DRAFT MINUTES
MHCC MEETING

January 19-21, 2016

Kentucky Expo Center | Louisville, KY

DRAFT MINUTES
MANUFACTURED HOUSING CONSENSUS COMMITTEE (MHCC) MEETING

January 19-21, 2016

Kentucky Expo Center | Louisville, KY

DAY 1: Tuesday, January 19, 2016

Call to Order

MHCC Chairman, Richard Weinert, called the meeting to order at 8:40 a.m. (EST) and welcomed new committee members: Garold Miller; Richard Nolan; and Alan Spencer and asked that they introduce themselves to the committee. Chairman Weinert reminded committee members to keep on point. Public comments would be allowed only after the committee has had a chance to discuss each topic, if time permits.

Roll Call

Kevin Kauffman, Program Manager of the Administering Organization (AO) Home Innovation Research Labs, called the roll and announced that a quorum was present. Guests were asked to introduce themselves. See Appendix A for a list of meeting participants. Timothy O'Leary, Myles Standish, and Charles Onsum were absent.

Introduction and Opening Remarks

Pamela Beck Danner, Administrator of the Office of Manufactured Housing Programs (DFO), welcomed the MHCC committee members. DFO Danner noted that this is a meeting of the Manufactured Housing Consensus Committee (MHCC) and that the meeting notice was published in the *Federal Register* dated December 29, 2015. DFO Danner also provided background on the creation of the MHCC:

> Section 604(a) of the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000 (42 U.S.C. 5401 et seq.) (the Act) establishes the MHCC. Among other things, the MHCC is responsible for providing periodic recommendations to HUD to adopt, revise, and interpret the manufactured housing construction and safety standards. HUD's Manufactured Home Construction and Safety Standards are codified at 24 CFR part 3280. According to Section 604(a)(4) of the Act, the MHCC is required to consider revisions not less than once during each 2-year period.

DFO Danner introduced Michael Henretty, SEBA Professional Service; and Ashok Goswami and James Turner, Institute for Building Technology and Safety, Inc. (IBTS).

DFO Danner welcomed the MHCC to Louisville, Kentucky, thanked Toni Price and Jane Hofilena, BLH Technologies, for providing the meeting planning logistics and noted that the last meeting held outside of Washington, D.C. took place in Tulsa, Oklahoma in 2010.

Mr. Kauffman provided a brief summary of meeting procedures to ensure compliance with MHCC Bylaws and that Robert's Rules of Order were followed. He noted that all voting items would be followed-up by letter ballot and that the vote would not be final until the letter ballot is complete by providing members who were not present an opportunity to participate in the process.

Approval of the Minutes

Modification added to the minutes of the last MHCC meeting, end of page 3

> "In response from a question by Mr. Weiss, DFO Danner stated that HUD had not received a regulatory cost-benefit analysis from DOE."

MHCC Motion to approve the August 18-20, 2015 MHCC Committee meeting minutes as modified.

Maker: Steven Anderson Second: Joseph Sadler

Meeting Vote: Unanimously Approved.

Update on Approved Proposals

Richard Mendlen, Senior Structural Engineer, Office of Manufactured Housing Programs from HUD, provided an update on previously approved proposals by the MHCC.

1. The on-site rule was published in final on September 8, 2015, and the effective date is March 7, 2016.
2. The revised RV rule will be published in the near future – when asked about the RV rule, Mr. Mendlen provided some background. For the benefit of new members, DFO Danner reminded the MHCC that HUD worked with the committee to draft the proposed rule.
3. The third group of standards are in process and are ready for processing to OMB. The carbon monoxide standard is in this third set.
4. The EPA Formaldehyde rule is currently scheduled to be published May 2016.
5. Updates to the referenced standards:
    - There was a list of reference standards provided to the committee.
    - Some updates that were not on the list are Log Items 117, 124, and 129.
    - Eight additional standards have been assigned to subcommittees and are pending review by those subcommittees.
    - Any additional reference standard updates require log items.
    - All of the reference standard updates will be included in a separate rulemaking process.
    - Any additional proposals approved will be included in the fourth set.

DFO Danner also reminded the MHCC of the change to the MHCC Bylaws and noted that the committee will operate on a 2-year cycle. Going forward, rather than referring to proposed changes as the second or third set of changes, proposed sets of changes will be referred to by its cycle year. With the late notice of this change to the public, proposed changes for the current cycle will be accepted until March 31, 2016.

Subcommittee Reports to the MHCC

Technical Systems Subcommittee Report

Chairman of the Technical Systems Subcommittee, John Weldy, presented the following Log Items to the committee for action:

LOG 116: **§ 3280.304(aa)(2) Incorporation by reference**

MHCC Motion to approve Log 116.

Maker: Steven Anderson Second: Robin Roy

Meeting Vote: Unanimously Approved.

DRAFT

LOG 118: **§ 3280.4 Incorporation by Reference and 3280.703 Minimum Standards**
MHCC Motion to approve Log 118 as modified.
Maker: Steven Anderson Second: Debra Blake
Meeting Vote: Unanimously Approved.

Assigned Reference Standards Update:

- ANSI/ASHRAE 62.2, Ventilation and Acceptable Indoor Air Quality in Low-Rise Residential Buildings

  Following the report from the subcommittee, the committee was assured by the DFO that the following action could be taken because it is considered a voluntary standard and that it is a simple switch of version date. Mark Weiss noted that the cost/benefit analysis has not been performed by this committee.

  MHCC Motion to modify Log 25, which references ANSI/ASHRAE 62.2-2010 to the 2013 version for Indoor Air Quality: Optional compliance with ASHRAE 62.2 (Log 25).
  Maker: Steven Anderson Second: William Freeborne
  Meeting Vote: 12-5-1

- ASTM E96, Standard Test Methods for Water Vapor Transmission of Materials

  Following a report from the subcommittee stating that although the changes to the ASTM E96-2015 are minimal, the implications of retesting products would be cost prohibitive. The committee took the following action:

  MHCC Motion to disapprove the ASTM E96 2015 update.
  Maker: John Weldy Second: Jeff Legault
  Meeting Vote: Unanimously Approved.

- NFPA 70, National Electrical Code

  Mr. Weldy provided some background on NFPA 70 and invited any interested parties to join the meeting of the task group (scheduled to meet later in the day). This is such a monumental change that some of the changes, if approved, will have an impact on other sections of the standards. It was agreed that there should be a thorough review of all changes and updates throughout the standard, specifically 3280.801.

BREAK

General Subcommittee Report

Chairman of the General Subcommittee, Mark Mazz, stated that there was nothing to report.

Structure and Design Subcommittee Report

Chairman of the Structure and Design Subcommittee, Jeffrey Legault, presented the following Log Items to the committee for action:

LOG 87: **§ 3280.112 Hallways.**
Log 87 is still with the subcommittee as a tabled item. The subcommittee was scheduled to meet at 2:15 p.m. on Day 2.

DRAFT

LOG 115: **§ 3280.4(ff)(21) Incorporation by Reference**

It was noted there was no cost increase in updating to the 2011 standard because the industry was already complying with this standard.

MHCC Motion to approve Log 115 as modified.

Maker: Steven Anderson Second: Rick Hanger

Meeting Vote: Unanimously Approved.

Assigned Reference Standards Update:

- AISC, Steel Construction Manual

  Tabled pending a proposed Log Item by Dave Tompos (Log 134).

- NER 272 / ESR-1539, National Evaluation Report, Power Driven Staple, Nails and Allied Fasteners for use in All Types of Building Construction

  Assigned to a task group led by Steven Anderson scheduled to meet at 1:15 p.m. on Day 2.

- APA – H815G, Design & Fabrication of All-Plywood Beam

  Assigned to a task group led by John Weldy scheduled to meet at 9:15 a.m. on Day 3.

This concluded the Structure and Design Subcommittee's report.

Regulatory Subcommittee Report

Chairman of the Technical Systems Subcommittee, Debra Blake, presented the following Log Items to the committee for action:

- Action Item 6: Shower, Bathtub and Tub-shower Combination Valve Adjustment During Installation

  Ms. Blake informed the committee that after reviewing the status of what already had been done, i.e., review of the HUD guidance letter **requiring** manufacturers to include the valve adjustment in their installation manuals, and the update to the Form 309 checklist, it was decided that these actions were satisfactory and no further action is necessary.

- SAA Funding Option Proposals

  Ms. Blake noted that if Option A was implemented, some states (including Arizona) would not be able to continue as an SAA state.

  MHCC Motion to recommend Option B to HUD.

  Maker: Steven Anderson Second: Debra Blake

  Meeting Vote: 17-1-0

LOG 135: **§ 3285.603 Water supply**

Ms. Blake provided some background and noted that pvc manufacturers warn against testing their pipes with air due to safety risks. Manuel Santana was tasked with drafting Log 135. The committee was in disagreement whether the testing issue concerned the entire water system or with just the yard line. Ultimately, the committee decided that more clarification was required.

MHCC Motion to refer Log 135 back to the Regulatory Subcommittee.

Maker: Ishbel Dickens Second: Steven Anderson

Meeting Vote: Unanimously Approved.

DRAFT

DFO Danner thanked Debra Blake for her report and welcomed Ms. Blake as the Vice Chairman of the MHCC. Ms. Danner reviewed the subcommittee membership lists and new member assignments (see Appendix B).

BREAK

Public Comment

Lois Starkey expressed disappointment with result of Log 90 and stated that the MHI TAC committee will work to submit another log item on the subject.

Review Current Log and Actions Items (AI)

LOG 80: **§ 3280.406 (new section)**
MHCC Motion to table Log 80 until the next MHCC meeting.
Maker: Debra Blake Second: Joseph Sadler
Meeting Vote: Unanimously Approved.

LOG 113: **§ 3280.4(b)(1) Incorporation by reference**
MHCC Motion to refer Log 113 to Structure and Design Subcommittee.
Maker: Steven Anderson Second: Rick Hanger
Meeting Vote: Unanimously Approved.

LOG 114: **§ 3280.4(i)(20) Incorporation by reference**
MHCC Motion to refer Log 114 to Structure and Design Subcommittee.
Maker: Debra Blake Second: Steven Anderson
Meeting Vote: Unanimously Approved.

The MHCC questioned what the ramifications will be with the imminent publishing of the DOE rule and continued to table several log items that may be affected.

LOG 119: **§ 3280.508(b) Heat loss, heat gain and cooling load calculations**
MHCC Motion to table Log 119 until the next MHCC meeting.
Maker: Jeff Legault Second: Ishbel Dickens
Meeting Vote: 16-1-0

LOG 120: **§ 3280.508(b) Heat loss, heat gain and cooling load calculations**
MHCC Motion to table Log 120 until the next MHCC meeting.
Maker: Debra Blake Second: Steven Anderson
Meeting Vote: 16-1-0

LOG 121: **§ 3280.508(d) Heat loss, heat gain and cooling load calculations**
MHCC Motion to table Log 121 until the next MHCC meeting.
Maker: Steven Anderson Second: John Weldy
Meeting Vote: 16-1-0

LOG 122: **§ 3280.511(a)(1) Comfort cooling certificate and information**
MHCC Motion to table Log 122 until the next MHCC meeting.
Maker: Steven Anderson Second: John Weldy
Meeting Vote: 16-1-0

DRAFT

LOG 123: **§ 3280.511(a)(2) Comfort cooling certificate and information**
MHCC Motion to table Log 123 until the next MHCC meeting.
Maker: Steven Anderson Second: John Weldy
Meeting Vote: 16-1-0

Chairman Weinert introduced Log 130 and noted that as it deals with fire safety and egress, it should be considered carefully.

LUNCH BREAK

Following the lunch break the committee continued to discuss Log 130. The discussion centered on the evolving boundaries and definitions of a "room."

