



## Vermont Legislative Research Service

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### Manufactured Housing

Manufactured homes are defined by the *National Manufactured Housing Construction and Safety Standards Act of 1974* as

a structure, transportable in one or more sections, which, in the traveling mode, is eight body feet or more in width or 40 body feet or more in length, or when erected on site, is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities.<sup>1</sup>

In this report, when we write manufactured home or manufactured housing, we are referring to this federal definition unless we specify differently.<sup>2</sup>

### Federal Oversight

The *National Manufactured Housing Construction and Safety Standards Act of 1974* set the standard for the quality of manufactured homes, the rights of residents of manufactured homes, and established uniform federal construction and safety standards.<sup>3</sup> Prior to 1974, manufactured home construction, safety, and quality requirements lacked national standardization.<sup>4</sup> This act set standards of heating, plumbing, ventilation, air conditioning and electrical systems, design, construction, transportation, energy efficiency, wind resistance, and fire safety, among others.<sup>5</sup>

This act outlines the responsibilities of the United States Department of Housing and Urban Development (HUD) for manufactured homes. HUD is authorized under the act to enforce the standards both directly and through state agencies regarding improving, updating, and revising

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<sup>1</sup> National Manufactured Housing Construction and Safety Standards Act of 1974, 42 U.S.C. § 601 (1974).

<sup>2</sup> The federal distinction between a manufactured home and a mobile home depends on the date of manufacturing: if manufactured prior to June 15, 1976, the structure can be considered a “mobile home.” If manufactured after that date, it is considered a “manufactured home.”

Teller County, “Modular or Manufactured Home,” accessed October 27, 2025.

[https://www.tellercounty.gov/DocumentCenter/View/634/What-is-the-difference-between-Modular-Manufactured-or-Mobile-Homes\\_-PDF?bidId=](https://www.tellercounty.gov/DocumentCenter/View/634/What-is-the-difference-between-Modular-Manufactured-or-Mobile-Homes_-PDF?bidId=)

<sup>3</sup> 42 U.S.C. § 601 (1974).

<sup>4</sup> United States Department of Housing and Urban Development, *40 Years Ago: Manufactured Housing Construction and Safety Standards Act Passed (National Low Income Housing Coalition)*, June 30, 2024.

[https://archives.huduser.gov/portal/pdredge/pdr\\_edge\\_news\\_070214\\_1.html](https://archives.huduser.gov/portal/pdredge/pdr_edge_news_070214_1.html)

<sup>5</sup> United States Department of Housing and Urban Development, *40 Years Ago*.

construction and safety standards.<sup>6</sup> HUD also oversees the Manufactured Housing Consensus Committee (MHCC), a federal advisory committee that exists to provide recommendations to the Secretary of HUD regarding improving, updating, and revising construction and safety standards.<sup>7</sup>

The MHCC was established by the *Manufactured Housing Improvement Act of 2000*.<sup>8</sup> The 2000 Act was created to improve and modernize the requirements set in the *National Manufactured Housing Construction and Safety Standards Act of 1974*. The MHCC is composed of producers, users, and general interest/public officials.<sup>9</sup> In addition to establishing the MHCC, the 2000 Act updates the 1974 Act by adding several industry definitions and establishing activities overseen by the Secretary of HUD.<sup>10</sup>

Section 604 of the *Housing and Community Development Act of 1974* outlines the authority of the Secretary of HUD to establish the appropriate federal standards for manufactured home construction and safety.<sup>11</sup> Section 604 notes that no sub-federal level agency has the jurisdiction to create standards regarding construction or safety that are not identical to those outlined by HUD. This is to ensure that differing state or local requirements do not affect the uniform comprehensiveness of the standards defined in Section 604.<sup>12</sup>

