

Manufactured Homes TAG

Meeting Notes

Date: Wednesday, November 19, 2025

Meeting Location: DLI Minnesota Room/WebEx Event

Call to order:

Greg Metz

Attendance:

TAG Members attending: Greg Metz, Krystina Nickila, Mike Schrader, Cheryl Hix, Mark Brunner, Michelle Carlson

TAG Members not attending: Dustin Brakemeier, Shawna Tomenes, Trevor Nelson

Guests attending: Chad Payment, Makenzie Johnson, Jeffery Lebowski

Compliance Form Review:

1. Rental Housing Notice of Compliance Form

- Clarification: The current 9-point NOC form remains in effect for January 1, 2026.
- Discussion focused on future additions to the NOC form for rentals (not yet in statute).
- Voting began on proposed new items (green text), with mixed support and abstentions.

Items Discussed:

- Item 4 (Electrical fixtures): Approved by majority vote.
- Item 5 (Appliances): Removed due to not being a life safety issue.
- Item 7 (Plumbing fixtures): Tied vote; not approved.
- Item 9 (Water heater relief valve): Approved.
- Item 11 (Fuel-fired water heater venting): Discussed as a HUD code requirement; supported but not formally voted.

Concerns Raised:

- Overlap with MN Statute 504B (habitability standards).
- Local rental licensing focuses on life safety, not appliance condition.
- Desire for clarity on what is new vs. existing language.
- Request for redlined version of proposed changes for next meeting.

2. Used Manufactured Home Sales

- **Proposal:** Expand the NOC form or create a **separate disclosure section** for non-life-safety items.
- **Goal:** Allow flexibility for “as-is” sales while still informing buyers of known issues.

Disclosure vs. Compliance:

- Disclosure would list non-compliant items without requiring correction before sale.
- Compliance items must be corrected before sale completion.

Key Points:

- Current NOC applies to all used manufactured home sales, including private party and real property sales.
- Enforcement is limited to licensed dealers; private sales rely on buyer/seller compliance.
- Federal HUD contract requires states to ensure a “minimum level of safety and durability” at time of sale.
- Durability (e.g., roof leaks, wall damage) is part of the federal expectation, not just life safety.

Realtor & Industry Feedback:

- Support for disclosure model similar to real estate transactions.
- Concerns about affordability if too many items are added to the compliance list.
- Recommendation: Keep the 9-point NOC for life safety, and use a separate disclosure for other conditions.

Next Meeting:

Date: December 10, 2025

Time: 1:00 PM

Location: DLI Washington Room

Meeting Adjourned: 3:00 PM

Prepared by: Makenzie Johnson