

MHI Submits Recommendations for 2020-2021 HUD Code Updates

Keeping our building code current and more regularly updated is critical for ensuring our industry can continue to produce safe, affordable homes with the innovative features and amenities today's consumer demands. As part of this effort, MHI submitted recommendations to the U.S. Department of Housing and Urban Development (HUD) for the 2020-2021 HUD Code development cycle. These recommendations are a continuation of MHI's ongoing efforts to make critical updates to the HUD Code. In March, MHI submitted recommendations in response to the Department's most comprehensive proposed update to the HUD Code in over a decade which included 44 proposed revisions.

The four recommendations submitted were based on discussions with MHI's Technical Activities Committee, which provides MHI with valuable input and recommendations to ensure updates to the HUD Code are appropriate and allow for even greater innovations by our industry. For this HUD Code development cycle, MHI requested the following updates:

Repeal the Bathroom Door Privacy Lock Requirement

The HUD Code currently requires all bathroom doors be equipped with a privacy lock that includes a safety release that, in the event of an emergency, disengages the locking mechanism from outside the room. While this requirement has generally not been a problem, interior barn doors present a unique design challenge, and these doors are popular with homebuyers. MHI is recommending that this requirement be repealed. Other contemporary building codes, such as the International Residential Code (IRC), do not require privacy locks on bathroom doors. Instead, whether to install a privacy lock is left to the discretion of the consumer.

Ensure Permissive Use of Combination Smoke/Carbon Monoxide Alarms

As part of its recent proposed rulemaking, HUD is incorporating rules for carbon monoxide alarms into the HUD Code. While MHI supports this update, HUD's rulemaking did not address combination smoke/carbon monoxide alarms. In MHI's comment letter in response to HUD's proposed rulemaking, we recommend that HUD clarify in its final rulemaking that combination alarms are permitted, including the introduction of a cross-reference between the existing smoke alarm requirements and the recently proposed carbon monoxide alarm requirements. MHI also provided HUD with model language for incorporating these new provisions into the HUD Code's existing smoke alarm requirements.

Update the Venting Requirements for Range Hoods

Currently, the HUD Code requires that range hoods vent to outside the home. Further, the HUD Code does not permit the installation of ductless range hoods. Amending the HUD Code's ventilation requirements would provide manufacturers with the same flexibility to install ductless range hoods that site-built homebuilders have enjoyed for several years. MHI is recommending that the HUD Code be updated with an exception for ductless range hoods that mirrors the same provision in the IRC. The

benefit would be two-fold—it would lower manufacturing costs, which could be passed along to the consumer, and eliminate a regulatory burden that is exclusive to manufactured housing construction.

Update the Air Return Requirements for Closets and Baths

As part of the HUD Code's provisions for circulating air systems, only toilet rooms are excepted from the return air opening requirements. Given that installing the master bath between the master bedroom and closet is a popular floorplan with homebuyers, complying with the HUD Code requires installing closet air returns that pull through the bath (which can introduce unpleasant odors) or the installation of jump ducts between the closet and bedroom to circumvent the bath (which can be prohibitively expensive). In comparison, the IRC states that return air shall not be taken from a closet, bathroom, or toilet room. MHI is recommending that the HUD Code be updated. This would clarify that return air need not be pulled from bathrooms and closets and ensure consistency with other contemporary building codes.

If you have any questions, please contact MHI's Advocacy and Communications Department at MHIgov@mfghome.org or 703-558-0675.