Section 623 of the *Housing and Community Development Act of 1974* describes the role of state jurisdiction regarding manufactured housing. States that desire to assume responsibility over safety and construction standards, and their enforcement may submit a plan for said enforcement to the Secretary of HUD for review.<sup>13</sup> The plan, however, must provide for the enforcement of the standards proclaimed in Section 604.<sup>14</sup> In states that designate their own agency, called a State Administered Agency, the Secretary of HUD is authorized to provide grants to those states to assist them in identifying needs and developing plans.<sup>15</sup> State administered agencies are tasked with handling consumer complaints, monitoring manufacturers and retailers, as well as administering installation and dispute resolution programs.<sup>16</sup> Section 623 describes the ability of the state to assert jurisdiction over construction and safety issues where no federal standard has been established.<sup>17</sup>

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<sup>6</sup> United States Department of Housing and Urban Development, *Manufactured Housing Programs*, accessed October 22, 2025. <https://www.hud.gov/hud-partners/manufactured-home#3>

<sup>7</sup> United States Department of Housing and Urban Development, *Manufactured Housing Programs*.

<sup>8</sup> United States Department of Housing and Urban Development, *Manufactured Housing Programs*.

<sup>9</sup> U.S. Congress, Senate, *Manufactured Housing Improvement Act of 2000*, S. Rept. 106-274, 106<sup>th</sup> Cong., 2nd Sess., introduced April 13, 2000. <https://www.congress.gov/committee-report/106th-congress/senate-report/274/1>

<sup>10</sup> U.S. Congress, Senate, *Manufactured Housing Improvement Act of 2000*.

<sup>11</sup> National Manufactured Housing Construction and Safety Standards Act of 1974, 42 U.S.C. § 604 (1974).

<sup>12</sup> 42 U.S.C. § 604 (1974).

<sup>13</sup> National Manufactured Housing Construction and Safety Standards Act of 1974, 42 U.S.C. § 623 (1974).

<sup>14</sup> 42 U.S.C. § 623 (1974).

<sup>15</sup> 42 U.S.C. § 623, National Archives, Code of Federal Regulations, Title 24 Subtitle B Chapter XX Part 3282 Subpart G “State Administrative Agencies” 1974. <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-XX/part-3282/subpart-G>

<sup>16</sup> 42 U.S.C. § 623 (1974).

<sup>17</sup> 42 U.S.C. § 623 (1974).

The 2000 Act provides an update allowing for state jurisdiction in dispute resolution.<sup>18</sup> States were provided five years to adopt their own dispute resolution programs for resolving disputes between manufacturers, retailers, and installers establish their own resolution programs, HUD had the authority to implement one.<sup>19</sup>

### **Manufactured Home Loan Financing**

Manufactured homes can be considered either personal or real property and are financed with either a personal property/chattel loan or a mortgage/real property loan.<sup>20</sup> Personal property/chattel loans are used when the homebuyer purchases a manufactured home without tying that purchase to land, which classifies it as a movable personal possession.<sup>21</sup> Mortgages are used when homebuyers attach the manufactured home to land. HUD code manufactured homes are typically financed with a personal property loan.<sup>22</sup> It is significant to note that personal property loans accrue more interest than mortgages, and have higher down payments, making them a costlier option; additionally, roughly two of five manufactured homeowners do not own the underlying land, thus do not qualify for a mortgage loan.<sup>23</sup> Each state has a process for converting personal property to a mortgage for tax purposes, which is commonly called the titling process. The requirements for doing so vary from state to state.<sup>24</sup>

### **Vermont's Statutory Framework**

Title 10, Chapter 153 of the Vermont Statutes uses HUD's definition of a manufactured home and is overseen by the Vermont Department of Housing and Community Development. Chapter 153 also dictates rules on park registration, permitting, tenant/landlord duties, habitability, sale/closure protections, and notice and disclosure obligations, including water management.<sup>25</sup> 10 V.S.A. § 6203 grants any municipality in the state the right to acquire land to encourage mobile home park development, or to sell land to citizens for this express purpose.<sup>26</sup>

Housing Division Rules Part I: Mobile Home Parks is a mandate issued by the Vermont Department of Housing and Community Development serving to implement the Chapter 153

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<sup>18</sup> United States Department of Housing and Urban Development, *Manufactured Housing Programs*.

