



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

May 5, 2021

**21-IW1-AC
NEW**

ALL MANUFACTURED HOME MANUFACTURERS

Dear Manufacturer:

To promote the purposes of the National Manufactured Housing Construction and Safety Standards Act of 1974 (Act), as amended, and assist the manufactured housing industry that is currently faced with the swinging exterior passage door supply chain challenges, the U.S. Department of Housing and Urban Development (HUD) issues this Alternative Construction (AC) letter under the terms and conditions stated herein, where no affirmative action is needed to protect the public interest. In accordance with 24 Code of Federal Regulations (CFR) 3282.14(b), HUD has determined that compliance with specific standards stated herein would be unreasonable due to material shortages and the COVID-19 pandemic. Specifically, the supply chain is currently unable to supply swinging exterior passage doors that conform to certain standards within 24 CFR part 3280 titled "Manufactured Home Construction and Safety Standards" (Standards). These supply chain issues, caused by the COVID-19 pandemic, has resulted in an industry-wide request for HUD to issue an AC letter specific to swinging exterior passage doors.

This AC letter is for the production of manufactured homes at any Production Inspection Primary Inspection Agency (IPIA) certified manufactured home production facility until December 31, 2021, and includes an unlimited number of manufactured homes that may be constructed.

The swinging exterior passage doors will be certified in accordance with the following direct alternative standard:

- ANSI Z97.1-2015, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test

HUD concludes that the above-mentioned standard meets or exceeds the following standard incorporated by reference in 24 CFR §3280.4 of the Standards:

- §3280.113(c) – ANSI Z97.1-2004, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test

The swinging exterior passage doors will further be certified in accordance with the following general standards:

- AAMA/WDMA/CSA 101/I.S.2/A440-17, North American Fenestration Standard/Specification for Windows, Doors, and Skylights, or ANSI/AMD 100-2013, Structural Performance Ratings of Side-Hinged Exterior Doors (SHEDs) and Procedures for Component Substitution - for design, testing and labeling;
- ASTM E283-04(2012), Standard Test Method for Determining Rate of Air Leakage Through Exterior Windows, Skylights, Curtain Walls, and Doors Under Specified Pressure Differences Across the Specimen - for air leakage related to thermal protection;
- ASTM E330/E330M-14(2014), Standard Test Method for Structural Performance of Exterior Windows, Doors, Skylights and Curtain Walls by Uniform Static Air Pressure Difference - for structural performance;
- ASTM E331-00(2009), Standard Test Method for Water Penetration of Exterior Windows, Skylights, Doors, and Curtain Walls by Uniform Static Air Pressure Difference - for water penetration as it relates to materials and methods;
- NFRC 100, 2004, Procedure for Determining Fenestration Product U-factors - for thermal performance (U-values) related to thermal protection; and
- NFRC 200, 2004, Procedure for Determining Fenestration Product Solar Heat Gain Coefficient and Visible Transmittance at Normal Incidence - for solar heat gain and visible transmittance related to thermal protection.

HUD concludes that the above-mentioned standards meet or exceed the following standards incorporated by reference in 24 CFR §3280.4 of the Standards:

- §3280.304(b)(1) – ANSI/AAMA/NWWDA 101/I.S.2-97, Voluntary Specifications for Aluminum, Vinyl (PVC), Wood Windows and Glass Doors, and ANSI Z97.1-2004, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test;
- §3280.405(b) – AAMA 1702.2-95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing;
- §3280.405(c) –NWWDA I.S.4-81, Water Repellent Preservative Non-Pressure Treatment for Millwork;
- §3280.405(e) – AAMA 1702.2-95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing;
- §3280.405(e)(1) –ANSI Z34.1-1993, Third Party Certification Programs for Products, Processes and Service;
- §3280.404(e)(2) – AAMA 1702.2-95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing; and
- §3280.508(e) – AAMA 1503.1-1988 for test methods for Thermal Transmittance and Condensation.

This AC letter shall no longer be valid on or after January 1, 2022.

