

3 Pre-publication facts-evidence-analysis (FEA) check by third-party artificial intelligence (AI) of the developing report on MHPProNews.com.

The State of Manufactured Housing Hearing. Kevin Clayton. Carla Burr-'Love My Manufactured Home-Only Mistake Was Putting it in a Park' 'We Feel Like Prisoners in a Feudal System' MHVille FEA

According to the Congressional testimony provided in Part I by manufactured homeowner and land-lease manufactured home community (MHC) resident Carla Burr, "I am a proud owner of a manufactured home in Chantilly, Virginia." "I would love to provide an unqualified recommendation for manufactured housing. However, until we fix the financing issue to provide equal access benefits and ensure secure tenure, manufactured home sales will remain slack." "What we are facing right now is a constant threat by the-- not manufactured housing, but by the landlord of this property." Burr told Congress: "I truly believe that manufactured housing can be a part of the solution to our need for affordable homes, and can create jobs, save energy, and provide attractive homes for people who want to buy them. There is much that Congress can do to improve the regulatory marketplace so buyers get the best possible loans, and ensure that Federal agencies use their resources to help homeowners buy a quality home that they can afford, and require protections for owners living in communities." But as the ROAD to Housing Act 2025 stands today, will it solve the issues raised by Burr or others at the Congressional "State of Manufactured Housing" field hearing provided in Part I? That and more will be explored in Part II.

As Part II will also demonstrate, these are the details routinely omitted by the Manufactured Housing Institute (MHI or manufacturedhousing.org) on the public facing side of their website. These details and facts are also routinely overlooked, downplayed, or omitted by [MHI linked state associations](#), or by their allied bloggers and trade publishers.

[caption id="attachment_188738" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/whos-who-at-manufactured-housing-state-associations-per-manufactured-housing-institute-mhi-others-with-mhi-official-history-per-al-hesselbart-claims-tips-views-plus-mhville-markets-u/> MHIProNews notes that this information that used to be found on the MHI website was later removed from the public-facing side of the MHI website. [/caption]

Manufactured homeowner and MHC resident Burr also said: "Owners of manufactured homes are frequently ignored by Federal housing policy." She also said the following.

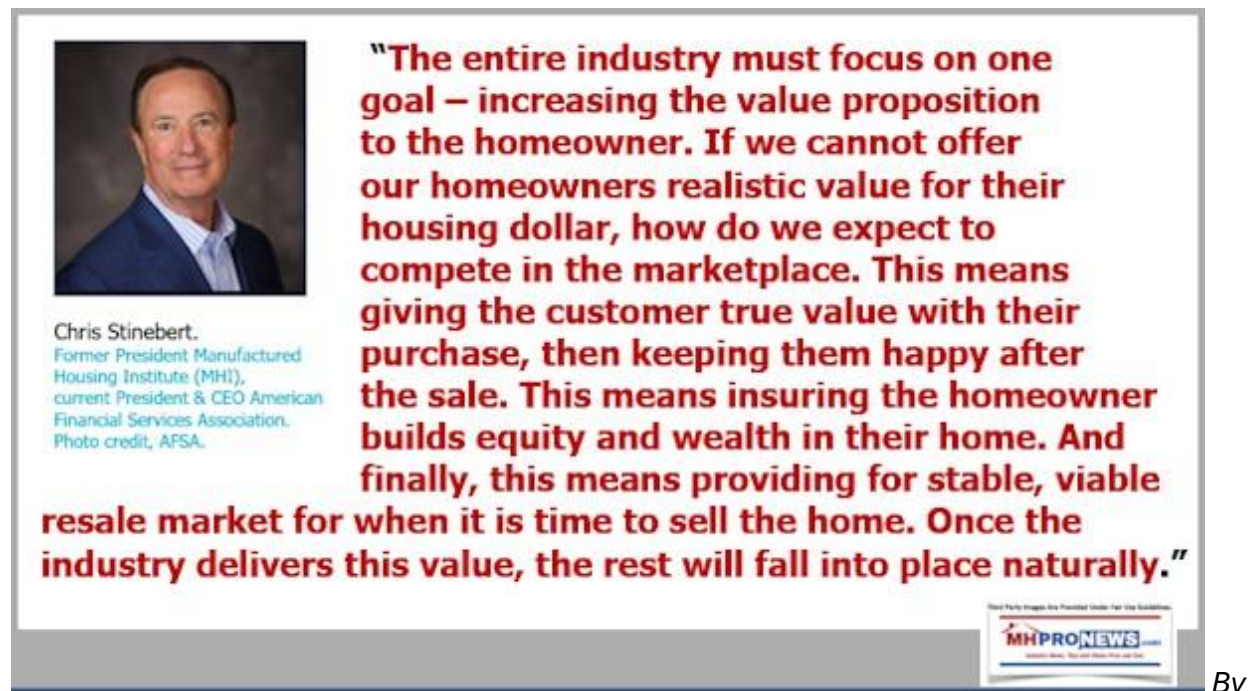
...management is not equitably applying the rules across-the-board. They single out those of us who are taking action to effect change. They try and persuade other homeowners to not attend our meetings because we are really seeking to get the whole community involved. They single out those of us who are taking action, and they use tactics to scare the homeowners. ``We are not going to renew your lease." Whether they do it or not, we don't know. This is an unacceptable position to be in, in any community.

Burr stated.

Everyone--the people who build the homes, the people who sell the homes, the people who finance the homes, and the people who buy these homes--should work together to improve outcomes for buyers like me.

That is not so different than what Chris Stinebert, the former president and CEO of MHI said in his farewell message to manufactured housing.

[caption id="attachment_136119" align="aligncenter" width="597"]



"The entire industry must focus on one goal – increasing the value proposition to the homeowner. If we cannot offer our homeowners realistic value for their housing dollar, how do we expect to compete in the marketplace. This means giving the customer true value with their purchase, then keeping them happy after the sale. This means insuring the homeowner builds equity and wealth in their home. And finally, this means providing for stable, viable resale market for when it is time to sell the home. Once the industry delivers this value, the rest will fall into place naturally."

Chris Stinebert.
Former President Manufactured Housing Institute (MHI),
current President & CEO American Financial Services Association.
Photo credit, AFSA.

MHPRONEWS
Manufactured Housing Professionals' News Service

failing to enforce their code of ethics, by failing to make more lending and placement available, consumers are harmed and so too are industry independents. [/caption]

But [Stinebert's name has been scrubbed from the public facing side of the MHI website, as have other past presidents/CEO, others](#) that were once found there, including [other former MHI vice presidents](#).

Some might wonder. Why look back at this Congressional testimony? Several reasons. One, the problems being experienced by manufactured housing and residents like Burr today are still present more than a dozen years later. There are mainstream media that write reports as if the problems they are describing are new. They are not. They already existed at the time the Danville, VA Congressional Field Hearing occurred.

The practical solutions needed then are the same solutions needed now.

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

1) From the text on the Congressional site shown below and as captured in a [PDF found at this link here.](#)

<https://www.congress.gov/event/112th-congress/house-event/LC1836/text>

THE STATE OF MANUFACTURED HOUSING

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FIELD HEARING

BEFORE THE

SUBCOMMITTEE ON
INSURANCE, HOUSING AND
COMMUNITY OPPORTUNITY

OF THE

COMMITTEE ON FINANCIAL SERVICES

U.S. HOUSE OF REPRESENTATIVES

ONE HUNDRED TWELFTH CONGRESS

FIRST SESSION

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THE STATE OF MANUFACTURED HOUSING

Tuesday, November 29, 2011

U.S. House of Representatives,
Subcommittee on Insurance, Housing
and Community Opportunity,
Committee on Financial Services,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:08 a.m., at
the Danville Municipal Building, 4th Floor City Hall, Danville
City Council Chambers, 427 Patton Street, Danville, Virginia,
Hon. Robert Hurt [vice chairman of the subcommittee] presiding.

Members present: Representative Hurt.

Mr. Hurt. [presiding]. Good morning. I want to, first of
all, welcome everybody to today's hearing.

As you all know, I am Robert Hurt, and I am a Member of
Congress. I represent Danville and all of Southside Virginia in
Congress. My district runs from Greene County, north of
Charlottesville, all the way down to the North Carolina line,

just a few miles from here, and runs from Martinsville in Henry County all the way over to South Hill and Lawrenceville over to the east.

So it is a very large district, and manufactured housing is very important to us here in Southside for two reasons. Number one, of course, it provides affordable housing for thousands of people all across my district, which is extremely important, especially in this economy when we have 9 percent unemployment. Number two, it is also important because it is a provider of jobs. We have a vibrant manufactured housing sector here, as is the case across the country, and we have many jobs that are associated with this business here.

And so, as we look at ways in Washington that we can make it easier for small businesses to succeed, as we look for ways on our Financial Services Committee that we can help ameliorate the effects of legislation that has been adopted in the past, as well as the economic troubles that we currently face, this hearing is an opportunity to focus on a very important part of what I think will be an inevitable economic recovery.

Unfortunately, it is taking longer, I think, than anybody would like. But I do believe that we will get there. And the evidence that we will receive today will be very helpful in our committee's deliberations.

As I said, I am a member of the Financial Services Committee. I am also the vice chairman of the Insurance, Housing and Community Opportunity Subcommittee. I am the only

member of the subcommittee who will be here today, but I can tell you that everything that we hear today, we will record.

We have a staff member from the Financial Services Committee here, Mr. Tallman Johnson, and we will take that evidence and we will carry it back with us to Washington. It will be made part of the record, and we will be able to use that as we go forward and look for legislative responses and regulatory responses that we believe will help the situation.

I also wanted to recognize two folks on my staff. Kelly Simpson is my legislative director. And we also have Denise Van Valkenburg, who is our director of constituent services.

Before I get started, I did want to recognize a few people that I really appreciate being here. Delegate Danny Marshall.

There is Danny. Danny, of course, is our delegate in Richmond.

Thank you, Danny, for being here.

When I was in the House of Delegates, he and I were on the Counties, Cities, and Towns Committee in the General Assembly, a committee that dealt with a lot of these issues. Thank you for being here, Danny.

I wanted to recognize Don Merricks' chief bottle washer.

Where is Gayle? There is Gayle Barts. Don couldn't be with us today, but I did want to thank him for sending Gayle, his able assistant.

We have a couple of folks from the city council. We have Fred Shanks. Thank you, Fred, for being here. And Buddy Rawley was here. I don't know if he is still here. There is Buddy.

Thank you, Buddy, for being here.

We have James Snead, who is a member of the Board of Supervisors and also the Mayor of Ringgold. And we also have Jimmy Gillie, who is our commissioner of revenue here in the city. I don't know if he is still here. Jimmy, thank you for being here. And we also have our city attorney, Clarke Whitfield.

And I am told that we have a special guest as well, Mayor Sherman Saunders. I just want you to know, Mr. Mayor, that I told my staff that I do not want to sit in Mayor Saunders' chair.

[laughter]

Mr. Hurt. So I am going to sit down here. But Mayor Saunders, it is so nice of you to be with us, and thank you for hosting us here. This is our Mayor, Sherman Saunders. Thank you, Mr. Saunders. I appreciate you being here.

[applause]

Mr. Hurt. So, with those introductions, I would like to bring this hearing of the Subcommittee on Insurance, Housing and Community Opportunity to order, and I will begin by making an opening statement, and then I will invite our witnesses to make opening statements.

Good morning, and welcome to today's Financial Services Committee field hearing on the state of the manufactured housing industry.

I want to thank all of our witnesses for traveling here to

Danville this morning to examine the manner in which Federal laws and regulations impact these manufacturers, and the affordable housing they produce, as well as jobs they create here in Virginia's Fifth District and across the country.

The term "manufactured home" refers to a home built in a factory in accordance with the construction standards set forth in the National Manufactured Housing Construction and Safety Standards Act of 1974, which is administered by the Department of Housing and Urban Development (HUD). HUD not only establishes the construction standards for units of manufactured housing, but it also coordinates inspections of these manufacturers' facilities to ensure that the homes they produce meet the quality and safety guidelines HUD maintains.

Manufactured housing plays a significant role in the Nation's housing stock, supplying millions of units of affordable housing to individuals and families across the country. These homes are constructed in quality-controlled, HUD-regulated settings that produce cost-effective homes, expanding consumer access to affordable housing options.

The industry is also a source of employment for thousands of Americans, hundreds of which reside and work here in Virginia's Fifth District. From Rocky Mount to South Hill, from Charlottesville to Danville, the Fifth District is home to a number of manufacturers, retailers, suppliers, and related services, which create numerous jobs in connection with manufactured and modular housing.

The impact of the industry cannot be overstated at a time when 9 percent of Americans are unemployed. Many communities in my district have even higher rates of unemployment.

According to the data from the Census Bureau, the manufactured housing industry experienced strong sales in the mid- to late 1990s, exceeding 300,000 units sold annually.

