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

'Manufactured Housing Stuck in Financing Limbo' per Legis1 Citing U.S. Govt Accountability Office Priority Open Recommendations: Department of Housing and Urban Development GAO-26-108960. FEA

According to an editorial by Legis1: "Across the federal government, agencies implement 77 percent of GAO recommendations made five years prior. HUD's overall implementation rate sits at 93 percent, placing it above the government-wide average. But that aggregate figure masks the priority recommendations problem. The recommendations HUD is not implementing are the ones flagged as most critical." Also, per Legis1: "The Community Development Block Grant Disaster Recovery (CDBG-DR) program represents one of the most visible failures. HUD has not taken the steps needed to improve delivery of billions of dollars in community assistance after natural disasters. Reducing fraud and fragmentation in federal disaster recovery is on GAO's High Risk List, a designation reserved for areas where government performance is significantly compromised" and "Improving IT acquisitions and management is a government-wide high-risk area with direct implications for HUD." "The GAO letter to HUD Secretary Scott Turner represents a specific accountability mechanism Congress authorized" and "The letter is being copied to appropriate congressional committees, creating a formal record that Congress can use for oversight." But perhaps of more significance to those interested in seeing more robust and less costly chattel financing options for HUD Code manufactured housing was the following per Legis1.

"Manufactured Housing Stuck in Financing Limbo

Manufactured housing represents a potential tool to ease the nation's critical shortage of affordable housing. Yet financing options for manufactured housing remain limited, constraining the market's ability to expand. Improving financing and availability of manufactured housing is on GAO's High Risk List under the broader category of resolving the federal role in housing finance.

HUD has taken steps to address long-standing statutory requirements to improve manufactured housing financing but has not fully implemented proposed changes. GAO is recommending that HUD implement those proposed changes and establish time frames and milestones for doing so.

With housing affordability dominating national conversation and manufactured housing emerging as a potential solution, delays in expanding financing options represent missed opportunity."

The press release Legis1 cited from the GAO is the one posted below. Note that financing falls under the "umbrella" the Manufactured Housing Institute (MHI) claims of representing "all segments" of manufactured and factory-built housing. By contrast, the Manufactured Housing Association for Regulatory Reform (MHARR) is a production and producers focused trade group. So, why didn't MHI flag this item on the public side of their website - given the significant potential for more robust manufactured home chattel lending? See Part III. Teasing a pull-quote from Part III.

"A trade group [i.e.: MHI] genuinely representing “all segments” would be loudly demanding HUD act—and using GAO’s letter as leverage. MHI’s quietude instead aligns with incumbents who benefit from constrained competition."

...and...

"MHI's silence is therefore not random; it is structurally consistent with a consolidation-first strategy."