As a reminder, all AC manufactured homes built must have the letters “AC” in the serial number stamped on the manufactured home’s chassis and in all official paperwork.

HUD has determined that the issuance of this AC letter is consistent with the objectives of the National Manufactured Housing Construction and Safety Standards Act of 1974, 42 U.S.C. §5401, *et seq.* In accordance with 24 CFR § 3282.14(c) of the Manufactured Home Procedural and Enforcement Regulations (Regulations), HUD will not take enforcement action against the manufacturer for violations of 24 CFR §§ 3280.113(c), 304(b)(1), 405(b), (c), (e)(1)-(2), and 3280.508(e), insofar as these regulations reference a specific referenced standard related to swinging exterior passage doors, as long as the manufacturer meets the following requirements:

1. Before any manufactured homes can be built in accordance with this AC letter, the manufacturer shall inform HUD and its IPIA and Design Approval Primary Inspection Agency (DAPIA) of its need and option to use this AC letter. The notification to HUD, including the specific production facilities to be included, can be sent via email to:

MHSreporting@HUD.gov.

2. This AC letter is not model specific. Reapproval of all model and construction drawings is not necessary as the alternative swinging exterior passage door standards accepted in the AC letter is in lieu of the applicable swinging exterior passage door standards under 24 CFR part 3280. This AC letter only permits nonconformance with 24 CFR §§ 3280.113(c), 304(b)(1), 405(b), (c), (e)(1)-(2), and 3280.508(e), as they relate to swinging exterior passage doors and does not permit nonconformance with any other regulations. The swinging exterior passage doors will be certified in accordance with the following standards:
 - ANSI Z97.1-2015, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test;
 - AAMA/WDMA/CSA 101/I.S.2/A440-17, North American Fenestration Standard/Specification for Windows, Doors, and Skylights, or AMD 100-2013, Structural Performance Ratings of Side-Hinged Exterior Doors (SHEDs) and Procedures for Component Substitution - for design, testing and labeling;
 - ASTM E283-04(2012), Standard Test Method for Determining Rate of Air Leakage Through Exterior Windows, Skylights, Curtain Walls, and Doors Under Specified Pressure Differences Across the Specimen - for air leakage related to thermal protection;
 - ASTM E330/E330M-14(2014), Standard Test Method for Structural Performance of Exterior Windows, Doors, Skylights and Curtain Walls by Uniform Static Air Pressure Difference - for structural performance;
 - ASTM E331-00(2009), Standard Test Method for Water Penetration of Exterior Windows, Skylights, Doors, and Curtain Walls by Uniform Static Air Pressure Difference - for water penetration as it relates to materials and methods;

- NFRC 100, 2004, Procedure for Determining Fenestration Product U-factors - for thermal performance (U values) related to thermal protection; and
- NFRC 200, 2004, Procedure for Determining Fenestration Product Solar Heat Gain Coefficient and Visible Transmittance at Normal Incidence - for solar heat gain and visible transmittance related to thermal protection.

Additionally, the installation of all swinging exterior passage doors must be completed in accordance with the swinging exterior passage door manufacturer's installation instructions.

3. This AC letter is **valid until December 31, 2021**, and for an **UNLIMITED** number of homes. This AC letter shall no longer be valid on or after January 1, 2022.
4. Manufactured homes sold directly to the Federal Emergency Management Agency (FEMA) must be reported on the HUD form 302 with purchaser/consumer information for FEMA. FEMA is not a retailer of manufactured homes. Further, the location for shipment must reflect the physical address of the first destination of the home, whether it is a storage facility, holding facility, or FEMA field office for disaster deployment. Listing FEMA's headquarters as the shipping address is not appropriate. Manufactured homes sold to or through a retailer or distributor for consumer purchase shall be reported with retailer information and consumer information completed.
5. The manufacturer must ensure that FEMA or each prospective purchaser receives a copy of the enclosed "Notice to Purchaser" (see "Exhibit A") before entering into any sales agreement. The manufacturer must place the "Notice to Purchaser" in clear view in the kitchen area of the home. It must not be removed until the sale of the home is complete.
6. The manufacturer must provide HUD with a cumulative production status report (see "Exhibit B") by January 31, 2022. The production status reports must be cumulative for and include all the information identified in "Exhibit B." The manufacturer must submit this report electronically to HUD to:

