Manufactured Housing Association for Regulatory Reform
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April 13, 2023

VIA ELECTRONIC SUBMISSION

Hon. Jennifer M. Granholm
Secretary
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Energy Conservation Standards for Manufactured Housing:
Extension of Compliance Date (EERE-2009-BT-BC-0021)

Dear Secretary Granholm:

The following comments are submitted on behalf of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a Washington, D.C.-based national trade organization representing the views and interests of producers of manufactured housing regulated by the U.S. Department of Housing and Urban Development (HUD) pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000 (2000 reform law) (42 U.S.C. 5401, et seq.) and subject to energy-related regulation by the U.S. Department of Energy (DOE) pursuant to section 413 of the Energy Independence and Security Act of 2007 (EISA) (42 U.S.C. 17071). MHARR was founded in 1985. Its members include independent producers of manufactured housing from all regions of the United States.

I. INTRODUCTION

EISA section 413(a)(1) directs DOE to "establish standards for energy efficiency in manufactured [homes] … after (2)(A) notice and an opportunity for comment by manufacturers of manufactured housing and other interested parties; and (B) consultation with the Secretary of Housing and Urban Development, who may seek further counsel from the Manufactured Housing Consensus Committee."

On May 31, 2022, without any meaningful consultation with either HUD or the Manufactured Housing Consensus Committee (MHCC) established pursuant to section 604 of the 2000 reform law (42 U.S.C. 5403), DOE published final manufactured housing "energy conservation" standards with compliance "required on and after May 31, 2023."[1] Those standards,

[1] See, 87 Federal Register, No. 104 (May 31, 2022), "Energy Conservation Standards for Manufactured Housing," p. 32728, et seq.

both as published[2] and as proposed, did not include regulations relating to testing, enforcement and/or regulatory compliance, or any consideration of the cost-benefit impacts of such regulatory compliance costs on manufactured housing consumers, either separately or in conjunction with the broader costs of the proposed and final standards. In written comments to DOE (and HUD),[3] MHARR emphasized that the absence of any provisions relating to enforcement and regulatory compliance – and related cost impacts -- was a fatal defect in both the proposed rule and final rule, that inevitably skewed its required cost-benefit analysis and rendered any such "analysis" illegitimate and invalid.

In relevant part, MHARR stated:

> "Most significantly, the DOE cost-benefit analysis fails to include or consider significant additional costs that will be incurred by manufacturers – and inevitably passed to consumers in the purchase price of new homes – for (1) testing, certification, inspections and other related activities to ensure compliance with any new DOE standards; (2) enforcement compliance and activity; and (3) ongoing regulatory compliance. Although such expenses are – and are recognized as – an integral component of the ultimate consumer level cost of any mandatory rule, they are totally excluded from DOE's cost-benefit and life-cycle cost (LCC) analysis in this rulemaking. Those analyses, as a result, are skewed toward greater alleged benefits from the proposed rule and shorter consumer LCC "payback" times than would be the case if all applicable costs were included and considered. *** The intentional omission of such [testing, regulatory compliance and enforcement] cost data … represents an admission by DOE that its cost-benefit analysis and LCC "calculations" are necessarily inaccurate, incomplete and not reflective of the true and complete costs of the proposed rule."[4]

(Emphasis in original). (Footnotes deleted).

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[2] See, 86 Federal Register, No.163 (August 26, 2021), "Energy Conservation Standards for Manufactured Housing," p. 47744, et seq.

