March 21, 2020

The Honorable Chad F. Wolf  
Acting Secretary of Homeland Security  
U.S. Department of Homeland Security  
Washington, DC  20528

Dear Acting Secretary Wolf,

On behalf of the Manufactured Housing Institute (MHI), I am writing to request that the Cybersecurity and Infrastructure Security Agency (CISA) include workers that are involved in residential housing construction (including factory-built homes, like manufactured and modular homes), and manufactured housing community property management on the list of designated critical infrastructure workers. It is imperative that CISA do this to ensure affordable housing construction and activities that support it can continue, and to preserve the essential functions of managing and maintaining manufactured housing community operations where thousands of residents rely on continued services.

MHI is the only national trade association that represents every segment of the factory-built housing industry, including manufactured and modular housing. Our members include home builders, suppliers, retail sellers, lenders, installers, community owners, community operators, and others who serve the industry, as well as 49 affiliated state organizations. In 2019, our industry produced nearly 100,000 manufactured homes, accounting for approximately 10 percent of new single-family home starts. These homes are produced by 32 U.S. corporations in 129 plants located across the country. MHI’s members are responsible for close to 85 percent of the manufactured homes produced each year. In addition, manufactured housing community owners and operators are responsible for over four million home sites, in more than 40,000 communities across the United States. As these communities essentially function as mini-cities, it is imperative that the operators of these communities are able to continue to support the infrastructure (i.e. water, sewer, roadways, and amenities) of these communities, ensuring that they remains safe and reliable for residents.

As the nation responds to the significant impacts and displacements from COVID-19, CISA must add workers that are involved in housing construction, as well as manufactured housing community management staff, as a part of its list designating critical infrastructure workers. There is a general consensus that our nation has an affordable housing shortage – both with respect to single family homes and rental housing. This shortage is only likely to be exacerbated by the COVID-19 emergency, as housing demand is as strong as ever.

Residential Housing Construction and Supporting Activities

Residential home construction, led by builders (who construct factory-built homes) and retailers (who oversee delivery and installation of factory-built homes) and those businesses that support them - including suppliers, transporters, and support contractors – are essential workers and should be included on CISA’s critical workforce list. Since these functions – builders, retailers and support operators – cannot function in isolation in delivering affordable housing, it is critical that all be clearly included in the workforce list in this category. These workers are necessary to the operations and maintenance of “Essential Infrastructure” in communities across America. They must be able to continue to work during
periods of community restriction, access management, social distancing, or closure orders/directives because they are absolutely crucial to community resilience and continuity of essential functions. If such workers are not appropriately excluded from shelter-in-place requirements, the production of affordable housing will grind to a halt and the affordable housing crisis will be exacerbated by the current COVID-19 crisis. This is particularly a problem since shelter-in-place policies require people to stay in their homes.

Many of our home building facilities support FEMA’s needs for the construction of emergency shelter and stand ready to assist during this emergency. For example, our manufacturing facilities have trained workforces who can provide construction for a variety of types of units to help with those who are impacted from the virus. Unlike other industries, we have a lot of flexibility to build different types of structures, and a trained workforce to handle construction. We can produce and deliver such structures quickly and in the volumes that will likely be needed. In order to be ready for such a call, while continuing to support the shortage of affordable housing, we must be able to remain operational throughout the duration of the crisis. In sum, it is essential to continue efforts to build housing units, including manufactured and modular homes, and we urge you to include these builders on CISA’s essential workforce list.

During the COVID-19 crisis, we have experienced a disparity in approaches among the states in their essential workforce designations, which underscores the urgent need for federal leadership and guidance. For example, in the “Stay at Home” Executive Order of California’s Governor, home construction is considered an essential service because it provides critical infrastructure. Unfortunately, Pennsylvania’s Governor failed to include home construction as an essential infrastructure need as a part of that order. By clearly including homebuilding on CISA’s essential workforce list, we can ensure that the construction of housing, including factory-built housing, in particular for affordable housing or housing for individuals experiencing homelessness, will continue across the country.

**Land-Lease Manufactured Housing Communities**

The residents in the almost 40,000 land-lease communities in the United States depend on the services and oversight of professional community managers, who ensure critical maintenance, communication, and safety operations are performed. As millions of individuals and families self-quarantine or shelter-in-place, it is crucial that front-line property management staff can maintain services in these communities, while carrying out those services in compliance with CDC and state and local health authorities’ Social Distancing Requirements. For that reason, we urge CISA to confirm that such operations and staff who conduct them will be deemed necessary to the operations and maintenance of “Essential Infrastructure,” by the federal government.

MHI appreciates your consideration, and we stand ready to provide any assistance necessary and share our perspectives, to ensure that Americans have access to critical resources during this trying time.

Sincerely,

Lesli Gooch, Ph.D.
Chief Executive Officer