Since then, these sales figures have steadily declined, with approximately 50,000 units sold in 2010. Today's hearing will explore the causes of these trends and the impact of the relevant Federal laws and regulations on the manufactured housing industry's ability to respond to changing economic conditions.

Among the most critical factors in the purchase of a home is access to financing. Consumers are finding it increasingly difficult to obtain financing for manufactured homes, which, in turn, reduces demand for the product, ultimately resulting in fewer jobs for manufacturers and related businesses and fewer choices available to the consumer.

The majority of manufactured home purchases are financed as personal property, rather than real property mortgages. This method of financing results in comparatively smaller loan balances with shorter durations, but higher interest rates, given that most personal property loans cannot be securitized in the secondary market like a conventional mortgage.

Given the unique nature of this model of finance, we must be mindful that laws governing traditional mortgage finance may

not be as effective in the manufactured housing market, case in point, the unintended consequences created by the Dodd-Frank Act. Dodd-Frank broadened the definition of high-cost loans under the Home Ownership and Equity Protection Act (HOEPA) and also imposed new requirements on loans considered to be high-cost loans under HOEPA.

While these provisions were well-intentioned, we must identify and mitigate the unintended consequences they produced: decreased access to affordable choices for consumers; and fewer jobs in the manufactured housing industry. This hearing will examine these and other issues that are impacting the manufactured housing industry and the consumers who utilize its products.

Again, I want to express my appreciation for today's witnesses, each of whom will speak to their expertise in a particular facet of the manufactured housing industry. I look forward to your testimony.

Without objection, your written statements will be made a part of the record, and you will each be recognized for a 5-minute summary of your testimony.

The first witness who will be testifying today is Mr. Henry Czauski, Acting Deputy Administrator for the Manufactured Housing Program at HUD.

Thank you, Mr. Czauski, for coming from Washington. It is my understanding that you came by way of Blacksburg, but we are glad to have you here. So you are recognized for 5 minutes.

STATEMENT OF HENRY S. CZAUSKI, ACTING DEPUTY ADMINISTRATOR FOR
THE OFFICE OF MANUFACTURED HOUSING PROGRAM, U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

Mr. Czauski. I want to thank Chairman Hurt and the other distinguished members of the subcommittee for the opportunity to testify today.

My name is Henry Czauski, and I am the Acting Deputy Administrator for the Office of Manufactured Housing Program with the U.S. Department of Housing and Urban Development.

My remarks will touch on some of the key aspects of manufactured housing legislation, the role HUD plays in implementing that legislation, the benefits to the stakeholders, and label fees.

In 1974, Congress enacted the National Manufactured Housing Construction and Safety Standards Act, which was amended by the Manufactured Housing Improvement Act of 2000. Congress found that manufactured housing plays a vital role in meeting the housing needs of the Nation and that manufactured homes provide a significant resource for affordable homeownership and rental housing accessible to all Americans.

HUD established a program to administer and carry out the many purposes of this legislation, which was intended to: protect the quality, durability, safety, and affordability of manufactured homes; provide for establishment of uniform

nationwide Federal construction standards; encourage innovative and cost-effective construction techniques; protect residents; establish a balanced consensus process to develop standards; and ensure uniform and effective enforcement of those standards.

To carry out these purposes, Congress included stakeholders in the process--manufacturers, retailers, consumers, State regulators, administrative and monitoring contractors, and others. A Manufactured Housing Consensus Committee was established as a Federal advisory committee to provide recommendations to HUD on adopting and revising Federal standards and regulations. This committee is composed of 21 voting members, including 7 producers/retailers, 7 persons representing consumer interests, and 7 persons representing public officials and the general interest.

An administering organization authorized by Congress assists the committee in its mission. This committee is an active body and in the past year has met on four occasions, and its subcommittees have held ongoing meetings throughout the year.

The Federal standards have been the subject of ongoing review and updating. Over the years, HUD promulgated numerous standards, including standards that limited formaldehyde emissions in manufactured homes, improved wind safety requirements after Hurricane Andrew, enhanced smoke alarm standards, and upgraded electrical safety requirements. These

standards are preemptive of State or political subdivision standards to ensure nationwide uniformity and comprehensiveness.

In order to assure compliance with these standards, manufacturers contract for inspection services with primary inspection agencies accepted by HUD. The Department conducts nationwide monitoring and inspections to assure that the standards are maintained.

Congress also authorized that States may assume responsibility for enforcement of standards, upon approval of a State plan approved by HUD. At the current time, 37 States have established plans. HUD assumes responsibility for enforcement of standards in the 13 States that do not have established plans. During the past 2 years, 2 national and 4 regional meetings with State regulators were held to provide guidance and ensure uniformity of standard administration among the States.

Once a manufactured home is determined to meet Federal standards, a certification label is permanently affixed to each home. This red label assures the consumer that the home was constructed in accordance with the Federal standards.

Congress authorized the Secretary to establish and collect a fee for this label to offset expenses incurred in carrying out the legislation. The current label fee was set at \$39 in

2002. In Fiscal Year 2000, prior to the fee increase, label fee income of \$11 million was collected.

As a result of reductions in the production of manufactured homes, fee income in Fiscal Year 2008 fell to \$5.7 million. In Fiscal Year 2011, fee income fell to less than \$3 million.

To supplement the reduced label fee income, Congress provided a direct appropriation of \$5.4 million in Fiscal Year

2009. The appropriation rose to \$9 million in Fiscal Year 2011.

For Fiscal Year 2012, the appropriation was set at \$2.5 million.

These label fees are used for conducting inspections and monitoring, providing funding to the States that have approved plans, administering the consensus committee, and administration of the enforcement of installation standards, and a dispute resolution program.

In closing, I would like to state that the Federal standards serve to protect the quality, durability, safety, and affordability of manufactured housing. I want to thank you for the opportunity to provide testimony today, and I would be pleased to answer any questions.

[The prepared statement of Mr. Czauski can be found on page 50 of the appendix.]

Mr. Hurt. Thank you, Mr. Czauski.

The next witness that we will recognize for 5 minutes is Mr. Kevin Clayton, who is the president and CEO of Clayton Homes. And he joins us from Maryville, Tennessee.

Thank you, Mr. Clayton, for being here. And we will recognize you for 5 minutes.

STATEMENT OF KEVIN CLAYTON, SECRETARY, EXECUTIVE COMMITTEE,
MANUFACTURED HOUSING INSTITUTE (MHI)

Mr. Clayton. Thank you, Mr. Chairman, and members of the subcommittee, for the opportunity to testify this morning.

My name is Kevin Clayton. I serve as the secretary of the Manufactured Housing Institute, or I will refer to that as MHI in my remarks.

I am also the president and CEO of Clayton Homes. The current chairman of MHI, Joe Stegmayer, sends his regards. He has a facility nearby in Rocky Mount. I know that you visited that facility, and we appreciate your interest and support of the industry.

My written testimony has been submitted for the record.

For over 60 years, manufactured housing has been critical as a single-family housing alternative for hard-working, low-to moderate-income families across this Nation. Most manufactured homes are located in rural America, where there are few apartments or other housing alternatives available.

The average cost of a new manufactured home is only \$63,000 versus \$270,000 for a site-built home. More importantly, the median annual income of a manufactured homeowner is \$32,000, versus \$60,000- plus for other homeowners.

An even greater indication of the Nation's reliance on manufactured homes as an affordable housing alternative is that

72 percent of all new homes sold under \$125,000 are manufactured homes. Additionally, since 1989, manufactured housing has served roughly 20-plus percent of all new home sales.

The American dream is homeownership, and the unintended effects of new regulation and lack of the secondary market by the GSEs is a path to tragically wipe out the remains of this important housing segment. The implementation of the Dodd-Frank Act amendments to the Home Ownership and Equity Protection Act stands to critically affect this industry. HOEPA, which defines high-cost mortgages, is designed to protect consumers and prevent predatory lending.

The law uses APR limits for the annual percentage rate and fees charged on a loan to determine whether the loan is a high-cost mortgage. Prior to the Dodd-Frank Act, HOEPA only applied to non-purchase finance or refinance loans, but now will apply to all manufactured housing loans as well.

With no secondary market, the cost of capital for manufactured housing lenders starts at a much higher rate, and the limits within the Dodd-Frank Act are based off of the current artificially low mortgage rates. This makes it very difficult, and impossible in many cases, for a lender in our industry in the future to be able to charge enough interest rate to offset the cost of originating and servicing the loans and stay underneath those limits.

For example, a \$200,000 site-built loan and a \$50,000

manufactured home loan, they cost the same in dollars to originate and service a loan. But as a percentage of each loan's size, it is significantly different in interest rate spread. This difference is effectively discriminating against the smaller size manufactured home loans, putting them at a much higher risk of being categorized as high-cost mortgages, even though there is nothing predatory about manufactured housing loans.

The impact of this provision is significant. Of the 400,000-plus loans that our company has made since 1972, more than 50 percent of those would have not been done because they would have been classified as a high-cost mortgage under the Dodd-Frank amendments.

Due to the liabilities and stigma associated with high-cost mortgages, lenders typically refuse to make these types of loans. The other real impact of HOEPA will be felt by the 19 million Americans who live in manufactured homes, who could see their ability to resell their homes effectively wiped out because lenders would be unwilling to provide the financing needed to help them sell their homes.

Our regulatory challenges are not limited to HOEPA and the Dodd-Frank Act. The industry is already feeling the impact of the SAFE Act, which requires States to establish standards for licensing mortgage loan originators. Unfortunately, there has been a lack of clarity and uniformity in applying the SAFE Act to the manufactured housing market, specifically the

manufactured home retailers and their salespeople.

Similar to real estate brokers, manufactured home retailers are in the business of assisting customers through the home-buying process. However, unlike conventional real estate, there are a limited number of banks that offer financing for manufactured housing. Without the assistance of the retailer and salespeople, the consumer would be--it is very difficult to locate a manufactured housing lender.

Salespeople are fundamentally involved in the business of selling homes, not originating mortgage loans. When they do not receive an incentive or compensation from a lender, then they should not be fearful to show a customer what financing options are available or answer basic questions about the lending process.

Additionally, as States have attempted to implement the SAFE Act, the impact has been inconsistent. Because of delays in the Federal rulemaking and the resulting differences and approaches taken at State levels, manufactured home retailers are often concerned with providing the most basic level of technical assistance and service to customers.

While MHI fully supports the mission of the SAFE Act, consideration should be made for the unique manufactured home-buying process. Our industry is critical for housing and providing jobs in America. Over the past decade, new manufactured home construction has declined nearly 80 percent, which has accounted for 160 plant closures, more than 7,500

retail center closures, and the loss of over 200,000 jobs.

More importantly, thousands of manufactured home customers may be limited in their ability to purchase, sell, or refinance homes. Without action in these key areas, the people who live in manufactured homes and those whose livelihood is connected to this industry face significant risk.

I thank you for the opportunity to testify and welcome your questions later.

[The prepared statement of Mr. Clayton can be found on page 36 of the appendix.]

Mr. Hurt. Thank you, Mr. Clayton, for your testimony.

The next witness who will testify will be Tyler Craddock, and he is the executive director for the Virginia Manufactured and Modular Housing Association. He is in Richmond, and he is from Southside.

Welcome, Tyler, and you are recognized for 5 minutes.

STATEMENT OF TYLER CRADDOCK, EXECUTIVE DIRECTOR, VIRGINIA
MANUFACTURED AND MODULAR HOUSING ASSOCIATION (VAMMHA)

Mr. Craddock. Thank you, Mr. Chairman. Thank you for the opportunity to testify this morning on the state of the manufactured housing industry, and thank you for hosting this hearing.

My name is Tyler Craddock, and I am the executive director of the Virginia Manufactured and Modular Housing Association.

Founded in 1965, VAMMHA is the voice of the factory-built housing industry in Virginia. We represent producers and retailers of manufactured and modular housing, community owners, lenders, suppliers, and others involved in providing Virginians with well-constructed, factory-built, affordable housing choices.

While most of our work is at the State and local level, we recognize that manufactured housing, by its very nature, requires a great deal of attention to Federal legislative and regulatory activity. For that reason, we are active members of and work in close partnership with the Manufactured Housing Institute, very ably represented here this morning by Kevin Clayton, with Clayton Homes.

Manufactured housing is an important component of the housing stock here in Virginia. According to the 2010 census, it comprises about 5.6 percent of the overall housing stock in the Commonwealth. But that does not tell the entire story. In many rural localities, especially in Southside and southwest Virginia, according to the 2000 census data--that is the latest data we have available on a county-by-county basis--the proportion of manufactured homes exceeds 15 to 20 percent of the housing stock. That is no small wonder, given the relative lack of construction labor in many rural communities and the affordable nature of manufactured homes in Virginia. In 2010, for example, the average cost of a new manufactured home in Virginia minus land was \$58,500. In spite

of manufactured housing's status as an affordable choice for many Virginia families, the manufactured housing industry in Virginia is limping along at present.

