



**The FACTs:
HUD's Manufactured Housing Newsletter**



Office of Manufactured Housing Programs

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Issue 13

Welcome to the thirteenth edition of The FACTs: HUD's Manufactured Housing Newsletter! The purpose of this newsletter is to connect to individuals who encompass the different aspects of manufactured housing – manufacturers, retailers, installers, trade associations, state and local officials, lenders, and consumers. We also want to reach out to those who are curious about manufactured housing, HUD's role as a regulatory body, and the impact of rules and regulation on the industry.

If you would like to receive further issues of the FACTs newsletter, [click here](#) to be added to our database. In addition to information from HUD's Manufactured Housing program, a new feature will be implemented periodically.

This "spotlight" will feature a guest columnist from outside of the Department. The purpose of this new feature will be to relay items of interest to other manufactured housing stakeholders. If you are interested in submitting an article to the FACTs Newsletter, please send an email to mhs@hud.gov and include the words "Article Submission" in the subject line. Thank you for reading our newsletter!

SAA/PIA Western and Midwestern Regional Meeting

The first SAA/PIA Western and Midwestern Regional meeting in many years was held on April 11-12, 2017, at the Sheraton Grand at Wild Horse Pass in Chandler, Arizona. The meeting was hosted by the U.S. Department of Housing and Urban Development (HUD) with the assistance from the Arizona State Administrative Agency (SAA). There were over 55 participants which included representatives from 16 state administrative agencies (SAAs), 10 primary inspection agencies (PIAs) both private and state, several manufacturers, trade association representatives, HUD staff and supporting contractors.

Pamela Danner, Administrator of the Department of Housing and Urban Development (HUD) Office of Manufactured Housing Programs (OMHP), opened the meeting by welcoming all attendees and thanking Debra Blake, Administrator of the Arizona SAA,

for assisting with hosting and planning for this meeting. Ms. Blake introduced Michael Traylor, Director of the Arizona Department of Housing. Mr. Traylor spoke briefly about the importance of manufactured housing in providing affordable and quality housing to Arizona residents.

Pamela Danner presented the meeting focus and objectives for each of the two groups: the SAAs and the PIAs. For the SAAs, the meeting focus and objectives were to understand how to comply with their job descriptions under Subpart G of the Federal Manufactured Home Procedural and Enforcement Regulations, 24 Code of Federal Regulations (CFR), Part 3282. These regulations require the SAAs to provide oversight of various tasks required of the manufacturers' handling of consumer complaints and other information under Subpart I, whether

continued on page 2

In this issue:

SAA/PIA Meeting	1
Installation Program Update	4
Dispute Resolution	4
From the Desk of the Administrator	5

SAA/PIA Meeting

they are a manufacturing state or a non-manufacturing state, also known as, a location state.

For the PIAs, the meeting focus and objectives presented by Ms. Danner were to understand how to comply with their job descriptions under 24 CFR 3282.416, which require them to provide oversight of notification and correction activities conducted by the manufacturers. She asked the participants in each group to determine what actions they will take to improve their oversight to better meet their job descriptions. This would include coming away from each session with one or two takeaways that they can report out to the whole group.

After relaying the meeting focus and objectives for each group, participants were divided into two working groups: SAAs and PIAs. The manufacturers and other attendees were asked to join the group of their choice and participate in these working sessions. Within the SAA working session, Ashok Goswami, Senior Program Manager, Institute for Building Technology and Safety (IBTS), provided an overview of the Subpart I requirements. He asked the group to take away the following guidance:

- Require the manufacturer to provide a better description of the problem so that a basis could be better determined.
- Require the manufacturer to provide the basis based on the definitions of the 5 types of determinations.

After the Subpart I overview, Patricia McDuffie, OMHP Manufactured Housing Specialist, provided an overview of the plant record review procedures utilized by HUD in conducting plant record reviews in the states where HUD serves as the SAA. Then to apply the knowledge gained, the group conducted a record review exercise using actual service records.

In the afternoon SAA working session, Joni Cage, Arizona SAA, and Justin Smith, Missouri SAA, provided an overview of their consumer complaint process. Then Demetress Stringfield, OMHP Management Analyst, conducted

a presentation on the HUD dispute resolution program which included an interactive true or false question session. This was followed by Janet Williams, Executive Director, Ohio Manufactured Homes Commission, presenting an overview of the Ohio Dispute Resolution Program. The last topic covered in the working session was provided by John Davis, Senior Analyst, IBTS and Leo Huott, Management Analyst, OMHP. Leo and John went through a presentation regarding the process and purpose of SAA Monitoring Assessments (SMA) and then concluded the session with a brainstorming session on ways to make the SMA process better.