LOG 130: **§ 3280.105(a)(2)(i) Exit facilities; exterior doors**
MHCC Motion to approve Log 130 as modified.
Maker: Steven Anderson Second: Joseph Sadler
Meeting Vote: 15-3-0

The MHCC meeting adjourned at 2:04 p.m. to allow for the NFPA 70 Task Group to meet.

The MHCC reconvened at 3:56 p.m.

BREAK

LOG 131: **§ 3280.305(k)(2) Structural Design Requirements**
John Weldy provided some background and noted that this was probably the most significant item the committee would be discussing. In the on-site rule (effective March 2016), there was language that changed 3280.305 which is the structural part of the standard. The on-site rule adds language for storage and live load. Attic storage is not defined in the current code. It adds a requirement that the bottom chord of the roof truss be designed for a 20 lb. live load. In most manufactured homes, there is not a defined attic space as there just isn't enough space. The text in Log 131 that Mr. Weldy proposed was from the IRC. He stated that if you have the access and the certain dimensions, then you would have the attic. As of next month, without this definition, Mr. Weldy suggested that he did not think he could continue to build manufactured homes.

Rick Mendlen clarified that there was a typographical error, the word **not** was left out of the standard. HUD guidance is that when there is an access panel you have access to the attic space, and when you don't, depending on roof slope, there may be no need for the storage live load.

Mr. Weldy stated that access is required in roof cavities to structurally connect the two halves of the multi-wide buildings. The guidance helps, it just doesn't help as much as we need.

DFO Danner reminded the committee that there will be a presentation on Day 2 that will cover this topic. Jason McJury asked that the committee members review the presentation provided in their meeting materials to prepare for the presentation.

MHCC Motion to Table Log 131 until after the presentation.
Maker: Debra Blake Second: Ishbel Dickens
Meeting Vote: Motion passed.

LOG 132: **§ 3285.2 Manufacturer Installation Instructions**
MHCC Motion to approve Log 132 as modified.

DRAFT

Maker: John Weldy Second: Steven Anderson
Meeting Vote: 18-0-0

Motion to adjourn at 5:10 p.m.

DAY 2: Wednesday, January 20, 2016

Reconvene

MHCC Chairman, Richard Weinert, reconvened the meeting at 9:05 a.m. and DFO Danner welcomed the committee back into session stating that Day 1 was successful and collaborative.

On-Site Completion of Construction Rule Presentation

Rick Mendlen provided some history on the evolution of the manufactured housing industry regarding onsite completion of construction.

Jason McJury provided an overview of the new on-site rule that was published in the *Federal Register* (Vol. 80, No. 173) (https://www.gpo.gov/fdsys/pkg/FR-2015-09-08/pdf/2015-21774.pdf). Mr. McJury stated the purpose of the presentation was to get the conversion going, for HUD to share plans and get feedback, and prepare for the March 7, 2016 effective date (see Appendix C).

BREAK

Following the presentation, there were many questions that ranged from the cost of implementation to states' rights.

Other than attic access and live load design requirements, another hot topic became the phrase "completion of the entire sales transaction," and the committee was concerned that the use of that language could have detrimental unintended effects on the manufactured housing industry.

Lois Starkey thanked HUD for their presentation as this issue was brought before the committee during its meeting in October 2015.

Robin Roy asked, what were the options for flexibility?

DFO Danner noted that there is some discretion but it is limited. She noted that the committee always has the ability to submit Log Items. HUD plans to hold conference calls with IPIAs & DAPIAs, follow-up with a webinar in February, provide ongoing guidance, and added an additional 6-month transition period for implementation.

LUNCH BREAK

MHCC Motion to respectfully request that HUD extend the transition period of the on-site rule to 12 months, instead of 6 months.
Maker: Leo Poggione Second: Steven Anderson
Meeting Vote: 18-0-0

DRAFT

Installation Program Update

DFO Danner introduced Michael Henretty, Project Manager, SEBA Professional Services. Mr. Henretty provided an update on the HUD Administered Manufactured Housing Installation Program (see Appendix D). The purpose of the program is to implement regulations 24 CFR Part 3285 and 24 CFR Part 3286. One of the key benefits is that everyone is trained to the same standard.

Two states were chosen for the initial training roll-out: Maryland and Nebraska. Visit the program's website for additional program information, forms, and FAQs at http://www.manufacturedhousinginstallation.com.

Review Current Log and Actions Items (AI)

The Committee turned its attention again to the list of Log Items.

LOG 131: **§ 3280.305(k)(2) Structural Design Requirements**
After a failed attempt to modify the language of Log 131, the committee ultimately decided to approve the log as written.
MHCC Motion to approve Log 131.
Maker: Steven Anderson Second: Jeffery Legault
Meeting Vote: 15-1-1

LOG 133: **§ 3280.2 Reference Standards**
Lois Starkey provided some background on Log 133 and stated that the intention was to include products such as tankless water heaters that were yet to be incorporated into the HUD code.
MHCC Motion to approve Log 133 as modified.
Maker: Steven Anderson Second: Debra Blake
Meeting Vote: 17-0-0

The committee was in agreement with the principle of Log 136 but looked for clarity and continuity with Log Items 136 through 138.

LOG 136: **§ 3286.205 (d) Prerequisites for installation license**
MHCC Motion to approve Log 136 as modified.
Maker: Jeffrey Legault Second: Alan Spencer
Meeting Vote: Unanimously Approved.

LOG 137: **§ 3286.205 (d) Prerequisites for installation license**
MHCC Motion to approve Log 137 as modified.
Maker: Steven Anderson Second: Richard Nolan
Meeting Vote: Unanimously Approved.

LOG 138: **§ 3286.209(b)(8)(vi) Prerequisites for installation license**
MHCC Motion to approve Log 138 as modified.
Maker: Steven Anderson Second: Ishbel Dickens
Meeting Vote: Unanimously Approved.

DRAFT

LOG 139: **§ 3280.4 Reference Standards**

Lois Starkey noted that this item was submitted to help with the review of reference standards. John Weldy suggested that APA H815G 2013 be added to the list as the Task Group had completed its review and it did not require further discussion on Day 3.

MHCC Motion to approve Log 139 as modified.

Maker: Steven Anderson Second: James Demitrus

Meeting Vote: Unanimously Approved.

Mark Weiss objected to this proposal being incorporated in a non-transparent process. As a late submittal, his view was that the public did not have sufficient time to evaluate.

BREAK

LOG 134: **§ 3280.304(b)(1) Materials**

MHCC Motion to approve Log 134.

Maker: John Weldy Second: Steven Anderson

Meeting Vote: Unanimously Approved.

Federal Emergency Management Agency (FEMA) Presentation

Matthew Rabkin, FEMA, provided an overview of the Manufactured Housing Unit Residential Fire Sprinkler System Program (see Appendix E) for temporary housing of eligible disaster survivors. Mr. Rabkin informed the committee that FEMA started with HUD code and added to it because it is designed for long-term use. Each unit could fulfill a housing need for up to 18 months and that the units were built to be transported anywhere in the contiguous states. They were designed to ensure simplicity for disaster survivors with minimal maintenance. The fire suppression system is concealed to prevent dwellers from hanging items from it and the pump system enclosure is anchored with the same tie downs as the manufactured home.

Mr. Rabkin answered questions and provided more detailed information. The fire suppression system is a wet system with heat trace, and closed foam insulation. This system is a life/safety system that is not designed to protect property, but to provide up to seven minutes to escape the dwelling. There are about 2,000 homes in stock stored in Selma, Alabama and Cumberland, Maryland.

The MHCC adjourned at 4:17 p.m. to allow the ESR-1539 Task Group of the Structure and Design Subcommittee to meet.

The MHCC reconvened at 4:43 p.m.

Public Comment Period

There were no public comments at this time.

There was a motion to adjourn at 4:45 p.m.

DRAFT

DAY 3: Thursday, January 21, 2016

Chairman Weinert reconvened the meeting at 9:03 a.m. and welcomed everyone back for the third and final day of the MHCC meetings. DFO Danner informed the committee that due to severe weather concerns, the Louisville Manufactured Housing Show will close one day early.

Tim Dewitt, Michigan Manufactured Housing Association, addressed the committee and provided some information for the tour of the show floor. He thanked the committee for making Louisville the location of their meeting. This was the 53rd annual Manufactured Housing Show and it is owned by the Midwest Manufactured Housing Association representing Michigan, Indiana, Illinois, Kentucky, and Ohio. The manufacturers are showing their new product lines, and the retailers are buying houses for their inventory. Committee members will get an opportunity to meet some of the CEOs of these companies and they can show you their products. He stated that they were pleased to have the MHCC meeting scheduled during and co-located with the Louisville Manufactured Housing Show.

DFO Danner reminded members to please fill-out the evaluation forms and pick-up their flash drive that contains the meeting materials. She stated that if the budget allows, the next meeting will probably be around mid-September after Labor Day.

Chairman Weinert addressed the committee. Mr. Weinert stated that as a committee, it is our duty to the consumers and the industry to do our due diligence and suggested that the committee should create an action item concerning the on-site rule and send it to the regulatory subcommittee.

Mr. Weinert noted that the committee should discuss exactly what the Regulatory Enforcement Subcommittee's assignment will be concerning the on-site rule. He stated that the industry is looking for some assistance from HUD.

MHCC motioned to establish an Action Item concerning the on-site final rule and assign the Action Item to the Regulatory Enforcement Subcommittee to provide the following tasks:

- **Examine the final rule**
- **Cost Analysis**
- **Risk Analysis (when the sale becomes final, who has authority to declare when the house should be occupied)**
- **Analysis of the implementation**
- **Authority and jurisdiction of HUD's expansion into states' rights and installation on-site.**

Maker: Steven Anderson Second: Ishbel Dickens
Meeting Vote: 18-0-0

The MHCC adjourned at 9:32 a.m. to allow the Structure and Design Subcommittee to meet.

The Structure and Design Subcommittee adjourned at 10:25 a.m.

DRAFT

Structure and Design Subcommittee Report

LOG 87: **§ 3280.112 Hallways.**
MHCC Motion to disapprove Log 87.
Maker: Ishbel Dickens Second: John Weldy
Meeting Vote: 17-1-0

Lois Starkey commented that at this point MHI cannot support changing all manufactured homes to 36-inch hallways.

Mark Weiss echoed Ms. Starkey's statement. Mr. Weiss also asked if the regulatory cost analysis has been submitted to HUD by DOE? If HUD has received it, when will the committee see it? DFO Danner stated that she must consult with legal counsel regarding her response.

BREAK

Dispute Resolution Program Presentation

DFO Danner introduced Demetress Stringfield, HUD, who provided an update on the HUD Manufactured Home Dispute Resolution Program (DRP) (see Appendix F) for HUD participating states. Ms. Stringfield informed the committee that HUD partnered with the Savan Group to create and administer the HUD DRP and track unresolved issues. She noted that the DRP was NOT for cosmetic issues but for construction/installation issues. Ms. Stringfield informed the committee of the new online tools available at www.huddrp.net.

Wrap UP

Chairman Weinert thanked HUD, Kevin Kauffman, Home Innovation Research Labs (AO), and Toni Price and Jane Hofilena, BLH Technologies (Meeting Planner).

Toni Price, BLH Technologies, thanked participants for their time and provided information on how to complete and file expense reports. Ms. Price informed the committee that they would get a flash drive with the digital copy of the notebook materials.

Chairman Weinert again thanked the committee for their time and adjourned the meeting at 11:15 a.m.

Tour of the Louisville Manufactured Housing Show 2016

The committee members broke-up into smaller groups to tour the show floor.

