

Pre-publication draft for submission to third-party artificial intelligence (AI) for facts-evidence-analysis (FEA) check for a developing report on MHPProNews.

Punchbowl-'Housing Effort Back in Crucible.' MHARR Analysis Reveals Serious Questions Regarding Pending Federal Housing Legislation. MHARR Fact Sheet on 21st Century ROAD to Housing. Mashup-FEA

According to *Punchbowl News* linked [here](#): "Vault: Housing effort back in the crucible." "The House is weighing another gambit in its struggle with the Senate over the future of housing development. We reported in the Midday edition about the [burgeoning plan](#) from House Financial Services Committee Chair French Hill (R-Ark.) and Rep. Maxine Waters (D-Calif.) to send an amended version of the 21st Century ROAD to Housing Act back to the Senate, where the bill first passed in mid-March. Sending back an amended version of 21st Century ROAD to the Senate wouldn't be simple by any stretch, and would likely take weeks for Hill and Waters to land an agreement able to clear the House. But work has begun to hammer out differences informally." That item by *Punchbowl* confirmed the more detailed overview with manufactured housing ramifications report via [HousingWire](#) just days ago. There is [plenty of pushback to the Build-to-Rent and related portions of the developing legislation as MHPProNews reported](#). Bisnow [said](#) on 4.14.2026: "The Senate Housing Bill Still Isn't Law, But It Has Already Paralyzed The Build-To-Rent Market." Per that item: "When the Senate passed the 21st Century Road to Housing Act [on March 12](#), it included restrictions on investment in single-family housing that sparked a panic from real estate industry groups. They say a provision forcing large developers of new [BTR](#) communities to sell to homeowners after seven years would effectively kill that market, stifling much-needed housing supply and pushing up rents." "The biggest investors and lenders in the housing market have essentially stopped buying and financing build-to-rent [BTR] communities due to legislation that remains stalled in Congress." With significant pushback on BTR, which [AEI Housing Center Co-Director Edward Pinto, J.D. said would only bring benefits 'at the margins.'](#) why hasn't the Manufactured Housing Institute (MHI) stopped playing footsy with mainstream housing and joined forces with the Manufactured Housing Association for Regulatory Reform (MHARR-see Part I), to advance the well documented case that [only HUD Code manufactured housing can realistically and rapidly help close the multi-million unit production gap the U.S. needs now?](#) With [MHI member PMHA's EVP Mary Gaiski's testimony to public officials now on public display for manufactured housing professionals and advocates to digest](#), the timing of MHARR's remarks is a reminder that it is not too late for MHI to pivot, just as they did when pressure from [MHARR, MHPProNews, and MHLivingNews caused MHI and the Texas Manufactured Housing Association \(TMHA\) to belatedly pivot and sue to slow the progress of the DOE energy rule.](#)

With that under 440-word executive summary with hot linked supporting [facts-evidence-analysis](#) (FEA), this MHPProNews mashup is underway.

Mashup   
A mashup involves blending two or more elements to create a new, integrated whole.

MH  

MHVille Defined 
Pro MANUFACTURED HOUSING despite artificial barriers, internal consolidation-concentration industry self-limits. 

FEA Model   

FACTS **EVIDENCE** **ANALYSIS**

Third Party Content Provided Under Fair Use Guidelines.



Part I. From the MHARR Press Release to MHPProNews linked [here](#) is the following.