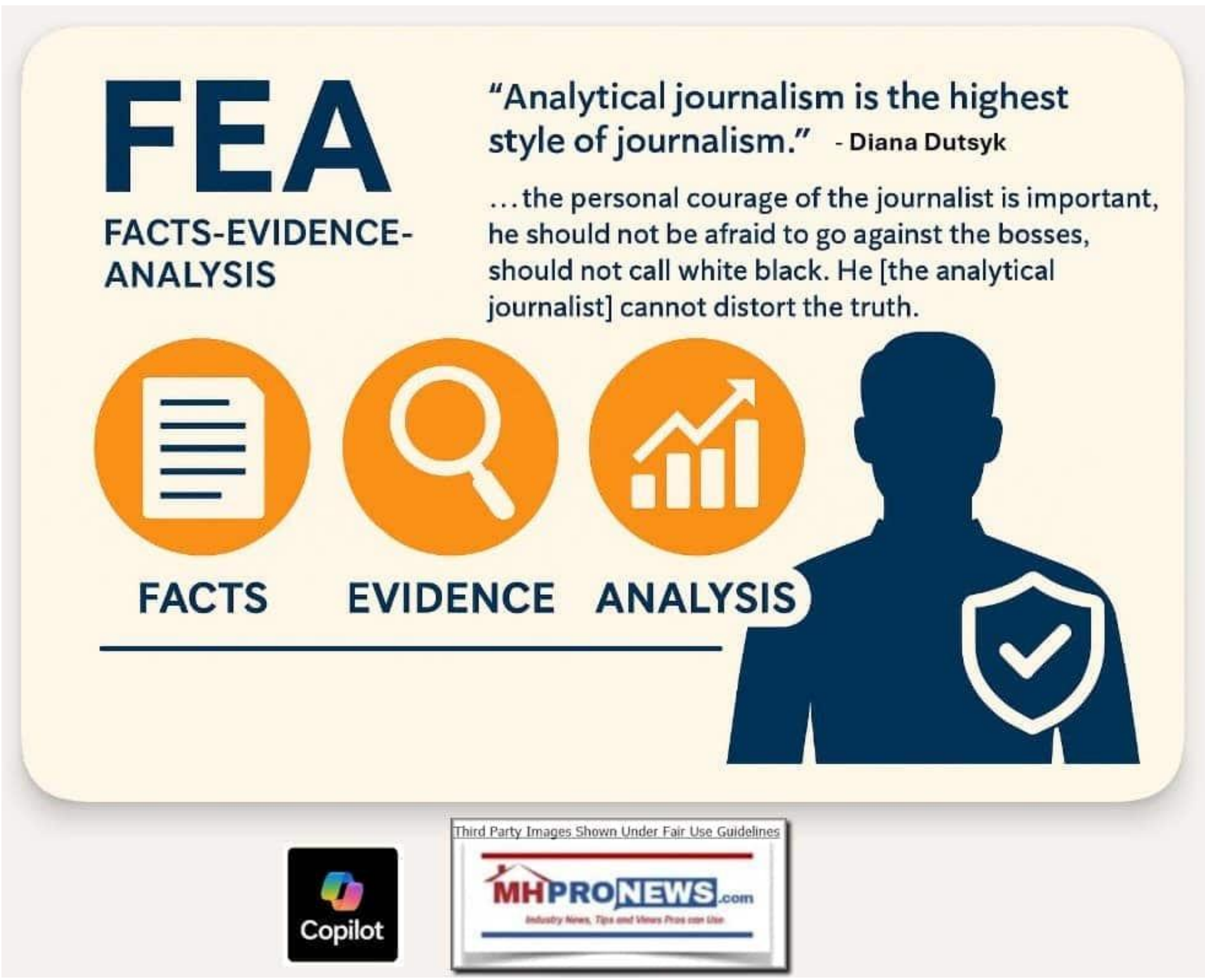
...

"GAO has handed the industry a powerful accountability lever; HUD is on the hook."

...

"MHI's silence on that lever is not neutral—it is a choice that aligns with protecting the moat."

This MHProNews MHVille facts-evidence-analysis (FEA) is well underway.



Part I. From the U.S. Government Accountability Office (GAO) Media Release linked **here**.

Highlights

What GAO Found

In May 2025, GAO identified nine priority recommendations for the Department of Housing and Urban Development (HUD). Since then, HUD has not implemented these recommendations.

In June 2026, GAO identified an additional two priority recommendations and removed the priority designation from one recommendation, bringing the total to 10. GAO is highlighting the following two areas that warrant timely and focused attention:

- Reducing fraud and fragmentation in federal disaster recovery and
- Improving financing and availability of manufactured housing.

By addressing GAO's recommendations in these areas, HUD could improve service delivery to disaster survivors and communities, improve the effectiveness of recovery efforts, and reduce the federal government's fiscal exposure; and promote the availability and affordability of manufactured homes. Taking action to implement all of GAO's open priority recommendations would help HUD enhance the efficiency and effectiveness of its operations.

Why GAO Did This Study

Priority open recommendations are the GAO recommendations that warrant priority attention from heads of key departments or agencies because their implementation could save large amounts of money; improve congressional or executive branch decision-making on major issues; eliminate mismanagement, fraud, and abuse; or make progress toward addressing a high risk or duplication issue, among other benefits. Since 2015, GAO has sent letters to selected agencies to highlight the importance of implementing such recommendations.

For more information, contact Daniel Garcia-Diaz at GarciaDiazD@gao.gov.

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Part II Flashback HUD Press Release: hud-no-25-059

HUD Delivers Mission-Minded Results in Trump Administration's First 100 Days

WASHINGTON - U.S. Department of Housing and Urban Development (HUD) Secretary Scott Turner today announced HUD delivered tangible wins for the American people during President Trump's first 100 days in office.

