




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

OFFICE OF HOUSING

JUN 12 2014

MEMORANDUM FOR: All IPIAs and DAPIAs

FROM: Pamela Beck Danner 
Administrator
Office of Manufactured Housing Programs

SUBJECT: Construction of On-Site Installation of Add-ons, such as an Attached Garage

The purpose of this Memorandum is to clarify the definition and scope of “Add-On” structures to a manufactured home. In 24CFR §3282.7, “Add-on means any structure (except a structure designed or produced as an integral part of a manufactured home) which, when attached to the basic manufactured home unit, increases the area, either living or storage, of the manufactured home.”

The Department has recently become aware that several manufacturers are producing homes that are subsequently modified in the field with “add-ons” such as a garage, family room, sun room, enclosed deck, etc. The discussion that follows relates principally to the on-site installation of an attached garage, although it could also apply to the types of structures stated above.

In particular, the Department is concerned about certain design and other factors when an attached garage is installed on-site including the load bearing effect on the manufactured home when a self-supporting garage is not provided; the possible removal of the secondary means of exterior egress from the manufactured home when the garage is attached; and the adequacy and completeness of the fire wall separation between the garage and manufactured home. There are many other design factors that may need to be addressed such as ventilation, lighting, foundation, through the roof venting, fire blocking, etc. If a manufacturer offers designs to facilitate attached garages, HUD approval is required in accordance with §3282.14, Alternative Construction (AC) of Manufactured Homes.

In some cases, manufacturers have been building compliant homes and selling to retailers and homebuyers who then construct garages. The home is compliant when it leaves the factory. In some cases the retailer may have taken the home out of compliance to add an attached garage. Retailers may not sell or lease a manufactured home that has been altered in such a way which “causes a failure to conform to applicable Federal standards (§3282.254).”

The Department is currently working with manufacturers that have recently submitted proposals for an AC for an add-on garage. All manufacturers who sell homes to retailers who intend to construct attached garages will need to submit an AC request in accordance with §3282.14 of the Manufactured Home Construction and Safety Standards (MHCSS) Act. HUD has detailed information about what it will expect in an AC request. (For example, see attached redacted sample AC.)

With respect to homes that may have been designed and constructed for attached garages and which do not have AC approval, HUD expects manufacturers to make a determination under Subpart I of the Manufactured Home Procedural and Enforcement Regulations (§3282.404). HUD will allow manufacturers to obtain AC approvals and continue to build garages pursuant to an approved AC at the

same time they are conducting Subpart I determinations as long as the manufacturer provides information to the Department regarding its conduct of a Subpart I investigation with its AC request.

Please forward this Memorandum to your manufacturers.

Further information can be obtained by contacting Eric Bers at 202-402-2123.