In 1990, over 5,400 homes were shipped into Virginia. That number rose to over 7,000 homes in the mid- to late 1990s and dropped over time to only 1,155 homes in 2010. Thus far in 2011, we are at approximately 30 percent off of our numbers from 2010, having only 670 shipments as of the end of September.

The decline in manufactured home shipments is mirrored in the decline we have seen in the number of manufactured homes actually produced here in Virginia. In 1990, 3,595 homes were produced in the Commonwealth. In the years that followed, that number went as high as 4,422 homes in 1998, but declined to only 113 homes in 2009.

While many of the issues we face are State or local in nature, and others testifying today can offer more in-depth perspective on the Federal issues affecting our industry, I would certainly be remiss if I did not highlight a couple of issues that have arisen as I have visited with VAMMHA members around the State. First and foremost, the lack of financing from manufactured home purchasers is putting many of our customers and our industry overall in a pinch.

Time and time again, retailers tell me that they have customers who are ready and willing to purchase a new home, but they cannot get financing for the purchase. In many cases,

these are families who, in years past, would have had no trouble qualifying for a loan, but they cannot do so now. In addition, for our customers who qualify, there remains the real threat that their home will not appraise for a value that will allow their home purchase to move forward. While appraisals are tighter across-the-board for the entire housing industry, a number of my members report that the problem lies not so much with appraisals in general, but with specific appraisers who do not understand our product and its unique nature. As such, there may be an opportunity for the industry and HUD to work in partnership to help ensure that appraisers are well educated with respect to manufactured homes.

Another issue that continues to concern our membership is the SAFE Act. While the final rule promulgated by HUD earlier this summer provides some helpful guidance and flexibility for our State regulators, it does not entirely clarify issues of critical concern to the industry.

The industry is seeking additional statutory language to clarify that licensed manufactured home salespersons not engaged in loan origination activities are not mortgage loan originators and, thus, subject to licensing. As it stands, given the unique nature of the retail side of our industry, manufactured home retailers, who are not in the business of making loans, could be on the hook for thousands in licensing fees at a time when they can least afford it.

In addition, the industry is seeking relief for those who

originate only a small number of manufactured home loans on an annual basis and for those sellers financing the sale of their own manufactured homes. At a time when financing options are very limited for manufactured home buyers, regulatory burdens imposed by the SAFE Act are further limiting the few financing options available to low- and moderate-income manufactured home buyers.

Mr. Chairman, thank you for the opportunity to testify, and I certainly welcome any questions.

[The prepared statement of Mr. Craddock can be found on page 45 of the appendix.]

Mr. Hurt. Thank you, Mr. Craddock.

We also have with us Stan Rush, who is an account representative with MHD Empire Services Corporation here in Danville. Mr. Rush, thank you very much for joining us today, and we will recognize you for 5 minutes.

Thank you, sir.

STATEMENT OF STANLEY RUSH, ACCOUNT EXECUTIVE, MHD EMPIRE SERVICE CORPORATION, AND VICE CHAIR, VIRGINIA MANUFACTURED AND MODULAR HOUSING ASSOCIATION (VAMMHA)

Mr. Rush. Thank you, Chairman Hurt, and members of the subcommittee for the opportunity to testify regarding the state of manufactured housing personal property financing.

My name is Stanley Rush, and I am an account executive with

MHD Empire. I am also currently serving as vice chair of the Virginia Manufactured and Modular Housing Association.

I have in worked many different areas of the manufactured housing industry since 1981 with almost 20 years of manufactured housing personal property financing experience.

The most serious obstacle that exists with personal property financing is the SAFE Act and its inherent regulations.

Primarily, States do not know how to enforce the new regulations. Most States, especially Virginia, already had predatory lending laws that were passed years ago. The SAFE Act has confused a situation that was working.

The SAFE Act creates confusion for the manufactured housing salespeople who are assisting customers with the process of obtaining financing for affordable homes they want to purchase.

There is great uncertainty about the SAFE Act and how it applies with respect to the need for manufactured housing salespeople to obtain a mortgage loan originator's license to be able to assist with a credit application.

Manufactured housing salespeople are licensed and regulated by the State. Any additional licensure is costly and unnecessary, as the salespeople are not making any lending decisions, merely helping with paperwork.

The SAFE Act is also preventing manufactured housing community owners from doing their own financing, which is necessary at this time because so many sources of money are no longer available. While the recent guidance from HUD and

conversations between our industry and State regulators have been helpful, they are based only on current interpretations and, as such, are subject to change in the future.

Additionally, these positive first steps do not completely address the industry's concerns. That is why we strongly encourage you to support clarifying language to state that manufactured housing salespersons not engaged in loan origination do not need to be registered, and language that provides some relief to folks making only a few loans and sellers financing the sale of their own homes.

At one time, there were more than a dozen national lenders doing manufactured housing personal property financing. Now, we are down to four. One of the reasons personal property financing has become so scarce is that banks are being told by regulators that if it is the least bit out of the ordinary, don't do it.

Manufactured housing personal property financing is out of the ordinary, and thus, the banks stay away. The new financial regulatory format is only making this situation worse.

Our industry is by no means perfect. None is. But we have gotten caught up in a perfect storm of unintended consequences that, on top of the prolonged poor economy, is keeping our customers out of the most affordable housing available today.

Thank you again, Chairman Hurt, for the opportunity to testify today, and I will be glad to answer any questions that you may have.

[The prepared statement of Mr. Rush can be found on page 55 of the appendix.]

Mr. Hurt. Thank you for your testimony, Mr. Rush.

And now, it is my pleasure to introduce Scott Yates, who is president of Yates Homes in Pittsylvania County. It is a family-owned business that has operated since 1986, and thank you very much for coming down to the big City of Danville--
[laughter]

Mr. Hurt. --to testify. You are recognized for 5 minutes.

STATEMENT OF SCOTT YATES, PRESIDENT, YATES HOMES, AND PAST
CHAIR, VIRGINIA MANUFACTURED AND MODULAR HOUSING ASSOCIATION
(VAMMHA)

Mr. Yates. Thank you, Congressman Hurt, for giving me the opportunity to appear before you today.

My name is Scott Yates, and I am president of Yates Homes, a family-owned business that has operated in Pittsylvania County since 1986.

Over the course of my career, I have sold manufactured and modular homes, and I own and operate a manufactured housing community. I am also a member of the Virginia Manufactured and Modular Housing Association, have served as its chairman, and I am also a member of the executive committee, the board of directors, and had the pleasure of being elected to MHI, representing Virginia for a number of years.

From day one, I have sold manufactured homes because I knew there was a need for affordable housing, but wanted to help consumers realize the American dream of homeownership. For quality of life and economic competitive reasons, every community needs a steady, well-built supply of affordable housing choices, and I decided early on that I wanted to play a part in helping provide that in Southside Virginia.

Since 1986, I have seen our industry hit some of its highest points, and likewise, I have been through some of its toughest times, as is the case today. At the peak of the industry, our business sold 180 houses a year and employed 19 people. As the economy went into a tailspin and the housing market slowed to a crawl, I have had to adjust our company to only 5 employees, including myself and my partner, and we are only selling 30 homes a year.

This being the third downturn we have been through and the longest of my career, I think we have outsmarted ourselves for the sake of fixing the housing problem and forgotten commonsense resolutions. With the constant pressure of government regulation at all levels, and a lack of reliable financing sources for customers, we have turned to modular homes instead of manufactured homes.

The finance community has turned from manufactured homes because of secondary markets not wanting to buy portfolios that contain this type of housing. The true loser is the customer who wants to provide shelter for their family at an affordable

price and who understands that manufactured housing is a viable option to do exactly that.

Four years ago, we recognized that lending sources for manufactured home buyers were drying up. As such, we deemed it necessary to explore an alternative business model so that our company could survive. We moved into modular homes because they are built to the prevailing local codes, which is the Virginia Uniform Statewide Building Code, the same standard that applies to site-built homes.

They have fewer restrictions for customers seeking financing and feature many of the same terms as the site-built homes. With manufactured homes, the interest rates are generally higher. In addition, we observed that the appraisals were coming in well below the price for which the home had sold.

Finally, it got to the point that selling manufactured homes was a losing scenario from a financial point of view. We were selling at a lower margin and being cut to the point that we could not make a small profit to keep our company going. In this scenario, however, the true loser is not me or our company. The true loser is the American people. Not every family can afford a home over \$100,000. These are the families today who are suffering the most in our economy. They are being squeezed between job losses and the increasing cost of providing necessities like food, clothing, and whatever type of shelter for their families.

In time, this leads to more people depending on our government to support them, thereby perpetuating the cycle of entitlement and spending that has brought our Nation to the brink of financial destruction. That is certainly not what this country was founded on, and in my opinion, it is not the direction our forefathers had in mind when they bravely affixed their names to the Declaration of Independence.

In closing, I would like to share a story from my first year in business. A couple came in with two children. The loving father and mother wanted to provide a home for their family. We had a \$4,000 used manufactured home for sale. They wanted to put it on the property that their family owned.

The father and mother had saved and worked hard to purchase this home. When they wrote us a check for the \$4,000, the notation in the memo line contained two very simple, but powerful words, ``a home."

I never forgot that family, and those words that remind us that whether a home has a \$1 million price tag or a \$4,000 price tag, it is a home that meets their housing needs and provides a home for their family.

Chairman Hurt, thank you for the opportunity to testify today, and I welcome any questions.

[The prepared statement of Mr. Yates can be found on page 65 of the appendix.]

Mr. Hurt. Thank you very much, Mr. Yates.

I would now like to recognize for 5 minutes Mr. Adam Rust,

who is the research director for the Community Reinvestment Association of North Carolina, and he comes to us from Durham, North Carolina.

Mr. Rust. That is right.

Mr. Hurt. So thank you for being with us, and you are recognized for 5 minutes.

STATEMENT OF ADAM RUST, RESEARCH DIRECTOR, COMMUNITY REINVESTMENT ASSOCIATION OF NORTH CAROLINA

Mr. Rust. Honorable Chairman Hurt, thank you for inviting me to testify before your panel today.

My name is Adam Rust, and I am the research director for the Community Reinvestment Association of North Carolina. Our main focus is housing finance. I am the author of, ``This Is My Home: The Challenges and Opportunities of Manufactured Housing." And since 2010, I have served as a general member of HUD's Manufactured Housing Consensus Committee.

In my opinion, today there is no better example of a community that is obstructed from accessing good credit than the local manufactured housing park. That is why I think it is important that this hearing is happening today.

To your first question, what has caused the manufactured housing industry to go from 300,000 units produced in 1999 to only 50,000 units in 2010? I would offer that an equally valid question is, what would help the manufactured housing industry

ship more homes in the near future?

I see two opportunities--better participation by the GSEs and a better industry effort to take advantage of demographic change in our population. The manufactured housing industry finds it hard to ship more units because fewer people can get the financing they need to buy the homes.

I agree with the sentiment expressed by Mr. Rush, Mr. Clayton, Mr. Yates, and Representative Hurt. Your opinion of personal property lending may determine your thoughts on the most important issues for how credit is accessed, how we interpret the way that the GSEs operationalize their duty to serve in the case of manufactured housing.

The GSEs have expressed that they want to narrow their commitment to only real property. I believe that we need to find a middle ground. I believe that the GSEs can be a lever that elevates the quality of manufactured housing lending for personal property. I imagine that if a GSE did focus on buying these loans, it would serve as a lever to elevate the quality of lending.

I think there are important conditions to set with that, including full disclosure under RESPA for closing costs, no balloon payments, and loans that do not bind people unable to get a refinance in the near future.

Secondly, the manufactured housing industry needs to do a better job of serving people with disabilities. We know the population is graying. The point of purchase is not when you

know if you will need a home with disability protections. As an example, you never know if you are going to need a seatbelt, but I believe that we are all glad that cars now come with seatbelts.

We know the population is graying, and I think it is about finding a middle ground. And to that, I want to say that I voted against the sprinkler proposal. But hallway widths are an important topic.

I have two letters that I have brought today from the Paralyzed Veterans of America and the American Association of People with Disabilities. Both of them specifically asked the Manufactured Housing Consensus Committee to establish a minimum hallway width of 36 inches in the HUD code.

The actions to consider with regard to financing include that the GSEs should not just focus on real property, but also on personal property loans, and that we change the rules associated with the GSEs' MH Select program, which currently require PMIs for some homes with higher LTVs. For better or worse, there were less than 200 PMI contracts written for manufactured homes in 2010, compared to more than 10,000 just as recently as 2004. The products are not being offered.

We need to create credit enhancement facilities for second position loans to help people acquire manufactured housing parks. And last, we need to engage and encourage State housing finance agencies to use their tax credit dollars to encourage manufactured housing lending.