For the PIA working group, Jason McJury, OMHP Structural Engineer, and James Turner, IBTS Program Manager, led the PIAs in a record review exercise to train them on their responsibility for conducting monthly reviews of each plant's service and inspection records. Then they discussed IBTS audit follow-up expectations, the top 5 In-plant Primary Inspection Agencies (IPIA) and Design Approval Primary Inspection Agencies (DAPIA) findings, site completion of construction, IPIA follow up regarding design deviation reports, and the proper completion of the HUD 302 forms. The 302 forms are completed by manufacturers and IPIAs and are provided monthly. The form shows the number and location of homes manufactured in any factory. Many of the 302 forms lack correct address information for the retailers.

In the morning of April 12th, the meeting was reconvened by Administrator Danner. Jason McJury provided an overview of the Federal Installation Program, including pictures of problems found during inspections in the HUD-Administered States. Then Rory Hoffmann, North Dakota SAA Administrator, presented an overview of the North Dakota installation program explaining how they have developed software that allows a paperless program. North Dakota conducts an inspection of each initial installation, which has had the effect of reducing consumer complaints. Then Rick Hanger, Colorado SAA Administrator, provided the participants with how Colorado is handling tiny home

issues.

After lunch, the participants were taken to the Champion Home Builders' plant in Chandler for a plant tour and a session conducted by Russell Sargent, Champion's National Director of Quality and Service. Mr. Sargent provided a presentation of the Champion procedures for complying with the Subpart I requirements. The participants toured one of Sun Communities' manufactured home communities, Brentwood West. This tour was arranged by Susan Brenton, Executive Director, Manufactured Housing Communities of Arizona, which concluded our two-day agenda packed meeting. Overall, the meeting was successful as participants were provided an opportunity to gain or be refreshed on their job responsibilities regarding compliance with the requirements of the manufactured housing program, as well as, an opportunity to network with other participants within the Western and Midwestern regions.



SAA/PIA Meeting in Pictures



SAA and PIA representatives from the West and Midwestern regions convene with HUD OMHP representatives at the HUD SAA-PIA Regional Meeting held in Chandler Arizona in April 2017.



Pamela Beck Danner, Administrator of the HUD OMHP and IBTS Senior Program Manager Ashok Goswami respond to questions from the SAA working group.



Tour of the Brentwood West Manufactured Housing Community in Mesa, Arizona.



Tour of the Champion Home Builders plant in Chandler, Arizona.



Opening Session of the 2017 HUD SAA-PIA Western & Midwestern Regional Meeting. At the head table, Director of the Arizona Department of Housing Michael Trailor is flanked on left by his Assistant Deputy Director, Debra Blake and Pamela Beck Danner, Administrator of HUD Office of Manufactured Housing Programs (OHMP).



Jason McJury, OMHP Structural Engineer and Manufactured Housing Specialist gives a presentation to the PIA working group.



Demetress Stringfield, OMHP Management Analyst, discusses Dispute Resolution in HUD Administered States.

Update on Manufactured Home Installation Program

The HUD-Administered Manufactured Home Installation Program has experienced great success and growth so far in 2017. The Installation Program performed several installation monitoring inspections, worked to improve manufactured housing installation instructions, approved a new installer training program, met with industry leaders in multiple states, and welcomed the state of Michigan into the program in May.

Monitoring inspections of recently installed new manufactured homes continue to provide insight into common industry practices and allows the Department to give constructive feedback to improve home installations. So far in 2017, qualified monitoring inspectors have examined 37 homes in Illinois and Maryland.

From June to September this year, HUD has scheduled inspections in Montana, South Dakota, Wyoming, and Nebraska with more to be added. Common inspection discoveries continue to be improper grading around the home, improper cap blocks, tie downs that exceed 60 degrees, lack of approved alternative foundation designs (foundation plans not found in the manufacturer's instruction manual) as well as lack of proper reporting

to HUD upon home sale and installation. This year's inspections have also revealed failure to extend condensation, hot water pan and over flow valves, and dryer lines to the perimeter of the home.

Beyond the inspections, HUD and SEBA have traveled to attend industry meetings as well as work with various associations with the goal of improving manufactured housing installation. HUD and SEBA attended the Northeast Super Symposium in Albany, New York, as well as the Illinois Manufactured Housing Association Annual Meeting in Chicago, Illinois. HUD and SEBA are scheduled to attend an International Code Council Meeting in Columbus, Ohio, and the Five State Convention in Deadwood, South Dakota.

HUD is excited to announce a new training program that has been approved for installers of manufactured homes. The *Manufactured Housing Professional Training by Mark Conte* was approved by HUD in April of this year and will provide in-person training to both small and large groups. For information on these trainings, please visit the Installation Program website listed below.

