

Congress of the United States
Washington, DC 20515

October 16, 2020

The Honorable Ben Carson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington DC. 20410

Dear Secretary Carson,

We are writing today to raise two issues that are critical to working families who choose to live in manufactured housing. We are requesting that the U.S. Department of Housing and Urban Development (HUD) elevate the Office of Manufactured Housing Programs (OMHP) and streamline the process for updating the federal construction standards (HUD Code) that manufactured housing must follow so that manufactured housing can continue to address the nation's critical need for quality, affordable housing. As the nation continues to navigate an affordable housing shortage while focusing on the Coronavirus crisis, ensuring that HUD's manufactured housing regulations continue to support innovative housing solutions becomes even more crucial.

Manufactured housing is one solution for addressing America's affordable housing shortage and making the dream of homeownership an attainable reality for millions of Americans. Given the affordable housing challenges our nation is confronting, and the importance of stable housing in the midst of the pandemic, we believe it is critical for HUD to take actions to ensure its regulation of manufactured housing serves the purpose set forth in law, which is to "facilitate the availability of affordable manufactured homes to increase homeownership for all Americans."

To achieve this statutory purpose, the OMHP should be elevated within HUD's structure and a Deputy Assistant Secretary, with requisite expertise in both industry and related consumer issues, appointed to lead it to ensure that manufactured housing is an integral part of the Department's affordable housing initiatives. The proposed HUD Budget for 2021 included the elevation of the Office of Manufactured Housing Programs (OMHP) and the appointment of a Deputy Assistant Secretary to lead it. This proposal will address the challenges that the manufactured housing industry continues to face, many of which are because of HUD's bureaucratic structure and, more specifically, manufactured housing's low priority within the agency. We urge you to move forward with the recommendation to elevate the office to bring more focus to the unique needs of manufactured housing.

In addition, because HUD is the standard-setting body for the nation's manufactured home construction and safety standards, updates to the HUD Code should follow a distinct administrative path and be prioritized separately from unrelated policy matters. Such an approach was recommended by the Government Accountability Office in 2014 and again last year, by HUD's own Office of Policy Development and Research (PD&R). It is more important than ever for HUD to streamline the

administrative processes within the department to ensure the HUD Code can be updated on a regular basis. We are aware that the agency is moving forward with the first proposed changes to the HUD Code in decades and that there are a number of subsequent changes in the queue that will need to be implemented in order to clear out the backlog of recommendations for HUD Code updates made by the Manufactured Housing Consensus Committee (MHCC). We urge you to complete work on clearing out this decades-old backlog as soon as possible. We would also ask that you evaluate any other changes to the HUD Code that may be needed and, in conjunction with the elevation of the OMHP, evaluate if any changes to the MHCC should be made to ensure its effectiveness at fostering high-quality, affordable housing. A streamlined process for updating the HUD Code would ensure this significant backlog in code updates does not happen again and will bring certainty to both manufactured housing producers and consumers that HUD will continually update the Code and that future revisions are implemented regularly.

We appreciate your prompt attention to our request and respectfully request a written response to this letter describing HUD's efforts to address the matters discussed herein, including timelines for expected actions. Addressing these organizational and administrative process issues at HUD can help ensure manufactured housing can support our nation's affordable housing needs during this pandemic, and into the future.

Sincerely,



Bill Foster
Member of Congress

Stephen Lynch
Member of Congress

David Scott
Member of Congress

Ben McAdams
Member of Congress

Al Lawson
Member of Congress

Josh Gottheimer
Member of Congress



Cynthia Axne
Member of Congress

Vicente Gonzalez
Member of Congress

Denny Heck
Member of Congress

Brad Sherman
Member of Congress

Rashida Tlaib
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Alma S. Adams, Ph.D.
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