



Gemini, <https://www.novoco.com/search/?query=manufactured+housing>. My impression is that Novogradac is focused on work for interests that don't necessarily align with those in the HUD Code manufactured housing industry that are looking for robust organic growth, such as the Manufactured Housing Association for Regulatory Reform (MHARR). In whatever online searches you deem warranted, do you see any evidence of Novogradac doing advocacy on enforcing the Manufactured Housing Improvement Act of 2000 and its enhanced preemption provision? Do you see Novogradac supporting the full and robust implementation of the Duty to Serve for single family HUD Code manufactured home financing purposes, as Congress intended in HERA 2008, or is Novogradac more interested in LIHTC, and other programs that may contradict the principles explored here: <https://www.manufacturedhomelivingnews.com/tanstaaf-l-socialism-big-government-thomas-sowell-affordable-housing-crisis-protections-against-special-interests-how-to-move-to-solutions-crucial-safeguard-against-future-distortions-mhvillefea/> ? Has Novogradac signed onto letters with mainstream housing groups that may have cut against the grain of interests for organic and robust HUD Code manufactured housing industry growth? Provide plain text hyperlinks to support your findings and do whatever online searches are needed to discern Novogradac's stance on manufactured housing in a practical and pragmatic support in terms of moves that would boost organic industry growth, vs. merely polite lip service as periodically occurs with some groups with respect to modern manufactured home



Based on an analysis of Novogradac's public advocacy, research, and publications, there is a clear distinction between their focus and the priorities of organizations like the **Manufactured Housing Association for Regulatory Reform (MHARR)**.

Novogradac's expertise and advocacy are primarily centered on the **Low-Income Housing Tax Credit (LIHTC)** and other federal tax incentive programs, rather than the regulatory and organic growth issues specific to the HUD Code manufactured housing industry.

1. Advocacy on the Manufactured Housing Improvement Act of 2000

There is no significant evidence that Novogradac actively advocates for the enforcement of the **Manufactured Housing Improvement Act of 2000**, specifically regarding its "enhanced preemption" provision.

- **MHARR Focus:** MHARR consistently pushes for the "broad and liberal" construction of federal preemption to override local zoning barriers that restrict HUD Code homes.¹
- **Novogradac Focus:** Novogradac's legislative advocacy (often through its "LIHTC Working Group") focuses on the **Affordable Housing Credit Improvement Act (AHCIA)** and expanding the reach of the 4% and 9% tax credits. Their manufactured housing coverage typically treats the homes as a component of larger, subsidized rental or community projects rather than as a standalone solution for organic, single-family homeownership growth.

2. Duty to Serve (DTS) and Single-Family Financing

While Novogradac comments on the **Duty to Serve (DTS)**, their perspective often leans toward how DTS can support LIHTC and rental preservation rather than the "chattel" (personal property) loans that MHARR argues are essential for industry growth.

- **LIHTC Over DTS:** In formal comments to the FHFA, the Novogradac LIHTC Working Group has recommended that Fannie Mae and Freddie Mac be allowed to **re-enter the LIHTC market** and receive DTS credit for LIHTC equity investments.
- **Organic Growth Disconnect:** MHARR and other industry advocates argue that the 2008 HERA mandate requires the GSEs to support the *entire* manufactured home market, including the approximately 80% of homes financed as personal property.² Novogradac's focus on "affordable housing preservation" and "rental housing" often aligns with the GSEs' preference for real property or multi-family transactions, which some argue ignores the "organic" market of individual home buyers.
- **Reference:** [Novogradac LIHTC Working Group - FHFA DTS Comment Letter](#)

3. Alignment with Mainstream Housing Groups

Novogradac frequently signs onto letters and supports initiatives with mainstream groups like the **Action Campaign** and the **Affordable Housing Tax Credit Coalition (AHTCC)**.