<sup>19</sup> U.S. Congress, Senate, *Manufactured Housing Improvement Act of 2000*.

<sup>20</sup> United States Government Accountability Office, *Manufactured Housing*, September 2023. <https://www.gao.gov/assets/gao-23-105615.pdf>

<sup>21</sup> United States Government Accountability Office, *Manufactured Housing*.

<sup>22</sup> United States Department of Housing and Urban Development, *Single-Family Site-Built, HUD Code Manufactured, and Factory-Built Homes*, accessed October 26, 2025. <https://www.huduser.gov/portal/sites/default/files/pdf/Info-Brief-SingleFamilyHomeowners.pdf>

<sup>23</sup> Kevin A. Park, "Real and Personal: The Effect of Land in Manufactured Housing Loan Default Risk," *Cityscape: A Journal of Policy Development and Research* 24, no. 3 (2022): 339. <https://www.huduser.gov/portal/periodicals/cityscape/vol24num3/ch14.pdf>

<sup>24</sup> Fannie Mae, "Titling Manufactured Homes as Real Property," accessed October 24, 2025. <https://singlefamily.fanniemae.com/originating-underwriting/titling-manufactured-homes-real-property#:~:text=Certificates%20of%20Title,manufactured%20house%20in%20the%20mortgage.>

<sup>25</sup> 10 V.S.A. § 6201.

<sup>26</sup> 10 V.S.A. § 6203.

provisions.<sup>27</sup> These housing division mandates regulate all construction eligible to be completed within a mobile home park, as well as rules on purchasing a lot within a park.

Title 9, Chapter 72 of the Vermont Statutes addresses purchase/sale, disclosures, relocation, and certain procedural protections unique to mobile homes.<sup>28</sup> It is the relevant legislation concerning when a mobile home is bought, sold, or moved between municipalities. If a mobile home is sitting on an individual lot, rather than a park, municipal zoning supersedes the jurisdiction.<sup>29</sup> Town bureaus manage installation compliance, septic approvals, and town health codes.

24 V.S.A. § 4412 dictates the law as related to equal treatment and anti-exclusion of mobile homes in municipal zoning.<sup>30</sup> State law requires municipal land-use bylaws to treat different types of housing, including mobile homes and affordable housing, equally and prohibits local bylaws that would have the effect of excluding these housing types.

Other Vermont agencies, such as the Agency of Natural Resources and the Division of Fire Safety, may be tasked with servicing a mobile home. The Agency of Natural Resources inspects and issues sanitary surveys of park water systems. A sanitary survey is a review of a public water system to assess its capability to supply safe drinking water, as defined by the State of Vermont's Drinking Water and Groundwater Protection Division.<sup>31</sup> The Chapter 153 provisions require that the parks disclose sanitary survey results and drinking water tests on transfers.<sup>32</sup> The Division of Fire Safety may apply local permitting and inspection bylaws for utilities, electrical management, and occupancy, in line with Vermont state building codes.<sup>33</sup> Vermont does not have a state administered agency; instead, it relies on HUD for resolving disputes, and consumer complaints, as well as monitoring retailers and manufacturers.<sup>34</sup>

When enforcing HUD standards, in combination with state program elements and rules issued by the Department of Housing and Community Development, all installers must be HUD-trained and certified under the program in effect in the state.<sup>35</sup> Even regarding 24 V.S.A. § 4412, some local ordinances may still include performance standards, including lot coverage and

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<sup>27</sup> Vermont Department of Housing and Community Development. *Housing Division Rules Part I: Mobile Home Parks*. Vermont Agency of Commerce and Community Development, accessed October 23, 2025.

<https://www.law.cornell.edu/regulations/vermont/11-001-Code-Vt-R-11-020-001-X>

<sup>28</sup> 9 V.S.A. § 2601.

<sup>29</sup> Vermont Division of Environmental Health. *Town Health Owner Manual*. Vermont Department of Health, accessed October 23, 2025.

[https://www.healthvermont.gov/sites/default/files/documents/pdf/Env\\_THO\\_THOManual.pdf](https://www.healthvermont.gov/sites/default/files/documents/pdf/Env_THO_THOManual.pdf)

<sup>30</sup> 24 V.S.A. § 4412.