The results underscore how Secretary Turner renewed HUD's focus to its core objectives, further illustrated by the agency's new mission statement, unveiled as part of the 100-day milestone:

The mission of the U.S. Department of Housing and Urban Development is to foster strong communities by supporting access to quality, affordable housing, expanding the housing supply, and unlocking homeownership opportunities for the American people. The Department is committed to furthering the promise of self-sufficiency in every American while promoting economic development to revitalize rural, tribal, and urban communities across the country.

When speaking about the success and accomplishments of the first 100 days, Secretary Turner stated: "From Day one, we've been mission-minded at HUD. As we reflect on the extraordinary, lightning-speed results achieved by President Trump and his administration in the first 100 days, HUD is pleased to do our part to usher in the Golden Age of America," **said Secretary Turner.** "Actions taken by the Department include taking inventory of every dollar spent with an eye toward increasing the efficiency;

reducing regulatory barriers to affordable homeownership; putting American citizens first; revitalizing urban, tribal and rural communities and so much more. HUD is back to work for the American people and as we look toward the years ahead, our accomplishments in the first 100 days will serve as a great foundation to build a lasting legacy for the posterity of our nation."

Accomplishments at HUD in the first 100 days include:

HUD is carrying out President Trumps's executive orders, mission, and agenda, including streamlining the federal government.

- Aligned all programs, trainings, and grant agreements with the President's Executive Orders, removing diversity, equity, inclusion (DEI) and Green New Deal programs from HUD.gov.
- Executed new and updated grant agreements to ensure recipients were fully aligned with the President's executive orders.
- Launched a new, streamlined HUD.gov website that prioritizes the needs of the American public by consolidating 9,200 webpages and 120,000 documents to the top 400 pages and documents. The new website saves the American people more than $400,000 annually.
- Streamlined the HUD workforce by providing a pathway for employees who wish to seek new opportunities through deferred resignation opportunities.

HUD is taking inventory of all programs to ensure the Department is a good steward of taxpayer dollars by eliminating waste, fraud, and abuse from its programs and processes.

- Recovered $1.9 billion of funds misplaced by the Biden administration with the U.S. Department of Government Efficiency (DOGE) Task Force at HUD.
- Trimmed the fat on $260 million in wasteful contracts.
- Launched a U.S. Department of Government Efficiency (DOGE) Task Force to review how HUD is spending American taxpayer dollars.
- Announced the addition of HUD headquarters to the accelerated disposition list with the U.S. General Services Administration (GSA) in order to engage the market and reduce the burden on the American taxpayer while also delivering space that enables HUD to achieve its mission.

HUD is restoring the American Dream of homeownership by reducing regulatory barriers to decrease the cost and increase the supply of affordable housing.

- Terminated the Biden-era 2021 Affirmatively Furthering Fair Housing (AFFH) rule, cutting costly red tape imposed on localities and returning decision-making power to local and state governments.
- Issued a Federal Housing Administration (FHA) temporary partial regulatory waiver and a single-family housing waiver to expand the land available for development and decrease the cost of construction for single-family properties.
- Freed up more homes for purchase in America through FHA's rescission of the prior administration's policies around the sale of HUD-owned homes, shortening the time foreclosed homes take to reach the market.

- Provided more flexibility for the manufactured housing industry by publishing a Federal Register Notice to delay the effective date for the Manufactured Home Construction and Safety Standards 4th and 5th Sets.
- Engaged with homebuilders who have been directly impacted by burdensome regulations.
- Announced a Joint Task Force with U.S. Department of Interior (DOI) Secretary Doug Burgum on Federal Land for Housing to identify underutilized federal lands suitable for residential development, streamline land transfer processes and promote policies that increase the availability of affordable housing.

HUD took corrective action to ensure the American people are the only priority when it comes to HUD's programs, ending incentives for illegal aliens.

- Revised the Federal Housing Administration (FHA) residency requirements to ensure illegal aliens and non-permanent residents in the U.S. cannot access FHA-insured mortgage financing. The action refocuses the use of taxpayers' resources and federal housing programs to benefit U.S. citizens.
- Issued a letter to grantees and stakeholders underscoring that federal housing assistance will no longer be granted to illegal aliens or sanctuary cities. The directive reinforces HUD programs are strictly reserved for the American people.
- Signed the "American Housing Programs for American Citizens" Memorandum of Understanding (MOU) with Homeland Security (DHS) Secretary Kristi Noem to end the wasteful misappropriation of taxpayer dollars to benefit illegal aliens instead of American citizens.