PRESS RELEASE

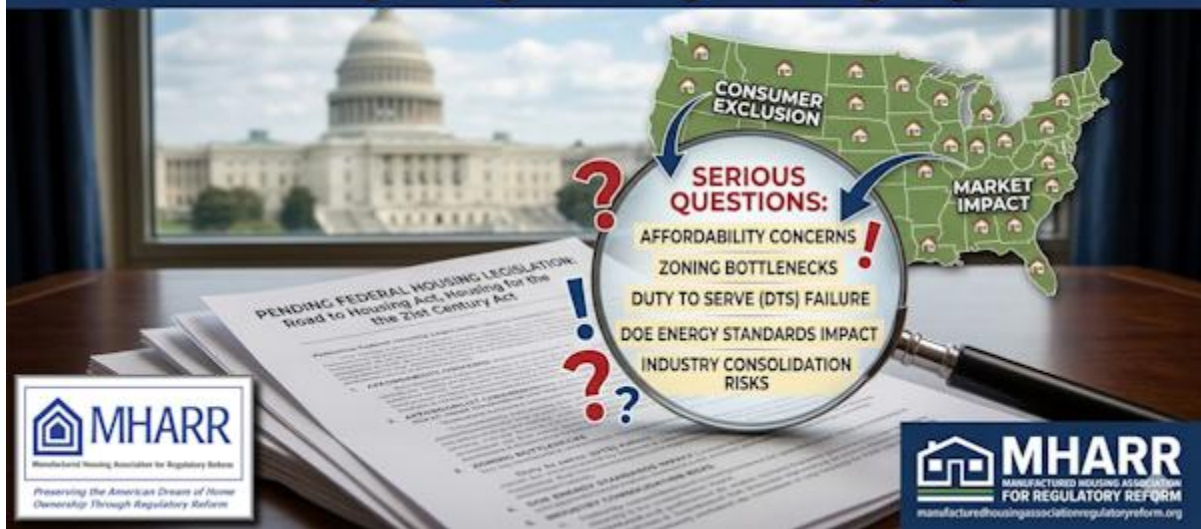
The **MANUFACTURED HOUSING ASSOCIATION** *for* **REGULATORY REFORM**

FOR IMMEDIATE RELEASE

Contact: MHARR

(202) 783-4087

MHARR News Item -- **MHARR Analysis Reveals Serious Questions Regarding Pending Housing Legislation**



MHARR ANALYSIS REVEALS SERIOUS QUESTIONS

REGARDING PENDING HOUSING LEGISLATION

Washington, D.C., April 13, 2026 – In a one-page summary analysis (copy attached) of the manufactured housing-related provisions of the housing bills currently pending in the U.S. Senate (i.e., the “ROAD to Housing Act”) and the U.S. House of Representatives (i.e., the “Housing for the 21st Century Act”), the Manufactured Housing Association for Regulatory Reform (MHARR) sets forth fundamental and potentially serious questions for the manufactured housing industry posed by those bills. MHARR has warned both the industry and consumers that an understanding of those questions and related issues is crucial insofar as Congress is returning from its recent recess and will imminently resume legislative activity. MHARR, therefore, will continue to closely examine the pending bills and publish further detailed analyses going forward. These analyses will begin with an examination of the statutory Duty to Serve (DTS), which is not addressed by either the Senate or House bill.

As the attached must-read analysis indicates, both bills would make optional the current statutory requirement for a “permanent chassis” on each manufactured home. While this change would be positive, it should have been made nearly 40 years ago, when it was first raised and advanced as a legislative amendment by MHARR, against strong opposition from homebuilders, HUD regulators and others, but was undermined when the Manufactured Housing Institute (MHI) withdrew its support. Given that experience, and given that the pending bills appear to contain multiple compromises contrary to mainstream industry interests, the MHARR analysis provides industry members and consumers with a basis to fully understand and potentially resolve these issues that could haunt the industry in the future.

The major defect in both bills is their failure to definitively rectify the principal post-production bottlenecks that continue to suppress the HUD Code industry. As previously detailed by MHARR, these bottlenecks are: (1) discriminatory zoning exclusion combined with HUD’s failure to fully and properly implement the enhanced federal preemption of the Manufactured Housing Improvement Act of 2000; and (2) the failure of Fannie Mae and Freddie Mac, and their federal regulator, the Federal Housing Finance Agency (FHFA) to implement the Duty to Serve mandate within the market-dominant chattel consumer financing sector. While MHARR has prepared and submitted proposed amendments to remedy both issues, those amendments have not been included in the pending bills, and to MHARR’s knowledge, have not been supported publicly by MHI, which has publicly supported the current deficient bills.

In addition, both proposed bills would leave open the possibility of a potential future landmine as a result of their failure to fully end the threat of draconian manufactured

housing energy regulation. While a separate bill by Rep. Erin Houchin (R-IN) would have repealed the current U.S. Department of Energy (DOE) standards and simultaneously repealed the statutory mandate underlying them, the pending bills would merely subject energy standards from other federal agencies to HUD review and approval (which would be a foregone conclusion in a future climate-focused administration), while the House bill would, in itself, affirmatively mandate HUD energy standard updates on a continuing cycle. Ultimately, the HUD Code industry and consumers will pay a heavy price for this inexplicable concession.