Between all training providers, 39 people have received training and 44 people have

become a HUD-Licensed Installer this year. The number of HUD-Licensed Installers will see a dramatic increase this year because the state of Michigan has been incorporated into the HUD Installation Program as of May 15, 2017. Installers who work in Michigan must receive their HUD Installer License by October 1, 2017, and must comply with reporting requirements.

To introduce the program in Michigan, HUD and SEBA will host a webinar on June 21, 2017 at 2:00 pm EST, 1:00 pm CST. Registration for the webinar is available at the Installation Program website listed below.

In addition to managing the state of Michigan's Installation Program, HUD will also manage the responsibilities of the State Administrative Agency (SAA) and the Dispute Resolution Programs (DRP) for the state. HUD and SEBA are looking forward to working with the manufactured housing industry in Michigan to ensure smooth and successful program implementations.

For more information on the program, visit www.manufacturedhousinginstallation.com. Here you will find all program requirements, documents, announcements, and important contacts.

Manufactured Home Dispute Resolution Program

The HUD Manufactured Home Dispute Resolution Program is a program of the Office of Manufactured Housing Programs (OMHP) that provides timely resolution of disputes between manufacturers, retailers, and installers when the parties cannot agree on a solution to a construction, safety, or installation issue with a manufactured home.

OMHP has made a concerted effort to educate industry stakeholders about the Dispute Resolution Program by focusing on stakeholder outreach, dispelling misconceptions about the Dispute Resolution Program, ensuring that retailers and manufacturers are aware of their consumer disclosure requirements, and serving as a resource to stakeholders overall.

OMHP is working on providing manufactured home stakeholders the tools they need to be successful partners, with a firm understanding of the guidelines and regulations set forth under the National

Manufactured Home Construction and Safety Standards Act.

For those who would like to learn more about the HUD Manufactured Home Dispute Resolution Program, OMHP will be hosting an informational webinar about the Manufactured Home Dispute Resolution Program on Tuesday, June 27 from 2:00-3:00pm Eastern.

OMHP will be discussing how the Dispute Resolution Program works, what types of issues are handled under the program, federal disclosure requirements, and additional resources available to stakeholders. This will also include a short presentation on the manufactured housing installation program.

[To register for the webinar, click here.](#) After registering, you will receive a confirmation email containing information on how to join the webinar. If you have any questions, please reach out to Victoria Bulson at

vbulson@savangroup.com.

For more information about the HUD Manufactured Home Dispute Resolution, visit www.hudgrp.net.



From the desk of the Administrator...

As we are now at the end of the third quarter of our fiscal year 2017, we wanted to provide you with our program news and updates. As discussed earlier in this newsletter, pursuant to the recommendations of our SAAs desiring smaller meetings, we held a SAA/PIA Western and Midwestern Regional meeting on April 11-12, 2017 in Chandler, Arizona. I was very pleased with the exchange of ideas and information among all the participants at this meeting and of the attendance and participation of several manufacturers. We are planning to hold an in-person meeting of the Eastern and Southern regions in September, 2017. We will be announcing the exact date and location soon.

On December 12, 2016, the Environmental Protection Agency (EPA) published in the Federal Register its final rule on "Formaldehyde Emission Standards for Composite Wood Products". HUD is required by the Toxic Substances Control Act Title VI as amended to finalize a rule within 180 days of the EPA final rule publication date "to ensure that the (HUD) regulation reflects the (EPA) standards". EPA has changed this rule's effective date to May 22, 2017 and also changed the compliance date to March 22, 2018. HUD is currently working on preparing its draft formaldehyde rule for Departmental clearance.

In June, 2017, I appreciated the opportunity provided to me by Mark Duran, Executive Director of the New Mexico Manufactured Housing Association, to address his members at their annual convention in Albuquerque, New Mexico. I enjoyed speaking to both the general membership and at the continuing education seminar for New Mexico licensed installers.



Pictured from left to right: Chris Starace, President of the NM Manufactured Housing Association, Pamela Danner, and Mark Duran, Executive Director of the NM MHA

Because of the withdrawal of the state of Michigan from the SAA, Installation, and Dispute Resolution Programs effective May 15, 2017, my staff has been working with the Michigan Manufactured Housing Association and the state to ensure a smooth transition for this transfer. In order to provide a transition period for Michigan installers, HUD is allowing all installers wanting to do installation business in Michigan until October 1, 2017, to obtain a HUD manufactured housing installation license.

As always, I look forward to continuing to work with you all, to provide affordable, safe, quality, and durable manufactured homes for our homeowners. We welcome your input for suggestions to improve this program and our partnerships.

Pamela Beck Danner, Administrator



Previous editions are on the web!

https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/rmra/mhs/newsletter

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