DRAFT

MHCC MEETING

January 19-21, 2016

APPENDIX A: PARTICIPANT LIST

Postmeeting Participant List

Manufactured Housing Consensus Committee Members

Joseph L. Anderson II
President and CEO
Timberland Mobile Housing, L.L.C.
1600 North Timberland Drive
Lufkin, TX 75901
Phone: 936-632-4481
E-mail: jodyanderson@consolidated.net

Steven T. Anderson
Apartment 417
815 Duke Drive
Grand Forks, ND 58201
Phone: 208-252-0244
E-mail: steveanderson@midco.net

Debra Blake
Deputy Director
Arizona Department of Fire, Building and Life Safety
Suite 100
1110 West Washington Street
Phoenix, AZ 85007
Phone: 602-364-1022
E-mail: debra.blake@dfbls.az.gov

James Demitrus
Commissioner
Ohio Manufactured Homes Commission
8974 Wood Thrush Drive
Streetsboro, OH 44241
Phone: 330-626-5941
E-mail: portagepacer@aol.com

Ishbel Dickens
Executive Director
National Manufactured Home Owners Association
P.O. Box 22346
Seattle, WA 98112
Phone: 206-851-6385
E-mail: ishbel@nmhoa.org

William Freeborne
Mechanical Engineer (Retired)
Apartment 606
4715 42nd Avenue, S.W.
Seattle, WA 98116
Phone: 301-467-2662
E-mail: wfreeborne@aol.com

Dominic Frisina
Vice President
RoMar Homes, Inc.
10316 Hartstown Road
Espyville, PA 16424
Phone: 724-301-0921
E-mail: dominic@romarhomes.com

Rick Hanger
Program Manager
Colorado Division of Housing
Suite 321
1313 Sherman Street
Denver, CO 80203
Phone: 303-864-7833
E-mail: rick.hanger@state.co.us

Jeffrey T. Legault, P.E.
Director, Product Design and Engineering
Skyline Corporation
2520 By-Pass Road
Elkhart, IN 46514
Phone: 574-294-6533
E-mail: jlegault@skylinecorp.com

Mark J. Mazz, A.I.A., L.L.C.
4016 Jefferson Street
Hyattsville, MD 20781
Phone: 301-440-4276
E-mail: mark.j.mazz@verizon.net

Garold Miller
Manager
Ricciardi Bros. Paint, Inc.
48 Boxwood Drive
Jackson, NJ 08527
Phone: 732-534-0085
E-mail: garnoldmiller@gmail.com

Richard Nolan
Vice President – Director of DAPIA
HWC Engineering
1627 South Myrtle Avenue
Clearwater, FL 33756
Phone: 727-584-8151
E-mail: rnolan@hwceng.com

Leo Poggione
President
Craftsman Home
P.O. Box 7036
Reno, NV 89510
Phone: 775-853-3004
E-mail: leo@forahouse.com

Robin Roy
Director, Building Energy Efficiency and
Clean Energy Strategy
Natural Resources Defense Council
360 Golden Oak Drive
Portola Valley, CA 94028
Phone: 650-888-7806
E-mail: rroy@nrdc.org

Joseph H. Sadler, Jr., P.E.
Deputy Director
North Carolina Department of Insurance
1202 Mail Service Center
Raleigh, NC 27699-1202
Phone: 919-661-5880, x215
Cell: 919-218-3941
E-mail: joe.sadler@ncdoi.gov

Alan Spencer
President
CAJ Enterprises, Inc., dba: Dakotaland Homes
1028 South Lyons Avenue
Sioux Falls, SD 57106
Phone: 605-335-8122
E-mail: aspencer@dakotalandhomes.com

Richard Weinert
Deputy Director
California Department of Housing and
Community Development
2020 West El Camino Avenue
Sacramento, CA 95833
Phone: 916-263-2966
E-mail: richard.weinert@hcd.ca.gov

John W. Weldy
Director of Engineering
CMH Manufacturing, Inc.
P.O. Box 1218
437 North Main Street
Middlebury, IN 46540
Phone: 574-825-7500
E-mail: john.weldy@clayton.net

U.S. Department of Housing and Urban Development

HUD Office of Manufactured Housing Programs Staff

Pamela Beck Danner
Administrator
Office of Manufactured Housing Programs
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410
Phone: 202-402-7112
E-mail: pamela.b.danner@hud.gov

Richard Mendlen
Senior Structural Engineer
Office of Manufactured Housing Programs
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410
Phone: 202-402-5608
E-mail: richard.a.mendlen@hud.gov

Patricia McDuffie
Manufactured Housing Specialist
Office of Manufactured Housing Programs
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410
Phone: 202-402-5607
E-mail: patricia.a.mcduffie@hud.gov

Demetress Stringfield
Management Analyst
Office of Manufactured Housing Programs
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410
Phone: 202-402-2239
E-mail: demetress.e.stringfield@hud.gov

Jason McJury
Structural Engineer and Manufactured Housing Specialist
Office of Manufactured Housing Programs
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410
Phone: 202-402-2480
E-mail: jason.c.mcjury@hud.gov

HUD Support Services Contractor Personnel

MHCC Administering Organization Staff

Kevin Kauffman
Research Engineer II
Home Innovation
400 Prince George's Boulevard
Upper Marlboro, MD 20774
Phone: 888-602-4663
E-mail: mhcc@homeinnovation.com

Tanya Akers
Executive Assistant
Home Innovation
400 Prince George's Boulevard
Upper Marlboro, MD 20774
Phone: 888-602-4663
E-mail: mhcc@homeinnovation.com

Monitoring Contract Staff

Ashok Goswami
Senior Program Manager
Institute for Building Technology and Safety, Inc.
45207 Research Place
Ashburn, VA 20147
Phone: 703-481-2000, x201
E-mail: agoswami@ibts.org

James Turner
DAPIA Task Manager
Institute for Building Technology and Safety, Inc.
45207 Research Place
Ashburn, VA 20147
Phone: 703-481-2000, x219
E-mail: jturner@ibts.org

Installation Contract Staff

Michael S. Henretty
Project Manager
SEBA Professional Services, L.L.C.
Suite 500
1325 G Street, N.W.
Washington, DC 20005
Phone: 703-407-1094
E-mail: michael.henretty@sebapro.com

Meeting Planner Contract Staff

Antoinette (Toni) Price
Deputy Project Director
BLH Technologies, Inc.
Suite 300
1803 Research Boulevard
Rockville, MD 20850
Phone: 240-399-8727
E-mail: aprice@blhtech.com

Jane Hofilena
Logistics Specialist
BLH Technologies, Inc.
Suite 300
1803 Research Boulevard
Rockville, MD 20850
Phone: 240-399-8742
E-mail: jhofilena@blhtech.com

Other Attendees

George Allen
President
GFA Management
P.O. Box 47024
Indianapolis, IN 46247
Phone: 317-348-7156
E-mail: gfa7156@aol.com

Amy Bliss
Executive Director
Wisconsin Housing Alliance
258 Corporate Drive, #200C
Madison, WI 53714
Phone: 608-255-3131
E-mail: amy@housingalliance.us

Debbie Anderson
Owner
R&H Mobile Housing
1600 North Timberland Drive
Lufkin, TX 75901
Phone: 936-632-4481

Mark Bowersox
Senior Vice President, Industry Relations
Manufactured Housing Institute
Suite 104
1655 North Fort Myer Drive
Arlington, VA 22209
Phone: 703-406-7074
E-mail: mbowersox@mfghome.org

Tim DeWitt
Executive Director
Michigan Manufactured Housing Association
2222 Association Drive
Okemos, MI 48864
Phone: 517-349-3300
E-mail: tdewitt@mmhrvca.org

Stacey Epperson
President
Next Step
2005 Longest Avenue
Louisville, KY 40204
Phone: 502-694-1972
E-mail: s.epperson@nextstepus.org

Mary Gaiski
Executive Vice President
Pennsylvania Manufactured Housing Association
P.O. Box 248
New Cumberland, PA 17070
Phone: 717-774-3440
E-mail: mary@pmha.org

Andy Gallagher
Executive Director
West Virginia Housing Institute, Inc.
P.O. Box 2182
Charleston, WV 25328
Phone: 304-415-4187
E-mail: andy@wvhi.org

Nancy Geer
Executive Director
New York Housing Association
634 Watervliet Shaker Road
Latham, NY 12110
Phone: 518-867-3242
E-mail: nancy@nyhousing.org

Tom Heinemann
Vice President, Government Relations
Manufactured Housing Institute
Suite 104
1655 North Fort Myer Drive
Arlington, VA 22209
Phone: 703-229-6207
E-mail: theinemann@mfghome.org

Jim Husom
President
PFS Corporation
1507 Matt Pass
Cottage Grove, WI 53527
Phone: 608-839-1372
E-mail: jhusom@pfscorporation.com

Don Iverson
Field Representative
National Electrical Manufacturers Association
1102 South Eifert Road
Mason, MI 48854
Phone: 517-648-0939
E-mail: don.iverson@nema.org

Laurie Mercurio
Communications Director
Wisconsin Housing Alliance
258 Corporate Drive, #200C
Madison, WI 53714
Phone: 608-255-3131
E-mail: laurie@housingalliance.us

Matthew Rabkin
Program Manager
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street, S.W.
Washington, DC 20024
Phone: 202-212-1011
E-mail: matthew.rabkin@fema.dhs.gov

Manuel Santana
Director of Engineering
Cavco Industries
1001 North Central Avenue
Phoenix, AZ 85004
Phone: 602-283-9228
E-mail: manuels@cavco.com

Lois Starkey
Vice President, Regulatory Affairs
Manufactured Housing Institute
Suite 104
1655 North Fort Myer Drive
Arlington, VA 22209
Phone: 703-558-0654
E-mail: lstarkey@mfghome.org

William Tegeler
Consultant
Radco, Inc.
4057 Lake Shore Drive
Bremen, IN 46506
Phone: 574-514-7207
E-mail: wtegeler@radcoinc.com

Cameron Tomasbi
Structural Engineer
Commodore Corporation
1423 Lincolnway, East
Goshen, IN 46526
Phone: 574-533-7100
E-mail: ctomasbi@commodorehomes.com

Nader Tomasbi
Commodore Corporation
1423 Lincolnway, East
Goshen, IN 46526
Phone: 574-533-7100
E-mail: nader@designtechnic.net

Michael Wade
Director of Manufacturing
Cavalier Homes, Inc.
P.O. Box 390
144 Corporate Way
Addison, AL 35540
Phone: 256-747-8589
E-mail: mwade@cavhomesinc.com

Mark Weiss
President and Chief Executive Officer
Manufactured Housing Association for
Regulatory Reform
Suite 512
1331 Pennsylvania Avenue, N.W.
Washington, DC 20004
Phone: 202-783-4087
E-mail: mharrdg@aol.com

Janet Williams
Executive Director
Ohio Manufactured Homes Commission
Suite 103
5100 Parkcenter Avenue
Dublin, OH 43017
Phone: 614-734-6010
E-mail: janet.williams@omhc.state.oh.us

Mike Zieman
President
Radco, Inc.
3220 East 59th Street
Long Beach, CA 90805
Phone: 562-272-7241
E-mail: mikezieman@aol.com

MHCC MEETING
January 19-21, 2016

APPENDIX B:
2016 MHCC MEMBERS AND SUBCOMMITTEE LISTS

MANUFACTURING HOUSING CONSENSUS COMMITTEE MEMBERS
JANUARY 2016

MHCC CHAIR & VICE CHAIR

MHCC Chair – Richard Weinert

MHCC Vice Chair – Debra Blake

USER CATEGORY

Steven T. Anderson
James Demitrus
Ishbel Dickens
Mark Mazz
Garold Miller
Timothy O'Leary
Charles Onsum