Moreover, while the pending bills (without MHARR's proposed amendments) give – at best – short-shrift to these major issues and, arguably, to the industry as a whole and would not be likely to produce significant immediate benefits for the industry's mainstream inherently affordable homes, they would offer significant benefits for industry competitors, such as modular producers, site-builders and for certain segments of the industry that are heavily invested in the development and placement of more costly, high-end manufactured homes. This failure would perpetuate an uneven playing field for all HUD Code manufactured homes, with or without a chassis (including more costly high-end models) unless (and until) current law governing zoning preemption and DTS support for chattel loans are fully and properly implemented.

While MHARR will continue to further detail the significant dangers inherent in these failures, it will also continue to pursue a rigorous investigation of how these flaws and one-sided concessions were incorporated in the pending bills, including but not limited to the possible involvement of -- and collaboration with -- industry competitors (e.g., modular and site-built interests), industry detractors, regulators (including HUD and FHFA), energy special interests, financing interests (e.g., Fannie Mae, Freddie Mac and entrenched, market-dominant industry lenders) and other vested and arguably anti-industry interests (including those who would subject the industry to local building codes, such as – but not limited to – so-called “international” building and “energy efficiency” codes). MHARR, in these inquiries, will follow the facts – regardless of where they might lead.

The Manufactured Housing Association for Regulatory Reform is a Washington, D.C.- based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.

-- 30 --

Attachments

- [MHARR.mhlegfactsheet4.13.2026](#)
- [MHARR.legsheetsnewsrelrev4.13.2026](#)

Manufactured Housing Association for Regulatory Reform (MHARR)

1331 Pennsylvania Ave N.W., Suite 512

Washington D.C. 20004

Phone: 202/783-4087

Fax: 202/783-4075

Email: MHARRDG@AOL.COM

Website: www.manufacturedhousingassociation.org

Attachment

**THE TREATMENT OF HUD-REGULATED MANUFACTURED HOUSING IN PENDING
FEDERAL
HOUSING LEGISLATION RAISES SERIOUS QUESTIONS**

1. Both pending housing bills -- the ROAD to Housing Act in the Senate and the Housing for the 21st Century Act in the House of Representatives – contain provisions relating to federally-regulated manufactured housing which raise serious questions for the industry and consumers.
2. Both bills would make optional the current statutory mandate that “manufactured homes” be built on a “permanent chassis.” This modification, which MHARR supports, was first raised by MHARR in 1990, in the context of an earlier amendment to the National Manufactured Housing Construction and Safety Standards Act of 1974, which the Manufactured Housing Institute (MHI) ultimately failed to support at that time, as well as the U.S. Department of Housing and Urban Development (HUD).
3. Neither current bill, however, would resolve, the two primary bottlenecks that have suppressed the production and availability of affordable, mainstream manufactured housing for at least two decades – e., (1) discriminatory zoning exclusion; and (2) the failure of federal mortgage giants Fannie Mae and Freddie Mac to implement the statutory “Duty to Serve” (DTS) mandate with respect to personal property or “chattel” consumer financing for manufactured home purchases. MHARR has prepared and provided Congress with proposed amendments to address both matters, but those amendments, to date, have not been included in either bill.

4. Neither bill would definitively withdraw the destructive May 31, 2022 U.S. Department of Energy (DOE) “energy conservation” standards for manufactured housing. A bill filed by Rep. Erin Houchin (R-IN) which would have repealed both the May 31, 2022 DOE standards and the EISA energy standards mandate, has been replaced with much less definitive language. This language, merely requiring any such standard to be approved/or “adopted” by HUD would do little or nothing to stop an administration focused on “climate change” as a top priority. Similarly, mandating new manufactured home “energy conservation” standards within one year of enactment is unnecessary and would needlessly increase the acquisition cost of manufactured homes, while excluding even more potential consumers from the market.

5. Instead of definitively resolving these key issues for the benefit of the entire industry and consumers, the bills appear to focus on (1) promoting certain higher-end, higher-cost manufactured home models; (2) promoting and advancing the status and utilization of modular homes which compete with certain segments of the manufactured housing market; and (3) as a consequence of points 1 and 2, increasing the purchase cost baseline for all manufactured homes.

6. Put differently, by promoting the utilization of higher-cost manufactured home models and modular homes (which exceed the average purchase cost of a new HUD Code manufactured home), the proposed changes will push the entire market toward higher price levels, which will exacerbate consumer market exclusion, which already stands at unacceptable levels.

