



## THE FACTS

Welcome to the fifth edition of The **FACTs**: HUD's Manu**FACT**ured Housing Newsletter! The Office of Manufactured Housing Programs will periodically issue the **FACTs** to enhance communication with consumers, industry, and other stakeholders by providing information on Manufactured Housing topics of interest.

If you would like to sign up to receive notice of future issues of the **FACTs**, please [click here](#) to be added to our database. Thank you for reading our newsletter!!

## LINKS

[Manufactured Housing Construction and Safety Program](#)

[Manufactured Home Consumer Q & A](#)

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## Contract Awarded for New MHCC Administering Organization

Home Innovation Research Labs, Inc., located in Upper Marlboro, Maryland, was awarded the Administering Organization (AO) contract for the Manufactured Housing Consensus Committee with a start date of June 9, 2014. Home Innovation Research Labs, Inc. is accredited by the American National Standards Institute (ANSI) as an independent third-party administrator. It currently serves as secretariat to the National Green Building Standards – ANS ICC 700, which is the first ANSI-accredited standard on sustainability of green buildings.

## How Are We Doing?

[How are we doing?](#)

## Manufactured Housing Consensus Committee Conference Call

The Office of Manufactured Housing Programs participated in a teleconference on June 26, 2014 with the members of the Manufactured Housing Consensus Committee. The conference call assembled the members of the MHCC for the first time since October 2012 to reestablish a regular basis of meeting to provide recommendations on updates to the Standards. Below is a summary of the teleconference.

### **Manufactured Housing Consensus Committee Meeting June 26, 2014**

#### **Introduction**

- The Manufactured Housing Consensus Committee (MHCC), on June 26, 2014, held its first full committee meeting since October 2012. The 3-hour meeting was conducted via conference call and addressed pending substantive issues, several procedural and logistical matters, and potential MHCC activities during the remainder of fiscal year 2014.
- The new Administrator for the Office of Manufactured Housing Programs, U.S. Department of Housing and Urban Development (HUD), Pamela Danner, was the Designated Federal Officer for this meeting.
- Richard Weinert was the MHCC Chair.
- Kevin Kauffman is the program manager for the new MHCC Administering Organization (AO)—Home Innovation Research Labs, Inc. (HIRL). He will support MHCC and respond to questions and comments called in 1-888-602-4663 or sent via [mhcc@homeinnovation.com](mailto:mhcc@homeinnovation.com).
- Vladimir Kotchkin will help oversee this project for HIRL and will help ensure that proper procedures, general principles regarding MHCC bylaws, and Robert's Rules of Order are followed.
- BLH Technologies, Inc. is MHCC's new meeting planner contractor.
- Voice votes that took place during this meeting will be followed up by a letter ballot that will be disseminated to committee members, as requested during the October 2012 meeting.
- A regular schedule of MHCC meetings should take place from here forward.
- An in-person meeting will occur in fall 2014 in the Washington, D.C. metropolitan area.

#### **Manufactured Housing Program Updates**

- Richard Mendlen, Senior Structural Engineer from HUD, advised MHCC members of various HUD program actions since the last MHCC meeting, including the following.
  - Several recommendations in a report from the Government Accountability Office (GAO) concerned home ventilation, which were forwarded to the MHCC for follow up.

- A final rule on roof truss-testing was published in January 2013.
- A second group of MHCC-recommended standards was published by HUD in December 2013, with a technical correction published on June 3, 2014.
- A memorandum was sent to MHCC in April 2014 regarding Southern Yellow Pine lumber.
- A memorandum was sent to the MHCC on May 1, 2014 concerning Class 0 air ducts that asked the MHCC to provide recommendations.
- Proposed rules from the U.S. Environmental Protection Agency (EPA) were published with regard to formaldehyde emissions from wood products. In addition, EPA requested new information for the proper treatment of laminates and furnishings.
- HUD issued two May 2014 memoranda on the clarification of attic insulation-testing requirements.
- The aforementioned AO contract was awarded to Home Innovation Research Labs in June 2014, and a new monitoring contract was awarded to IBTS in August 2013.
- A U.S. Department of Energy (DOE) workgroup, as part of its Appliance Standards and Rulemaking Advisory Committee, was formed in June 2014 to develop new manufactured housing energy-efficiency standards, which are due to be issued at the end of September 2014.
- An on-site completion of construction final rule and a third group of standards are being reviewed for clearance by HUD.
- A ground anchor testing standards final rule, published originally in 2013 as a proposed rule, is under consideration by HUD.
- The HUD Subpart I modification final rule was published in October 2013 having requirements for monthly reviews of manufacturers' service and investigation records that would be done by in-plant inspection agencies.
- A request for new proposals to update the Manufactured Home Construction and Safety Standards will be issued by HUD in July 2014. The proposals will be provided to the MHCC for its consideration in preparing future revisions to the Standards for the on-going two year review period required by the Act.

### **Subcommittee Reports**

- The Structure and Design Subcommittee reported on the following log items.
  - Part 3280, Log Item 80: Formaldehyde standards testing were put on hold by the Structure and Design Subcommittee until EPA provides more information to clarify some items. This item was tabled pending EPA action.
  - Part 3280, Log Item 81: This log item is a proposed update of the American Architectural Manufacturers Association (AAMA) 1701.2 reference standard for the certification of windows and sliding glass doors to the 2012 edition. Manufacturers are already meeting this standard, and the potential economic impact would be minimal. The subcommittee recommended approval of this log item. A voice vote of MHCC members approved this log item; no one expressed opposition.
  - Part 3280, Log Item 82: This log item is a proposed update of the AAMA 1704 reference standard for the testing and certification of egress windows to the 2012 edition. The main change involved the minimum egress area needing to be accomplished without removing the window sash. The industry has already made provisions to meet this standard, and the potential economic impact would be minimal. The subcommittee recommended approval of this log item. A voice vote of MHCC members approved this log item; no one expressed opposition.