[3] MHARR hereby incorporates by reference herein as if restated in full, the following comments (and attachments thereto) previously submitted by MHARR in this matter – (1) MHARR's August 8, 2016 Comments in response to DOE's June 17, 2016 Notice of Proposed Rulemaking regarding Energy Conservation Standards for Manufactured Housing (Attachment 1, hereto); (2) MHARR's August 3, 2021 Comments in response to DOE's July 7, 2021 Notice of Intent to Prepare an Environmental Impact Statement for Energy Conservation Standards for Manufactured Housing (Attachment 2, hereto); (3) MHARR's September 15, 2021 Comments to the Manufactured Housing Consensus Committee regarding Proposed Energy Conservation Standards for Manufactured Housing; (4) MHARR's October 1, 2021 Comments to the MHCC regarding Proposed Energy Conservation Standards for Manufactured Housing; (5) MHARR's October 13, 2021 Comments to the MHCC regarding Proposed Energy Conservation Standards for Manufactured Housing; (6) MHARR's October 25, 2021 Comments in response to DOE's August 21, 2021 Supplemental Notice of Proposed Rulemaking regarding Energy Conservation Standards for Manufactured Housing (Attachment 3, hereto); (7) MHARR's November 22, 2021 Supplemental Comments in response to DOE's August 21, 2021 Supplemental Notice of Proposed Rulemaking regarding Energy Conservation Standards for Manufactured Housing (Attachment 4, hereto); (8) MHARR's February 25, 2022 Comments in response to DOE's January 14, 2022 Draft Environmental Impact Statement regarding Energy Conservation Standards for Manufactured Housing (Attachment 5, hereto); and (9) MHARR's November 9, 2022 Comments to the MHCC regarding Energy Conservation Standards for Manufactured Housing.

[4] See, Attachment 3, hereto, at pp. 20-21.

Notwithstanding this warning, however, and the clear requirements of applicable law, including but not limited to the federal Administrative Procedure Act (APA) and EISA section 413, itself, DOE rushed to publish its final May 31, 2022 manufactured housing energy standards rule without any proposed testing, compliance, or enforcement procedures, or any consideration of the potential cost impact of such measures on manufactured housing consumers once adopted. Nor is this fact in dispute, as DOE itself acknowledged in the May 31, 2022 publication of its final rule, stating: "DOE is not addressing a test procedure in this rulemaking. DOE will consider … test procedures, including an analysis of any related costs, in any future action on test procedures."[5] Similarly, in the same document, DOE admitted: "[I]n the August 2021 SNOPR, DOE did not propose a system of certification, compliance and enforcement ("CCE") instead indicating these items would be addressed in a separate rulemaking. At this time, DOE is not addressing CCE issues in this rulemaking…."[6] Consequently, as part of its allegedly "final" manufactured housing energy conservation standards rule, DOE expressly found that rule "cost-effective," while acknowledging and admitting on the record in the same publication that its purported "cost-benefit" analysis did not actually consider all applicable and relevant costs. In doing so, DOE continued, extended and exacerbated its well-documented record of bad faith in connection with this rulemaking, dating to at least 2014.[7]

Now, not surprisingly, confronted with litigation specifically alleging, among other things, that "DOE failed to analyze" and consider "test procedures and compliance and enforcement costs for [its] new energy standards" in violation of both the APA and EISA itself,[8] DOE has initiated the current rulemaking to supposedly extend the implementation date for its May 31, 2022 manufactured housing energy standards from the current deadline of May 31, 2023, until a point after currently unknown but allegedly "forthcoming enforcement procedures take effect."[9] Essentially, then, when brought to account before a U.S. District Court for its failure to promulgate a valid, legitimate and cost-benefit-justified final manufactured housing energy standards final rule in all respects, including testing enforcement and regulatory compliance as required by law, DOE is pulling back the "compliance" date for its standards and retreating in advance of what it knows will be a defeat and rebuke in court. Put differently, DOE is now seeking to do retroactively what it should have done to begin with – i.e., propose and adopt a complete final rule, including enforcement criteria and legitimate consideration of enforcement and regulatory compliance costs as an integral part of its cost benefit analysis. Absent a court filing, however, it is evident -- and entirely consistent with its past track record in this matter -- that DOE would not have extended the compliance date, leaving HUD Code manufactured housing producers (and consumers) in regulatory limbo, facing unknown and unknowable enforcement activity and related costs in addition to the extreme and unnecessary costs of the final standards themselves.

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[5] See, 87 Federal Register, supra at p. 32757, col.3.

[6] Id.

[7] See, Attachment 1, hereto.

[8] See, Manufactured Housing Institute, et al v. U.S. Department of Energy, et al, Civil Action No. 1:23-CV-00174, (W.D.TX), "Plaintiffs' Original Complaint Seeking Temporary and Permanent Declaratory and Stay/Injunctive Relief Under the APA" at p. 39, et seq.

[9] See, 88 Federal Register, No. 57 (March 24, 2023), "Energy Conservation Standard for Manufactured Housing; Extension of Compliance Date," p. 17745 at p. 17746, col.3. As proposed by DOE, the compliance date for "Tier I" standards would be extended until "60 days after publication of … final enforcement procedures for Tier I homes," while the compliance date for "Tier 2" homes would be extended until "180 days after publication of … final enforcement procedures for Tier 2 homes."