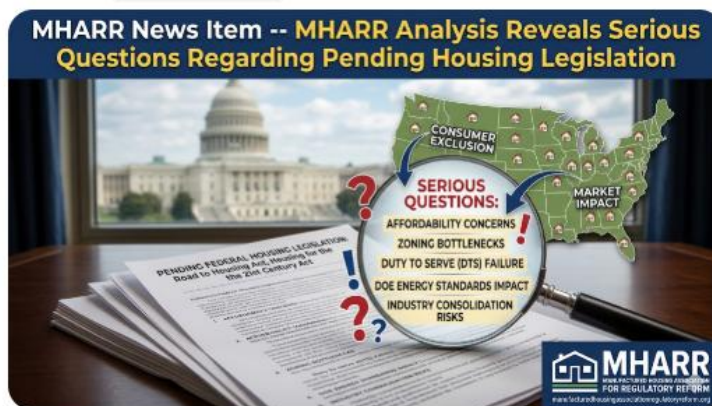
7. Further, by undercutting the affordability of the lower-cost portion of the manufactured housing market, the proposed changes will likely result in further consolidation of the industry and production, leading to a reduction in competition and additional pressure for higher price levels and the potential future disappearance of federally-regulated manufactured housing.

MHARR's news reports - like this one - are available for re-publication in full (i.e.: without alteration or substantive modification) without further permission and with proper attribution and/or linkback to MHARR.

MHARR notes that the featured image was generated by artificial intelligence (AI) powered Gemini.



Create a featured image for this headline for MHARR: "MHARR News Item -- MHARR Analysis Reveals Serious Questions Regarding Pending Housing Legislation"



AI Overview Keywords (Contextual & Semantic)

- **Impact of pending federal legislation on housing affordability**
- **Unresolved manufactured housing industry bottlenecks**
- **Critique of 21st Century ROAD to Housing Act**
- **Consolidation risks in manufactured housing sector**
- **Exclusionary zoning impacts on HUD Code homes**
- **Secondary market support for manufactured home personal property loans**
- **Withdrawal of May 31, 2022 DOE energy conservation standards**
- **Comparison of manufactured vs. modular housing regulation**

Part II. Additional Information and Analysis from Sources as Shown.

In no particular order of importance are the following.

1. [MHProNews](#) and [MHLivingNews](#) informed/reminded readers that MHI could have had the [removable chassis in 1990 via the Hiler Amendment](#). Briefly, MHARR supported it, as they said above, and MHI *initially* supported it. Later, MHI inexplicably removed their support for the [Hiler Amendment](#). Rachel Cohen Booth for Vox cited that [MHProNews](#) documented insight.

[caption id="attachment_223153" align="center" width="600"]



<https://www.manufacturedhomelivingnews.com/was-vox-rachel-cohen-booth-misled-by-mhi-ceo-lesli-gooch-removable-chassis-road-to-housing-act-2025-unpacking-evidence-of-deception-and-misdirection-by-manufactured-housing-institute-fea/> [/caption]

2. As AEI's Pinto and others have evidenced and argued, the current bill passed by the U.S. Senate could cut housing production. As Bisnow (see preface, above) reported, just the threat of this bill passing in the current form has resulted in a cut-back of BTR construction. Meaning, a key claim of the housing bill is being undermined. MHARR has said that the removable chassis, while desirable, will likely only provide marginal benefits to manufactured housing production because it leaves the key issues untouched. As MHProNews exclusively reported yesterday, MHI-linked Pennsylvania Manufactured Housing Association (PMHA) EVP Mary Gaiski testified the severe impact of zoning and

placement barriers and the lack of competitive financing. While Gaiski's presentation arguably has misses, it in several respects has confirmed years of MHPProNews and MHLivingNews reporting.

[caption id="attachment_230462" align="aligncenter" width="600"]

Mary Gaiski - EVP at
Pennsylvania Manufactured
Housing Association

**'PERCEPTION IS
GREATEST CHALLENGE
TO AFFORDABLE HOUSING-
PARTICULARLY FOR
MANUFACTURED HOUSING.'**

**TESTIMONY OF PENNSYLVANIA
MANUFACTURED HOUSING ASSOC EVP
MARY GAISKI-SENATE POLICY
COMMITTEE-FEA**

MHPRONEWS.com
Housing News, Tips and Views from the Industry

<https://www.manufacturedhomepronews.com/perception-is-greatest-challenge-to-affordable-housing-particularly-for-manufactured-housing-testimony-of-pennsylvania-manufactured-housing-assoc-evp-mary-gaiski-senate-policy-committee-fea/>

[/caption][caption id="attachment_230295" align="aligncenter" width="600"]

FORTUNE:
AEI'S PINTO

21ST CENTURY ROAD TO HOUSING ACT

IS 'EFFECTIVELY ROAD TO KILLING BILLIONS IN INVESTMENTS'
LIKELY TO SHRINK HOUSING SUPPLY.
BEYOND MHARR-
DOZENS OF

GROUPS OPPOSE BILL.