- Part 3280, Log Item 83: This log item is a proposed update of the AAMA 1702.2 reference standard for the certification of swinging exterior doors to the 2012 edition. No major changes were proposed other than provisions concerning the sealants used in manufacturing the doors. The industry has already made provisions to meet this standard, and the potential economic impact would be minimal. A voice vote of MHCC members approved this log item; no one expressed opposition.
- The MHCC voice votes for final action on Log Items 81, 82 and 83 will be followed up by written ballots, as noted above.

#### **Old Business**

- A proposal by Steve Anderson regarding modifications to minimum hallway horizontal dimensions and other minimal clearances due to fire-safety issues was voluntarily withdrawn after a request for additional substantiating information by other MHCC members.
- Log Items 84, 85 and 86, which were submitted after the last full MHCC meeting but had not been submitted to the MHCC or a subcommittee for consideration, were discussed.
  - Log Item 84, which would update the label required in 3280.813(b) to read the same as the requirement in the 2005 National Electrical Code (NEC) was approved with no voiced opposition.
  - For Log Item 85, regarding tamper-resistant electrical receptacles and arc-fault circuit breakers, MHCC members voted to refer this matter to the Systems Subcommittee for prompt action to evaluate whether NEC version 2011 or 2014 would be the appropriate standard. This change was approved with two no votes.
  - For Log Item 86, which was a proposal to update electrical receptacles in accordance with NEC version 2011, MHCC voted to refer this matter to the Systems Subcommittee for further evaluation. This change was approved with one no vote.

#### **New Business**

- This segment of the meeting addressed the following three areas that HUD had referred to the MHCC for further consideration. The relevant action(s) for each item is detailed below.
  - *Southern Yellow Pine*—New national design standards (NDS) by the American Wood Council, using reduced design values for Southern Yellow Pine lumber, were adopted in 2012 via a retroactive addendum to the 2001 NDS. HUD deferred the adoption and enforcement of this reference standard (currently until January 1, 2015, via a memorandum from Ms. Danner) pending MHCC consideration of the 2001 or 2012 NDS. Given the potentially significant structural and cost impact of this change, MHCC members referred this matter to the Structure and Design Subcommittee for further evaluation by voice vote with no voiced opposition.
  - *Supply Air Ducts*—In a May 1, 2014, letter to MHCC, HUD noted manufacturers' difficulties in complying—due to space constraints—with the new requirement (based on a prior MHCC recommendation) for Class 0 (metal) air ducts to be used at a minimum of 3 feet from a heat exchanger(s). Pending any further MHCC review, HUD has been allowing manufacturers to use either Class 0 or Class 1 ducts. After a discussion, MHCC members referred this matter to the Systems Subcommittee for further evaluation by voice vote with no voiced opposition.

- *GAO October 2012 Report on Ventilation Systems*—A January 9, 2013, letter from HUD to the MHCC has two GAO recommendations: (1) the development of an appropriate method to test and validate the performance of manufactured home ventilation systems and (2) a reassessment of standards for whole-house ventilation. Given the potentially significant technical and cost issues, MHCC members voted to refer this matter to the Systems Subcommittee for further evaluation.

## Revised Standards

The Revised Standards went into effect on June 9, 2014. A Technical Amendment regarding Anti-Scald valves for bathtubs without showers was published on June 3, 2014 to add reference standard ASSE 1070-2004 since ASSE 1016-2005 addresses only individual showers and bathtub/shower combinations.

## HUD – DOE Collaboration

HUD is working with the Department of Energy (DOE) on how to coordinate on establishing and enforcing energy standards for manufactured homes to be developed pursuant to the mandates of the Energy Independence and Security Act of 2007.

## From the desk of the Administrator...

It has been a busy 3 months, so we wanted to provide an update on the Office of Manufactured Housing Programs' recent activities and our interest in providing better communication with the program's participants and the public.

I am pleased to report that the Department awarded the contract to Home Innovation Research Labs, Inc. to serve as the Administering Organization for the Manufactured Housing Consensus Committee (MHCC). The Department also awarded a contract to BLH Technologies, Inc. to serve as our Program's meeting planner. With the able assistance of these two contractors and my staff, the MHCC met by teleconference on June 26, 2014 for the first time since October 2012. At this meeting, chaired by Richard Weinert, the Department updated the MHCC on the revisions to the standards and regulations in process and finalized. The MHCC also addressed pending recommendations as discussed more fully in this newsletter. We look forward to holding an in person meeting this fall so that the MHCC can move forward with recommendations for updates to the Standards.

In the past 3 months, my staff and the Institute for Building Technology and Safety (IBTS), our monitoring contractor, met by teleconference with the third party inspection agencies regarding compliance with the new requirements in Subpart I for monthly service and inspection record reviews and updates to IBTS' audit procedures. We plan to work in cooperation with the third parties to implement these requirements and procedures on a graduated basis.

On June 9<sup>th</sup> the revisions to the Standards went into effect with a technical correction regarding anti-scald valves that was published on June 3<sup>rd</sup>.

Our Office is pleased to announce that on July 14<sup>th</sup> James I. Martin, joined our staff as a Presidential Management Fellow. He is an attorney who graduated from the University of South Carolina School of Law and we look forward to using his skills.

We look forward to hearing from you with any questions or concerns.



Pamela Beck Danner  
Administrator