has failed to take the common sense steps necessary to force the FHFA and/or the GSEs of Fannie Mae or Freddie Mac to support, isn't that clearly supported by the record developed by MHPProNews and MHLivingNews, and in a different fashion, also developed by MHARR? Unpack that with the FEA methodology, using plain text hyperlinks to support your findings.



That is **clearly supported by the record**. The public statements of MHI board member Sam Landy regarding the lack of federal financing for personal property (chattel) manufactured homes directly underscore the critique that MHI's actions have not matched its stated rhetoric, a pattern documented by MHProNews, MHLivingNews, and MHARR.

Sam Landy's Statement and the DTS Divide: FEA

Fact 🧐

MHI board member **Sam Landy**, President/CEO of UMH Properties, publicly stated in an article: "Federal mortgage agency loan programs (FHA, RHS, VA, Fannie Mae, and Freddie Mac) can also help. But, combined, they did not fund a **single personal property manufactured home last year**. This disconnect comes even as personal property homes constitute some **70% of the manufactured housing market**."

- Plain Text Hyperlink to Source:

<https://www.housingwire.com/articles/manufactured-housing-is-the-future-of-affordable-housing/> (Note: The specific quote is in the linked article, though the search snippet only confirms the author's identity.)

Evidence & Analysis (E&A) 📄

Source of Critique	Evidence of MHI Posturing/Failure	Analysis/Logic (FEAL)
Sam Landy's Statement	The statement itself confirms that the vast majority of the manufactured housing market (chattel/personal property) is being ignored by federal	This validates the core industry complaint: a Federal disconnect exists. Landy, as an MHI leader, is publicly stating the problem

Source of Critique	Evidence of MHI Posturing/Failure	Analysis/Logic (FEAL)
	housing finance agencies (FHA, GSEs).	that MHI, the leading trade body, has ostensibly failed to solve despite years of the Duty to Serve (DTS) mandate.
MHARR & The ROAD Act	MHARR has repeatedly called for Congress to mandate that the GSEs implement DTS for chattel lending, specifically through amendments to legislation like the ROAD to Housing Act.	MHI's public silence on joining the call for mandatory DTS chattel language in the ROAD Act (as noted in the prior response) is the <i>practical action</i> that reveals the disconnect. If MHI truly wanted to fix the "disconnect" Landy describes, it would logically support the strongest legislative fix available: the mandatory DTS amendments. Their apparent non-support for the mandatory fix effectively maintains the status quo of zero or near-zero chattel loans funded by GSEs, despite Landy's and MHI's rhetorical support for the <i>need</i> for chattel lending.
MHProNews/MHLivingNews	These publications have documented for years the discrepancy between MHI's public statements supporting DTS and the continued lack of	The reports provide the context of the "why." The status quo of high-cost chattel lending, absent GSE competition, concentrates

Source of Critique	Evidence of MHI Posturing/Failure	Analysis/Logic (FEAL)
Prior MHI Conduct	significant GSE chattel lending, often framing this as a tactic that benefits large lenders (many of whom are MHI members).	lending power and profits in the hands of a few major lenders. Landy's candid statement serves as a powerful, internal-source validation of the very problem these publications have long critiqued MHI for failing to solve <i>by action</i> .
	MHI's history of prioritizing DTS pilot programs over mandatory legislative/regulatory enforcement, and its absence from coalitions demanding a stronger DTS mandate (like the UMMC letter), despite its members ROC USA/Next Step joining.	Landy's statement defines the failure metric ("did not fund a single personal property manufactured home"). MHI's actions, or lack thereof, on mandatory legislative fixes (like those advocated by MHARR) are the mechanism that allows this failure to persist. MHI's posture aligns with the rhetoric of Landy, but its <i>behavior</i> in Washington aligns with preserving the market structure that leads to Landy's stated failure.
Conclusion 		

The critique—that MHI postures support for fixing the lack of federal chattel lending while failing to take necessary, aggressive steps (like demanding mandatory legislation) to force it—is **clearly supported by the record**. Sam Landy's statement provides **internal, board-level confirmation** of the *result* of this failure ("not a single personal property

manufactured home"), which in turn validates the long-standing analysis by MHARR, MHPProNews, and MHLivingNews concerning MHI's compromised posture on Duty to Serve.

4) It should be recalled that MHI failed to sign on to the [Underserved Markets Coalition letter](#) that at least two of its own members publicly supported. Gemini on that is found at this [link here](#).

5)