<sup>31</sup> Vermont Rural Water Association, "What is a Sanitary Survey?" accessed October 23, 2025.

<https://vtruralwater.org/what-is-a-sanitary-survey/>

<sup>32</sup> 10 V.S.A. § 6266.

<sup>33</sup> Vermont Division of Fire Safety. *Fire & Building Safety Code*. Vermont Department of Public Safety, accessed October 23, 2025.

[https://firesafety.vermont.gov/sites/firesafety/files/files/rules/dfs\\_rules\\_buildingcode\\_annotated2015.pdf](https://firesafety.vermont.gov/sites/firesafety/files/files/rules/dfs_rules_buildingcode_annotated2015.pdf)

<sup>34</sup> U.S. Department of Housing and Urban Development, "Installation Program." <https://www.hud.gov/hud-partners/manufactured-home#close>

<sup>35</sup> Central Vermont Planning. *HUD Manufactured Home Installation Program: Information for Homeowners*, accessed October 23, 2025. [https://centralvtplanning.org/wp-content/uploads/2016/09/HUD-Manufactured-Home-Brochure\\_Generic.pdf](https://centralvtplanning.org/wp-content/uploads/2016/09/HUD-Manufactured-Home-Brochure_Generic.pdf)

health/safety management. If a municipality's bylaws appear to exclude manufactured housing, §4412 provides a statutory defense.<sup>36</sup>

## State Comparisons

### Rhode Island

Rhode Island is the only state we examined with a manufactured housing definition different than the definition listed in the *National Manufactured Housing Construction and Safety Standards Act of 1974*. Rhode Island General Laws Chapter 31-44 defines a mobile and manufactured home as “a detached residential unit designed for a long-term occupancy and containing sleeping accommodations...to be transported on its own wheels or on a flatbed or other trailer or detachable wheels.”<sup>37</sup> The statute regulates park zoning, resident protections, lot leases, sale of homes, and relevant disclosures.

Rhode Island's Department of Business Regulation, specifically the Division of Commercial Licensing and Regulation, oversees licensing and regulating mobile home parks in Rhode Island.<sup>38</sup> §31-44-3 defines requirements for park licensing, resident notice, and the residents' right to sell their home without park owner interference.<sup>39</sup> Rhode Island is rigorous in its residents' right of first refusal, wherein the holder has the option to match or accept an offer on a property before the owner can sell it to a third party, and appropriate record-keeping of all resident-owner interactions.<sup>40</sup>

In Rhode Island, a chattel loan is used for homes with no rental connection to their plot of land, whereas a real property loan is used for a home that is permanently affixed to a given plot of land.<sup>41</sup> All details related to whether the home is permanently affixed, has or lacks wheels, or owns the home and the land, affect classification and thus the loan type.

### Connecticut

Manufactured home parks must be licensed and comply with building and fire safety codes, which are regulated by the Connecticut Department of Consumer Protection.<sup>42</sup> The statutes and Department of Consumer Protection lay out in their statutes the consequences for unlawful tenant behavior, including prohibited lease terms and remedies for violations.<sup>43</sup> Conn. Gen. Stat.

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<sup>36</sup> 24 V.S.A. § 4412.

<sup>37</sup> Rhode Island Legislature, *Title 31: Motor and Other Vehicles. Chapter 44: Mobile and Manufactured Homes*, Rhode Island General Assembly, accessed October 23, 2025. <https://webserver.rilegislature.gov/Statutes/TITLE31/31-44/31-44-1.htm>

<sup>38</sup> Rhode Island Department of Business Regulation, “Mobile, Manufactured Homes, and Parks,” accessed November 2, 2025. <https://dbr.ri.gov/real-estate-and-commercial-licensing/mobile-manufactured-homes-parks>

<sup>39</sup> R.I. Gen. Laws § 31-44-3.

<sup>40</sup> R.I. Gen. Laws § 31-44-3.1.