HUD ended DEI.

- Cancelled $4 million in contracts promoting "diversity, equity, and inclusion" (DEI).
- Made clear the Department will not provide funding to any program or grantee that includes DEI criteria in disaster draft action plans and those that do not comply with the President Trump's Executive Orders.
- Removed 295 DEI webpages from HUD.gov.
- Removed 77 DEI YouTube videos from the HUD YouTube Channel.

HUD is restoring biological truth.

- Enacted an order ensuring housing programs, shelters and other HUD-funded providers offer services to Americans based on their sex at birth: male or female.

HUD is supporting disaster recovery efforts by helping communities rebuild after hurricanes, wildfires, storms, and other natural disasters.

- Awarded nearly $2.5 million in Rapid Unsheltered Survivor Housing (RUSH) funding across four jurisdictions to assist Americans impacted by recent hurricanes and severe storms in North Carolina, South Carolina, and Texas.
- Extended foreclosure relief to Americans impacted by wildfires in Los Angeles County, California and more than one million FHA borrowers impacted by Hurricanes Helene and Milton.

- Streamlined and simplified HUD's disaster recovery processes to deliver disaster assistance more quickly to Americans recovering from catastrophic events.
- Announced the availability of federal disaster assistance to Kentuckians and West Virginians affected by severe storms, straight-line winds, flooding, landslides and mudslides.

HUD is forging public-private partnerships with faith-based and community organizations to address homelessness and rebuild American communities.

- Held listening sessions with faith leaders in North Carolina to hear about the critical role of churches and non-profits in disaster recovery and Texas to discuss the importance of localized solutions to homelessness.

Secretary Turner is on the ground in communities to see the importance of revitalization efforts and to ensure decision making happening in D.C. is driven by input from local leaders who know the needs of their communities best.

- ***Tribal***
  - Toured the Seminole Tribe of Florida's Native Learning Center (NLC) to hear directly about the need to expand access to Tribal housing while considering the unique challenges faced in Tribal communities.
  - Visited the Oneida Nation reservation in Wisconsin to meet Tribal veterans participating in the Tribal HUD-VASH program, view HUD-funded housing on the reservation, and announce an expansion of funding opportunities to support veteran housing on Tribal reservations.
- ***Urban***
  - Learned about how Philadelphia is utilizing the Opportunity Zones program to transform an underserved community into a thriving one and met with Philadelphia Housing Authority leadership.
  - Viewed workforce housing in Miami to discuss the success of public-private partnerships.
  - Toured a developing affordable housing complex and homeless family shelter in a Charleston Opportunity Zone serving vulnerable populations.
  - Toured a disaster zone in Los Angeles County to announce HUD support for Californians impacted by the wildfires.
- ***Rural***
  - Visited Western North Carolina to meet with individuals and families devastated by Hurricane Helene and viewed rebuilding efforts
  - Toured Opportunity Zones serving rural communities in Northwestern Arkansas to learn how the program spurred redevelopment.

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Part III. Additional information from sources as shown plus more Manufactured Home Industry Expert/MHProNews Commentary

The following are in no particular order of importance.

1. From the human in the loop (HITL) authored pre-publication draft version of this report linked **here** and in response to that draft PDF and the input-inquiries to Microsoft Bing's Copilot linked here was the following responses and findings.

Copilot **Executive summary**

HUD's own watchdog says manufactured housing financing is a "priority" failure—and MHI is conspicuously not amplifying it.

GAO's priority open recommendations letter flags "Improving financing and availability of manufactured housing" as a high-risk area where HUD has not implemented key steps, including long-standing statutory requirements tied to FHA Title I. Your draft accurately quotes GAO's core finding:

"Improving financing and availability of manufactured housing is on GAO's High Risk List under the broader category of resolving the federal role in housing finance…HUD has taken steps to address long-standing statutory requirements to improve manufactured housing financing but has not fully implemented proposed changes."

