

State of Florida
**DEPARTMENT OF
HIGHWAY SAFETY AND MOTOR VEHICLES**



ELECTRA THEODORIDES-BUSTLE
Executive Director

DATE: October 15, 2008

TO: Mobile/Manufactured Home Dealers and Installers in Florida

FROM: Dwight F. Davis, Chief
Bureau of Mobile Home and RV Construction

SUBJECT: New U.S. Department of Housing and Urban Development (HUD) Regulations Governing Mobile/Manufactured Home Installation

The U.S. Department of Housing and Urban Development (HUD) has finalized the Model Manufactured Home Installation Standards (MMHIS) and the effective date is October 20, 2008. The MMHIS requires new manufactured/mobile home manufacturer's installation manuals to equal or exceed the protection provided by the MMHIS. The Standards are published in the Federal Register, Part II, Department of Housing and Urban Development, 24 CFR Part 3285. **The HUD MMHISs govern the installation of new homes only.** You may review and print our HUD's Model Manufactured Home Installation Standards online at: http://www.access.gpo.gov/nara/cfr/waisidx_08/24cfr3285_08.html.

As far as the installation of manufactured/mobile homes in Florida, the Department is not affected and Florida Statutes and the Florida Administrative Code, Rule Chapter 15C-1 and 15C-2 will still apply. The Department has always required new manufactured/mobile homes to be installed to the manufacturer's installation manuals and when available used homes also. Many manufactured/mobile home manufacturers' installation instructions may already meet the new installation standards, however any areas that do not, must be changed. Changes made by manufacturers will be required to be followed when homes are installed beginning October 20, 2008. However, any new manufactured/mobile homes where permit applications were received by the local building departments on October 19, 2008 or earlier will be exempted.

Some of HUD's minimum requirements are:

- To help prevent settling or sagging, the foundation must be constructed on firm, undisturbed soil or fill compacted to at least 90 percent of its maximum relative density.
- Drainage to be provided to direct surface water away from the home. Drainage must be diverted away from the home and must slope a minimum of one-half inch per foot away from the foundation for the first ten feet. Some exemptions apply (refer to installation manuals).
- A vapor retarder, 6 mills or better must be installed over the entire area under every new home, except under porches, recessed entries or decks if the home is to be skirted. The vapor retarder may be placed directly beneath footings, or otherwise installed around or over footings placed at grade, and around anchors or other obstructions. **Note:** When installing a vapor retarder, the installer must have carefully prepared the site for the

placement of the home. A poorly prepared site may allow water to run under the home and collect on top of the vapor retarder and increase chances of mold and structural damage to the home.

- Frame piers less than 36 inches may be single stacked.
- Frame piers less than 67 inches must be double stacked, engineering on piers over 67 inches.
- Shims must be used in pairs and driven tight so that they do not occupy more than one inch of vertical height.
- A one inch gap tolerance between sections of homes if the gap is shimmed and the fastener lengths increased.
- Gaskets are required between home sections and to be supplied by the manufacturer.
- HVAC ducts are to be supported off the ground by straps or other means and not spaced at more than 4 feet. When straps are used they must be ½" wider than the spacing of the metal spirals encasing the duct.

In some cases Florida Rule is more stringent than HUD and Florida Rule will apply. Those are as follows:

- HUD allows 1500 psf minimum for soil bearing, however Florida allows for the use of pocket penetrometers and the assumption of 1000 psf soil bearing.
- HUD allows the homes to be set 12 inches off the ground, but Florida requires 18 inches.
- HUD allows the use of pressure treated wood foundations, but Florida Rule does not approve their use.
- HUD will allow the use of pressure treated wood piers, but Florida Rule does not approve their use.
- HUD allows the attachment of a frame strap to the bottom of the I-beam if the frame is designed to prevent rotation. Florida requires the attachment of frame clamps to the top of I-beams.
- HUD requires longitudinal protection, but Florida specifies the number of anchors, straps, stabilizer plates or other approved systems.
- HUD requires stabilizer plates, but Florida specifies 180 square inches of plate.
- HUD addresses only 4 foot anchors, but Florida requires 5 foot anchors in some cases.
- HUD specifies a minimum of 0.030 oz/ft² coating of zinc on metal components; Florida requires 0.060 oz/ft² coating of zinc on metal components.
- HUD will allow one square foot of ventilation for every 1500 square foot of home when the home is skirted and a vapor retarder is used. To protect consumers and homes from Florida's humid climate, the Department recommends one square foot of ventilation for every 300 square feet of home when the home is skirted and a vapor retarder is used.