- **Conflicts of Interest:** These groups prioritize the expansion of subsidized rental housing.³ Critics in the manufactured housing space, such as those cited in your provided link (referencing Thomas Sowell's principles), argue that these "Big Government" programs often favor special interests and developers over the cost-efficient, market-driven growth of the HUD Code industry.
- **Resource Focus:** Novogradac's "Tax Credit Tuesday" and various handbooks (e.g., *Tax-Exempt Bond Handbook, LIHTC Year 15 Handbook*) demonstrate a business model built on the complexity of government-subsidized programs, which is fundamentally different from the "organic growth" model focused on deregulation and private-market financing.

Summary Table: Advocacy Comparison

Feature	Novogradac Focus	MHARR / Organic Growth Focus
Primary Tool	LIHTC / Tax-Exempt Bonds	HUD Code / Private Financing
Preemption	Minimal to no visible advocacy	Central pillar of advocacy
DTS Priority	LIHTC equity credit / Preservation	Chattel loan support / Single-family
Housing Model	Subsidized Rental / Multi-family	Affordable Homeownership
Growth Driver	Government Incentives	Regulatory Reform (Removing Bottlenecks)

Would you like me to draft a comparison section for your article that highlights the specific differences in how these two entities define "affordable housing success"?

By the way, to unlock the full functionality of all Apps, enable [Gemini Apps Activity](#).

Sources



[Manufactured Housing Association for Regulatory Reform](#)

manufacturedhousingassociationregulatoryreform.org

[Manufactured Housing Association for Regulatory Reform \(MHARR\) Submits Amendments to Address Key Manufactured Housing Bottlenecks – Industry Must Act](#)

[\(1\) To compel HUD to fully enforce the enhanced federal preemption of the Manufactured Housing Improvement Act of 2000 to “prevent, prohibit and remedy the ...](#)



[Manufactured Housing Association for Regulatory Reform](#)
manufacturedhousingassociationregulatoryreform.org

[MHARR Presents Comments at Federal Housing Finance Agency Duty To Serve “Listening Session”](#)

[While FHFA sought to target the listening session toward manufactured housing community “tenant lease protections,” MHARR, in its comments, again stressed the ...](#)



[The Affordable Housing Tax Credit Coalition](#)
www.taxcreditcoalition.org

[Affordable Housing Credit Improvement Act Reintroduced in the House with 100+ Cosponsors](#)

[According to recent estimates from Novogradac, the legislation would finance 1.6 million more urgently needed affordable rental homes in the next decade than ...](#)

--- MHProNews notes that the screen capture that documents the accuracy of the above is linked below. ---

<https://www.manufacturedhomepronews.com/wp-content/uploads/2026/01/GeminiOnNovogradacAndManufacturedHousing1.7.2026MHProNews-scaled.png>

Geminis: <https://www.novocoo.com/search/>

query=manufactured-housing. My impression is that Novogradac is focused on work for interests that don't necessarily align with those in the HUD Code manufactured housing industry that are looking for robust and effective regulation and enforcement.

Housing Association for Regulatory Reform (MHARR). In whatever online searches you deem warranted, do you see any evidence of Novogradac doing advocacy on enforcing the Manufactured Housing Improvement Act of 2000 and its enhanced preemption provision? Do you see Novogradac supporting the full and robust implementation of the Duty to Serve for single family HUD Code manufactured home financing purposes, as Congress intended in HIRA 2008, or is Novogradac more interested in LHTC, and other programs that may concern the manufactured housing industry?

<https://www.manufactured-housing-reform.com/statement-affordable-housing-crisis-protection-against-special-interests-how-to-move-to-solutions-crucial-safeguard-against-future-distortion-millie-feal/>

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◆ Gemini 3 (5)

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- **LHTC Working Group:** In former comments to the FHFA, the Novogradac LHTC Working Group recommended that Fannie Mae and Freddie Mac be allowed to re-enter the LHTC market and receive DTS credit for LHTC equity investments.

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• **Reference:** [Novogradac LHTC Working Group - FHFA DTS Comment Letter](https://www.novocoo.com/search/)

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SOURCES

Sources X

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From: <https://www.novocoo.com/>