This after-the-fact desperation move to extend the compliance date, however, will be unavailing, because the final rule is already not cost-beneficial for virtually any manufactured homebuyers, as is readily demonstrated by both the administrative record and the pleadings filed in the above-referenced litigation.[10] When the additional costs of testing, enforcement and regulatory compliance, combined with continuing inflation levels well above those projected in the proposed and final rule are added to this cost-benefit matrix, those additional costs will ensure that the final standards and related testing, enforcement and regulatory compliance measures adopted by DOE will, per se, not be cost-effective for any segment of the manufactured housing market, and will ultimately be found invalid by a reviewing court, although DOE will undoubtedly, based on its record in this rulemaking, attempt to skew and manipulate those figures to show a fictitious cost-benefit for consumers that will not, in fact, actually exist.

Consequently, for all of the reasons set forth in greater detail herein, MHARR believes that an extension of the scheduled May 31, 2023 energy standards compliance date is warranted and, in fact, necessary, as the promulgation of testing, enforcement and regulatory compliance criteria are a necessary component of any technical/construction standard. Further, an extension of the current implementation date is warranted and necessary to ensure that the costs of such testing, enforcement and regulatory compliance measures are properly considered, both individually and in the context of the overall cost of the manufactured housing energy standards and enforcement procedures, combined. That said, however, MHARR continues to maintain and assert that the May 31, 2022 final standards, regardless of whatever testing, enforcement and regulatory compliance criteria may ultimately be proposed and adopted by DOE, are organically flawed and fatally-defective, both substantively and procedurally, and must be repealed (or, failing that, invalidated by a reviewing court). Instead, DOE should return "to the drawing board" to revisit and completely alter its approach to the development of manufactured housing energy standards under EISA section 413, to involve, cooperate and coordinate with both HUD and the MHCC, from the start in the development of a new set of proposed cost-effective standards that are appropriate for manufactured housing as a unique and uniquely-affordable type of housing subject to federal regulation.[11]

MHARR, therefore, supports an indefinite extension of both the compliance and "effective" dates for DOE manufactured housing "energy conservation" standards[12] pending the

[10] See, Exhibits to Plaintiff's Motion to Stay Agency Action and Request for Expedited Consideration and Hearing in Manufactured Housing Institute v. U.S. Department of Energy, supra.

[11] Research by government entities consistently shows that manufactured housing is overwhelmingly utilized and relied-upon by lower and moderate-income Americans.

[12] In submitting these comments for the administrative record, MHARR does not implicitly accept – but, to the contrary, expressly rejects and disavows – DOE's effort in the underlying litigation concerning this rule, to invent, out of whole cloth, a legal distinction between the "effective" and "compliance dates of the May 31, 2022 final rule. DOE, in Defendants' Memorandum in Opposition to Plaintiff's Motion to Stay Agency Action and Request for Expedited Consideration and Hearing (Defendants' Stay Memorandum) in Manufactured Housing Institute v. U.S. Department of Energy, supra, resorts to brazen sophistry to maintain that a court, pursuant to 5 U.S.C. 705, cannot stay an agency rule that is already "in effect" and that the DOE final manufactured housing energy rule is "in effect" even though "compliance" was/is not required until May 31, 2023 (or some time thereafter). This assertion distorts and seeks to deceptively twist the plain meaning of relevant terms -- and applicable law -- into an absurd, nonsensical construct. The unavoidable fact is that the DOE final rule – as published (i.e., without testing, enforcement and regulatory compliance criteria) was substantively and fatally defective, per se, and could not have become "effective" or complied with – by anyone -- in that form. For DOE to claim that an intrinsically incomplete and fatally defective regulation

development of new, legitimate, appropriate and cost-effective standards in accordance with all applicable law, as well as the development of legitimate, appropriate and cost-effective testing, enforcement and regulatory compliance criteria, again in full compliance with all applicable law. Absent such full compliance, MHARR will continue to oppose the imposition of any such standards or regulations.