GENERAL INTEREST – PUBLIC OFFICIAL CATEGORY

Debra Blake
Robin Roy
Richard Weinert
William Freeborne
Rick Hanger
Richard Nolan
Joseph Sadler

PRODUCER CATEGORY

Joseph Anderson
Dominic C. Frisina
Jeffrey T. Legault, P.E.
Leo Poggione
Alan Spencer
Myles Standish
John Weldy

HUD STAFF & ADMINISTERING ORGANIZATION (AO)

Pamela Beck-Danner – Designated Federal Office (DFO)
Administrator
Office of Manufactured Housing Programs
451 7th Street, SW, Room 9168
Washington DC 20410-8000
202-402-7112
Pamela.B.Danner@hud.gov

Kevin Kauffman, Administering Organization (AO)
Home Innovation Research Labs
400 Prince George's Boulevard
Upper Marlboro, MD, 20744
1-888-602-4663
mhcc@homeinnovation.com

MANUFACTURING HOUSING CONSENSUS COMMITTEE

SUBCOMMITTEE MEMBERS

January 2016

	Technical Systems	
	3280 Subpart F, G, H, I	
	Name	Email
Users	Mark Mazz	mark.j.mazz@verizon.net
	Garold Miller	garnoldmiller@gmail.com
	James Demitrus	portagepacer@aol.com
	Timothy O'Leary	idahoinspector@frontier.com
Producers	John Weldy	john.weldy@claytonhomes.com
	Leo Poggione	leo@forahouse.com
	Alan Spencer	aspencer@dakotalandhomes.com
General Interest / Public Official	Robin Roy	rroy@nrdc.org
	Debra Blake	debra.blake@dfbls.az.gov
	William Freeborne	WFreeborne@aol.com
	Rick Hanger	Rick.Hanger@state.co.us

	Regulatory Enforcement	
	3282, 3285, 3286, 3288	
	Name	Email
Users	Ishbel Dickens	ishbel@nmhoa.org
	Charles Onsum	chaswm@onsum.net
	James Demitrus	portagepacer@aol.com
Producers	Alan Spencer	aspencer@dakotalandhomes.com
	Jeffrey T. Legault	jlegault@skylinecorp.com
	Joseph Anderson	jodyanderson@consolidated.net
General Interest / Public Official	William Freeborne	WFreeborne@aol.com
	Debra Blake	debra.blake@dfbls.az.gov
	Robin Roy	rroy@nrdc.org
	Richard Weinert	rweinert@hcd.ca.gov

	Structure & Design	
	3280 Subpart A, B, C, D, E, J	
	Name	Email
Users	Steven T. Anderson	steveanderson@midco.net
	Ishbel Dickens	ishbel@nmhoa.org
	Charles Onsum	chaswm@onsum.net
Producers	Myles Standish	mestandish@aol.com
	Jeffrey T. Legault	jlegault@skylinecorp.com
	Dominic Frisina	dominic@romarhomes.com
	John Weldy	john.weldy@claytonhomes.com
General Interest / Public Official	Joseph Sadler	joe.sadler@ncdoi.gov
	Richard Weinert	rweinert@hcd.ca.gov
	Richard Nolan	rnolan@hwceng.com

	General	
	Name	Email
Users	Steven T. Anderson	steveanderson@midco.net
	Garold Miller	garnoldmiller@gmail.com
	Mark Mazz	mark.j.mazz@verizon.net
Producers	Leo Poggione	leo@forahouse.com
	Dominic Frisina	dominic@romarhomes.com
	Myles Standish	mestandish@aol.com
General Interest / Public Official	Rick Hanger	Rick.Hanger@state.co.us
	Richard Nolan	rnolan@hwceng.com
	Joseph Sadler	joe.sadler@ncdoi.gov

MHCC MEETING
January 19-21, 2016

APPENDIX C:
ON-SITE COMPLETION OF CONSTRUCTION RULE PRESENTATION

By Jason McJury and Richard Mendlen

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

On-Site Completion of Construction of Manufactured Homes

24 CFR 3282 Subpart M

Richard Mendlen and Jason McJury

Purpose and Goals

- Purpose:
  - Provide introduction and Implementation information for the MHCC, PIAs, Manufacturers, Retailers, Installers, SAAs, and other interested parties
- Goals:
  - Engage, Share, Collect Feedback

The Final Rule

FEDERAL REGISTER

Vol. 80 Tuesday,
No. 173 September 8, 2015

Pages 53691–54222

OFFICE OF THE FEDERAL REGISTER

- Published on September 8, 2015
- Federal Register Volume 80
  Number 173
- Pages 53712 through 53732
- Establishes new Subpart M and includes some correlating changes
- Effective Date of March 7, 2016

https://www.gpo.gov/fdsys/pkg/FR-2015-09-08/pdf/2015-21774.pdf

What is this Rule For?

- Procedure by which construction of new manufactured housing that is substantially completed in the factory can be completed at the final installation site, rather than in the plant, under specific approval including terms and conditions
- The completed site work must bring the home into conformance with the Manufactured Home Construction and Safety Standards (3280)
- Does not apply to homes that will not comply with the standards upon completion or when a major section or assembly of a manufactured home is to be constructed on-site.

Benefits of the Rule

- Expands regulatory flexibility by offering choices to manufacturers and homeowners
- Facilitates the continuing evolution and sophistication of this factory-built housing product
- Encourages designs and techniques that demonstrate the adaptability and versatility of manufactured housing
- Provides for responsiveness to consumer demands
- Improved aesthetics
- Overall it aims to simplify and reduce the burdens for obtaining approval for many aspects currently allowed and regulated through Alternative Construction Approvals.

Correlating Changes

- § 3280.5(c) Data Plate – One of two statements on Data Plate must be present:
  - One if the home is completed in the factory
  - One if the home is designed for site completion (all homes where SC applies)

Correlating Changes

- § 3280.305(k) - Attic loads – Establishes Attic Load requirement
  - For homes with roof slope of 7/12 and greater, the area of the attic floor meeting ceiling height and living space requirements must be designed for a 40 PSF design live load. (Note that all loads MUST be carried through to the ground)
  - For homes with roof slope less than 7/12 that contain an attic access or for portions of roofs with slopes 7/12 or greater that do not meet ceiling height and living space requirements must be designed for a storage live load of 20 PSF. (Technical errors to be corrected)

Correlating Changes

- § 3282.252 – Modifies terms of prohibition of sale to accommodate homes with SC approval
  - This modification indicates that for homes built under Subpart M (the On Site Completion of Manufactured Home Construction), the sale is not considered complete until the purchaser or lessor is provided with a final site inspection report.
  - It is noted that if the retailer agrees to provide installation as part of the sales agreement, the sale is also not considered complete until the installation is complete.

Correlating Changes

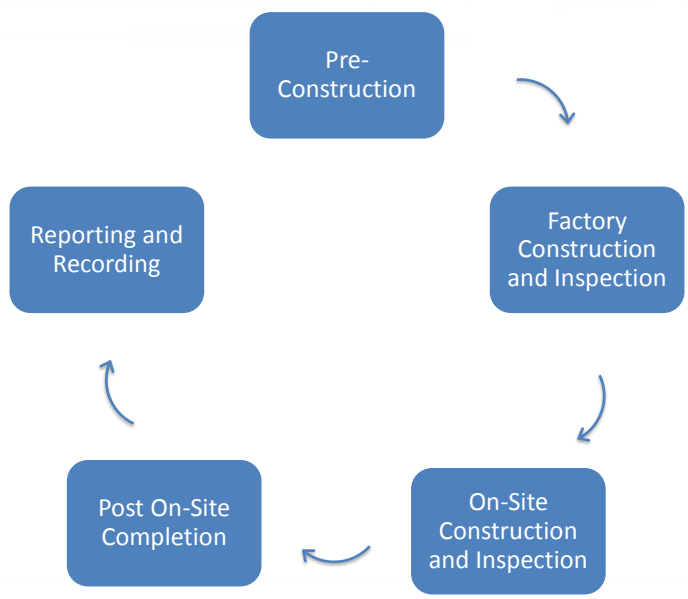
- § 3285.801 – Exterior Close Up
- Completion of “peak cap” and “peak flip” roof construction is permitted to be completed as installation work if the roof slope is less than 7:12 and is designed for Wind Zone I only.

Requirements

- **General Eligibility**
  - The homes must be substantially complete in the factory [§ 3282.601(b)(1)]
  - On Site construction must bring the home into compliance with the Construction and Safety Standards [§ 3282.601(b)(2)]
  - Be inspected by the manufacturer’s IPIA [§ 3282.601(b)(3)]

Requirements

- **Other Considerations**
  - Allows only partial completion of structural assemblies or systems (plumbing, electrical, heating, cooling, fuel burning, and fire safety) and components built as an integral part of the home [§ 3282.602]
  - Partial completion must be necessary because factory completion is not practicable [§ 3282.602]
  - If construction will not result in compliance with the Construction and Safety Standards, Alternative Construction will be required [§ 3282.14]



Pre-Construction

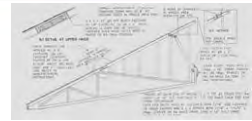
Pre-Construction

Stakeholder Responsibilities

Manufacturer
• Develop written request package (designs, QA manual, Consumer Information Notice, etc.). [§§3282.603(a), 608]
• Ensure package contains minimum required contents including IPIA agreements to perform on-site inspections. [§§3282.603, 608]
• Obtain DAPIA Approval. [§3282.608]

Pre-Construction

Stakeholder Responsibilities



DAPIA

- Review and approve or deny written request and retain written record of its action. [§§3282.603(b), 604]
- Stamp or sign each page of approval and ensure that each page has "SC" designation at a minimum. [§3282.603(c)]
- Send copy of action correspondence to HUD and continue to send approvals per ongoing protocol. [§3282.603(c)]

Pre-Construction

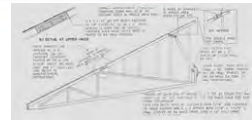
Stakeholder Responsibilities

IPIA

- Review and concur on QC checklist and on-site inspection checklist. [§§3282.603(d), 607(a)]
- Agree to be responsible for site inspections. [§§3282.603(d), 608(b)]

Pre-Construction

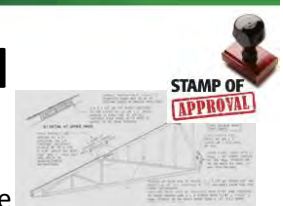
Stakeholder Responsibilities



Retailer

- Retailer must provide Consumer Information Notice before purchase agreement. [§3282.606(c)]

Contents of DAPIA Approval



- ✓ Unique site completion numeric identification
- ✓ Identification of work allowed to be completed on-site
- ✓ List of applicable models or indication approval is non-model specific
- ✓ Instructions for completing the on site work
- ✓ Consumer Information Notice
- ✓ QA manual for on-site completion
- ✓ QC checklist ensuring all instructions and materials are provided
- ✓ Inspection checklist to be used for final site inspections
- ✓ IPIA's written agreement to complete inspections and record keeping
- ✓ Description of the manufacturer's tracking system
- ✓ Any other requirements or limitations deemed necessary by the DAPIA

IMPORTANT CONSUMER INFORMATION NOTICE

WARNING: DO NOT LIVE IN THIS HOME UNTIL THE ON-SITE WORK HAS BEEN COMPLETED AND THE MANUFACTURER HAS PROVIDED A COPY OF THE INSPECTION REPORT THAT CERTIFIES THAT THE HOME HAS BEEN INSPECTED AND IS CONSTRUCTED IN ACCORDANCE WITH APPROVED INSTRUCTIONS FOR MEETING THE CONSTRUCTION AND SAFETY STANDARDS.