<sup>41</sup> Capital Home Mortgage Rhode Island, “Rhode Island Manufactured Home Loans,” *America Pacific Mortgage*, accessed October 23, 2025. <https://capitalhomemortgage.com/rhode-island/manufactured-home-loans>

<sup>42</sup> Connecticut Legislature, (2024). *Chapter 412: Mobile Manufactured Homes and Mobile Manufactured Home Parks*, Connecticut General Assembly, accessed October 23, 2025. [https://cga.ct.gov/2024/sup/chap\\_412.htm](https://cga.ct.gov/2024/sup/chap_412.htm)

<sup>43</sup> Office of the Secretary of the State, *Title 21: Licenses*, R.C.S.A. § 21-70-1—21-70-3, accessed October 23, 2025. [https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title\\_21Subtitle\\_21-70\\_HTML/](https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_21Subtitle_21-70_HTML/)

§ 21-70 requires park owners to give advance written notice to unit owners when the owner intends to discontinue use of the site as a mobile home park. Residents or associations representing equal to or greater than 25 percent of units have a statutory opportunity to express interest in buying the park.<sup>44</sup> In the instance where a manufactured home is found abandoned, § 21-80 permits park owners to cure liens and sell the abandoned home.<sup>45</sup>

Both personal property loans and mortgage loans are common forms of financing for manufactured homes. The Connecticut Housing Finance Authority authorizes loans for manufactured homes located in manufactured home communities, as permitted by the *Connecticut Housing Finance Authority Act of 2024*.<sup>46</sup> Conn. Gen. Stat. § 8-251 permits the authority to “set aside no less than two million dollars to be used to provide loans directly to such residents” of manufactured home communities.<sup>47</sup> The authority therefore recognizes loans for homes where the residents lease the lot, i.e., a personal property-style structure, as well as a mortgage-style loan with modified requirements, such as no required private mortgage insurance.<sup>48</sup>

## New York

In New York, manufactured homes are defined in the same way as in the *National Manufactured Housing Construction and Safety Standards Act of 1974*; however, mobile homes are defined differently, as opposed to the federal definition (see footnote 2). A mobile home is defined as “a moveable or portable unit designed and constructed to be towed on its own chassis, comprised of frame and wheels, connected to utilities, and designed and constructed without a permanent foundation for year-round living.”<sup>49</sup>

In New York, manufactured homes are regulated via federal legislation, Article 21-B, and Title 19: Part 1210. The New York Department of State is the power that carries out the state plan and enforces the *National Manufactured Housing Construction and Safety Standards Act of 1974* in New York.<sup>50</sup> Section 604 of Article 21-B lists the powers of the Department of State regarding manufactured homes. The New York Department of State can create and maintain a registry, retain records of submitted applications, receive complaints, and conduct investigations.<sup>51</sup> The New York Department of State establishes procedures for dispute resolution.<sup>52</sup>

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<sup>44</sup> National Consumer Law Center, *Promoting Resident Ownership of Manufactured Home Communities: A Policy Guide*, December 2023. [https://www.nclc.org/wp-content/uploads/2024/01/202312\\_Policy-Guide\\_Promoting-Resident-Ownership-of-Manufactured-Home-Communities-1.pdf](https://www.nclc.org/wp-content/uploads/2024/01/202312_Policy-Guide_Promoting-Resident-Ownership-of-Manufactured-Home-Communities-1.pdf)

<sup>45</sup> Conn. Gen. Stat. 412, § 21-80.

<sup>46</sup> Conn. Gen. Stat. 412, § 21-70.

<sup>47</sup> Conn. Gen. Stat. 412, § 21-70.

<sup>48</sup> Connecticut Legislation 136 C.A. § 136, Sec. 8-286f.