II. COMMENTS

A. A DELAY IN THE EFFECTIVE AND COMPLIANCE DATES FOR THE DOE ENERGY RULE IS ESSENTIAL

An immediate delay in both the "effective" and "compliance" dates for the final May 31, 2022 DOE manufactured housing energy standards rule,[13] is essential because the so-called "final rule," as published, is inherently and fatally defective and cannot be complied-with in its current form. Indeed, absent a proposed and finally-adopted system of testing, enforcement and compliance regulations, the final rule would unlawfully deprive HUD Code manufacturers of their constitutional Due Process rights if the DOE standards were, in fact, "enforced" as currently constituted.

As a threshold matter, there can be no dispute that DOE did not propose, in either its August 26, 2021 proposed rule, or its May 31, 2022 final manufactured housing energy conservation standards rule, any system or standards for testing, enforcement, or regulatory compliance with the new energy conservation criteria. To the contrary, DOE, in its final energy standards rule, expressly disavowed the inclusion of any such mandates in that rulemaking, stating: "DOE is not addressing a test procedure, or compliance and enforcement provisions for energy conservation standards for manufactured housing in this document,"[14]Nor did DOE, in the absence of any such proposed testing, enforcement, or regulatory compliance criteria, consider the cost of any such mandates. Axiomatically, then, DOE did not include either the direct or indirect costs of any such compliance mandates in its alleged cost-benefit analysis concerning the proposed or final energy standards because, per se, without any such criteria proposed or under consideration, the supposed "cost" of those criteria would have been either entirely speculative at best, or entirely fictional at worst.

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can somehow be deemed "effective" by agency fiat and, simultaneously, cannot be addressed and remedied by a federal court through judicial review and injunctive relief pursuant to section 705, is completely disingenuous and would allow corrupt agencies to avoid pre-enforcement judicial review of baseless regulations through the simple expedient of declaring a rule to be immediately (or nearly-immediately) "in effect" even though not immediately "enforced." Any such subterfuge should be summarily rejected.

[13] Again, any reference herein to DOE's artificial and baseless "effective" date/"compliance" date "distinction" is solely for purposes of clarity in the context of the current administrative and judicial record. MHARR does not accept or recognize any such fictional distinction in this matter, and any such reference does not constitute a waiver on the part of MHARR, of its right to assert the invalidity of that fictional distinction in any forum, whether judicial, administrative, or otherwise.

[14] See, 87 Federal Register, supra at p. 32743, col. 1.

Moreover – (1) insofar as regulatory compliance costs are an inherent part of any rule which must be included in a rule's cost benefit analysis;[15] and (2) insofar as both EISA section 413 and the National Manufactured Housing Construction and Safety Standards Act affirmatively require that the cost of any manufactured housing standard and/or regulation be determined, considered and shown to be cost-justified and beneficial in relation to the acquisition cost of the home;[16] and (3) insofar as DOE has the "affirmative burden of promulgating and explaining a non-arbitrary, non-capricious rule" under the federal Administrative Procedure Act,[17] DOE's May 31, 2022 final rule is inherently and fatally defective and cannot be enforced in its current form. Indeed, it is an axiomatic tenet of constitutional Due Process that a regulated party must be made aware of all substantive and procedural (i.e., enforcement and compliance) aspects of any applicable regulatory mandate, so that party has a reasonable opportunity to conform its conduct to applicable law. This necessarily includes the means, methods and conduct needed to comply with any such enforcement or compliance regulations, and bars enforcement in the absence of such criteria. As a result, and in the absence of any such testing, enforcement or regulatory compliance criteria, both the effective and compliance dates for the May 31, 2022 final rule must – at a bare minimum -- be indefinitely delayed, and MHARR supports such a delay.

It should be noted that DOE, in the underlying stay litigation, makes multiple assertions related to its supposed "consideration" of testing, enforcement and regulatory compliance means and methods -- and related costs -- that are baseless and directly contradicted by the administrative record in this matter. These groundless, disingenuous and deceitful assertions should – and must -- be specifically refuted in the record of this proceeding.