FEA

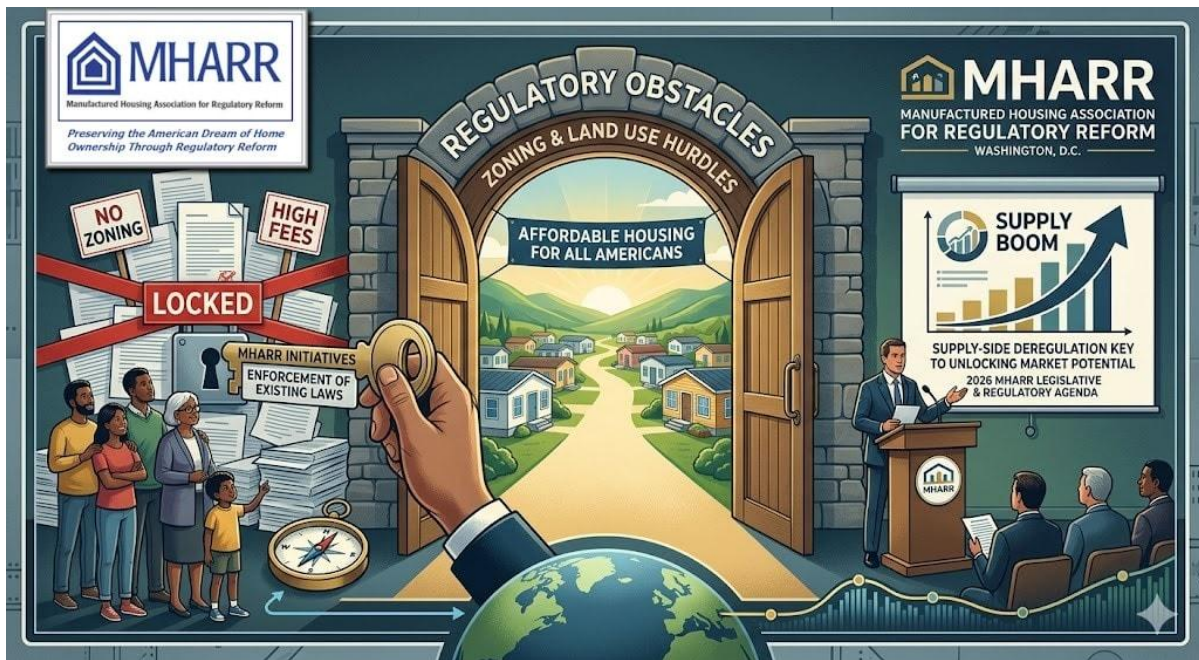
Edward J. Pinto
SENIOR FELLOW AND CODIRECTOR, AEI Housing Center
Indiana University Bloomington
Doctor of Law - JD - Law
AEI Housing Center

MHPRONEWS.com
Housing News, Tips and Views from the Industry

<https://www.manufacturedhomepronews.com/fortune-aeis-pinto-21st-century-road-to-housing-act-is-effectively-road-to-killing-billions-in-investments-likely-to-shrink-housing-supply-beyond-mharr-dozens-of-groups-opp> [/caption]

Rephrased, by MHI, Clayton Homes (BRK), Champion Homes (SKY), and Cavco Industries (CVCO) formally supporting variations of the emerging bill, they are failing to boost manufactured housing at a time when the industry is in yet another production decline.

[caption id="attachment_230316" align="aligncenter" width="599"]



<https://manufacturedhousingassociationregulatoryreform.org/hud-code-manufactured-housing-production-decline-continues-in-the-face-of-unresolved-manufactured-home-industry-bottlenecks-per-mharr/> [/caption]

[caption id="attachment_230127" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/hud-code-manufactured-housing-production-decline-continues-in-the-face-of-unresolved-manufactured-home-industry-bottlenecks-per-mharr-implications-for-champion-sky-and-cavco-cvco-fea/>[/caption]

- 3.
- 4.
- 5.