This memorandum is meant for informational purposes and may not be inclusive of all of HUD's installation requirements. Licensed installers and dealers are encouraged to work closely with their manufacturers and carefully examine the changes to the manufacturer's installation manual.

Also, please note, all licensed installers will be required to take a four hour course on the HUD changes. The training schedules and locations will be announced soon.

If you have questions you may call Wayne Jordan 813-740-7644.

CAF/dfd

MOBILE/MANUFACTURED HOME CONSTRUCTION STANDARDS

The U.S. Department of Housing and Urban Development (HUD) began to regulate the construction of mobile/manufactured homes in 1976 pursuant to the provisions of the National Manufactured Housing Construction and Safety Standards Act of 1974. In accordance with this law, HUD promulgated the Manufactured Housing Construction and Safety Standards in 1976; Title 24 Code of Federal Regulations (CFR), Part 3280. Section 320.823, Florida Statutes (F.S.), provides that any mobile/ manufactured home sold in Florida must conform to these standards. Copies of these standards may be ordered from:

Institute for Building Technology and Safety (IBTS)
505 Huntmar Park Drive, Suite 210
Herndon, Virginia 22070
Telephone: (703) 481-2000

Copies of the standards may also be obtained from the HUD's Manufactured Housing Program website on the Internet at the following address:

<http://www.hud.gov/offices/hsg/sfh/mhs/mhshome.cfm/>

In 1994, HUD amended the Manufactured Housing Construction and Safety Standards to provide for greater protection for mobile/manufactured homes from wind damage. During the severe hurricane seasons of 2004 and 2005, no mobile/manufactured home that was built after these new standards went into effect sustained any significant structural damage from the storms.

Regulation of Mobile/Manufactured Home Construction

HUD established a framework for regulating mobile/manufactured home construction in administrative rules they promulgated for this purpose. These regulations are contained in 24 CFR, Part 3282. These regulations established the responsibilities of mobile/manufactured home manufacturers, states and other organizations in ensuring that mobile/manufactured homes are built to be as safe as possible.

Requirement for a Design Approval Primary Inspection Agency (DAPIA)

In order to ensure that mobile/manufactured home manufacturers construct homes that are in compliance with HUD's Manufactured Housing Construction and Safety Standards, they must employ a Design Approval Primary Inspection Agency (DAPIA) pursuant to 24 CFR, Section 3282.203. These are essentially engineering firms that must certify that the designs of mobile/manufactured homes are consistent with the standards. There are five such firms and one state agency that perform this function.

Requirement for a Production Inspection and Primary Inspection Agency (IPIA)

In addition, manufacturers are held accountable for building homes that are compliant with HUD's standards by agents of HUD which are referred to as Production Inspection and Primary Inspection Agencies (IPIA) pursuant to 24 CFR, Section 3282.351. The Bureau of Mobile Home and Recreational Vehicle Construction (BMHRVC) is such an agent. The IPIA is responsible for certifying manufacturing plants before they can begin operations and for routinely inspecting manufacturing in the plants to ensure that they are in compliance with the Manufactured Housing Construction and Safety Standards. There are 10 states in which a state agency acts as the IPIA. In the other states where mobile/manufactured home manufacturing occurs, the IPIA is a private company. There are five such companies.

Mobile/Manufactured Home Labels

HUD Label Display: Every mobile/manufactured home must receive a HUD label certifying that it was built in accordance with the Federal Manufactured Housing Construction and Safety Standards. Pursuant to 24 CFR, Section 3280.11, the label shall be approximately 2 inches by 4 inches in size and shall be permanently attached to the home by means of 4 blind rivets, drive screws, or other means that render it difficult to remove without defacing it. It shall be etched on 0.32 inches thick aluminum plate. The label number shall be etched or stamped with a 3 letter designation which identifies the Production Inspection and Primary Inspection Agency (IPIA) for the state in which the home is manufactured. Each label shall also be marked with a 6 digit number which the label supplier will furnish. The label shall be located at the tail-light end of each transportable section of the home approximately one foot up from the floor and one foot in from the road side.

HUD LABEL



Color: Red Metal