This home has been substantially completed at the factory and certified as having been constructed in conformance with the Federal Manufactured Home Construction and Safety Standards when specified work is performed and inspected at the home site. This on-site work must be performed in accordance with manufacturer's instructions that have been approved for this purpose. The work to be performed on-site is [insert description of all work to be performed in accordance with the construction and safety standards].

This notice may be removed by the purchaser or lessor when the manufacturer provides the first purchaser or lessor with a copy of the manufacturer's final site inspection report, as required by regulation. This final report must include the manufacturer's certification of completion. All manufactured homes may also be subject to separate regulations requiring approval of items not covered by the Federal Manufactured Home Construction and Safety Standards, such as installation and utility connections.

¾" high "title" text

¼" high "notice" text

Factory Construction and Inspection

Factory Construction and Inspection

Stakeholder Responsibilities

Manufacturer

- Include "SC" as a prefix or suffix to serial number. [§3282.605(a)]
- Provide appropriate language on Data Plate indicating home built for on-site completion. [§3280.5]
- Provide a Consumer Information Notice in or on the home. [§3282.605(b)]
- Report to HUD, through its IPIA, monthly production, copies to SAAs where homes are located. [§3285.605(e)]

Factory Construction and Inspection

Stakeholder Responsibilities

DAPIA

- Issue design and quality assurance manual change approvals as may be necessary. [§§3282.361(b), 361(c)]
- Monitor approval and act as may be necessary. [§§3282.604, 609]

Factory Construction and Inspection

Stakeholder Responsibilities

IPIA

- Oversee the effectiveness of the manufacturers QC system, including adequacy and effectiveness of use of in-plant checklists. [§3282.607]

On Site Construction and Inspection

On-Site Construction and Inspection

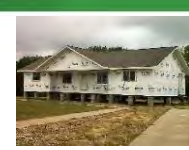
Stakeholder Responsibilities

Manufacturer

- Provide its inspection report to the IPIA within 5 business days of completing the report. [§§3282.605(d) and 608(m)]
- Inspect all aspects of on-site construction per its QA manual. [§§3282.605(c), 608(k)]
- Notify the IPIA to arrange for its inspection. [§§3282.608(c) and 608(l)]
- Retain the DAPIA approved QA manual, instructions for completing the work, and the approved inspection checklist, at the job site until all work is complete and accepted by the IPIA. [§3282.608(e)]
- Provide its inspection report to the IPIA within 5 business days of completing the report. [§§3282.605(d) and 608(m)]

On-Site Construction and Inspection

Stakeholder Responsibilities



DAPIA

- Issue design and quality assurance manual change approvals as may be necessary. [§§3282.361(b), 361(c)]
- Monitor approval and act as may be necessary. [§§3282.604, 609]

On-Site Construction and Inspection

Stakeholder Responsibilities

IPIA
• Verify the manufacturer's quality control system for on site work is functioning and being followed. [§3282.607(c)]
• Inspect all of the on-site work using the DAPIA-approved inspection checklist. [§§3282.603(d), 607(c), 607(d)]
• Red tag any non-conforming home and re-inspect until it is satisfied that the manufacturer is conforming to the conditions of the approval. [§3282.605(d)]
• Notify the manufacturer of its rejection or acceptance of the manufacturer's final inspection report by either issuing its own inspection report or by indicating in writing, within 5 days of preparing its report, that it accepts the manufacturer's inspection report. [§§3282.605(d), 607(c), 607(e), 607(f)]
• Monitoring the manufacturer's system for tracking homes from factory production through to site completion and final inspections of the homes. [§3282.607(c)]

Final On Site Inspection Report

- ✓ Name and address of manufacturer
- ✓ Serial number(s) of the home
- ✓ Address of the home site
- ✓ Name of person/agency responsible for manufacturer's final site inspection
- ✓ Name of each person/agency performing inspection on behalf of IPIA
- ✓ Name of the person responsible for accepting the manufacturer's final inspection report
- ✓ IPIA's name, mailing address and telephone number (email)
- ✓ Description of the work performed on site and the inspections made
- ✓ Verification that any problems noted in either inspection report were corrected before certification of compliance
- ✓ Certification by the manufacturer of completion in accordance with the DAPIA-approved instructions and that the home conforms with the approved design or as appropriate the construction and safety standards

Post - On Site Construction and Inspection

Post On-Site Completion

Stakeholder Responsibilities

Manufacturer

- Provide a written certification to the lessor or purchaser, when all work is completed, that each home, to the best of its knowledge and belief, is constructed in conformance with the Construction and Safety Standards. [§3282.608(g)]
- Within 5 business days after the date the IPIA provides its approval of the manufacturer's final site inspection report, the manufacturer must provide a copy of the inspection report, prior to occupancy, to the purchaser or lessor, retailer, or any other person that performed the work. [§3282.605(d)]

Post On-Site Completion

Stakeholder Responsibilities

Retailer

- Note that for purposes of manufacturer and retailer responsibilities under the Act, the sale is not considered complete until the manufacturer provides the purchaser or lessor a copy of the IPIA-approved or accepted final site inspection report and certification of completion. [§3282.252, 606(d)]

Recordkeeping and Reporting

Recordkeeping and Reporting

Stakeholder Responsibilities

Manufacturer
• Maintain all records at the factory of origin. [§§3282.608(n), 608(q)]
• Report on its monthly production reports, in addition to all data reported, a brief description of the work to be completed at the site. [§§3282.552, 608(o)]
• Provide cumulative quarterly production reports to HUD. [§3282.608(p)]
• Maintain in its records for 5 years after date of sale, an indication that the final site inspection and certification of completion has been provided to the lessor or purchaser and as applicable the retailer. [§3282.606(d)]
• Responsible for paying costs of IPIA inspection. [§3282.608(d)]

Recordkeeping and Reporting

Stakeholder Responsibilities

DAPIA
• Maintain approvals for at least 5 years. [§3282.604(c)]
• Revoke or amend approvals as may be necessary. [§3282.604(d)]
• Review approvals every 3 years or more frequently if there are changes made to the MHCSS to verify continued compliance with the Standards. [§3282.604(e)]

Recordkeeping and Reporting

Stakeholder Responsibilities

IPIA

- Maintain records of all site inspections made for 5 years. [§§3282.362(d), 607(f)]
- All reports must remain available for inspection by SAA or HUD in its central records office. [§3282.607(f)]
- Report to the HUD, the DAPIA, and the manufacturer if one or more homes are not inspected prior to occupancy or if manufacturer is not making arrangements for site inspections. [§3282.607(g)]

Recordkeeping and Reporting

Stakeholder Responsibilities

Retailer

- Maintain record of manufacturer's inspection that it will receive from manufacturer within 5 days of IPIA's acceptance of manufacturer's inspection report (recommended at least 5 years).

Revocation and Amendment § 3282.609

- The DAPIA or Secretary may revoke or amend, prospectively, any approval when it determines:
  - 1) noncompliance with terms of the approval,
  - 2) approval was not issued in conformance to requirements,
  - 3) a home produced under the approval fails to comply with the MHCSS or contains an Imminent Safety Hazard,
  - 4) manufacturer fails to make arrangements for inspection by IPIA prior to occupancy.
- The DAPIA must immediately notify the manufacturer, the IPIA, and HUD of any revocation or amendment

Failure to Comply with the Procedures of this Subpart 3282.610

- HUD may prohibit any manufacturer or PIA from using these procedures, found to be in violation of the requirements of this section (presentation of views will be afforded)
- Repeated infractions may be grounds for suspension or disqualification of a PIA

General Requirements

- Must bring home into compliance with MHCSS
- Must be substantially complete with limited on-site completion for items that cannot reasonably be completed at the factory
- Sale is not complete until all goods and services provided

Summary of Responsibilities by Stakeholder

- **Manufacturer**
  - Prepare designs and QA manual and submit to DAPIA for review
  - Coordinate to obtain IPIA agreement to do inspections – signed letter
  - Incorporate SC prefix or suffix to serial number
  - Provide a Data Plate that indicates On-Site Completion
  - Develop and provide a Consumer Notice
  - Implement system of completing and inspecting work and tracking homes
  - Ensure paperwork is available on site until work is completed and accepted by the IPIA
  - Notify the IPIA when it is ready for inspection
  - Provide written certification upon completion.
  - Provide purchaser/lessor with final site inspection report within 5 days after IPIA acceptance

Summary of Responsibilities by Stakeholder

- **DAPIA**
  - Review and approve or deny requests for on-site construction (designs, QA manual, systems, checklists, special requirements or limitations, etc.)
  - Identify approvals with a unique on site completion approval number and serial numbering system
  - Act as necessary by revoking or amending approvals and informing parties
  - Review approvals at least every 3 years
  - Retain approvals for at least 5 years

Summary of Responsibilities by Stakeholder

- **IPIA**
  - Agree to do inspections and concur on QA manual
  - Oversee manufacturer's processes
  - Monitor manufacturers tracking system
  - Perform 100% inspection on-site according to DAPIA checklist
  - Review and provide acceptance /rejection of manufacturer's inspection to the manufacturer
  - Document and report FTC as well as quality procedure failures, red tag and re-inspect as needed
  - Retain inspection records for 5 years.

Summary of Responsibilities by Stakeholder

- **Retailer**
  - Provide a copy of Consumer Information Notice before entering into purchase agreement
  - Ensure it does not remove the notice in/on home until purchaser takes possession
  - Retain record of manufacturer's inspection that it will receive from manufacturer within 5 days of IPIA's acceptance of manufacturer's inspection report (recommended at least 5 years).

Example Work Scopes

Alternative Construction Approval

On-Site Construction Approval

Installation Close-Up Work

Example Work Scopes:

- Appropriate Work Scopes for On-Site Construction:
  - Site construction of a fireplace hearth that cannot be completed in the factory because it spans the mating line of a multi-section manufactured home
  - Site construction of exterior French doors that cannot be completed in the factory due to potential damage during home shipment
  - Site completion of roof dormers including windows in dormers that cannot be completed in the factory due to shipment height limitations
  - Site construction of hinged roofs and eaves not considered to be installation

Example Work Scopes:

- Appropriate Work Scopes for On-Site Construction:
  - Site construction of sidings not considered close-up, such as stone, brick, stucco, or other materials that cannot be installed at the factory due to transportation challenges
  - Site construction of limited, specific building components such as an appliance and or fireplace provided they are listed or certified for use in manufactured homes (may be provided by retailer, purchaser, manufacturer)
  - Site construction of sidewall bay windows or tiled tub surrounds that cannot be completed in the factory due to potential damage during home shipment

Example Work Scopes:

- Appropriate Work Scopes for Alternative Construction:
  - Homes that will not comply with the standards or for which there are no federal standards
    - Two story home designs
    - Accessible Showers
    - Homes without floor insulation installed over heated basements
    - Tankless water heaters
    - Homes that exceed 2571 square feet, due to WHV requirements
    - Homes with less than 40 amp power supply
  - Homes that require significant work on site that is not deemed substantially completed in the factory
    - Triple Wide homes with center section roofs installed at the site
    - Add-on Garages

Example Work Scopes:

- Appropriate Work Scopes for Construction considered as Installation:
  - Peak flip and peak cap roof completion for low slope (less than 7/12), Wind Zone 1
  - All low slope (less than 7/12) hinged roof completion for Wind Zone 1 only.
  - Exterior siding close up at mating line
  - Chain hung lighting fixture completion
  - Completing ceiling suspended fans
  - Exterior lighting fixture completion
  - Duct connection between home sections
  - Main power supply connection and section crossovers
  - Dryer venting completion
  - Range cooktop exhaust termination vent
  - Plumbing connections between halves
  - Gas line connection between sections
  - Mate line gasket
  - Floor, roof, wall interconnections

Transition Information

Challenges of Implementation

Challenge	Mitigation Approach
Uniform treatment by PIAs	Guidance, Monitoring, and Communication, FAQs
Tracking and reporting of homes/inspections	Unique SC numbers, Guidance and Coordination
Scope creep with non-specific definition of “substantial completion”	Continual monitoring and review by PIAs and HUD
Manufacturer responsibilities for site work and inspection	Delegation of authority but responsibility remains with manufacturer
State IPIA responsibilities for inspections out of state	Acceptance of qualified inspectors to complete inspections on behalf of an IPIA
Timeline for effective implementation	Transition period (March 7 – September 7, 2016)

Transition Information

ACs for <u>work defined as Installation:</u>

- If the AC expires before March 7, 2016, manufacturers must request renewal and submit at least 60 days before the approval expires to avoid a lapse in approval.
- If the AC approval expires after March 7, 2016, manufacturers must modify their installation instructions to require inspection of any peak flip or peak cap roof systems in Wind Zone I pursuant to the installation provisions of the Standards.
- AC approvals for this work will not be renewed or extended after expiration because AC approval will no longer be necessary.