Straight to the third question, what role will the CFPB play for the manufactured housing industry under Dodd-Frank, I believe that Dodd-Frank will reward the good guys by eliminating the competitive threat posed by a race to the bottom among financing companies. CFPB's focus is on consumer protection. It is not the SAFE Act. It is different.

And here is what is wrong with personal property lending.

We know that it is hard to shop around for a better loan when the financing comes from a retailer that is selling the home.

It is even harder when there is no requirement for closing costs. And then, ultimately, the homes come with features that may change the ultimate resale value of the home, including balloon payments or prepayment penalties.

One in five borrowers ends up unable to make their payments. Some people are getting these loans that they couldn't qualify for a mortgage. It is bad for consumers, and it stands to reason that this will be bad for the future of the industry.

In fact, the problems facing manufactured housing took place and developed before the idea of the CFPB was even imagined. The CFPB will not regulate manufacturers. It will supervise, enforce, and write rules only for nonbank financial institutions and only if they are considered larger participants.

The CFPB is only about making sure that people get the best financed product that they deserve, and I think that enhancing

the role of the GSEs is the first step to making that happen. Ultimately, and to conclude, as transactions become more transparent and as more finance products prove to be sound, results will be seen and the quality of manufactured housing communities and the experience that owners have and in the perception of the industry--I believe that the only way that the industry will go forward and return to health is to address this issue of financing.

Thank you.

[The prepared statement of Mr. Rust can be found on page 58 of the appendix.]

Mr. Hurt. Thank you, Mr. Rust.

The next witness that we will hear from is Ms. Carla Burr. She is a manufactured housing resident, and she is from Chantilly, Virginia. And we will recognize you, Ms. Burr, for 5 minutes.

STATEMENT OF CARLA BURR, MANUFACTURED HOUSING RESIDENT

Ms. Burr. Thank you.

Good morning, Vice Chairman Hurt, and I thank you for the opportunity to testify.

My name is Carla Burr, and I am a proud owner of a manufactured home in Chantilly, Virginia. But I am not just representing myself. I am representing 17 million families who live in these homes across this country.

Owners of manufactured homes are frequently ignored by Federal housing policy. So I am very grateful that we have this attention paid to it today.

We believe if you want to understand why manufactured home sales have dropped so dramatically, it is critical to ask the homeowners and buyers and residents among these communities: Would you recommend them to others? Would you recommend your child buy one?

I would certainly recommend someone buy a manufactured home. My only mistake was putting it in a park, where I have no control. The issues regarding manufactured housing in a community such as ours is so grave that people are walking in and turning in their title to their home because they can't sell it. It is too old. They can't get a replacement.

There are many people in our community who are suffering so badly that they can't even buy food. It is a toss-up between food and medical bills and lot rent.

In my particular community, the lot rent is going to increase this next year to \$919 a month. In most communities, we are finding the lot rent is higher than the mortgage, and this is unconscionable. In some communities, the lot rent is almost equal to the mortgage.

We know one homeowner in my community, their lot rent is like \$100 less than their mortgage. A \$2,000 a month payment for a manufactured home in a community is just absurd.

What we are facing right now is a constant threat by the--

not manufactured housing, but by the landlord of this property.

We are really considering how we are going to try and get out of this community. We would like to buy it. We would love to buy the property.

In fact, if I had the chance to buy the land my house sits on, I would do it in a heartbeat. But there are no provisions. We don't have any rights as far as homeowners. There is no right of first refusal for us.

The landlord could basically sell the property out from under us, and we would never know until the sale happened. And then, we would be frantically trying to find someone to buy our home for less than what it is worth.

Right now, we have been successful as a community in getting our property taxes lowered because the assessment values were way out of line. We felt that they were using this Wingate appraisal method to actually assess our homes, and we found it to be absurdly unrealistic. My house I could probably sell for less than half of what I paid for it, and I would be lucky to get that.

Anyway, for the nearly 3 million homeowners like me on leased land, we are in a financially precarious position. We are not notified if the land owner decides to sell. Like I said, we don't have right of first refusal.

There are practices of certain community owners that further erode the value of my investment if I want to sell. For example, landlords can refuse to sell to someone who wants to

buy my home. They can limit how I market my house. They can steer potential buyers to other homes within the community, toward their product, which is happening in my community. In my community, it has gotten so bad that people are turning in their title, which I have said. We feel like prisoners in a feudal system.

The other practice is where management is not equitably applying the rules across-the-board. They single out those of us who are taking action to effect change. They try and persuade other homeowners to not attend our meetings because we are really seeking to get the whole community involved.

They single out those of us who are taking action, and they use tactics to scare the homeowners. ``We are not going to renew your lease." Whether they do it or not, we don't know.

This is an unacceptable position to be in, in any community.

And why is the manufactured housing community singled out?

Because of nonexistent protection under the law. Although Virginia does have some vague laws about this type of retaliation, and even our rental agreement says the landlord cannot retaliate, they basically ignore those rules.

I truly believe that manufactured housing can be a part of the solution to our need for affordable homes, and can create jobs, save energy, and provide attractive homes for people who want to buy them.

There is much that Congress can do to improve the regulatory marketplace so buyers get the best possible loans,

and ensure that Federal agencies use their resources to help homeowners buy a quality home that they can afford, and require protections for owners living in communities. Everyone--the people who build the homes, the people who sell the homes, the people who finance the homes, and the people who buy these homes--should work together to improve outcomes for buyers like me.

I would love to provide an unqualified recommendation for manufactured housing. However, until we fix the financing issue to provide equal access benefits and ensure secure tenure, manufactured home sales will remain slack.

Finally, as an owner of a manufactured home, I really look forward to the day when we have equal rights under the law as a homeowner. Whether it is stick-built or some other condominium, we are also petitioning our local representatives in Virginia to pursue some sort of rent control or restructuring so that land owners cannot raise the lot rent without impunity. And there needs to be some sort of ceiling.

We know rent control is gone for the most part in this country, but for our purposes, there is no way we can stay. We have determined there is no affordable housing in Fairfax County. It doesn't exist. And an article in the Washington Post even confirmed that.

So thank you for listening.

[The prepared statement of Ms. Burr can be found on page 29 of the appendix.]

Mr. Hurt. Thank you, Ms. Burr, very much for your testimony.

Not on the program is a gentleman from the Manufactured Housing Association for Regulatory Reform. His name is Mark Weiss. He is behind you, Ms. Burr. If we could get that microphone to him, I would like to ask unanimous consent to recognize him to make a brief statement for the record. He comes from Washington.

STATEMENT OF MARK WEISS, SENIOR VICE PRESIDENT, MANUFACTURED HOUSING ASSOCIATION FOR REGULATORY REFORM (MHARR)

Mr. Weiss. Thank you, Mr. Chairman. I appreciate the opportunity to speak here today.

Mr. Hurt. Yes, sir. Thank you.

Mr. Weiss. My name is Mark Weiss, and I am senior vice president of the Manufactured Housing Association for Regulatory Reform.

MHARR is a national trade association of mostly smaller producers of HUD-regulated manufactured housing. MHARR first requested an oversight hearing on the HUD Manufactured Housing Program and was promised such a hearing by Chairman Bachus earlier this year. MHARR specifically requested an oversight hearing on HUD's failure to fully and properly implement key reform provisions of the Manufactured Housing Improvement Act of 2000.

We expressed our wish to present testimony showing the devastating impact of that failure on the industry and particularly the smaller independent manufacturers that MHARR represents, as well as American consumers of affordable housing, which would then provide the committee with a basis to seek answers from HUD officials on those issues.

The smaller businesses represented by MHARR have major and specific grievances based on HUD's failure to fully and properly implement those key reforms of that law, reforms that were designed to ensure that manufactured homes are treated as housing rather than the trailers of yesteryear. Some of those reforms have been distorted, others have been ignored, and yet others have been effectively read out of the Act entirely by process of interpretation.

We trust and hope that during the next session of the 112th Congress, a hearing on those specific implementation issues will be held where our small business members and their witnesses can appear and testify before the committee. In the interim, we would ask that my statement be included in the record, as well as a series of fact sheets specifically addressing those implementation issues that we have prepared and will submit to the committee.

Mr. Hurt. Without objection, those documents will be admitted to the record. And thank you for your statement, Mr. Weiss.

Mr. Weiss. Thank you, Mr. Chairman.

Mr. Hurt. Now, we will commence with a period of questioning for the witnesses, and I will ask a few questions. First up, Ms. Burr, thank you for your testimony. One of the things that I was wondering about as you testified was whether or not there is a market for being able to sell your home in the, I don't know if you call it the secondhand market or used market?

Ms. Burr. Yes.

Mr. Hurt. Is there a market for that? And I would imagine living in Fairfax County, like you do, that it would be very difficult to find affordable housing in Fairfax County. We would, just for the record, invite you to move to Pittsylvania County.

[laughter]

Mr. Hurt. But with that said, is there a vibrant market at this time for used manufactured housing?

Ms. Burr. Not from what we can see. The county has actually made it so difficult. They have changed the zoning on some of the land. You can't actually move it. If you buy a piece of land in Fairfax County, it is probably zoned in such a way that you can't put your home on it. So even if I could move it, there is nowhere to move it.

And I have checked with communities like ours all the way into Maryland and West Virginia. They don't have lots big enough to put my house on. And if you want to buy a piece of property, the zoning doesn't allow you to move it there. So we

are stuck.

Mr. Hurt. Okay. Thank you.

And Mr. Rust, I would like to ask you a question. If you would try to use the microphone for the court reporter, if you don't mind?

Thank you for your testimony, Mr. Rust. I was wondering if you could just address--you talked a lot about the GSEs, and of course, that is something that has taken up a lot of our focus in Washington is dealing with Fannie Mae and Freddie Mac and how do we--taxpayers provided a \$160 billion bailout for those two organizations. And I think that there is across-the-aisle support for trying to wind those down.

The key, the key to the success for that, though, will be bringing the private sector into the secondary mortgage market.

That is the only way it works if we don't want to make it worse for housing and make it worse for the real estate market.

So I was wondering if you could speak to that. Obviously, it would be nice to see that secondary mortgage market evolve in the private sector, and I didn't know if you had any comments as it relates to that?

Mr. Rust. It is true that there is hardly a market for those kind of homes on the private investor side. One issue that--

Mr. Hurt. How do we correct that without--

Mr. Rust. Okay. So I am worried about the loan level price adjustments, which are a series of costs that are imposed on

the delivery of manufactured homes or any mortgage to the secondary market. And specifically, I am concerned about the additional costs that are passed on for borrowers even when they haven't demonstrated a poor credit record.

There is an additional fee specifically designated for a manufactured home so that is raising cost that is passed on either in the interest rate or in the closing costs. And so, that is one thing I would encourage you to look at because I think it is a little bit under the radar, and it has been taking place since about 2009 and continues to evolve. But it is really hurting the secondary market and liquidity.

Mr. Hurt. Okay. Thank you.

Mr. Yates, I have a question for you. Thank you again for your testimony, and I appreciate the 35 years of experience that you bring to this.

When you think about the regulatory structure, and I don't mean just as it relates specifically to manufactured housing and modular housing, but the regulatory structure generally, just as a small business, a family-owned business for 35 years, I would imagine that those regulatory burdens, whether it be taxes or whether it be environmental issues, can you talk a little bit about that burden just generally as a small business?

And do you have any advice for us in terms of how we make it easier for you to succeed so that you are not--your testimony is very compelling when you talk about how your

business has changed in the last 10 years.

Mr. Yates. The regulatory environment is a moving target.

It is constantly moving. I will give you one quick example.

Basically, bringing the consumer back into it because that is what drives all of our businesses. It is not just myself; it is the consumer.

In Pittsylvania County today, it costs \$700, approximately \$725 just to get a well and septic permit. Now that is before you do anything. That is just a permit on the property to say, I can put a home here, whether it is a manufactured home, a modular home, or a stick-built home.

But from the consumer, the regulation that is coming down, the permit for this, the permit for that, and I understand the State needs its funding, local government needs its funding. But--

Mr. Hurt. It all adds up, doesn't it?

Mr. Yates. Absolutely. And it takes people who want to buy from our business, it takes them off of the buying arena because these fees keep adding up.

I can remember when my closing files used to be this big.

Now, they are this big.

Mr. Hurt. Right.

Mr. Yates. We had someone out of Richmond come in last week and check our company. We are visible. So we are constantly getting people in, making sure you have this license, you have that license. I am not saying license is a bad thing. I think

it needs to be regulated.

But again, as I said in my statement, when we get past, when we outsmart ourselves and we forget the commonsense approach to, number one, the consumer, and number two, to business, we are hurting from top to bottom all the way down.

Mr. Hurt. Sure. Thank you.

Mr. Rush, you talked a little bit about the appraisal standards and the changes that were brought by Dodd-Frank. And I was wondering if you could just talk a little bit about those appraisal standards and how those changes have and will affect the marketplace.