First, DOE maintains that "a review of the record reveals" that it "made a reasonable effort to consider" costs "associated with testing, compliance and enforcement."[18] This assertion is false as is shown by the administrative record of the DOE "final" rule. Thus, the May 31, 2022 final rule preamble states: (1) that DOE did "not addres[s]" test procedures in [that] rulemaking;" (2) that DOE would "consider" test procedures and costs "related" to such test procedures in a "future action;" and (3) that DOE would "propose a system of certification, compliance and enforcement" and, by necessary implication, the costs of such a system, "in a separate rulemaking."[19](Emphasis added). These and other similar assertions contained in the administrative record make it clear that as of the time that DOE engaged in final agency action within the meaning of the APA – i.e., as of the time that it published its final rule for manufactured housing energy conservation standards –

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[15] See e.g., Michigan v. Environmental Protection Agency, 576 U.S. 743 (2015) ("The Agency must consider cost — including, most importantly, cost of compliance — before deciding whether regulation is appropriate and necessary").

[16] EISA Section 413 (42 U.S.C. 17071(b)(1)) provides in relevant part: "The energy conservation standards established under this section shall be based on the most recent version of the International Energy Conservation Code (including supplements), except in cases in which the Secretary finds that the code is not cost-effective … based on the impact of the code on the purchase price of manufactured housing and on total life-cycle construction and operating costs." Similarly, federal manufactured housing law provides, in relevant part: "The consensus committee, in recommending standards, regulations and interpretations, and the Secretary, in establishing standards or regulations, or issuing interpretations under this section, shall … (4) consider the probable effect of such standard on the cost of the manufactured home to the public." (42 U.S.C. 5403(e)(4)).

[17] See, Small Refiner Lead Phase-Down Task Force v. Environmental Protection Agency, 705 F2d. 506 (D.C. Cir. 1983).

[18] See, Defendant's Stay Memorandum at p. 12.

[19] See, 87 Federal Register, supra at p. 32757.

it had not proposed or adopted testing, enforcement and regulatory compliance criteria for those standards and, consequently, and as specifically admitted by DOE at that time, had not considered the costs associated with any such criteria. Indeed, it is disingenuous to assert the contrary, when no such criteria had even been proposed. Put differently, it is a logical and practical impossibility to consider costs related to criteria that themselves have not even been considered. Accordingly, DOE's assertion to the contrary is false and should be rejected.

Second, DOE asserts that "by the [final] rule's own terms, manufacturers have no additional testing or compliance obligations – and thus no additional costs."[20] Again, this is directly contrary to the administrative record and basic common sense. Most fundamentally, it is absurd to maintain that technical standards, such as those adopted by DOE, will somehow not require parallel and related testing, enforcement and regulatory compliance procedures, and that those criteria, in turn, will have no associated costs for regulated parties. The mere fact that those procedures and costs were not considered in the DOE "final Rule" does not mean that there are and will be no such costs. Rather, it is dispositive proof of the fatal insufficiency and legal inadequacy of that rule as published and deemed "effective" by DOE, insofar as both EISA section 413 and federal manufactured housing law affirmatively require the determination of the full cost, cost impacts and cost-benefit indices of any such standard or regulation.[21] Moreover, the very assertion made by DOE is disingenuous when one considers the fact that the preamble to the DOE final rule made clear that such criteria would be proposed, albeit in a separate, subsequent rulemaking. Again, DOE's argument, far from legitimating its fundamentally incomplete and fatally defective "final" rule, instead proves that the final rule is inherently incomplete and legally inadequate.

Third, DOE maintains that it did consider "the costs associated with testing, compliance and enforcement and concluded that they would be minimal."[22](Emphasis added). Put simply, though, there is no evidence whatsoever in the administrative record that DOE ever quantified those costs or included those costs in its cost-benefit analysis of the final standards as required both by EISA section 413 and by federal manufactured housing law. To the contrary, the only evidence in the administrative record is that DOE, as of the time of publication of its final energy standards rule for manufactured homes, had reached no conclusion regarding the substance of testing, enforcement and regulatory compliance criteria in connection with those standards. And, in the absence of any conclusion regarding the substance of those criteria, it would have been per se impossible for DOE to have "considered" or reached any conclusion regarding related cost impacts. Again, therefore, DOE's assertions are fictitious constructs and prove nothing other than DOE's continued bad faith in connection with this entire matter.

Accordingly, and for the reasons stated above, the effective and compliance dates for the DOE May 31, 2022 final standard must, at a minimum, be delayed. However, and even more importantly, by supporting an indefinite delay of the effective/compliance date(s) for the May 31, 2022 DOE standards, MHARR does not waive, but, to the contrary, expressly reserves and asserts its longstanding position in this rulemaking, that the May 31, 2022 DOE standards -- having been derived from a rulemaking process that in all respects violated the affirmative mandate of EISA

[20] See, Defendants' Stay Memorandum at p. 13.

