



December 15, 2022

The Honorable Julia Gordon
Assistant Secretary for Housing and Federal Housing Commissioner
Federal Housing Administration
U.S. Department of Housing and Urban Development
451 7th Street, S.W., Washington, DC 20410

Dear Commissioner Gordon:

The National Association of REALTORS® (NAR) and Manufactured Housing Institute (MHI) thank you for your commitment to addressing financing opportunities for manufactured homes. Manufactured homes play an important role in providing homeownership opportunities for buyers across the country. Unfortunately, low to moderate-income and first-time homebuyers have not been able to utilize FHA's Title 1 loan program due to low and outdated loan limits. NAR and MHI commend the Federal Housing Administration (FHA) for its recently proposed updates to Title 1 Manufactured Loan Limits (Docket Number HUD-2022-0078), which comes at a critical time in the nation's housing supply shortage¹.

FHA's proposed rule creates a unique indexing methodology that increases loan limits through annual adjustments to ensure they remain current with the housing market. Without the indexing, the supply of homes available for FHA funding would shrink as prices rise. With these updates, low to moderate-income and first-time buyers will be able to take advantage of financing through FHA and begin building wealth through homeownership.

In NAR's and MHI's response to FHA and Ginnie Mae's joint request for information on enhancements to the Title 1 program, we requested FHA update its fee structures to incentivize lenders to offer loans through the Title 1, which were not incorporated into this proposed rule. We also recommended FHA ensure its Handbook have consistent definitions with the Manufactured Home Construction and Safety Act and HUD code, and create parity among the requirements for Title I and Title II borrowers. In order to ensure borrowers can take full advantage of Title I loans through FHA, we look forward to working with you to address these changes.

Once again, NAR and MHI thank you for your efforts to support the nation's housing market and future buyers. We welcome solutions to address the unique issues associated with manufactured homes so that low to moderate income and first-time buyers can achieve homeownership and the American dream. If you have any questions or comments, please feel free to reach out to Jeremy Green, NAR's Federal Housing Policy Representative at (312) 329-8404 or JGreen@NAR.REALTOR or Lesli Gooch, MHI's Chief Executive Officer at lgooch@mfghome.org or (703) 558-0660.

Sincerely,

National Association of REALTORS®
Manufactured Housing Institute

¹ [The Double Trouble of the Housing Market](#)