



Manufactured Housing Association for Regulatory Reform

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December 17, 2025

VIA FEDERAL EXPRESS

Hon. Kelly Loeffler
Administrator
U.S. Small Business Administration
409 3rd Street, S.W.
Washington, D.C. 20416

Re: Deregulation Strike Force – Manufactured Housing

Dear Administrator Loeffler:

I am writing on behalf of the members of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a Washington, D.C.-based national trade association representing the views and interests of producers of manufactured housing regulated, primarily, 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 (42 U.S.C. 5401, et seq.). MHARR was founded in 1985. Its members are mostly smaller, independent manufacturers located in all regions of the United States.

The Small Business Administration's (SBA) establishment of a "Deregulation Strike Force" (Strike Force) "to fight [federal] regulations that burden small businesses," with an emphasis on unnecessary, needless and costly regulation that impacts "housing and construction," is of particular interest to MHARR and its member manufacturers.

While the HUD manufactured housing regulatory program and its mandates are an ongoing concern, the manufactured housing industry – and most particularly the smaller, independent manufacturers represented by MHARR (as well as the lower and moderate-income American consumers of affordable housing that they serve) – are currently facing an extreme yet unnecessary regulatory threat in the form of high-cost "energy conservation" regulations imposed by the Biden Administration pursuant to a rule adopted May 31, 2022 by the U.S. Department of Energy (DOE).

As MHARR demonstrated in comments filed during that tortured and corrupted multi-year rulemaking (see, e.g., copy attached), the DOE "energy conservation" standards are not only unnecessary (insofar as manufactured home energy costs across all fuel types are already lower than those for other types of housing), but would needlessly add thousands of dollars to the

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purchase price of manufactured homes, making them unaffordable and thereby excluding millions of potential buyers from the manufactured housing market at a time when the nation is facing an unprecedented shortage of affordable housing and homeownership. Moreover, as MHARR has also demonstrated, the most damaging burden of these regulations would fall on smaller, independent manufacturers with a smaller production baseline over which the additional costs necessitated by the DOE regulations could be amortized.

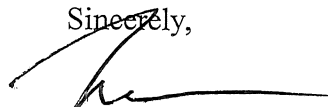
Indeed, SBA, when the initial iteration of the DOE manufactured housing “energy” standards was proposed in 2016, filed its own comments (see, copy attached), pointing out that “small businesses cannot absorb the added cost to comply with the proposed [energy] regulation[s] and remain competitive in the manufactured housing market.” Significantly, the final regulations adopted by DOE on May 31, 2022 did nothing to address or remedy this fatal flaw and remain an existential threat to small businesses in the manufactured housing industry and American consumers who would be harmed by needless price increases, housing market exclusion and a collapse of full free-market competition within the manufactured housing market.

It should also be noted that Congress has taken cognizance of the extreme damage that the DOE standards would do to both the industry and the availability of inherently affordable manufactured housing for American consumers, and has taken the first steps toward enacting a repeal of both the May 31, 2022 DOE standards and their underlying legislative authority. (See, H.R. 5184, attached).

Nevertheless, and for all the reasons stated above -- and as explained in greater detail in the attached comments and others filed by MHARR in the DOE manufactured housing energy standards rulemaking docket -- the May 31, 2022 DOE “final” manufactured housing regulations should be withdrawn and repealed by the SBA Deregulation Strike Force as an indefensible, baseless and destructive example of “massive regulatory overreach.”

MHARR stands ready to assist SBA in this matter and will provide any further documents and materials that SBA may need in order to effectuate a review and repeal of the DOE May 31, 2022 manufactured housing “energy” regulations.

Sincerely,



Mark Weiss
President and CEO

cc: Hon. Donald J. Trump
Hon. Chris Wright
Hon. Scott Turner
Hon. Russell Vought
HUD Code Manufactured Housing Industry Members

Attachments

NEWS RELEASE 26-14

SBA Launches Deregulation Strike Force to Support President Trump's Affordability Agenda

Agency Conducting Government-Wide Review of Regulations Impacting Small Businesses

Published on December 15, 2025

WASHINGTON — Today, the [U.S. Small Business Administration](#) (SBA) launched a new [Deregulation Strike Force](#), dedicating a full team to the mission of identifying and eliminating excessive Biden-era regulations that have disproportionately increased costs for America's small businesses and consumers. The strike force, led by the SBA's [Office of Advocacy](#), is working across all federal agencies to cut regulations that have needlessly driven up prices in key industries such as housing, healthcare, agriculture, and energy.

"Bidenomics brought historic new highs in inflation that crushed working families and small businesses, driven in part by the massive bureaucracy that heaped trillions in new federal regulations onto the backs of hardworking Americans," **said SBA Administrator Kelly Loeffler**. "Through our Deregulation Strike Force, SBA is leveraging its unique authority to deregulate across the federal government and cut senseless red tape that drove up costs for small businesses and consumers – especially in industries hit hardest by Bidenflation. Our efforts will add to President Trump's ongoing work to cut prices, from energy to food to housing, by delivering meaningful relief on Main Street."

According to the Committee to Unleash Prosperity, the Biden Administration [imposed](#) an estimated \$6 trillion in cumulative regulatory costs on American families and small businesses. The new rules and reporting requirements amounted to an [additional](#) 356 hours of paperwork for every job creator in America and contributed substantially to inflation that reached 40-year highs in 2024.

SBA is the only cabinet-level agency authorized to review and fight regulations that burden small businesses – including those that are costly, duplicative, or

which otherwise constrain the success of job creators. Empowered by the Small Business Regulatory Enforcement Fairness Act and the Regulatory Flexibility Act, SBA's Office of Advocacy will lead the Deregulation Task Force by soliciting feedback from small businesses to identify the most burdensome regulations across key industries. Advocacy will further conduct a government-wide review of Biden-era regulations to cut costs for job creators and promote small business growth and formation.

Following four years of massive regulatory overreach, SBA's Deregulation Strike Force will focus on cutting regulations for small businesses in the following industries:

- Housing and construction
- Healthcare and medical services
- Agriculture and food production
- Energy and utilities
- Transportation and logistics
- Other goods and services

The SBA has already helped to eliminate an estimated \$98.9 billion in federal regulations since President Trump took office – including the [FinCen](#) Beneficial Ownership Rule, Biden-era energy efficiency [regulations](#), and Green New Deal [rules](#) on diesel exhaust fluid. In total, the Trump Administration has [eliminated](#) 48 old regulations for every new regulation enacted for an [estimated](#) regulatory savings of nearly \$200 billion.

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