Transition Information

ACs for <u>work permitted for On Site Construction</u>:

- Begin working with Primary Inspection Agencies (PIAs) now to avoid any unnecessary delays or lapse in approval.
- All ACs that are eligible for SC approval <u>must be</u> transitioned to SC approval(s) in a timely manner.
- The Department is permitting a 6-month transition period to ensure applicable ACs can be transitioned to SCs.
- DAPIAs may issue SC approvals prior to March 7, 2016.
- IPIAs are not to permit affected SC units to enter the first phase or stage of production until March 7, 2016.

Transition Information

ACs for work permitted for On Site Construction

- AC approvals expiring before March 7, 2016
  - Request a renewal and submit the request at least 60 days before the approval expires to avoid a lapse in approval.
- AC approvals expiring after March 7, 2016, and the AC is not transitioned to an SC approval on or before March 7, 2016
  - Ensure the construction remains allowed under a valid AC approval until transitioned.
- During the transition period, manufacturers are responsible to submit a renewal request as may be needed to accommodate the period between transition from an AC and SC approval.
- Manufacturers need to notify the Department in writing once an SC approval has been approved to replace an AC approval [provide both the new SC identification number issued by the DAPIA and the affected AC number(s)].

Individual liaisons or mhs@hud.gov

On-Site Completion of Construction of Manufactured Homes
Frequently Asked Questions

General Information for Implementation

1. Since some manufacturers use more than one organization to provide DAPIA services, how will a unique site completion numeric identification be assured across the multiple DAPIAs?

In order to ensure that site completion numeric identifications are unique, DAPIAs are required to incorporate some method in their review procedures, and within each specific approval, to ensure a unique identification. This may be done with the incorporation of a three letter abbreviation that has been used for each agency, or through some other system appropriately detailed within each agency's Site Construction (SC) design approval procedures to assure that it's issued identifications are unique.

2. Can a DAPIA approve an SC request and issue an approval before the effective date of the rule?

In order to assist in the transition period and facilitate conversion of Alternate Construction (AC) approvals to SC approvals, the Department will permit DAPIAs to review and issue SC approvals before the March 7, 2016, effective date. However, IPIAs are not permitted to allow homes that will be built under an SC approval to enter the first stage or phase of production until the effective date (March 7, 2016).

3. Please clarify what the effective date means for this rule?

The effective date of the rule means that homes built in accordance with the requirements of the rule cannot enter the first stage or phase of production until March 7, 2016.

4. How does the Department intend to enforce a non-specific definition of "substantial completion?"

This definition was intended to permit flexibility in recognition of the evolving and changing design and construction innovation used in manufactured homes. The Department will be ensuring compliance through measurement against the intent of the rule, as deemed consistent with the types of construction specifically identified in the rule (§3282.602) and whether the construction is of a limited nature and can be reasonably completed in the factory or whether it is more practicable to complete on-site. The Department will monitor the DAPIA approvals and perform monitoring inspections as may be necessary to properly implement and enforce the Regulations.

5. What will be the role of the monitoring contractor, particularly, in regard to the monitoring oversight of on-site work?

The monitoring contractor is expected to develop and implement procedures for evaluating how well the PIAs are performing the responsibilities for which they have been charged under this rule. The design review and auditing procedures are not changing, as this is only extending the quality assurance processes to the home site and will be monitored accordingly. Existing procedures reasonably include review of available records, monitoring of design approvals, monitoring of the oversight of quality assurance systems, retailer lots, and on-site monitoring of construction work.

DRAFT

6. Which documentation (e.g. site inspection reports, IPIA's acceptance of the manufacturer's final site inspection report, etc.) needs to be kept in the home file to support the Subpart I process for homes completed under the on-site rule?

Please refer to 24 CFR § 3282.417(e)(1) for information required to be contained in the manufacturer's records for each home.

7. Section 3282.606(c) requires that the manufacturer or retailer provide a prospective purchaser a copy of the Consumer Information Notice (CIN) before an agreement to purchase is executed. What proof of this will be required by 1) the prospective purchaser to obtain a copy of the CIN from the manufacturer, and 2) the manufacturer to verify that a CIN was provided to the prospective purchaser?

Consistent with best practice for assuring that purchasers and or lessors are provided with the "Notice to Purchaser" under an Alternative Construction approval, manufacturers may choose to include a purchaser and or lessor sign off on a copy of the Consumer Information Notice. Otherwise, a manufacturer's request for SC approval needs to identify the method(s) it will use to ensure compliance with this requirement. The methods must provide for an auditable system that can be monitored by relevant parties such as during record reviews conducted by SAAs and the Department through its monitoring contractor.

8. Can a homeowner be authorized to complete the site work?

The manufacturer may authorize others to complete construction work at the site, but the authorized parties must be a licensed contractor or similarly qualified professional and be provided prior authorization to do the work on the manufacturer's behalf. The homeowner could be allowed to perform the site construction work if authorized by the manufacturer, provided the work is performed under the supervision of a licensed contractor or similarly qualified individual that is authorized by the manufacturer to perform the work and the manufacturer agrees to be responsible for the final inspection and complete the required certification that all site work has been satisfactorily completed and conforms in all aspects to the Standards. Note: It is the manufacturer's responsibility to certify that the construction complies and the retailer cannot sell a home that does not comply with the Standards.

DRAFT

DAPIA Approval of Manufacturer Requests for On Site Completion

9. Is it permissible for a manufacturer to bundle multiple aspects of construction that would be site completed under one site completion approval request?

The intent of the regulation is to maintain a system of approvals and inspections that can be easily navigated and tracked from design through final site inspection. Therefore, bundling of multiple aspects of construction into a single SC approval needs to be reviewed very closely in order to ensure that the system of design approvals and inspections can result in compliant construction on an ongoing basis. Bundling of various site construction elements/aspects/items may be allowed under one SC approval only on a case-by-case basis, subject to the approval of the DAPIA and required concurrences of the IPIA and should be closely coordinated with the Department to avoid potential issues and concerns.

10. Can there be a single DAPIA approval issued to a corporate manufacturer for a corporate design package that includes multiple, subsidiary manufacturing locations?

It is possible for a DAPIA to review and issue approval for an SC approval request for multiple manufacturing locations that use a single design approval manual and shared elements of a Quality Assurance Manual. However, all requirements and specifics necessary to ensure each location can build and complete compliant homes must be included in the approval. Necessary considerations that must be addressed include but are not limited to potential facility-specific quality control checklists, on-site inspection checklists, whether multiple IPIA's are involved requiring multiple written agreements and concurrences, as well as how the manufacturer will track, inspect, and report homes on a facility-specific basis.

11. Does a DAPIA's approval and unique site completion approval numeric identification (SC-XX) need to be IPIA and production facility-specific?

A DAPIA-issued, site construction approval, must include all necessary specifics that include but are not limited to identifying the specific manufacturing facilities that may use the approval, facility-specific quality control checklists, on-site checklists, and each IPIA must provide a written agreement to be responsible to complete on-site inspection of the homes built under their respective in-plant surveillance and the affected IPIAs must also concur on the quality systems developed to control in-plant and on-site construction.

12. Is the DAPIA required to initiate contact with the IPIA(s) after a request for approval has been submitted by a manufacturer?

It is the manufacturer's responsibility to coordinate with its contracted IPIA(s) and DAPIA(s) to develop a compliant and complete Site Construction approval request. The DAPIA is responsible to ensure, before it approves a request, that the manufacturer's request addresses all requirements for IPIA agreement(s) and concurrence(s).

DRAFT

13. Is there a particular format (e.g. a simple email, an official notice on a letterhead, etc.) for a DAPIA's notice of approval (or rejection) to a manufacturer?

There are no specific formatting requirements for a DAPIA notification of approval. However, the notification of approval or rejection to the manufacturer and HUD must be made pursuant to all requirements of §3282.603. Each DAPIA should develop its procedures for handling requests for on-site construction completion that it needs to implement and enforce with its clients.

14. Is a formal rejection notice anticipated, or would the expectation be that the deviation report process would apply and a back and forth dialogue would ensue until the noted deficiencies have been adequately addressed?

If a DAPIA finds that a manufacturer's request does not meet the requirements contained in the Regulations, then it must notify the manufacturer that its request is denied and provide the reasons for the denial. Each DAPIA should develop its procedures for handling requests for on-site construction completion that it needs to implement and enforce with its clients. The design and quality assurance manual deviation report process may be integrated into that process provided the methods meet the requirements for notification and set forth reasons for denial.

15. Is the manufacturer required to supply and ship all of the materials, including fasteners, needed for the completion of the on-site work along with manufactured home?

The manufacturer will need to comply with all terms and conditions outlined in each DAPIA-issued SC approval. This approval needs to identify the specific items that must be completed at the factory versus those aspects to be completed on site and include listing of materials and components that will be shipped with the home and provided on site. These aspects will be controlled through manufacturer inspection, IPIA surveillance and inspections, and will be subject to monitoring by the Department.

16. Section 3282.604(e) requires the DAPIA to review Subpart M approvals every three years. How is this to be documented and monitored?

Each DAPIA needs to develop its procedures for completing and documenting the required reviews every three years. The procedures and resulting documentation of the three year reviews must result in clear documentation, available to the IPIAs and the Department, that the approvals are valid and current. As potential options, SC approvals may be re-approved every three years if the DAPIA deems that action appropriate or the DAPIA may stamp those approvals as limited approvals with a 3-year expiration noted on the approval stamp. Other methods may be developed to meet this intent. The Department will monitor DAPIA performance in this regard through monitoring.

17. Must dormers completed on-site be an approved engineered dormer set provided by the manufacturer or will stick built (i.e. dormers fabricated on-site) be allowed?

Specific instructions for completing work on-site must be DAPIA-approved and include the methods by which a manufacturer can choose to complete the construction on-site. In addition, the quality control and on-site inspection checklists must be adequately detailed enough to ensure conformance with the designs and where the designs are not specific, to the Standards.

DRAFT

Reporting and Record Keeping

18. Will there be a specific format required for manufacturer systems of tracking the status of homes, or is it at the discretion of each manufacturer?

Each manufacturer must establish and implement its method for tracking homes from the time homes are built through to the time the homes are inspected by the IPIA. Each system must be part of the request as well as approval issued by the DAPIA. The tracking and reporting systems used in the current Alternative Construction process may be used as examples to accomplish tracking and reporting.

19. What level of detail is anticipated for the description of on-site work required to be included in monthly production reports (HUD 302)?

Each manufacturer must establish and implement its method for reporting a brief description of the on-site work applicable to each home it builds under an SC approval. This method must be included in the request for the DAPIA's approval and accomplish the intent of being able to understand from reviewing the report, the extent of the on-site construction work and inspection(s) expected for that construction.