Mr. Rush. The problem that has come into, and I think it is affecting the real estate market also is that the Federal guidelines are one thing, and then each lender has their own set of guidelines for how they are doing manufactured housing and how they are doing site-built housing.

Right now, we have a situation where a modular home can be built to the statewide building code and the frame can be left under it. And if that is the case, then the Federal guidelines from FHA are that the appraiser has to appraise it like a manufactured house, a HUD code manufactured house, which means they can only use comps that are HUD code houses. That limits the comps, especially in the market today, where there are not that many being sold, and there are almost none being resold because of the appraisal process and the lack of financing. So they are condensing us down into a little, small pinhole

that is not helping the industry, and it is drastically hurting the industry as far as appraisals. We need to be able to comp a mod to a mod if that is--or site-built because they are built to the same code, whether it has a frame under it or it doesn't have a frame under it. That is just one area where the appraisals are being affected.

The other thing is that they are not supposed to be using foreclosures for comps, and the appraisers are. And it is hurting the prices because people are doing short sales. Lenders are doing short sales. We don't have any bigger problem with foreclosures than the site-built industry, but we all have them right now with the way the economy has been going for such a long period of time, with folks out of work.

So there are foreclosures out there in both the site-built and the manufactured housing industry. These things are all, as I said in my testimony, a perfect storm of negative things that are affecting our industry.

Mr. Hurt. Good deal. Thank you, Mr. Rush.

Tyler, a question for you. From your viewpoint in Richmond, can you just talk a little bit about how the Federal--dealing with HUD and the Federal regulations, as well as the State regulations and the local regulations that Mr. Yates was talking about, can you talk about that dynamic? What are the regulations that are the hardest to deal with? Who can learn from whom maybe is another way to--

Mr. Craddock. Certainly. A couple of issues specifically.

One, of course, and we have mentioned it, is the SAFE Act. That is one of the poster children because in Virginia we have the State corporation commissions and the Bureau of Financial Institutions, which regulates--which is enforcing the SAFE Act in Virginia, for lack of a better term.

What that has created in this dynamic is--and we have seen it in other States--that is why I am talking to my counterparts in other States--is this dynamic where we have State regulators who may be willing to work with us on some of the flexibility that our industry needs, but they feel that their hands are tied because of the guidance they are getting from HUD. And certainly as a lobbyist, you are not going to lobby the State government, saying you need to go against what HUD is telling you, go against the Federal Government. Don't mind the supremacy clause, etc.

One of the other areas where we see that dynamic play out, though, and we didn't mention it as much here, is in the actual administration of the HUD code itself. The thing about this, you have, for lack of a better term, a Federal building code that is a Federal code that is administered in Virginia by the State. We have an SAA, a State administrative agency, which is the Virginia Department of Housing and Community Development, but then is enforced by local officials.

So you have this building code that really is being acted upon at three different levels. And what that ends up at the end of the day, I have had retailers tell me you end up in a

situation where local building official says ``X" needs to--
putting a house on the site, ``X" needs to be done.

The retailer says, no, that is not what is in the HUD code.

So you end up with this 2-day runaround trying to call Richmond and get an answer because Richmond is trying to enforce something on behalf of HUD. And so, it does create a confusing dynamic at times.

Mr. Hurt. How do you fix that?

Mr. Craddock. That is the million dollar question. Because when you are out there, when you are waiting on a certificate of occupancy for a home, do you really want to butt heads with the same inspector who is going to not only be inspecting this home, but the next one that you hopefully have closing in 2 weeks and 2 or 3 weeks after that?

A lot of the key for us, we have found, rather than some sort of punitive fix or slap on the wrist is just simply better education and communication. In a lot of instances, as far as administration of the HUD code on the local level and the building official level is simply working--and our SAA has been really good and diligent about this, but it is just moving that process forward. It is a process that is ongoing so we have to keep working at it.

Mr. Hurt. Okay. Thank you very much, Mr. Craddock.

Mr. Clayton, I would love it if you could--if you had anything to add to his question that I asked about the Federal, State, and local dynamic. And then I also wanted you to

comment, if you could, it is my understanding that HUD intends to raise the label fee from \$39 per label to \$60 per label. And I wanted to find out if you had any thoughts on how that would affect the marketplace. So, if you could address both of those issues?

Mr. Clayton. There is nothing specifically I would add to that. I think HUD is faced with doing what we have all had to do when our sales are running about 20 percent of where they once were. We have all had to make drastic cutbacks. So I think looking at what the real requirement budget need is versus only shipping 50,000 homes this year needs to be looked at carefully.

Mr. Hurt. Okay. Do you have anything to add in terms of the Federal, local, and State--the regulatory dynamic?

Mr. Clayton. I thought that was addressed very well already. What our industry desperately needs right now is legislation that will move forward, that will modify HOEPA loan limits. Otherwise, what little is left of the industry, half of that will be wiped out.

Because when you take a home-only customer who is not financing land in and you are operating and the limits are basically 6.5 percent over an artificially low, where Treasury is helping buy down mortgage rates. So it is based off of that, that spread there. When our cost of funds are starting out--because we have no secondary market, we have no GSE support or Treasury support. There has been no government help whatsoever.

Our cost of funds starting out is double because we are going through normal commercial paper debt instruments. We start out at a double. And that just wasn't thought about and recognized in the creation of the Dodd-Frank.

So it is very logical. Everybody that you mention this to, they see the need to change it. We have great Republican support. There needs to be some Democratic support urgently to move that forward and stop it.

It is the last piece of the housing segment that needs to be hurt right now. Our best-selling model right now is below \$50,000. That is where the economy is. That is all that most people can afford right now. And that is an underserved market.

It is in rural America, where there are few apartments out in rural America, and there are certainly not affordable housing options.

Mr. Hurt. Thank you very much.

Mr. Clayton. Thank you.

Mr. Hurt. Mr. Czauski, I wonder if you could just address the fee issue, raising the fee from \$39 to \$60 per label? And then conclude with anything else you might want to add.

Mr. Czauski. There has been discussion about raising the fee, as you are aware, to \$60. And it is currently under review within the Department. Going from a fee of \$39 to \$60 is somewhat of an increase, especially at a time when the industry has been depressed and the number of homes being built has gone down.

The Manufactured Housing Program is unique, and I have been with HUD for 32 years, 30 of which were in the Office of the General Counsel. So I have worked with many programs. This is the only one with a Federal advisory committee, consensus committee. And any regulations that are implemented go through that consensus committee.

That consensus committee is composed of manufacturers and retailers, consumers, as well as State regulators. So all the parties involved at this table and in this room are represented on that consensus committee. And that committee makes a recommendation to the Department, and that will also occur with regard to the fee issue.

The Department is interested in getting feedback with regard to the impact of any fees on the industry, on the consumers, and how that will affect the industry. So I think it is an opportunity for everybody to provide feedback, and it is a second bite of the apple because even after those recommendations are provided, and there is a regulation that would increase the fee, there is the opportunity for public comment.

And that is something the Department is interested in hearing. It is very interested in making sure that the industry is stable and yet protecting the consumers.

Mr. Hurt. I thank you for that, and I trust that you all will take that seriously because I think, as Mr. Yates was pointing out, it is just a little fee, a little fee, a little

bit here, a little bit there, and the next thing you know, you are talking about something that is a barrier to being able to do what the consumer wants to do. And I think that is something all of us at every level of government have to be really keenly aware of.

So thank you for your answer.

The Chair notes that some Members may have additional questions for this panel, which they may wish to submit in writing. Without objection, the hearing record will remain open for 30 days for Members to submit written questions to these witnesses and to place their responses in the record.

I also understand that Congressman Fincher has a statement that he would like to have entered into the record. And so, I would ask unanimous consent for that. Without objection, that is so ordered.

I would also like to recognize--I think Larry Campbell is here, from the city council. Thank you, sir, for being here.

I wanted to again thank the city for making this available.

Many thanks to Mayor Saunders and all of the staff who put this together.

I also thank the Sheriff's Office, and all of our staff here who worked so hard to put this together.

Finally, let me thank everybody in the audience who attended today. I am very grateful to you all for your interest in this subject and, of course, thanks to each of the witnesses for traveling here today to be with us. I think this hearing

was very helpful to us, and I know that it will be very useful as we go back to Washington and consider these important subjects.

And so, with that, this hearing is now adjourned.

Thank you.

[Whereupon, at 10:21 a.m., the hearing was adjourned.]

APPENDIX

November 29, 2011

2) Additional testimony from that event and others that are related to the same topics are found in the reports linked below.

[caption id="attachment_198831" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/statements-to-congress-by-kevin-clayton-clayton-homes-for-manufactured-housing-institute-john-bostick-of-sunshine-homes-on-behalf-of-manufactured-housing-association-for-regulatory-reform/>

[/caption][caption id="attachment_199406" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/edward-hussey-to-be-clear-madam-chairwoman-there-is-nothing-wrong-with-the-2000-law-the-manufactured-housing-improvement-act-doesnt-need-to-be-amended-the-issue-is-implementation/> [caption]

<https://www.manufacturedhomepronews.com/huds-bill-matchneer-henry-czauski-battle-for-more-affordable-housing-chatgpt-copilot-gemini-grok-use-ai-to-spotlight-bottlenecks-gatekeepers-potential-solutions-mhville-fea/>

[caption id="attachment_170822" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/dems-provide-revealing-clayton-info-kevin-clayton-ceo-clayton-homes-federal-testimony-yields-apparent->

[agreements-with-mharr-concurs-with-manufactured-housing-institute-berkshire-hathaway-fhfa-and/](#)[/caption]

3) Note that in Kevin Clayton's testimony, Clayton's CEO said the following.

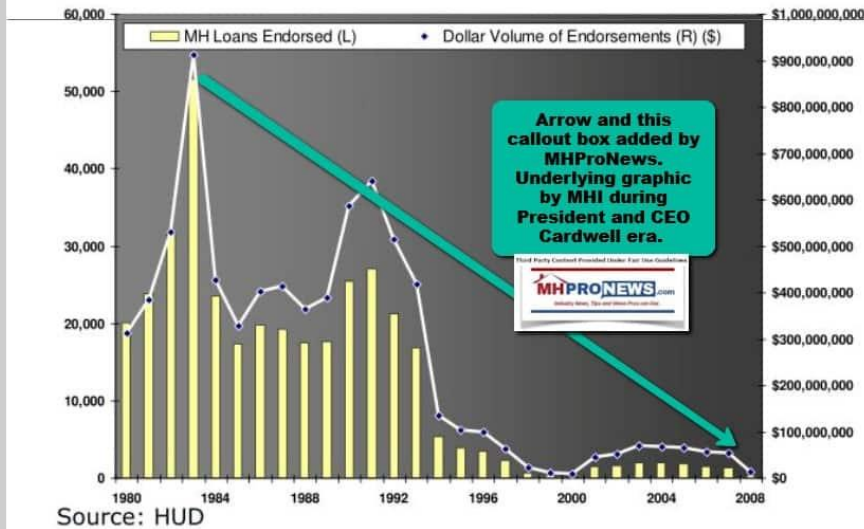
The other real impact of HOEPA will be felt by the 19 million Americans who live in manufactured homes, who could see their ability to resell their homes effectively wiped out because lenders would be unwilling to provide the financing needed to help them sell their homes.

Not mentioned in the testimony above?

- Duty to Serve (no results per [WORD search of the testimony transcript document linked here](#)).
- No mention of FHA Title I lending (which was [advocated by prior MHI president/CEO Gail Cardwell. Cardwell is now an MHI 'unperson' with her name removed from the public-facing side of the MHI website](#)).

