

The Honorable Mike Johnson
Speaker
United States House of Representatives
Washington, D.C. 20515

The Honorable Hakeem Jeffries
Minority Leader
United States House of Representatives
Washington, D.C. 20515

January 9, 2026

Dear Speaker Johnson and Minority Leader Jeffries,

We are writing to urge Members of Congress to support H.R. 5184, the Affordable HOMES Act, which is being considered on the House floor this week. Our nation is facing an affordability and housing supply crisis, and manufactured housing is a critical tool for quickly and affordably increasing available housing stock.

The Affordable HOMES Act would provide regulatory clarity and streamlining for manufactured housing energy efficiency standards, returning authority to the housing experts at the U.S. Department of Housing and Urban Development (HUD), eliminating the Department of Energy (DOE)'s authority to set its own standards while providing an opportunity for DOE to provide recommendations to HUD in its process. The bill also rescinds the DOE's May 2022 manufactured housing energy efficiency rule which has yet to be fully finalized as enforcement has not gone into effect. Higher energy efficiency standards are an important goal which we support, however, they must be designed with affordability in mind, and by the agency that understands how housing works.

HUD had exclusive authority for setting these standards since 1974 until DOE was given parallel authority in 2007 under the Energy Independence and Security Act. In part due to the resulting conflicting statutory authorities, the HUD standards have not been fully updated since 1994, though some updates that do provide energy efficiency improvements have been made in the broader HUD manufactured housing code since then, such as energy efficiency standards for appliances, windows, and water retention barriers.¹ In 2022, HUD's Manufactured Housing Consensus Committee (MHCC), which was established by Congress, reviewed and recommended meaningful energy efficiency improvements to HUD's code, which also have industry support. We

¹ **Federal Register – HUD Manufactured Home Standards (final rule)**. U.S. Department of Housing and Urban Development. (2024, September 16). *Manufactured Home Construction and Safety Standards* (Final rule, Docket No. FR-6233-F-02, 89 FR 75704). *Federal Register*. Retrieved from <https://www.federalregister.gov/documents/2024/09/16/2024-20545/manufactured-home-construction-and-safety-standards>

recommend that these move forward after DOE's rule is rescinded and sole authority be returned to HUD.

Experts, including HUD's MHCC during the Biden administration, have been concerned that many of the requirements in the DOE rule are not workable in practice and would drive up housing costs. For example, the DOE standards include HVAC requirements that rely on site-built standards which are not applicable to manufactured housing. While it is true that increased energy efficiency can lower costs for consumers over the long-term, the upfront costs are a significant barrier for many consumers, especially considering that manufactured housing is generally the most affordable option for lower-income homebuyers.

The median household income for residents of manufactured homes is \$40,000 compared to \$85,000 for single-family home residents, and the median income for manufactured housing homeowners is \$41,500 compared to \$93,000 for single-family homeowners. The DOE's standards would increase costs in each climate zone for both single- and multi-section manufactured homes. By DOE's own conservative estimates, the incremental purchase price for a manufactured home would increase \$660 on average for single-section (tier 1), and an average of \$4,222 for multi-section (tier 2) homes.² As noted in the DOE's analysis, and posited by experts, energy efficiency savings for consumers are less impactful in warmer climates.³ In addition, DOE estimated the industry would incur one-time conversion costs of \$29.5 million.⁴ The DOE analysis used estimated materials costs from 2014 with an assumed 2.3 percent annual cost increase between 2014 through 2023. According to Federal Reserve Bank of St. Louis data, building material and supplies prices have increased 51.77 percent from 2014 through 2023, an average annual increase of 4.3 percent.⁵ The costs would be even higher for builders and manufactured housing developers.

At a time when our nation needs more affordable housing of all kinds, unworkable standards, increased costs, and regulatory confusion only serves to hamper progress in meeting our nation's affordable housing supply needs. While decarbonizing the building sector is an important goal, prioritization should be placed on the highest contributors, and policies should be designed in a way that do not place an undue burden on the

² **Federal Register – DOE Energy Conservation Standards for Manufactured Housing.** U.S. Department of Energy. (2022, May). *Energy Conservation Program: Energy Conservation Standards for Manufactured Housing* (PDF). Retrieved from https://www.energy.gov/sites/default/files/2022-05/mh-ecs-fr_0.pdf

³ **Regulatory Studies Center – DOE's Energy Conservation Standards for Manufactured Housing.** The George Washington University Regulatory Studies Center. (n.d.). (2019, August). *Does energy conservation standards for manufactured housing...* Retrieved from <https://regulatorystudies.columbian.gwu.edu/does-energy-conservation-standards-manufactured-housing>

⁴ See footnote 2

⁵ **FRED – Producer Price Index (Building Material & Supplies).** U.S. Bureau of Labor Statistics. (n.d.). *Producer Price Index by Industry: Building Material and Supplies Dealers [PCU44414441]*. FRED, Federal Reserve Bank of St. Louis. Retrieved from <https://fred.stlouisfed.org/series/PCU44414441>

households least able to afford the premium. We support improving energy efficiency standards in a cost-effective and fair way. Consumers should always be given the choice for more energy efficient housing and be able to make the financial decision that best works for them.

We support the Affordable HOMES Act because it is good for housing affordability, and it is good for housing supply. An abundance and affordability agenda requires streamlined, efficient, and feasible regulation that enhances and supports innovation and cost efficiencies. We urge you and the members of your respective caucuses to support the Affordable HOMES Act when it comes to the floor for consideration.

Thank you for your consideration, and we look forward to working with you on unlocking our nation's affordable, quality housing supply.

Sincerely,

National Housing Conference
Atlanta Neighborhood Development Partnership, Inc.
California Community Reinvestment Corporation (CCRC)
CBC Mortgage Agency and the Chenoa Fund
Community Solutions
Homeownership Council of America
Inclusive Abundance Action
Manufactured Housing Institute
Mortgage Bankers Association
UnidosUS