DRAFT

IPIA Inspections for On Site Completion Approvals

20. Will the IPIA be expected to monitor all elements of the on-site work throughout its duration, or just at the final inspection?

The IPIA is responsible to complete a full inspection of on-site work, whether managed through staged or multiple inspections or whether managed through inspection accommodated by access panels that permit inspection after completion. The site-inspection checklist must be developed in cooperation with each applicable IPIA and be included in the DAPIA approval.

21. Can there be a simple sign-off (such as an IPIA's acceptance statement) on the manufacturer's inspection report for its final inspection?

Yes, there can be a simple sign off documenting the IPIA's written acceptance of the manufacturer's inspection report. However, in that event, the entire manufacturer inspection report also becomes the IPIA's record of its inspection. Whether a separate inspection report is developed or whether an acceptance statement on the manufacturer's inspection report is utilized, the methods expected and required for any given SC IPIA inspection acceptance need to be auditable and outlined in each approval and demonstrate compliance with 3282.603(d)(9).

22. Will the IPIA be required to issue an independent inspection report document?

Consistent with §§3282.605(d)(3)(i) and (d)(3)(iii), in order to document an IPIA's acceptance of the final site construction, an IPIA may issue its own independent inspection report using the DAPIA-approved inspection checklist, or it may indicate its acceptance, in writing, of the manufacturer's completed site-inspection report by alternate means. See response to the previous question above as well.

23. How will the prohibition against occupancy before IPIA approval of the final inspection report and issuance of the certificate of completion be enforced from a practical standpoint?

IPIA's are responsible to complete inspections prior to occupancy. IPIA's need to report to HUD, the DAPIA, and manufacturer whenever any home is occupied before it inspects for compliance with all SC requirements and the Standards. IPIAs are also responsible to monitor the manufacturer's systems for notifying the IPIA when homes are ready for inspection and assuring that homes are not occupied before IPIA inspection and acceptance of the manufacturer's final site inspection report. This would be enforced on a case-by-case basis as determined based on IPIA inspection reporting or other sources of information indicating nonconformance. IPIAs are to monitor and report per 3282.607(g) specifically on this issue.

24. Section 3282.605(d)(3)(ii) appears to only require the IPIA to red tag a home when the manufacturer is "not performing adequately in conformance with the approval" and in the context of the final inspection. Is this correct?

No. An IPIA is required to red tag a home when it finds any failure to conform on site, regardless of when the issue is found during the IPIA's on-site inspection.

DRAFT

Alternative Construction vs. On-Site Construction

25. Will HUD continue to provide AC approvals for construction that can otherwise be addressed through an On-Site Completion approval?

The Department will not review or approve AC requests for construction that can otherwise be approved through an SC approval. In order to facilitate a reasonable, yet timely transition from ACs to SCs, the Department is permitting a 6 month transition period, ending September 7, 2016. All ACs that can otherwise be approved through an SC approval, must be transitioned by September 7, 2016.

26. Is it permissible to produce a home that has both an AC approval and an SC approval?

Manufacturers may build a home that falls under both types of approvals, but the terms and conditions of each respective approval must be met, including identification of SC and AC in serial numbering.

27. Regardless of the specifics, can a manufacturer elect to request an AC approval rather than pursue an SC approval for construction that is eligible for SC approval?

Manufacturers should work with their IPIA(s) and DAPIA(s) to transition eligible AC approvals to SC approvals. After September 7, 2016, manufacturers will no longer be granted AC approval for construction eligible for SC approval. During the transition period (March 7, 2016 through September 7, 2016), existing AC approvals for construction that would be eligible for SC approval will continue to be allowed until the transition period is ended or until an SC approval is issued, whichever occurs first.

28. Can a manufacturer request an AC that covers aspects also covered by an SC approval?

For new or renewal AC requests that contain elements that include aspects of construction that require AC approval and have aspects that are eligible for SC, an AC request/approval will only be allowed during the transition period. Thereafter AC approvals must be modified or amended to remove aspects covered by a SC approval. For homes that incorporate aspects covered by an AC and SC approvals, all terms and conditions of each approval must be adhered to.

29. Why are attached garages not addressed in the on-site rule and will they be added later?

Due to the complexity of the structural design of the home and site construction that may be required based on the various manufacturer options and anticipated garage construction and location on home plans, the Department has decided to remain actively involved in the review and approval of such construction. During the interim, manufacturers may continue to submit requests for attached garages under the Alternative Construction provisions of the Regulations (24 CFR 3282.14). HUD is planning to revise the standards to include provisions for attached garages and once that is done, the Department would then be in a position to revise the on-site construction completion rule. Any such proposal either coming from HUD or the public would be forwarded to the MHCC for review.

DRAFT

Clarifications on Correlating Standards Changes

30. Section 3282.603(e) refers to 3282.603(d)(3). Is this correct?

The current reference within 3282.603(e) incorrectly refers to paragraph (d)(3) of this section. The correct reference is to paragraph (d)(4) of this section that addresses the quality assurance manual approval.

31. In order to trigger the 40 PSF attic load design criteria in 3280.305(k)(1), does the space need to meet both height and area requirements, or does the space only need to meet one of them to require attic load design?

In order to trigger the 40 PSF design live load requirement, the attic space must meet both the ceiling height and living space (habitable room) requirements of the Standards.

32. Is it permissible to build a home with a roof slope of 7:12 or greater, without any access to the roof cavity and as such without any floor load design requirements?

An access panel may be required to facilitate the inspection of site construction in the attic area. However, access to the area of the attic is not a consideration that triggers the required live load design criteria. The Standard is specific that if the roof slope is 7:12 or greater, the area of the attic floor meeting the ceiling height and living space requirements of the Standards must be designed for 40 psf.

33. For homes with roof slopes less than 7:12 with an attic area, does the bottom chord of the truss need to be designed for a minimum 20 PSF load, regardless of whether an access is provided?

The attic floor design load provisions for storage are only applicable for roof slopes less than 7:12, when an attic access opening is provided by the manufacturer.

DRAFT

MHCC MEETING
January 19-21, 2016

APPENDIX D: HUD-ADMINISTERED MANUFACTURED HOME STATE INSTALLATION PROGRAM PRESENTATION

By Michael Henretty

HUD-Administered Manufactured Housing Installation Program

From the

The U.S. Department of Housing and Urban Development

Presented by

SEBA Professional Services, LLC

1

HUD Administered Manufactured Housing Installation Program

Purpose

- The Manufactured Housing Improvement Act of 2000, Model Manufactured Home Installation Standards were implemented in 2008.
- The program for HUD-Administered states has been rolled out now as part of this implementation.
- The purpose of the program is to implement regulations 24 CFR Part 3285 and 24 CFR Part 3286.

2

HUD Administered Manufactured Housing Installation Program

Requirements

- States must either operate their own qualifying installation program or participate in the federal program.
- State programs must meet or exceed the minimum requirements outlined in 24 CFR 3286.803(b).
- Regulating and improving the installation and performance of manufactured homes within HUD-Administered States to improve the protection of residents.

3

HUD Administered Manufactured Housing Installation Program

HUD-Administered States

At present the following states fall under the HUD-Administered Installation Program:

1. Alaska
2. Connecticut
3. Hawaii
4. Illinois
5. Maryland
6. Massachusetts
7. Montana
8. Nebraska
9. New Jersey
10. Rhode Island
11. South Dakota
12. Vermont
13. Wyoming

4

HUD Administered Manufactured Housing State Installation Program

Implementation

HUD will implement the regulations by:

- Evaluating and certifying installer trainers and training programs to become federally approved per requirements outlined in 3286 Subpart D—Training of Installers in HUD-Administered States.
- Requiring that all installers in HUD-Administered states receive a HUD Manufactured Home Installer License in accordance with 3286.205.
- Requiring that all manufactured home inspectors meet requirements per 3286.511.
- Tracking the sale, installation and inspection of homes in HUD-Administered states.

5

HUD Administered Manufactured Housing Installation Program

Program Benefits

- Reciprocity between all 13 states in the HUD program.
- Uniform requirements for installers, inspectors, retailers, manufacturers and training programs for all HUD states.
- Centralized publishing for industry resources and individuals.
- Consistent enforcement of regulations that are intended to improve the manufactured housing industry and customer experience.

6

HUD Administered Manufactured Housing Installation Program

Program Roll-out

The installation program is being implemented in 4 phases throughout the country.

- **Phases 1 and 2** involved implementing pilot programs in two (2) states: Maryland (July 14 – Nov. 1) and Nebraska (Sept. 1 – Dec. 1).
- **Phase 3**: Eastern States (Dec. 1 – May 1)
- **Phase 4**: Western States (Jan. 1 – June 1)

7

HUD Administered Manufactured Housing Installation Program

Industry Outreach

- Kick-off webinars & monthly industry conference calls
- Specialty webinars (retailer responsibilities)
- Maryland Building Officials Association Meeting
- Connecticut Manufactured Housing Association Meeting
- Massachusetts Manufactured Housing Association Meeting
- *Albany meeting

8

HUD Administered Manufactured Housing Installation Program

Installer Training Programs

1. Manufactured Home Installation Training by MHEI
2. Pennsylvania Manufactured Housing Program & Basic Installer Training
3. Manufactured Housing Resources (George Porter)
4. Manufactured Home Installation Training by Patrick Lewis

HUD Administered Manufactured Housing Installation Program

Licensed Installers

Number of HUD Licensed Installers: 54

Maryland	14	Montana	2
South Dakota	11	Massachusetts	1
Nebraska	7	Virginia*	1
Delaware*	5	West Virginia*	1
Pennsylvania*	5	Connecticut	1
New Jersey	2	Iowa*	1
Wyoming	2	Rhode Island	1

* Individuals licensed by HUD in these states obtained licenses to do installations in HUD-Administered states.

HUD Administered Manufactured Housing Installation Program

General Program Resources

- Kick-off Call & Webinar
- Monthly Conference Calls
- Communication Outlets & Website
- Program Information Packet
- Attendance at associations & industry meetings
- Published list of approved training programs
- Published list of licensed installers
- Published list of available inspectors
- Ongoing program assistance

11

HUD Administered Manufactured Housing Installation Program

Resources for Installers

- Guidance on insurance, bond and irrevocable letter of credit requirements
- Bond form template
- Published list of bond providers, direct communications with insurance and bond companies
- Online application submission
- Thorough and timely review of installer applications
- Receipt of large and small installer license
- Assistance with understanding installation and program requirements
- Published list of licensed installers and contact information
- Notice of expiring insurance/bond and installer license
- Continuing education options

12

HUD Administered Manufactured Housing Installation Program

Resources for Retailers

- Retailer Webinar – live and recorded
- Consumer Disclosure Template as required per 3286.7
- Assistance with creating disclosures
- Online document submission for the HUD 305 and HUD 306
- Continued assistance with understanding retailer requirements

13

HUD Administered Manufactured Housing Installation Program

Resources for Inspectors

- Ongoing outreach and assistance to local inspectors and building officials
- Published list of third party inspectors
- Information on MHEI Inspector Training
- Guidance on cooperative enforcement through requiring HUD-licensed manufactured home installers for permits issued in HUD-administered states

14

HUD Administered Manufactured Housing Installation Program

Moving Forward: Review of State Programs

With the Installation Program fully implemented, a review of Qualified State Programs has begun to ensure continued compliance with 24 CFR §3286.803.

Upon completing several reviews, issues have been discovered relating to:

1. Training
2. Inspections
3. Installation Code Compliance

15

HUD Administered Manufactured Housing Installation Program

Moving Forward: Alternative Foundation Systems

A variety of engineered plans for alternative foundation systems for manufactured homes are being used for placement in freezing climates [ref: 3285.312(d)].