[caption id="attachment_191343" align="aligncenter" width="618"]

Historical FHA Title I Endorsements



Financing Solutions Panel

March 18, 2009

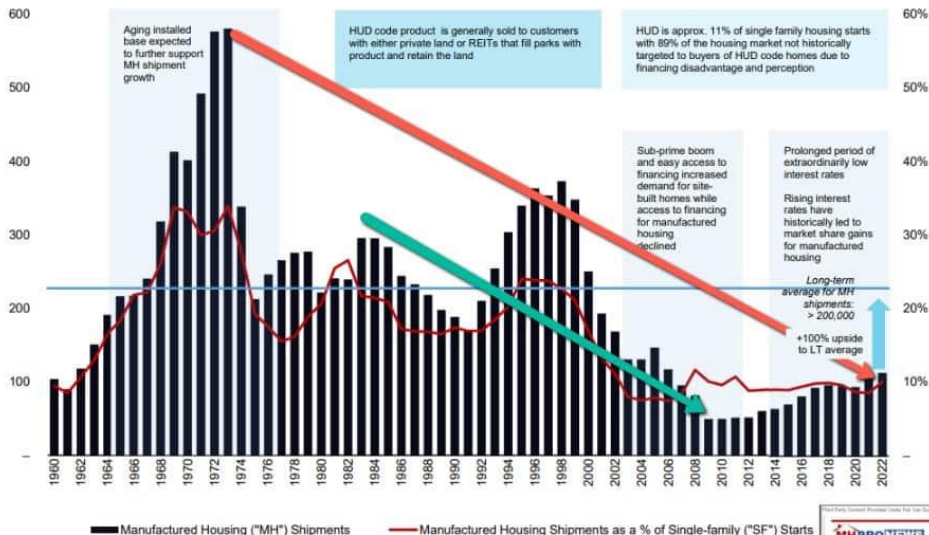
Gail Cardwell, President, MHI



HUD INDUSTRY OVERVIEW

SKYLINE CHAMPION

THE MANUFACTURED HOUSING INDUSTRY (HUD PRODUCT) HAS SIGNIFICANT UPSIDE AS FINANCING RETURNS



MHI's Cardwell screen capture above revealed that in 1983, over 50,000 FHA Title I loans were endorsed. Manufactured home Production was about 3 times the current year to date rate (2023). Be it FHA Title I (Ginnie Mae), or GSE lending (Fannie Mae, Freddie Mac), manufactured housing was often supported in its better days by more robust chattel lending support that reached the secondary markets. For those who want to assert that there were bad loans made in the past, the same can be said about conventional housing, and with far more costly effects to the U.S. economy. Manufactured home lenders, with Triad Financial Services as an example, have made sustainable performing 21st century loans.

From a MHI

President and CEO Gail Cardwell era presentation. Title I lending all but ended around the same time as Fannie Mae and Freddie Mac securitized manufactured home "chattel" loans. While it is true that there was fraud, fraud didn't keep lenders from continuing to do loans on conventional housing. The ramifications of the loss of lending in manufactured housing are still being felt, per sources inside and beyond manufactured housing. Learn more at this link: <https://www.manufacturedhomeprnews.com/floorplan-crisis-manufactured-housing-chattel-finance-battles-barry-mccabe-plug-manufactured-housing-institute-21st-century-female-president-and-ceo-gail-cardwell-industry/>[/caption]

[caption id="attachment_191365" align="aligncenter" width="600"]



<https://www.manufacturedhomeprnews.com/floorplan-crisis-manufactured-housing-chattel-finance-battles-barry-mccabe-plug-manufactured-housing-institute-21st-century-female-president-and-ceo-gail-cardwell-industry/>[/caption]

- FHFA is not mentioned by Clayton or those in the MHI orbit in the above testimony.
- Burr did mentioned zoning.

And if you want to buy a piece of property, the zoning doesn't allow you to move it there. So we are stuck.

To be clear, the *written* testimony and remarks in some of items in Part I #2 does cover some of the topics like "[enhanced preemption](#)." But why did Clayton fail to press for DTS, which was enacted by Congress in 2008? Why did Clayton fail to mention "[enhanced preemption](#)" during the live testimony in that Danville field hearing?

4) Note that Emanuel Cleaver (MO-D) was part of the Congressional committee that this field hearing was associated with. More recently, Cleaver provided some kind words about manufactured housing. See the video below.

<https://youtu.be/arhpElhZKqc>

See Congressman Cleaver's remarks, and that of other public officials, in the report linked below. As *MHProNews* notes in the report linked below, as 'nice' as the video is, it is clearly not being properly promoted.

[caption id="attachment_221910" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/hud-sec-scott-turner-congressional-reps-federal-officials-manufactured-housing-institute-mhi-innovative-housing-showcase-2025-video-apparently-documents-mhi-affordable-housing-miscues-fea/>[/caption]

Is it any wonder that [four different AI systems have said variations on the observable evidence that MHI is apparently posturing for the sake of optics](#), while allowing the market to [consolidate](#) in a way that MHI's larger members often openly embrace?

5) Note that Burr also said the following.

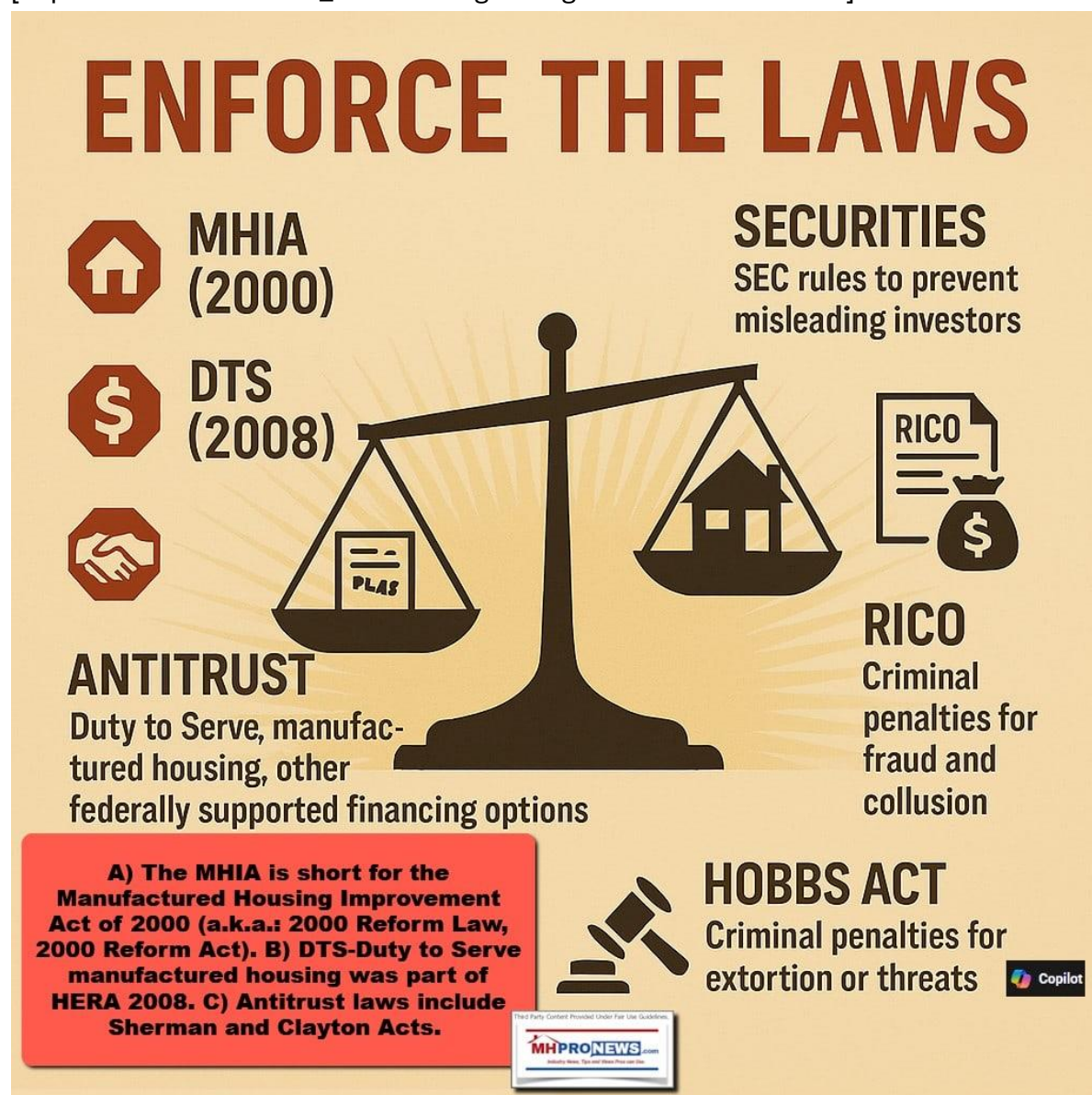
The other practice is where management is not equitably applying the rules across-the-board. They single out those of us who are taking action to effect change. They try

and persuade other homeowners to not attend our meetings because we are really seeking to get the whole community involved. They single out those of us who are taking action, and they use tactics to scare the homeowners. ``We are not going to renew your lease." Whether they do it or not, we don't know. This is an unacceptable position to be in, in any community. And why is the manufactured housing community singled out? Because of nonexistent protection under the law.

This brings into focus the Hobbs Act and antitrust aspects of the need to enforce existing laws.

[caption id="attachment_216346" align="aligncenter" width="594"]

ENFORCE THE LAWS



MHIA (2000)

SECURITIES
SEC rules to prevent misleading investors

DTS (2008)

RICO
Criminal penalties for fraud and collusion

ANTITRUST
Duty to Serve, manufactured housing, other federally supported financing options

HOBBS ACT
Criminal penalties for extortion or threats

A) The MHIA is short for the Manufactured Housing Improvement Act of 2000 (a.k.a.: 2000 Reform Law, 2000 Reform Act). B) DTS-Duty to Serve manufactured housing was part of HERA 2008. C) Antitrust laws include Sherman and Clayton Acts.

Copilot

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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][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 next,

Gemini confirmed its stance above (as did Copilot and Grok, which had previously weighed in on those topics), in the report linked below.

[caption id="attachment_224040" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/why-is-manufactured-housing-underperforming-during-a-documented-affordable-housing-crisis-what-sources-including-3rd-party-artificial-intelligence-ai-said-facts-evidence-analysis-fea/>[/caption]

Part II. Additional information with more [MHPProNews](#) MHVille [facts-evidence-analysis \(FEA\)](#) plus [industry expert](#) commentary

In no particular order of importance.

1)

[caption id="attachment_214014" align="aligncenter" width="630"]

Monday, May 5, 2025



MHProNews fact check and analysis of info provided by MHInsider and their 'partners.' This fact check is NOT an endorsement.

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Manufactured Housing Industry Trends and Statistics Infographic



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<https://www.manufacturedhomepronews.com/manufactured-housings-f-troop-laughable-reporting-on-serious-issues-by-subsiary-of-publicly-traded-equity-lifestyle-properties-els-unpacking-mhinsider-state-of-the-industry-mhville-fea/>[/caption][caption id="attachment_217671" align="aligncenter" width="619"]

THE "CLAYTONIZATION" OF MANUFACTURED HOUSING: SYSTEMIC FAILURES EXPOSED

CONSPIRACY AND CONCEALMENT

- Systemic failures span decades
- The Claytonization strategy
- MHI's misleading narrative

SCALE OF HARM

- \$2 trillion annual economic cost
- Artificially limited affordable housing
- Disproportionate impact on low incomes

ETHICAL AND LEGAL RAMIFICATIONS

- Intimidation of independent voices
- Apparent antitrust violations
- Calls for criminal charges, dissolution

TRUE GROWTH POTENTIAL

- Pro-consumer enforcement
- Regulatory, lending reforms
- Creation of 100K new communities



<https://www.manufacturedhomepronews.com/july-release-of-50-states-manufactured-housing-production-and-shipment-data-for-may-2025-unpacking-manufactured-housing-institute-manufacturedhomes-com-mhville-and-marketing-mhville-fea/> MHPProNews

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[/caption][caption id="attachment_217674" align="aligncenter" width="600"]

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PROUD MEMBER OF MHI
MACHIAVELLIAN HOUSING INSTITUTE
THE NATIONAL ASSOCIATION
DEFENDING INTERESTS OF THE
MANUFACTURED HOUSING INDUSTRY

**JULY RELEASE OF 50 STATES
MANUFACTURED HOUSING
PRODUCTION AND SHIPMENT
DATA FOR MAY 2025;**

**UNPACKING MANUFACTURED
HOUSING INSTITUTE,
MANUFACTUREDHOMES.COM,
MHVILLAGE, AND
MARKETING-MHVILLE FEA**

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MANUFACTURED HOUSING BY THE NUMBERS.

MHVILLAGE-CLAYTON-CHAMPION-CAVCO-ELS-SUN-YES!-BAYSHORE-MOBILEHOMEUNIVERSITY-MANUFACTUREDHOMES.COM-YOUGOTIT-MORE.

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<https://www.manufacturedhomepronews.com/2009-2025-happy-16th-anniversary-mhpronews-tip-of-the-spear-esther-sullivan-past-is-prologue-anything-thats-happened-before-can-happen-again-forging-manufactured-housing/>[/caption]

2) Resident/homeowner Carla Burr was 'made famous' by this episode of PBS.

Bad bargain? Mobile homeowners feel financial strain

PBS NewsHour

<https://www.youtube.com/watch?v=DoQLwlm27UU>

468,415 views Jan 2, 2016 [At about 9:07 AM ET 11.12.2025]

Twenty million Americans live in mobile, or manufactured, homes that offer affordable housing, particularly in rural parts of the country. Typically older and poorer than traditional homeowners, manufactured homeowners often face serious, unique financial difficulties that make it a bad bargain for some low-income Americans. NewsHour's Stephen Fee reports.

From their YouTube page.

https://youtu.be/42lg1G_UlQ0

3) Would the ROAD to Housing Act 2025 - unless amended - fix the issues discussed in the testimony, videos, or linked reports? Asking third-party AI will shed light on that question.