MHSreporting@hud.gov

If the manufacturer cannot send the report electronically, please send the paper copy report to the following address:

U.S. Department of Housing and Urban Development
Office of Manufactured Housing Programs
451 7th Street, SW, Room 9170
Washington, DC 20410-8000

HUD is forwarding a copy of this letter to all IPIAs and DAPIAs. After the manufacturer has provided notification to HUD, the IPIA(s) and DAPIA(s) may use this AC letter, which authorizes the IPIA to permit the use of this AC letter and authorizes the DAPIA to approve plans that reference this AC letter provided that the conditions set forth in the letter are met. HUD also forwarding a copy of this letter to all State Administrative Agencies (SAA).

HUD's decision does not affect any rights that manufactured home purchasers may have under the Act. This decision is limited solely to the subject request and only applies to the manufacturer's manufacturing operations that have been certified to build manufactured homes.

Please reference HUD File No. 21-IW1-AC in any correspondence about this specific AC approval. If you have any questions concerning this matter, please contact Mr. Jason McJury of this office at (202) 402-2480 or by email at Jason.C.McJury@hud.gov.

Sincerely,

5/5/2021

X 

Teresa B. Payne, Administrator
Office of Manufactured Housing Programs
Signed by: TERESA PAYNE

Enclosures

cc: IBTS; ALL SAAs; ALL IPIAs; ALL DAPIAs

EXHIBIT A

21-IW1-AC ALL MANUFACTURED HOME MANUFACTURERS (SWINGING EXTERIOR PASSAGE DOORS)

NOTICE TO PURCHASER/OCCUPANT

The U.S. Department of Housing and Urban Development (HUD) has issued an Alternative Construction (AC) Letter No. 21-IW1-AC, available to all manufactured home manufacturers.

As constructed in the factory, this home may not meet certain aspects of the Federal Manufactured Home Construction and Safety Standards (Standards). Specifically, the testing and certification standard for your home's swinging exterior passage doors have been performed to the AAMA/WDMA/CSA 101/I.S.2/A440-17 or AMD 100-2013 standard. While the alternative standards meet or exceed the same performance testing as outlined in AAMA 1702.2-95, it does not meet the specific standard outlined in HUD's 24 Code of Federal Regulations § 3280.405.

The swinging exterior passage doors are installed in accordance with the product manufacturer's installation instructions, DAPIA-approved drawings, instructions, specifications, and comply with the AAMA/WDMA/CSA 101/I.S.2/A440-17 or AMD 100-2013.

HUD evaluated this alternative construction concept and concludes that it provides levels of quality, durability, and safety that are equivalent to those required by the Federal Standards. To comply with the approval letter issued to the manufacturer, the letters "AC" must appear in your home's serial number.

For further information about the specific Federal Standards involved, a copy of the letter issued by HUD to the manufacturer pursuant to 24 CFR 3282.14(c) is available from this retailer/dealer or the manufacturer upon request.

A copy of this Notice must be provided to the Home Purchaser/Occupant and must be temporarily affixed in a location within the kitchen area of the home.

EXHIBIT B

**21-IW1-AC ALL MANUFACTURED HOME MANUFACTURERS
(SWINGING EXTERIOR PASSAGE DOORS)**

CUMULATIVE PRODUCTION STATUS REPORT

Ending date: _____

(Reported Annually)

AC Valid thru: December 31, 2021

Plant Location: _____

Max. No. of Homes Approved: UNLIMITED

Serial Number	HUD Label Number	Retailer/Dealer Name and Location	Name, Address, Email & Phone # of Homeowner	Date of Manufacture

Authorized Mfr's Representative

Title: _____ Date: _____

Copy to HUD