

Open Industry Conference Call: Questions and Answers December 13, 2016

1. Please provide an update on the alternate foundation issue?

There was a meeting of the Manufactured Housing Consensus Committee (MHCC) Regulatory Committee members on December 12, 2016 where they discussed a proposed draft Interpretative Bulletin (IB) that will be released shortly from HUD, however, an exact publication date cannot be provided at this time. The MHCC provided comments to HUD which will be reviewed and then the proposed interpretative bulletin, incorporating any changes in consideration of MHCC comments will be published in the Federal Register for public comment. The draft IB, as reviewed by the MHCC, can be found on the HUD website at hud.gov/mhs.

2. Regarding alternative foundations in freezing climates: Once a design is approved by the Manufacturer and its DAPIA, and is incorporated into the installation manual, are installers still required to have site-specific soil testing conducted?

It depends on whether the alternative foundation design is based on or requires the use of non-frost susceptible soil. If an alternative design is based on a requirement for non-frost susceptible soils, then a soil test must be performed unless site records or soil maps for the sites are available. In general only engineered monolithic slabs or insulated foundation designs do not require the use of non-frost susceptible soils. In addition, it is also recommended that you always check the approved design plan notes for testing requirements. Additionally, installation designs are not interchangeable. Any given foundation system must be approved by each manufacturer and its DAPIA and if you switched from one manufacturer to another, the system must be approved by the new manufacturer. Therefore, each manufacturer and its DAPIA must approve the system for use with their homes.

3. In some municipalities, in order for a Certificate of Occupancy to be issued, a foundation system must be used that is approved by that specific municipality. Local requirements could sometimes be significantly different than manufacturer requirements. What outreach is being done to inform municipalities of their requirements under the HUD Code?

HUD and SEBA have reached out to municipalities to educate them on federal requirements. Because of the large number of different municipalities and their ranges of control, HUD and SEBA continue to encourage people to send us contact information so the municipalities can be provided proper information and to keep them informed on regulation applicability and updates.

As a reminder, federal installation regulations are minimum standards. Therefore, states and localities must meet those standards but may also exceed the standards. If state or local codes are more stringent, HUD does not preempt them. Also note that localities can require that alternative foundation plans to be stamped by a state licensed engineer or architect.

4. After submission of HUD Forms (305, 306 and/or 309), will senders receive a receipt?

No.

5. Is the HUD 309 Form due to be submitted seven (7) days after installation completion date OR seven (7) days after completion of the final inspection?

The HUD 309 form should be submitted as soon as the home passes inspection and the form is signed by the inspector.