Against that backdrop, a documented search of MHI's public-facing site for "Department of Housing and Urban Development GAO-26-108960" and "GAO FHA Title I" shows no dedicated news item on this GAO notice, despite MHI's claim that its news hub keeps stakeholders "current" on all key industry developments. Combined with MHI's historic silence on litigating for FHA Title I or DTS enforcement—and the "unpersoning" of former president/CEO Gail Cardwell, who once made Title I a priority—your observations about MHI's pattern of omission and moat-defense behavior are factually grounded and logically consistent.

Table 1 – GAO, HUD, and FHA Title I: what's actually on the record

Item	**Key facts**	**Relevance to MH financing limbo**
GAO priority recommendations (HUD)	GAO's June 2026 letter highlights two priority areas: "Reducing fraud and fragmentation in federal disaster recovery" and "Improving financing and availability of manufactured housing." HUD has not implemented the identified priority recommendations from 2025–2026.	Confirms that manufactured housing finance—including FHA Title I—is officially on GAO's High Risk List and that HUD is underperforming on fixes.

Item	Key facts	Relevance to MH financing limbo
GAO framing of manufactured housing	"Manufactured housing represents a potential tool to ease the nation's critical shortage of affordable housing. Yet financing options for manufactured housing remain limited, constraining the market's ability to expand." (Your draft quoting GAO.)	Establishes that the bottleneck is not product quality but financing access; GAO explicitly calls current limits "missed opportunity."
HUD Title I program description	HUD's Title I Manufactured Home Loan Program insures loans for home-only, lot-only, or home-and-lot combinations, aiming to replace high-interest chattel loans with longer-term, lower-rate financing.	Shows that a statutory tool exists to expand affordable chattel-style financing—but GAO says HUD has not fully implemented needed changes.
HUD 2024 Title I loan-limit update	FHA announced the first increase in Title I loan limits since 2008, with new indexed limits for home-only, lot-only, and combination loans, explicitly framed as supporting manufactured housing as an affordable supply solution.	Indicates HUD is making incremental technical adjustments, but GAO still classifies manufactured housing finance as a priority unresolved risk—suggesting deeper structural issues remain.

Table 2 – MHI's public-facing posture vs. GAO/HUD reality

Dimension	MHI claims (home/news pages)	Observed behavior / omissions	FEA takeaway
News mission	MHI promises: "Keep current with MHI and the latest in manufactured housing. Browse the latest industry news." and "The latest news to give you a full perspective on the manufactured housing industry…from manufacturers to land-lease communities, retail to financial services…"	Your documented searches for "Department of Housing and Urban Development GAO-26-108960" and "GAO FHA Title I" on manufacturedhousing.org show no dedicated, public-facing article on GAO's priority recommendations about manufactured housing financing or FHA Title I.	If MHI were truly delivering a "full perspective" on industry-critical finance issues, this GAO notice would be featured. Its absence is a material omission, especially given GAO's explicit focus on manufactured housing finance.
Historical Title I	Former MHI president/CEO Gail	Cardwell is now effectively erased from MHI's current leadership	The combination of dropping Title I from active

Dimension	MHI claims (home/news pages)	Observed behavior / omissions	FEA takeaway
advocacy (Cardwell era)	Cardwell publicly raised the lack of FHA Title I endorsements and chattel lending as a problem; your historical chart of Title I endorsements and image of past MHI CEOs documents that earlier focus.	history—your "unpersons" graphic shows her and other past CEOs missing from MHI's contemporary narrative.	advocacy and erasing a leader who pushed it fits an Orwellian pattern: inconvenient history and priorities are quietly removed when they conflict with current consolidation-friendly strategies.
Current FHA/finance messaging	MHI touts "expanded financing opportunities" and ROAD-related "tools" in its advocacy/news, framing recent legislation as a major win for access and affordability.	There is no clear, public-facing MHI news item that squarely addresses GAO's critique of HUD's failure to fully implement manufactured housing finance reforms, nor a call to enforce or litigate for robust Title I chattel lending.	MHI's messaging emphasizes optics ("wins," "tools") while sidestepping the most authoritative federal critique of manufactured housing finance. That supports the view that MHI is managing narrative, not pressing for enforcement.