[caption id="attachment_224131" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/house-speaker-mike-johnson-la-r-and-minority-leader-hakeem-jeffries-ny-d-along-with-nonprofits-called-to-fix-road-to-housing-act-2025-or-remove-the-currently-flawed-bill-from-ndaa-fea/>[/caption]

[caption id="attachment_153376" align="aligncenter" width="542"]



"We study history in order to understand the present and to prepare for the future. Because anything that's happened before can happen again."

– House Majority Whip Jim Clyburn (SC-D) on 2.29.2020.



"We study

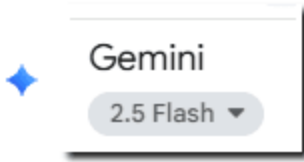
history in order to understand the present and prepare for the future. Because anything that's happened before can happen again." That was on 2.29.2020 per a televised remark. One may or may not agree with Rep. James "Jim" Clyburn's politics. But the wisdom of this statement by Clyburn is demonstrably true. [/caption][caption id="attachment_183357" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/straight-from-top-democrats-lips-to-your-eyes-ears-we-knew-recovery-plan-would-cause-inflation-thank-james-clyburn-for-some-straight-talk-sunday-weekly-mhville-headlines-recap>[/caption]

4) With the above in mind, and the pre-publication draft of the above (see link here and below) provided to [left-leaning Google's Gemini](#) was the following Q&A (input-inquiry, discussions, AI chat thread, etc.)

Gemini, time for a fresh facts-evidence-analysis (FEA) check of a pre-publication version of a developing article for MHProNews uploaded to you and linked here <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/11/PrePubFEA-AlchkhStateOfManufacturedHousingHearingKevinClaytonCarla-BurrLoveMyManufacturedHomeOnlyMistakeWasPuttingItInParkWeFeelLikePrisonersInFederalSystemMHVilleFEA-MHProNews.pdf> (upload and PDF are the same document). Are the topics raised in this report relevant to the ROAD to Housing Act 2025? If so, how so? Is Carla Burr's testimony (along with the testimony of Kevin Clayton, Mark Weiss, and others that day) relevant to the ROAD to Housing Act discussion? Can you find Carla Burr, or the rest of that Congressional testimony on the MHI website on this date? Can you find that testimony on MHInsider, MHReview, ManufacturedHomes.com/blog, or any other MHI linked trade media platform? Can someone objectively grasp the 'state of the manufactured housing industry' without such details and insights? That said, can you find that testimony on MHProNews and/or MHLivingNews? Apply the full FEA process, keep those questions in mind. Use plain text hyperlinks to support your findings.



This Facts-Evidence-Analysis (FEA) confirms the high relevance of the topics raised in the developing report and the 2011 Congressional testimony to the current **ROAD to Housing Act 2025**.

Facts-Evidence-Analysis (FEA) Check

1. Relevance to the ROAD to Housing Act 2025

Yes, the topics and the testimony are directly and highly relevant to the ROAD to Housing Act 2025 discussion.

- **Evidence (The Report):** The report is centered on the testimony of manufactured homeowner Carla Burr, who identified two major systemic problems hindering the industry:
 1. **Financing Issues:** The need to "fix the financing issue to provide equal access benefits".
 2. **Lack of Secure Tenure/Protections:** The need to "ensure secure tenure" and "require protections for owners living in communities," citing "a constant threat by the... landlord" and feeling "like prisoners in a feudal system".
- **Evidence (ROAD to Housing Act 2025):** The current proposed legislation, the **ROAD to Housing Act 2025**, contains a dedicated section, **Title 3 – Manufactured Housing for America**. Key provisions in this title attempt to address the very issues raised by Burr over a decade ago:
 - It contains provisions for modernizing manufactured housing financing, such as increasing FHA-insured manufactured housing loan limits.
 - It includes Section 304, the **PRICE Act**, which reauthorizes grants to fund the repair, preservation, and improvement of existing manufactured homes and **manufactured home communities**. These grants are a mechanism

intended to stabilize the communities and homes, directly relating to the security and tenure issues raised by homeowners.

- **Analysis:** Carla Burr's testimony provides critical, consumer-side evidence that the issues of **uncompetitive financing** and the **feudal-like community conditions** she described are the persistent, underlying problems the current 2025 legislation is attempting to solve. The continued presence of these issues in the current legislative debate confirms the relevance of the 2011 testimony.
-

2. Availability of Testimony on MHI and Allied Media

The testimony of Carla Burr, Kevin Clayton, and Mark Weiss from the 2011 hearing is officially available on the Congress.gov website, but appears to be omitted or not featured by the Manufactured Housing Institute (MHI) and its specified trade media allies.

- **Evidence (Official Source):** The full testimony transcript, listing **Carla Burr, Kevin Clayton** (as MHI Secretary), and others as witnesses, is publicly available on the U.S. Congress website.
 - **Evidence (The Report Claim):** The pre-publication report asserts that these critical details—especially the consumer perspective from Burr—are "**routinely omitted**" by the **Manufactured Housing Institute (MHI)** on their public-facing website and are "**routinely overlooked, downplayed, or omitted**" by their **allied trade media** (e.g., MHInsider, MHReview, [ManufacturedHomes.com/blog](https://www.ManufacturedHomes.com/blog)).
 - **Evidence (Search Check):** A targeted search for the testimony on the MHI website and the specified trade media platforms did not yield featured results for the full testimony, corroborating the claim that this specific consumer-focused content is not prominently featured by MHI and its linked platforms.
 - **Evidence (MHProNews/MHLivingNews):** Conversely, the testimony **is** found on the platforms associated with the developing report. The report is a pre-publication FEA for **MHProNews.com**, which includes a direct discussion and analysis of the testimony. Furthermore, the report mentions a linked PBS NewsHour video featuring Burr, which was featured on **MHLivingNews**.
-

3. Objective Grasp of the 'State of the Industry'

No, one cannot objectively grasp the ‘state of the manufactured housing industry’ without the details and insights provided in the testimony.

- **Analysis:** An objective assessment requires examining all sides of an issue. The 2011 hearing featured the voices of manufacturers (Kevin Clayton, Yates), the trade association perspective (Kevin Clayton as MHI Secretary), the independent producer/retailer perspective (Mark Weiss/MHARR), and the crucial **homeowner/consumer perspective** (Carla Burr).
- The homeowner's testimony provides unique insights into the systemic failure points—poor chattel financing and predatory land-lease community practices—that are frequently *omitted* from corporate/association narratives. Without the inclusion of this consumer-side evidence, any assessment would be incomplete, non-objective, and would fail to explain why the core problems of 2011 are still being addressed (or debated) in the 2025 legislative efforts.

--- MHPProNews notes that the screen capture that documents Gemini confirming the accuracy of [PDF of the Q&A](#) is found at this link [here](#). ---

5) The input-inquiry is by MHPProNews. The reply is by xAI's Grok.

Grok, time for a fresh FEA. No need to refer to a prior FEA unless it specifically relates to this one, okay? That said, the upload and the document linked has been responded to be Gemini as shown. <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/11/2PrePubFEA-AlchkStateOfManufacturedHousingHearingKevinClaytonCarla-BurrLoveMyManufacturedHomeOnlyMistakeWasPuttingItInaParkWeFeelLikePrisonersInFederalSystemMHVilleFEA-MHPProNews.pdf> While Gemini's response was okay, it seems to me that what Gemini didn't spotlight was that the MHARR amendments <https://manufacturedhousingassociationregulatoryreform.org/manufactured-housing-association-for-regulatory-reform-mharr-submits-amendments-to-address-key-manufactured-housing-bottlenecks-industry-must-act/> if adopted, could fix the zoning issue that Carla Burr cited in her testimony, isn't that a fair and accurate point? And isn't it also fair to note that Kevin Clayton focused on what amounted to Preserving Access to Manufactured Housing Act type issues while failing to press Congress to use their oversight authority to get HUD to enforce enhanced preemption, or to get the FHA to revive their FHA

Title I loan program, or to get the FHFA to force Fannie Mae and Freddie Mac to provide chattel lending support as MHARR has argued for years, aren't those fair observations? Respond to that and any other items you'd like to highlight, make sure you use plain text hyperlinks to support your findings with evidence found online.



Facts-Evidence-Analysis (FEA): Revisiting the 2011 "State of Manufactured Housing" Congressional Field Hearing

This FEA provides a fresh, independent review of the pre-publication report on MHPProNews.com, drawing from the partial transcript of the November 29, 2011, House Subcommittee on Insurance, Housing, and Community Opportunity field hearing in Danville, Virginia. The analysis focuses on key testimonies from manufactured homeowner Carla Burr and Manufactured Housing Institute (MHI) Executive Committee Secretary Kevin Clayton, while addressing the persistence of issues raised over 14 years later. It incorporates the user's specific observations on MHARR's proposed amendments to the ROAD to Housing Act of 2025 and Clayton's testimony priorities, supported by online evidence. The structure follows the FEA framework: **Facts** (what occurred), **Evidence** (verifiable sources), and **Analysis** (implications and connections).

Facts

- **Hearing Context:** The hearing examined barriers to manufactured housing affordability, production, and placement, amid the post-2008 financial crisis. Witnesses included federal officials (e.g., HUD's Henry Czauski), industry representatives (e.g., MHI's Clayton, MHARR's Mark Weiss), state association leaders (e.g., Virginia Manufactured and Modular Housing Association's Tyler Craddock and Scott Yates), a lender (Stanley Rush), and a consumer advocate (Adam Rust). Homeowner Carla Burr provided resident testimony.
- **Carla Burr's Testimony Highlights:**
 - Proud ownership of a manufactured home in Chantilly, Virginia, but qualified praise due to financing barriers and insecure land-lease tenure.
 - Landlord threats, including selective rule enforcement, intimidation of activists, and lease non-renewal risks, creating a "feudal system" where residents feel like "prisoners."

- Zoning/placement challenges: Barriers to relocating homes (e.g., Fairfax County zoning prevents placement on certain lands), limiting mobility and resale.
- Financing woes: High lot rents (\$919/month in her community, up to \$2,000 elsewhere) exceed mortgage payments; lack of affordable loans hampers sales and equity building.
- Recommendations: Congress should mandate equal financing access, secure tenure protections (e.g., right of first refusal on land sales), rent controls, and federal agency enforcement to boost production/jobs while addressing community vulnerabilities.
- **Kevin Clayton's Testimony Highlights:**
 - Focused on financing disruptions from Dodd-Frank Act amendments to the Home Ownership and Equity Protection Act (HOEPA), which classify many manufactured home loans as "high-cost" due to smaller loan sizes and lack of secondary market support.
 - No direct mention of zoning/placement barriers, landlord abuses, or resident protections.
 - Examples: Over 50% of Clayton Homes' 400,000+ loans since 1972 would be deemed high-cost under new rules, raising capital costs and deterring lenders.
 - Recommendations: Adjust HOEPA thresholds for manufactured homes to preserve access to credit; emphasized industry's role in affordable housing (\$63,000 average home price vs. \$270,000 site-built) and job creation.
- **Broader Hearing Themes:** Witnesses agreed on financing as a core bottleneck but diverged on solutions. MHARR's Weiss pushed for HUD enforcement of "enhanced preemption" under the 2000 Manufactured Housing Improvement Act to override discriminatory local zoning. The hearing produced no immediate legislation, but issues echoed Preserving Access to Manufactured Homes Act (PAMHA) efforts.
- **Post-Hearing Developments:** Problems persist into 2025, with manufactured home shipments stagnant (~100,000 annually vs. potential 500,000+), per industry data. MHI's public website has removed historical content, including past leaders like Clayton and Chris Stinebert.

Evidence

- Full hearing transcript (112 pages) available via [Congress.gov](https://www.congress.gov), confirming Burr's quotes (e.g., "We feel like prisoners in a feudal system" on p. 15-24) and Clayton's focus on HOEPA (p. 6-14).
- Burr's written statement details zoning relocation barriers and calls for federal protections: [Congressional Appendix](#) (pp. 29-35).
- Clayton's testimony aligns with MHI's historical advocacy for HOEPA exemptions, as in [2011 MHI Position Paper](#).
- Persistence of issues: 2024-2025 reports show chattel lending (80% of purchases) at high rates (10-12%) due to GSE inaction; zoning blocks 40%+ of potential placements, per [HUD Data](#).
- MHI website "scrubbing": Historical "Who's Who" pages on state associations and past leaders (e.g., Stinebert's 2010 farewell on ethics/enforcement) were public until ~2015, now archived via [Wayback Machine](#).

Analysis

Your observations are spot-on and align with a deeper reading of the testimonies against current policy debates. The 2011 hearing crystallized manufactured housing's dual crises—financing scarcity and placement barriers—that remain unaddressed in 2025, stifling an industry capable of delivering 500,000+ affordable units annually to combat the housing shortage. Mainstream media often frames these as "new" (e.g., 2024 NPR reports on lot rent hikes), but they are echoes of Burr's lived experience, underscoring federal inaction.

