

**OHIO HOUSE OF REPRESENTATIVES
FINANCE COMMITTEE**

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HB 49--MAINTAIN OHIO MANUFACTURED HOMES COMMISSION EXISTING LAW

Chairman Smith, Vice Chair Ryan, Ranking Member Cera and members of the Committee,

My name is Rick Robinson. I am Senior Vice President for State and Local Affairs and General Counsel for the Manufactured Housing Institute (MHI) located in Arlington, Virginia. MHI is a national trade organization representing the factory-built housing industry before the U.S. Congress and Executive branches.

I appreciate the opportunity to come before this body to discuss manufactured housing and the important partnership our industry has with state regulatory bodies like the Ohio Manufactured Home Commission (OMHC).

First, I would like to share some facts:

- Nationally, manufactured housing provides quality, affordable housing for more than 22 million low and moderate income Americans and last year represented 9% of all new single family home starts in the US.
- The median income of manufactured homeowners is just over \$26,000 annually, nearly 50% less than the median income of all homeowners.
- Manufactured housing represents 7.3% of all occupied housing units and 10.3% of all occupied single family detached housing.
- Based on U.S. census data, the average price per square foot of a manufactured home is \$44, compared to \$94 for site built homes.
- Unlike site built homes, manufactured homes are built almost entirely in a controlled factory environment in accordance with pre-emptive federal building codes administered by the U.S. Department of Housing and Urban Development (commonly referred to as HUD Code). The HUD Code has existed since 1976. Homes are transported to the home site where they are installed in compliance with federal and state laws.

I also feel it necessary to clear up a few misconceptions that may be floating around regarding the fire safety of manufactured homes.

Elements of the HUD Code have led the way for not just manufactured homes but for fire safety involving all site built single family residential homes. In fact, the HUD Code was the first of its kind to require smoke alarms.

In many cases, the HUD Code is more restrictive than other building codes. For instance, methods of egress standards are much more restrictive for manufactured homes than the International Residential Code (IRC) adopted by most localities. The HUD Code also has more stringent flame spread requirements in many of the construction materials used in manufactured homes.

The use of the HUD Code has revolutionized safety in manufactured homes and should not be confused with the older “mobile homes” and trailers which lacked appropriate fire standards prior to 1976.

Building to the HUD Code has paid off for consumers. A 2013 Study by the National Fire Protection Association (NFPA) indicated the manufactured homes fire safety code is more stringent than the code for all other homes built on site. NFPA indicated today’s manufactured homes have 38-44% less fires and lower civilian fire injuries than site built homes per 100,000 people. No local or state agency or the MH Commission has any authority over fire codes in manufactured homes because the fire safety code is federally pre-empted by HUD (U.S. Department of Housing and Urban Development).

It is interesting that the Ohio Fire Chiefs’ Association has engaged on this topic and references a program that does not exist. A simple Google search for the Housing Safety Equality Initiative included in their letter to you last week yields no results for a program, including on their own website. The State Fire Marshall’s office did not include a mention of the program in his Spring 2017 newsletter. Perhaps this is to be a new initiative launched by the State Fire Marshall, who we salute as a longtime public servant and first responder and wish him well in his upcoming retirement.

State Fire Marshall Flowers as a former legislator and former firefighter voted and more importantly co-sponsored the bill (SB 102, 125th GA) to create the Ohio Manufactured Homes Commission. The HUD fire safety standards which have been in place since 1976 were not raised as concerns regarding the safety of manufactured homes at the time the Commission legislation was enacted. If such was a concern it is likely then-Representative Flowers would have heard from his former colleagues and be urged not to support or add his name to the bill?

As to the provisions of this bill, MHI’s national role has given us perspective on how state governments organize and implement regulations for manufactured homes. Ohio is one of the very few states that have consolidated regulations under one roof. The Ohio Manufactured Homes Commission is often highlighted nationally as a model program for

regulation of Manufactured Homes. The OMHC director is often asked to speak at national conferences about the Ohio Program.

With that, Mr. Chairman and members of the Committee I thank you for the opportunity to set the record straight and to express support for maintaining the Ohio Manufactured Homes Commission as in present Ohio law.

I am happy to answer any questions.