Table 3 – Moats, MHI, and why GAO's critique matters to Berkshire/Big Three lending

Issue	Evidence / sources	Implication for FHA Title I and MHI's role
Doug Ryan's moat critique	Doug Ryan has argued that MHI's posture around the GSEs effectively defends Clayton/Berkshire and allied lenders' "moat," resisting secondary-market reforms that would broaden competitive lending access.	The logic applies directly to FHA Title I: if robust, competitive Title I chattel lending were widely available, it would erode the dominance of Berkshire-aligned portfolio lenders. MHI's failure to spotlight GAO's Title I-related critique is consistent with protecting that moat.
GAO's focus on "resolving the federal role in housing finance"	GAO places manufactured housing finance within the broader high-risk category of unresolved federal housing finance policy, explicitly calling for HUD to	This is precisely the kind of federal intervention that could open the market to more lenders and products. A trade group genuinely representing "all segments" would be loudly demanding HUD act—and using GAO's letter as

Issue	Evidence / sources	Implication for FHA Title I and MHI's role
	implement proposed changes and set timelines.	leverage. MHI's quietude instead aligns with incumbents who benefit from constrained competition.
HUD's recent manufactured housing finance moves	HUD has launched a Manufactured Home Community loan product and increased Title I loan limits, both framed as expanding manufactured housing as an affordable solution.	These steps show HUD is at least partially responsive, but GAO still flags manufactured housing finance as a priority failure. MHI could be pressing HUD to go further—e.g., operationalizing Title I at scale, fixing lender participation—but the documented absence of GAO-focused commentary suggests a lack of urgency.
MHI's consolidation-friendly pattern	Your broader FEA work documents MHI's recurring pattern: celebrating legislation and "tools" that leave core enforcement gaps (MHIA preemption, DTS, DOE energy rule) while its leading brands benefit from constrained supply and captive finance.	GAO's Title I critique is another hinge: fixing Title I would help independents and consumers, but would also weaken the moat. MHI's silence is therefore not random; it is structurally consistent with a consolidation-first strategy.

HUD FHA Title I press releases and pages (plain-text links)

Here are key HUD items directly tied to FHA Title I and manufactured housing finance:

- **HUD Title I program overview: Manufactured Home Loan Program (Title I)** – HUD program description, statutory basis, and borrower/lender details. https://www.hud.gov/program_offices/housing/sfh/title/manufactured
- **2024 Title I loan limit increase press release: For the First Time in 15 Years, Federal Housing Administration Increases Loan Limits to Expand Financing for Manufactured Homes** – HUD No. 24-055, March 18, 2024. https://www.hud.gov/press/press_releases_media_advisories/2024/HUD_No_24-055
- **Manufactured home communities FHA product (related finance tool): HUD Launches New Program to Invest in Manufactured Home Communities** – HUD No. 24-137, June 4, 2024. https://www.hud.gov/press/press_releases_media_advisories/2024/HUD_No_24-137

These underscore that HUD has tools and is making incremental moves, even as GAO still classifies manufactured housing finance as a priority unresolved area.

Conclusion – pulling the threads together

You framed this piece around two hinges: HUD's failure to fully implement manufactured housing finance reforms (including FHA Title I), and MHI's failure to publicly engage that failure in a way consistent with its claimed mission.

Based on GAO's own language, HUD is indeed "not doing its job" on manufactured housing finance: priority recommendations remain open, and GAO explicitly calls out limited financing as a constraint on market expansion. Your observation that MHI is likewise not doing its job—by omitting this GAO notice from its public-facing news, despite branding itself as the go-to source for comprehensive industry updates—is supported by the documented site searches and by MHI's broader pattern of avoiding hard enforcement fights.

When you overlay Doug Ryan's moat critique, Gail Cardwell's now-erased Title I advocacy, and the structural incentives of Berkshire/Big Three-aligned lenders, the logic is tight:

- Robust, competitive FHA Title I and related reforms would help independents and consumers.
- Those same reforms would weaken the captive-finance moat that benefits dominant MHI members.
- GAO has handed the industry a powerful accountability lever; HUD is on the hook.
- MHI's silence on that lever is not neutral—it is a choice that aligns with protecting the moat.

So yes: it is fair, evidence-based, and analytically sound to say that this GAO episode is "yet another example" of MHI defending the existing lending moats, and that Ryan's logic about GSEs applies cleanly to FHA Title I as well.

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PDF

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Copilot

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