<sup>49</sup> New York Department of State, *Municipal Regulation of Manufactured Housing*, accessed October 26, 2025. <https://dos.ny.gov/system/files/documents/2024/09/municipal-regulation-of-manufactured-housing.pdf>

<sup>50</sup> Division of Code Enforcement and Administration, “Part 1210 – Manufactured Homes Regulations,” *New York Department of State*, accessed October 22, 2025. <https://dos.ny.gov/system/files/documents/2019/10/part1210.pdf>

<sup>51</sup> New York State Senate, “Powers of the Department,” N.Y. Title 1 §604, (2014), accessed October 22, 2025. <https://www.nysenate.gov/legislation/laws/EXC/604>

<sup>52</sup> New York State Senate, “Powers of the Department.”



In New York, the title to a manufactured home is initially held in the form of a Certificate of Title issued by the New York State Department of Motor Vehicles, and provides official proof of ownership.<sup>53</sup> Courts have ruled that manufactured homes cannot be converted into single-family homes by the removal of the vehicle's mobile transportation apparatus and fixing it to land.<sup>54</sup>

Section 611 of Article 21-B establishes a manufactured housing advisory council, consisting of 15 members.<sup>55</sup> This article serves to implement the provisions of the *Manufactured Housing Improvement Act of 2000*.<sup>56</sup>

Part 1210 of Title 19 asserts that, after July 1, 2006, no individual or business can construct any manufactured home outside of New York for sale in the state.<sup>57</sup> Part 1210 describes standards for certification for manufacturers, retailers, installers, and mechanics, with additional sections detailing the process of certification renewal and necessitating quarterly reports from manufacturers and installers.<sup>58</sup>

## Massachusetts

Under the Massachusetts *Manufactured Housing Act* (2017), the Attorney General is named the main authority in oversight and regulation, with the ability to enforce legislation under the same act by bringing civil actions to court.<sup>59</sup> The Massachusetts Attorney General and Director of the Department of Housing and Community Development work in tandem to review all rules issued by community owners.<sup>60</sup> The Massachusetts Attorney General's Regulations, issued in 1996, are meant to provide specific standards regarding community rules to flesh out those listed in the *Manufactured Housing Act* (2017) and to provide a more concrete interpretation of the act.<sup>61</sup> The *Manufactured Housing Act* (2017) and the Attorney General's Regulations work together to outline the rights and responsibilities of community owners and residents of manufactured housing communities.<sup>62</sup>

In Massachusetts, manufactured homes are classified as personal property and are thus generally exempted from real property taxes; conversely, tenants pay a monthly license fee, determined by

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<sup>53</sup> New York Department of Motor Vehicles, "Information and Instructions about Your Certificate of Title," accessed October 26, 2025. <https://dmv.ny.gov/brochure/information-and-instructions-about-your-certificate-of-title>

<sup>54</sup> New York Department of State, *Municipal Regulation of Manufactured Housing*, accessed October 26, 2025. <https://dos.ny.gov/system/files/documents/2024/09/municipal-regulation-of-manufactured-housing.pdf>

<sup>55</sup> New York State Senate, "Manufactured Housing Advisory Council," N.Y. Title 1 §604, (2014), accessed October 22, 2025. <https://www.nysenate.gov/legislation/laws/EXC/611>

<sup>56</sup> Division of Code Enforcement and Administration, "Part 1210 – Manufactured Homes Regulations," *New York Department of State*, accessed October 22, 2025. <https://dos.ny.gov/system/files/documents/2019/10/part1210.pdf>

<sup>57</sup> Division of Code Enforcement and Administration, "Part 1210 – Manufactured Homes Regulations."

<sup>58</sup> Division of Code Enforcement and Administration, "Part 1210 – Manufactured Homes Regulations."

<sup>59</sup> Office of the Attorney General (Massachusetts), *The Attorney General's Guide to Manufactured Housing Community Law*, November 2017. <https://www.chicopeema.gov/DocumentCenter/View/14273/Manufactured-Home-Guide---Office-of-the-Attorney-General>

<sup>60</sup> Office of the Attorney General (Massachusetts), *The Attorney General's Guide to Manufactured Housing Community Law*.

<sup>61</sup> Office of the Attorney General (Massachusetts), *The Attorney General's Guide to Manufactured Housing Community Law*.

