



Next Generation Manufactured Housing Action Plan

Manufactured housing has reached an important transition point. Fifty years after the establishment of the federal manufactured housing program, the 21st Century Road to Housing Act creates an opportunity to modernize the HUD Code, encourage innovation, and broaden the range and reach of factory-built housing that can operate within the federal program.

The removal of the permanent chassis requirement is particularly significant. For decades, the permanent chassis has been one of the defining physical characteristics of a manufactured home. Allowing homes certified within the HUD code program to be built and shipped nationwide, with or without a permanent chassis, creates new opportunities for innovation in design, transportation, foundations, installation, and multistory construction, and strengthens the opportunity for synergy between manufactured housing and other forms of off-site construction.

The objective of this action plan is to identify a future plan for manufactured housing that takes into account recent statutory changes, including but not limited to the removal of the chassis, while positioning the federal program for the future. The changes undertaken in accordance with this plan will involve the consideration of the Manufactured Housing Consensus Committee (MHCC) in its role of advising HUD on program changes. The intent is not to predetermine individual regulatory outcomes. Rather, the plan identifies areas where standards, research, demonstrations, technical analysis, and stakeholder input are likely to be needed.

The action plan also recognizes that HUD's manufactured housing program is more than a construction code. The value of the federal program comes from the combination of national design and construction standards, factory quality assurance and controls, state and third-party oversight, minimum installation requirements, consumer protections, and federal preemption of state and local building code requirements. As innovations in manufactured housing are considered, the challenge will be to preserve the strengths of the system while allowing HUD's manufactured housing regulatory framework to accommodate new housing types and manufacturing methods.

The following seven actions provide a potential framework for that work.

1. Update Manufactured Housing Energy Efficiency Standards
2. Update 24 CFR Part 3280 for Chassis-Free Construction
3. Update 24 CFR Part 3285 for Foundations and Installation
4. Establish a Multi-Module Construction Pathway
5. Develop a Performance-Based Code for Buildings with Five or More Units
6. Develop Off-Chassis Case Studies and Disseminate Lessons Learned
7. Create a Manufacturer On-Ramp to the HUD Regulatory System

The actions are interconnected. The 21st Century ROAD to Housing law requires HUD to address both the removal of the permanent chassis requirement and updated energy efficiency standards for manufactured housing. Implementing those provisions creates an immediate need to update the Construction and Safety Standards (Part 3280) and Model Installation Standards (Part 3285), while also opening a broader discussion about the future scope of the federal manufactured housing program.

These statutory changes also create an opportunity to consider related improvements, including multi-module construction, expanded multifamily applications, demonstrations, and pathways for existing modular and other off-site construction manufacturers to enter the HUD Code regulatory system.

The MHCC provides an important forum for working through these questions. Its role can extend beyond reviewing individual regulatory provisions to helping identify where the existing framework works well, where it creates barriers to innovation, and where new technical pathways may be appropriate.

The overarching goal is straightforward: preserve the strengths of the federal manufactured housing system while ensuring that it can support innovation and the next generation of factory-built housing. The 50th anniversary of the HUD Code provides an appropriate moment to undertake that work and establish a foundation for the next 50 years of manufactured housing.

1. Update Manufactured Housing Energy Efficiency Standards

The 21st Century ROAD to Housing law requires HUD to update manufactured housing energy efficiency standards. At its July 23, 2026, meeting, the MHCC reaffirmed its 2022 energy efficiency recommendations. The Office of Manufactured Housing Programs (OMHP) will conduct rulemaking to update 24 CFR Part 3280 consistent with MHCC's recommended standards. In support of OMHP's rulemaking, HUD's Office of Policy Development and Research (PD&R) is providing technical and analytical assistance with contracted support, which will be used to conduct the Regulatory Impact Analysis (RIA) necessary for proposed rulemaking.

2. Update 24 CFR Part 3280 for Chassis-Free Construction

Section 301 of the 21st Century ROAD to Housing Act removes the permanent chassis requirement and directs HUD, in consultation with the MHCC, to establish revised standards for manufactured homes built without a permanent chassis. OMHP will review the MHCC's future recommendations for proposed rulemaking that will update 24 CFR Part 3280, Manufactured Home Construction and Safety Standards, to address chassis-free construction, including structural design, transportation, lifting, connections, and related technical requirements. The update should provide a clear standards-based framework for homes with and without a permanent chassis, while maintaining safety, performance, and flexibility for new designs.

3. Update 24 CFR Part 3285 for Foundations and Installation

Section 301 of the 21st Century ROAD to Housing Act also creates the need to review how chassis-free homes are installed, supported, and affixed to the ground. OMHP will review the

MHCC's future recommendations for proposed rulemaking to update 24 CFR Part 3285, Model Manufactured Home Installation Standards, that will address foundations, anchoring, structural connections, setting procedures, and other installation requirements for chassis-free homes. The update should consider a range of support systems and provide sufficient flexibility to accommodate new designs while maintaining safe and reliable performance of the homes.

4. Establish a Multi-Module Construction Pathway

Removing the permanent chassis requirement creates an opportunity for innovation in what may be considered transportable sections of manufactured homes. This includes how the homes can be designed, transported, and assembled. HUD will explore the range of housing types and designs that can be accommodated under 24 CFR Part 3282, Manufactured Home Procedural and Enforcement Regulations, to provide greater flexibility in how sections are designed, constructed, transported, combined, and completed and installed on-site while preserving substantial factory completion.

5. Develop a Performance-Based Code for Buildings with Five or More Units

Develop a federal performance-based construction and safety code, modeled on 24 CFR Part 3280, Manufactured Home Construction and Safety Standards, for residential structures containing five or more dwelling units. Larger buildings introduce issues such as common corridors, stairs, accessibility, fire separation, shared systems, and egress that are not fully addressed by the existing manufactured housing standards. Extending the HUD Code to buildings with five or more units could create a national pathway for repeatable multifamily construction under a consistent federal regulatory framework.

6. Develop Chassis-Free Case Studies and Disseminate Lessons Learned

Section 301 of the 21st Century ROAD to Housing Act creates a new pathway for manufactured homes built without a permanent chassis. HUD will document early chassis-free projects and provide clear information to the public on design, transportation, foundations, installation, zoning, appraisal, lending, insurance, and market acceptance. These case studies can help consumers, communities, lenders, developers, builders, planners, and other stakeholders better understand how off-chassis manufactured housing works in practice.

7. Create a Manufacturer On-Ramp to the HUD Regulatory System

Develop guidance and offer resources to help existing modular and other off-site construction product manufacturers understand and enter the HUD regulatory system. Support will address factory certification, design approval, quality assurance and controls, state and third-party inspection, certification labeling, installation, and other program requirements, while helping manufacturers identify where existing processes align with HUD program requirements. The goal is to reduce barriers to entry and make it easier for factory-built product manufacturers to produce HUD-regulated homes.