[21] See, relevant statutory text quoted at note 16.

[22] Id.

section 413 that DOE engage in substantive coordination, cooperation and consultation with both HUD and the MHCC – are inherently and fundamentally flawed and invalid, and completely inappropriate for manufactured housing and the affordable manufactured housing market. Put differently, and as explained further below, no amount of delay or future modification can correct or remedy a process and resulting standards derived from a rulemaking process which fundamentally violated from the outset – and continues to violate – the substantive and essential consultation and coordination requirements of EISA Section 413. Given the unique nature, construction and affordability of HUD Code manufactured housing as already recognized by federal law,[23] DOE's failure to abide by this consultation/coordination mandate, ab initio, renders all of its actions in this matter preemptively invalid, arbitrary and not in accordance with applicable law.

B. REGARDLESS OF ANY DELAY THE DOE FINAL RULE SHOULD BE WITHDRAWN AND REPLACED

Beyond the issue of a delay in the enforcement of the DOE rule pending the development of related testing, enforcement and regulatory compliance procedures and the correct, proper and legitimate determination and consideration of the cost-benefit of those criteria, both individually and in conjunction with the DOE final standards, the entire edifice and substance of the DOE final rule -- as is demonstrated by previous MHARR comments to DOE and HUD,[24] and in the underlying stay litigation – would be destructive of the manufactured housing industry and the availability of affordable homeownership for lower and moderate-income Americans, is not appropriate for manufactured homes and should be withdrawn. This is an inherent consequence of DOE's failure to actively and properly consult with both HUD and the MHCC -- and thereby consider the unique nature, construction and utilization of manufactured homes -- as required by EISA Section 413. That failure, from the outset, caused the entire foundation and framework of DOE's standards development process in this matter to be inconsistent factually with the unique construction and utilization of HUD Code manufactured housing and inconsistent legally with applicable law regarding the essential and necessary affordability of such housing.

A complete recitation of this failure, ab initio, and all other related procedural and substantive bases for the withdrawal of the final rule – and the legal/practical necessity of such action -- are set forth in detail in the comments previously filed in the DOE rulemaking docket (and with the MHCC) by MHARR. Significantly, the same conclusion was reached by the statutory Manufactured Housing Consensus Committee, which found, at its October/November 2022 meeting, that:

> "… DOE circumvented the standards development process prescribed in EISA which requires cost justification and consultation with HUD; DOE provided an energy conservation standard which was based on site-built construction and applied it to a performance-based national code. If adopted as written, the final rule would adversely impact the entire Manufactured Housing program and cost increases associated with compliance would reduce prospective purchasers

[23] See, e.g., 42 U.S.C. 5401.

[24] See, Comments referenced at note 3, supra.

(especially minorities and low-income consumers) from durable, safe, high quality and affordable housing."[25]

(Emphasis added).

Based on all of the foregoing, and as explained in previous MHARR comments in this docket, DOE should withdraw the baseless and destructive May 22, 2022 final rule and following the withdrawal of that rule, DOE, in accordance with all applicable law, should go "back to the drawing board" -- as repeatedly instructed by the Office of Information and Regulatory Affairs (OIRA) in this docket -- and, in full and legitimate cooperation and coordination with both HUD and the MHCC, develop a cost-effective rule that is appropriate for the unique nature, construction and affordability of HUD Code manufactured homes, which would benefit manufactured home owners, rather than needlessly and discriminatorily exclude them from the housing market and from homeownership altogether.

III. CONCLUSION

For all of the reasons set forth above, the DOE May 31, 2022 final manufactured housing "energy conservation" standards rule should not only be delayed indefinitely, but should be withdrawn and replaced with a legitimate, cost-effective rule developed from the outset in consultation, coordination and cooperation with HUD and the statutory MHCC as to both substantive standards and regulatory compliance procedures,

Sincerely,

Mark Weiss
President and CEO

cc: Hon. Marcia Fudge
Hon. Shalanda Young
Hon. Sherrod Brown
Hon. Tim Scott
Hon. Patrick McHenry
Hon. Maxine Waters
Hon. Warren Davidson
Hon. Emanuel Cleaver

[25] See, MHCC October/November 2022 Working Document.