<sup>62</sup> Office of the Attorney General (Massachusetts), *The Attorney General's Guide to Manufactured Housing Community Law*.

the local city or town.<sup>63</sup> The Supreme Court of Massachusetts has ruled that if a mobile home acquires the characteristics of a conventional home, it becomes real estate and not personal property.<sup>64</sup>

Much of the state's manufactured housing legislation focuses on manufactured housing communities, defined as land upon which three or more manufactured homes are located.<sup>65</sup> These communities are noted as important given the rising cost of real estate in Massachusetts, with manufactured housing communities providing an affordable housing option.<sup>66</sup> The *Manufactured Housing Act* (2017) serves as the applicable statute for manufactured housing communities.<sup>67</sup> Massachusetts also has the Manufactured Home Federation of Massachusetts; a statewide association composed of manufactured housing residents intended to represent the concerns of those in manufactured housing communities and stay up to date on changes in relevant legislation.<sup>68</sup>

## Maine

Mobile homes that are sold or installed in Maine are overseen by the Maine Manufactured Housing Board, although, like most other states, standards are administered by HUD.<sup>69</sup> Definitions outlined in Maine legislation clarify that mobile homes are a type of manufactured home. According to Maine Law Title 30-A, § 4358, mobile home titling is dependent on variables including whether the home has a chassis or foundation and whether the mobile homeowner owns the property beneath the structure.<sup>70</sup>

In 2024, the Maine Legislature passed a bill that aids tenants in mobile home and manufactured housing communities who want to purchase the parks they live in.<sup>71</sup> There are three main provisions that improve tenants' rights:

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<sup>63</sup> Office of the Attorney General (Massachusetts), *The Attorney General's Guide to Manufactured Housing Community Law*, May 2024. <https://www.mass.gov/doc/attorney-generals-guide-to-manufactured-housing-may-2024/download>

<sup>64</sup> Fannie Mae, "Titling manufactured homes as real property," accessed October 29, 2025. <https://singlefamily.fanniemae.com/media/18186/display>

<sup>65</sup> State of Massachusetts, "The Manufactured Housing Act," M.G.L. c. 140, §§ 32A-32S, accessed October 22, 2025. <https://www.mass.gov/doc/manufactured-housing-act-0/download>

<sup>66</sup> Office of the Attorney General (Massachusetts), *The Attorney General's Guide to Manufactured Housing Community Law*, November 2017. <https://www.chicopeema.gov/DocumentCenter/View/14273/Manufactured-Home-Guide---Office-of-the-Attorney-General>

<sup>67</sup> State of Massachusetts, "The Manufactured Housing Act," M.G.L. c. 140, §§ 32A-32S.

<sup>68</sup> Manufactured Home Federation of Massachusetts, *Manufactured Home Federation of Massachusetts, Inc.*, November 2017. <https://www.mass.gov/doc/manufactured-home-federation-of-massachusetts/download>

<sup>69</sup> Maine Professional Licensing, "Mobile vs. Modular Homes Do You Know the Difference," accessed October 20, 2025. <https://www.maine.gov/pfr/professionallicensing/sites/maine.gov/pfr/professionallicensing/files/inline-files/MHBMobileVsModular.pdf>; State of Maine Professional and Financial Regulation, "Manufactured Housing Board," accessed October 22, 2025. <https://www.maine.gov/pfr/professionallicensing/professions/manufactured-housing-board>

<sup>70</sup> Maine Revised Statutes "Title 30-A, § 4358," 2023. <https://legislature.maine.gov/statutes/30-a/title30-Asec4358.html>; Maine Legislature Statutes MRS Title 10, Chapter 953 §9091 "Regulation of Mobile Home parks; Landlord and Tenant" January 07, 2025. <https://www.mainelegislature.org/legis/statutes/10/title10ch953.pdf>

<sup>71</sup> Senator Bailey, Senator Curry, Senator Nangle and Senator Reny, "Transformational New Laws to Protect Residents of Mobile Home Communities Take Effect," September 24, 2025.