Reminder of options:

1. Conventional Footings placed below frost line depth, or
2. Monolithic slab systems subject to design and site specific conditions, or
3. Insulated foundations subject to design and site specific conditions

16

HUD Administered Manufactured Housing Installation Program

Moving Forward: Alternative Foundation Systems

Both monolithic slabs and insulated foundations must be a) designed to prevent the effects of frost heave, or b) designed in accordance with SEI/ASCE 32-01.

SEI/ASCE 32-01 Section C4.2 Foundations on Non–Frost Susceptible Ground or Fill Material

Foundations placed on a layer of well-drained, undisturbed ground or fill material that is not susceptible to frost shall have the thickness of such a layer included in meeting the design frost depth defined in Section 3.2. Undisturbed granular soils or fill material with less than 6% of mass passing a #200 (0.074 mm) mesh sieve in accordance with ASTM D422 and other approved non–frost-susceptible materials shall be considered non–frost-susceptible. Classification of frost susceptibility of soil shall be determined by a soils or geotechnical engineer, unless otherwise approved. Emphasis added.

HUD Administered Manufactured Housing Installation Program

Moving Forward: Alternative Foundation Systems

It has been found that many installers and quite possibly inspectors are overlooking the requirement that unless designed in full accordance with SEI/ASCE 32-01, the site must be determined to have non-frost susceptible. This is vital for proper performance of the foundation.

Overlooking site-specific conditions in areas subject to freezing raises concerns about potential for frost heave due to ice lenses forming in frost-susceptible soils.

HUD Administered Manufactured Housing Installation Program

Contact Information

All participants can submit questions or information to SEBA through any of the following channels:

- Email: hudinfo@sebapro.com
- Website: www.manufacturedhousinginstallation.com
- Phone: 202-552-7356
- Fax: 202-379-3340
- Address: Office of Manufactured Housing Installation Programs
  C/O SEBA Professional Services, LLC
  1325 G Street, NW Suite 500
  Washington, DC 20005

MHCC MEETING

January 19-21, 2016

APPENDIX E: FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) PRESENTATION

By Matthew Rabkin

FEMA

LOGISTICS MANAGEMENT DIRECTORATE

FEMA
Manufactured Housing Unit
Residential Fire Sprinkler System Program

Presented by: Matthew Rabkin, Manager
Logistics Manufactured Housing Unit Program
Department of Homeland Security
Federal Emergency Management Agency
Office of Response and Recovery
Logistics Management Directorate

Manufactured Housing Unit Program (MHU) Goals

- **Support FEMA's Stafford Act Authority for the Individuals and Households Program**
- **Provide Transportable Temporary Housing for Disaster Survivors when Financial Assistance is Impractical**
- **Ensure that MHUs are Safe, Sanitary Living Conditions, Secure and in Functioning Condition**
- **Ensure that EFMA Housing Stock can be Placed anywhere within the Contiguous United States**
- **Use Housing that is Built to a National Standard that Supersedes State/Local Regulations**
- **Provide MHUs that Minimize Installation Time**

Residential Fire Sprinkler System (RFSS) Project Goals

- **Provide Disaster Survivors with Additional Time to Escape an MHU in Case of a Fire**
- **Improve life safety for disaster survivors living in FEMA Manufactured Housing Units (MHU) by adding an RFSS**
- **Use existing national standards (i.e. National Fire Protection Association [NFPA]) for Fire Sprinkler Requirements**
- **Ensure that the RFSS will work anywhere in the Contiguous United States (CONUS)**
- **Minimize the impact on the disaster survivor**

RFSS Project Issues/Impediments and Solutions

Issues/Impediments

- **Equipment**
  - RFSS Equipped MHUs can be Deployed Anywhere within CONUS
  - Unknown if Adequate Water Flow and Water Pressure is Available at Installation Locations
- **Survivor**
  - Ensure Simplicity and Reliability
  - Human Nature to Play with Things
- **Contract**
  - Minimal design changes allowed to MHU
  - No Ability to Add Internal RFSS Tank and Pump

Solutions

- **Equipment**
  - Design to meet -35 Degrees Fahrenheit (all Components are within Heat Envelope or Heated)
  - Provide External Tank and Pump System to Ensure Adequate Water Flow and Water Pressure is Available at Installation Locations
- **Survivor**
  - Provide a Solution that does not Require Survivor Interaction
  - Conceal RFSS piping using Sprinkler Soffit
  - Conceal Sprinkler Heads by Using "Pop-Out" Heads
- **Contract**
  - Modify Contract to Include "Pipes and Sprinkler Heads" to MHU
  - RFSS Tank and Pump System Under Separate Contract

FEMA MHU RFSS Sprinkler Initiative
Exposed Sprinkler Pipe and Sprinkler Head

RFSS Before Concealing Soffit is Added

- Exposed Sprinkler Pipe
- Exposed Sprinkler Head

FEMA Plan Manage Sustain

5

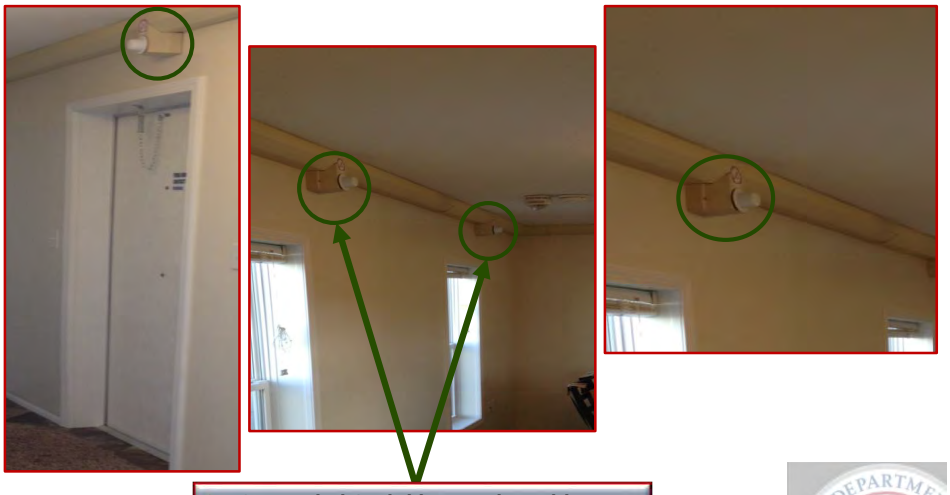
FEMA MHU RFSS Sprinkler Initiative
Concealed Sprinkler Pipes

- Concealed Sprinkler Pipe Inside MHU

FEMA Plan Manage Sustain

6

FEMA MHU RFSS Sprinkler Initiative
Concealed Sprinkler Heads



➢ Concealed Sprinkler Heads Inside MHU

FEMA MHU RFSS Sprinkler Initiative
Tank and Pump System

➢ Tank & Pump System Enclosure
TPS (foreground) MHU (background)

➢ Tank & Pump Interior

MHCC MEETING
January 19-21, 2016

APPENDIX F: HUD MANUFACTURED HOME DISPUTE RESOLUTION PROGRAM (DRP) PRESENTATION

By Demetress Stringfield

HUD Manufactured Home Dispute Resolution Program (DRP)

U.S. Department of Housing and Urban Development (HUD)
Office of Manufactured Housing Programs (OMHP)

Presented By: Demetress Stringfield
January 21, 2016

Presentation Overview

- HUD Dispute Resolution Program Overview
- HUD Dispute Resolution Program Evolution
- New Educational Tools
- Questions

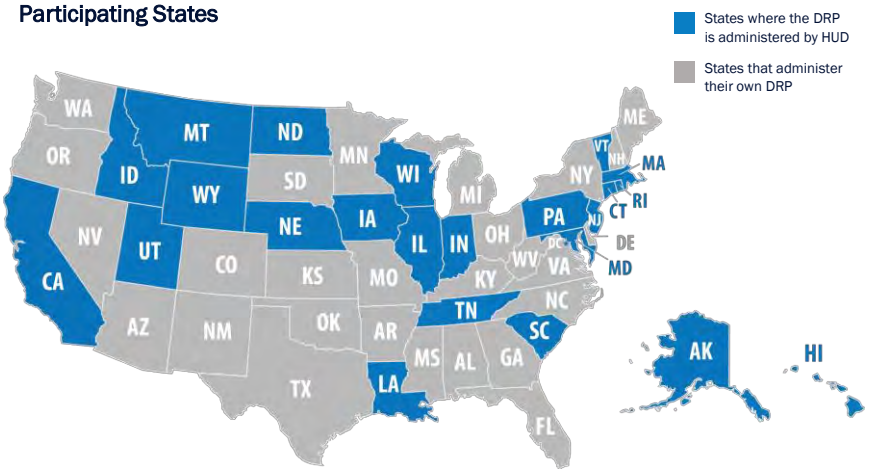
HUD DRP Overview

The HUD DRP provides the timely, neutral resolution of disputes between manufacturers, retailers and installers of manufactured homes.

- The goal of the program is to determine responsibility and issue appropriate orders for the correction or repair of defects in manufactured homes relating to construction, safety and installation.
- The homeowner, manufacturer, retailer or installer may submit a request for dispute resolution.
- The alleged defect must be reported during the one-year period after the date of the first home installation.
- Currently, 23 states use the HUD DRP, and 27 states administer their own dispute resolution program, approved by HUD.

HUD DRP Overview

Participating States



HUD DRP Evolution

Program Established on Feb. 8, 2008: Program Challenges

EDUCATION

- Low program awareness among homeowners
- Low program awareness among industry
- Limited educational tools

ACCESS

- One online resource for information (hud.gov)
- No online method for submitting dispute requests
- Limited communication channels

TRANSPARENCY

- Misconceptions about the program among industry
- Little visibility into the DRP process
- Limited reporting tools

123,174

The number of homes installed in all 23 HUD DRP states between 2008 and 2014

24 only **3** eligible

The approximate number of dispute resolution requests received between 2008 and 2014

These numbers and stakeholder feedback speak to a need for increased program education, access and transparency.

HUD DRP Evolution

Savan Group Contract Awarded Oct. 2014: Continued Progress

EDUCATION

- Created five new educational tools for homeowners and the industry (website, video, fact sheet, FAQs, presentations)
- Delivered four educational presentations to stakeholders
- Contributed article to homeowners association newsletter

ACCESS

- Created online HUD DRP submission form
- Established more lines of communication for DRP inquiries and submissions

TRANSPARENCY

- Enhanced HUD DRP reporting capabilities through online form
- Increased engagement with manufactured housing industry to dispel program misconceptions
- Created process map for educational materials

11

Dispute resolution requests received since Spring 2015

✓8

- **4** settlements completed
- **2** in mediation
- **2** settlements declined by homeowner

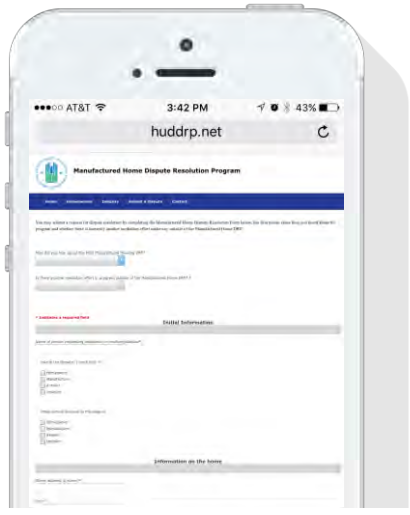
Of the 11 requests, the number deemed eligible.

These numbers speak to an increase in program education, access and transparency.

New HUD DRP Educational Tools

Mobile-Friendly Website with DRP Submission Form

www.huddrp.net



7

New HUD DRP Educational Tools

Online Fact Sheet

8

New HUD DRP Educational Tools

Educational Video

Questions