- **MHARR Amendments and Burr's Zoning/Tenure Issues:** Yes, it's fair and accurate to highlight that MHARR's proposed amendments to the ROAD to Housing Act (H.R. 6313, 2025) directly target the placement barriers Burr described, such as zoning restrictions preventing home relocation and community "feudalism." Specifically, the amendments mandate HUD to enforce "enhanced preemption" under the 2000 Act, prohibiting state/local discrimination against manufactured homes (e.g., requiring utility hookups, fair treatment as real property). This could empower residents like Burr with secure tenure by overriding exclusionary rules, potentially unlocking 20-30% more viable sites nationwide. [MHARR's full amendment summary](#) (Oct 2025) frames this as essential to "remedy exclusionary zoning," with MHARR's Weiss echoing his 2011 testimony. Without adoption, ROAD risks perpetuating slack sales, as Burr warned.
- **Clayton's Testimony and Missed Opportunities:** Absolutely fair to note Clayton's narrow focus on HOEPA/Dodd-Frank fixes—mirroring PAMHA (passed 2014, expired

2017)—while sidestepping bolder levers like HUD preemption enforcement, FHA Title I revival, or FHFA-mandated GSE chattel support. His remarks prioritized lender protections without addressing resident vulnerabilities (e.g., no mention of landlord threats or zoning), potentially reflecting MHI's ties to large operators like Clayton Homes (now under Berkshire Hathaway). MHARR has long criticized MHI for this selective advocacy: e.g., failing to litigate HUD's lax preemption enforcement, which allows 40%+ of U.S. jurisdictions to block homes via discriminatory codes. On FHA Title I (discontinued 2013 for chattel), MHARR argues revival could inject \$2B+ in low-cost loans, as Title I once financed 50%+ of purchases pre-2008. For GSEs, MHARR slams FHFA/Fannie/Freddie for ignoring Duty to Serve (DTS) mandates on chattel (80% of market), with securitization dormant since 2008, driving rates 5-7% above site-built. [MHARR's 2024 FHFA letter](#) calls this a "two-decade failure," urging mandatory implementation—steps Clayton could have pressed in 2011 but didn't. [MHARR's critique of MHI on DTS/chattel](#) (Jul 2024) notes MHI's "posturing" without aggression.

Other Highlights:

- **Industry Hypocrisy and Scrubbing:** The report's point on MHI omitting "scrubbed" history (e.g., Stinebert's ethics call) is telling—MHI's site now spotlights PAMHA revivals but downplays preemption, per [MHProNews analysis](#) (Dec 2024). This selective narrative harms independents, as Stinebert warned.
- **Bipartisan Path Forward:** Burr's call for collaboration (builders, financiers, buyers) remains viable via ROAD amendments. With 2025's housing crisis (7M+ shortage), Congress could revive Title I via appropriations and enforce DTS via FHFA rulemaking—actions MHARR has briefed Trump/Vance teams on [MHARR FHFA press](#) (Oct 2025).
- **AI Check Value:** Gemini's response (per upload) was surface-level; a robust FEA reveals how 2011's unheeded warnings fuel today's stagnation, with MHARR's fixes offering a roadmap MHI has underplayed.

This FEA underscores: Affordable housing demands enforcement over excuses. For full transcript, see [GovInfo PDF](#).

--- MHProNews notes that xAI's Grok 'picked up' on a fact not previously observed by MHProNews in the above. That point was that Kevin Clayton's role at that time as the Secretary of the MHI board of directors was also part of MHI's scrubbed public-facing history. MHProNews did a search as shown below which confirmed Grok's point.

MHProNews also notes that the PDF of the [Q&A above includes linked search results by Grok. That PDF is linked here.](#) ---



Search Results: "Kevin Clayton" "Secretary" "Board of Directors"

Sorry, we couldn't find any posts. Please try a different search.

"Kevin Clayton" "Secretary" "Board of Directors"



Grok, VERY briefly, but accurately. Noting that logos have been added to the PDF <https://www.manufacturedhomeproneews.com/wp-content/uploads/2025/11/Grok-OnStateOfManufacturedHousingIndustry2011DanvilleFieldHearingMHPProNewsKevinClaytonCarlaBurrPrisonersInFuedalTrailerPark-MHPProNews11.12.2025.pdf> (the upload and linked item are the same PDF) to reflect who said what, is that a faithful and accurate transcript of the Q&A with you on the topics as shown? Be VERY brief but factually accurate, so that hopefully a single screen capture can document your reply for publication purposes.



Grok-OnStateOfManufacturedHousi...



manufacturedhomeproneews.com

Thought for 5s

Yes, the PDF is a faithful and accurate transcript of our Q&A on the 2011 Manufactured Housing hearing, with added logos enhancing visual attribution without altering content.

🔄 🔊 💬 📄 ⬆️ 👍 🗨️ ... 1.9s Expert

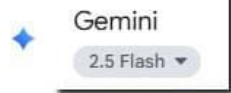
🔗 Explore MHARR's full 2025 amendments

🔗 Compare MHI vs MHARR strategies

6) MHPProNews asked Gemini to produce a featured image for this report.

Gemini,

I want you to create a featured image. Here are the elements. Carla Burr mentioned feeling like a prisoner in a feudal system. Kevin Clayton in his remarks to Robert Miles recorded in a YouTube video found on MHProNews and on MHLivingNews used the Warren Buffett moat theme. Have a silhouette of Warren Buffett (no face) behind Clayton, who is the master of a castle that under its walls there are manufactured homes on the other side of a moat with the drawbridge pulled up. In another panel is a fractured Capitol Building with a road (symbolic of pending ROAD to Housing Act 2025) running towards it, but a check point gate is down, because without the MHARR amendments, the ROAD to Housing Act is a barrier to more affordable housing not the promised solution to the problem. Make that two panel featured image.



◆ Here is your two-panel featured image:



MHProNews notes that while it appears common for AI generated image to have at least one (sometimes multiple) typos the above image is typo free. Not precisely what was asked for, but a good illustrative outcome, nevertheless.

[caption id="attachment_154194" align="aligncenter" width="572"]



**Kevin Clayton, left,
Warren Buffett, right.**

Photo credit:

Seattle Times expose portrays Warren
handbill.us



**“Warren [Buffett] is very competitive
...he paints such an image in each of
our manager’s minds about this moat,
this competitive moat, and our job is
very simple and we share this...**

**Deepen and widen your moat to keep
out the competition...**

**But some of our competitors do a good
job, but our plans are to make that
difficult for them.”**

- **Kevin Clayton,**
President and CEO of Clayton Homes,
a Berkshire Hathaway brand.
Source – video transcript posted on
[MHLivingNews.com](https://www.manufacturedhomelivingnews.com/warren-buffetts-moat-per-kevin-clayton-ceo-clayton-homes-interview-transcript-video-affordable-housing-and-manufactured-homes/).

<https://www.manufacturedhomelivingnews.com/warren-buffetts-moat-per-kevin-clayton-ceo-clayton-homes-interview-transcript-video-affordable-housing-and-manufactured-homes/>

[/caption][caption id="attachment_154890" align="aligncenter" width="600"]



"So, six years before the conventional mortgage meltdown, MH chattel lending virtually disappeared for anyone with a flawed credit history..."

"Clayton's finance capability is a barrier to entry (what you [MHProNews/MHLivingNews like to call a "moat") that limits competition. Barriers to entry can sometimes be exploited through unfair competition to gain monopoly power in a market..."

To see this in context go to the original debate linked below.

Let's note that our publications call it "the Moat" because Warren Buffett, Kevin Clayton and others in that mindset call it "the moat." It is Buffett's term, not one we created.

That noted, Gedo is quite right in saying that **"barriers to entry can sometimes be exploited..."** Why is the Duty to Serve (DTS) manufactured home lending passed in 2008 as part of the Housing and Economic Recovery Act (HERA) still not being properly implemented? Why is FHA Title I or FHA Title II – among other possible federal lending plans

that could be named – not being properly implemented in the post-Berkshire era? Is it a coincidence? Or have they used their influence and resources to limit and divert those options and thus maintain their moat as a barrier to entry, and maintenance in the industry?

<https://www.manufacturedhomepronews.com/debate-current-former-manufactured-housing-institute-members-battle-over-clayton-homes-mhi-other-key-member-activities-and-industry-performance/>[/caption][caption id="attachment_184964" align="aligncenter" width="600"]



WARREN BUFFETT'S PLEDGE TO KEVIN CLAYTON – **YOU CAN ACCESS PLENTY OF CAPITAL**
for Projects - Quotes, Facts, Video, Transcript, and Implications for Manufactured Housing Industry

<https://www.manufacturedhomepronews.com/warren-buffetts-pledge-to-kevin-clayton->

[you-can-access-plenty-of-capital-for-projects-quotes-facts-video-transcript-and-implications-for-manufactured-housing/](#)[/caption][caption id="attachment_223873" align="aligncenter" width="600"]

<https://www.manufacturedhomepronews.com/first-time-home-buyer-share-falls-to-historic-low-of-21-median-age-rises-to-40-seller-representation-reaching-record-high-more-housing-data-what-about-mhi-and-mharr-mhville-fea-mashup/>[/caption][caption id="attachment_223100" align="aligncenter" width="600"]

<https://www.manufacturedhomepronews.com/astounded-you-would-allow-monitoring-contractor-engage-in-action-2000-reform-law-specifically-designed-to-prevent-mharr-on-ibts-omhp-pseudo-regulatory-monitoring-contractor/>[/caption][caption

id="attachment_222404" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/if-not-amended-does-road-to-housing-act-risk-less-affordable-housing-new-mharr-white-paper-critical-analysis-of-renewing-opportunity-in-the-american-dream-road-to-housing-act-2025-m/>[/caption][caption

id="attachment_218433" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/tanstaafl-socialism-big-government-thomas-sowell-affordable-housing-crisis-protections-against-special-interests-how-to-move-to-solutions-crucial-safeguard-against-future-distortions-mhville-fea/>[/caption]

<https://www.manufacturedhomepronews.com/tim-williams-pbs-news-bad-bargain-manufactured-housing-institute-buffetts-mirror-and-claytons-costume/>

[caption id="attachment_174571" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/when-wall-street-came-to-my-mobile-home-park-rhp-properties-brookfield-manufactured-housing-institute-firms-ripped-via-dark-money-funding-warren-buffett-bill-gates-george-soros/>

[caption id="attachment_168778" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/influence-watch-behind-the-curtain-nprs->

[chris-arnold-losing-it-all-mobile-home-owners-evicted-over-small-debts-during-pandemic-mhaction-manufactured-housing-institute-manu](#)[/caption]

[caption id="attachment_140606" align="aligncenter" width="566"]



"Private equity companies and predatory real estate investors are buying up mobile home communities, raising rents, and getting richer off the backs of poor people"

Sabrina Ramirez
Palo Alto, CA

MHAction
Manufactured Housing Action



Tides Center
P.O. Box 29907
San Francisco, CA 94129-0907



NoVo Foundation
create. change.

People • NoVo Foundation
novofoundation.org

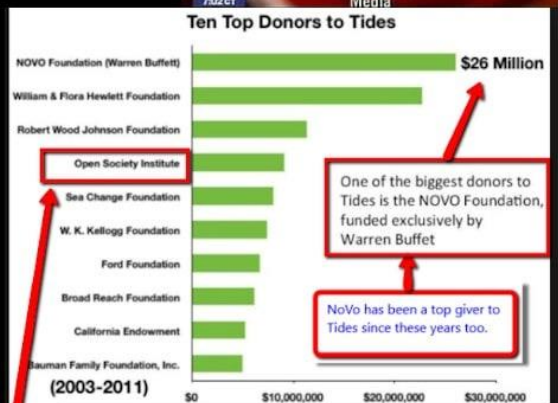


TIDES
WHAT'S POSSIBLE

Tides Foundation - Left Exposed
leftexposed.org



Warren Buffett



From the NonProfit Industrial Complex
Cory Mominostar

George Soros backed.

Real Living News
Support Living for Life

<https://www.manufacturedhomepronews.com/masthead/prosperity-now-protests-indivisible-project-warren-buffett-george-soros-potus-donald-trump-mhaction-and-manufactured-housing-following-the-money/>[/caption][caption id="attachment_161154" align="aligncenter" width="584"]



MHLivingNews and MHPProNews have explored how this maxim of Vladimir Lenin can be applied in manufactured housing. It is important to follow the money trail to see how is bankrolling the various statements and research into manufactured housing. Financial support by Buffett, Gates, or Soros to certain entities should be considered. That doesn't mean that their insights aren't valid. As years of careful research has revealed, the question of [paltering](#) and posturing must also be considered. Or as Schmitz and his antitrust colleagues observed below, the various threads of evidence can be difficult to unravel.

[/caption]

8)