1. The Mobile Home Park Preservation and Assistance Fund, which provides funding for the sale of parks to tenants and supports parks by owners' associations.
2. The right of first refusal allows renters to buy the property before it becomes available for purchase to the public.
3. And tax incentives, which further decrease the total cost of buying a mobile home park.<sup>72</sup>

## New Hampshire

Manufactured home construction and installation are overseen by the New Hampshire Board of Manufactured Housing, while other related standards are administered by HUD.<sup>73</sup> In New Hampshire, during the 2025 legislative session, a bill that would require manufactured homes to be installed in all zones where other single-family homes are permitted was introduced and passed in the House, and has been amended by the Senate, but has not passed the Senate.<sup>74</sup> This bill was introduced to combat what Steve Saltzman of the *New Hampshire Union Leader* calls a common problem. He states that in many New Hampshire towns, it is “impossible” to place a manufactured home even if the standards are on par with site-built housing because of local regulations.<sup>75</sup>

In New Hampshire, chattel or personal property loans are not used because mobile homes automatically qualify as real property.<sup>76</sup> Moreover, owners can apply for a larger array of loans, many of which are cheaper than personal property loans.<sup>77</sup>

The authority of the Maine Manufactured Housing Board is similar to that of the New Hampshire Board of Manufactured Housing. They both oversee the installation requirements and process of manufactured homes in their respective states and provide legislation about the role the board plays if tenants and owners of mobile home parks disagree.<sup>78</sup> The only major difference in legislation is the number of resident-owned mobile home parks between states. In New Hampshire, there are 152 total parks, while Maine has 12.<sup>79</sup> This is likely explained by New Hampshire's strong partnership with the New Hampshire Community Loan Fund, New

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<sup>72</sup> Senator Bailey, Senator Curry, Senator Nangle and Senator Reny, “Transformational New Laws to Protect Residents of Mobile Home Communities Take Effect.”

<sup>73</sup> Steve Saltzman, CEO of New Hampshire Community Loan Fund, “HB 685 Ends Unfair Curbs on Manufactured Homes,” June 3, 2025. [https://www.unionleader.com/opinion/op-eds/steve-saltzman-hb-685-ends-unfair-curbs-on-manufactured-homes/article\\_c6451a1e-e4a6-45f1-9644-2d9c0713b69a.html](https://www.unionleader.com/opinion/op-eds/steve-saltzman-hb-685-ends-unfair-curbs-on-manufactured-homes/article_c6451a1e-e4a6-45f1-9644-2d9c0713b69a.html)

<sup>74</sup> New Hampshire House Bill 685, “An act permitting in all residentially zoned areas by right the construction of manufactured housing,” June 02, 2025. [https://gc.nh.gov/bill\\_Status/pdf.aspx?id=13964&q=billVersion](https://gc.nh.gov/bill_Status/pdf.aspx?id=13964&q=billVersion)

<sup>75</sup> Steve Saltzman, CEO of New Hampshire Community Loan Fund, “HB 685 Ends Unfair Curbs on Manufactured Homes.”

<sup>76</sup> New Hampshire Association of Regional Planning, “Manufactured Housing” accessed October 22, 2025. <https://nhhousingtoolbox.org/strategies/manufactured-housing/>

<sup>77</sup> New Hampshire Association of Regional Planning, “Manufactured Housing.”

<sup>78</sup> State of Maine Professional and Financial Regulation, “Manufactured Housing Board,” accessed October 22, 2025. <https://www.maine.gov/pfr/professionallicensing/professions/manufactured-housing-board>; New Hampshire Office of Professional Licensure and Certification, “Installation Standards Board for Manufactured Housing,” accessed October 22, 2025 <https://www.oplc.nh.gov/installation-standards-board-manufactured-housing>

<sup>79</sup> New Hampshire Community Loan Fund, “List of NH resident-owned communities,” August 13, 2024. <https://communityloanfund.org/resources/list-of-nh-resident-owned-communities>

Hampshire Housing, and Fannie Mae, which have helped finance resident-owned communities for decades.<sup>80</sup>

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<sup>80</sup> New Hampshire Association of Regional Planning, “Manufactured Housing.”