



Maryland Consumer Rights Coalition

Nora Corasaniti
Director of Legislative Response and Special Projects
Office of the Commissioner of Financial Regulation
Maryland Department of Labor, Licensing & Regulation
500 N Calvert St., Suite 402
Baltimore, MD 21202

August 10, 2018

Re: Working Group Recommendations on Manufactured Housing

Dear Ms. Corasaniti:

On behalf of the Maryland Consumer Rights Coalition (MCRC) and the undersigned organizations, we appreciate the opportunity to comment on the Working Group Recommendations on Manufactured Housing.

MCRC advances economic rights and financial inclusion through research, education, organizing, direct service, and policy advocacy. Our 8,500 supporters and members include individuals and organizations committed to expanding consumer protections and reducing the racial wealth gap. MCRC coordinates the Baltimore Homeownership Preservation Coalition (BHPC) which brings together housing counseling organizations, CDFIs, legal service providers, consumer advocates, realtors, regulators and other stakeholders to stabilize neighborhoods, increase homeownership, and reduce foreclosures in Baltimore City.

The State of Maryland has over 36,000 manufactured homes, many of which are located in over 200 manufactured home communities across the state. Because families living in manufactured housing frequently own their homes but not the land on which the home sits, they are in need of expanded consumer protections. We welcome the initial work of the CFR Working Group in expanding these protections and rights for owners of manufactured homes.

Inclusion of manufactured home brokers, lenders, mortgage originators under Maryland Mortgage Lending Law.

We support the recommendation to include these agents under Maryland mortgage law. This inclusion remedies a current weakness in our regulatory scheme and extends additional protections to families in manufactured housing.



Manufactured home retailers who do not broker, lend, or originate loans

We support a new provision stating that a manufacturing home retailer who does not broker, lend, or originate loans, must provide financing information in a fair and honest manner. This section should be expanded to require retailers to explicitly state, in plain English, any financial relationship between the retailer and the lender whom the retailer provides information on.

New Consumer Protection Notices

We support the requirement of new disclosures and information about purchasers' rights be distributed by manufactured home retailers. In addition to the notice requirement, we recommend that violations of borrowers rights be clearly defined as violations of the Maryland Consumer Protection Act or other applicable laws. The new disclosures as well as the investigatory and enforcement process within the CFR should be accompanied by appropriate penalties for initial and subsequent violations.

Additional Areas for Consideration

In addition to these provisions, we recommend inclusion of the following to strengthen the rights of homeowners in manufactured housing:

- **Maryland Mortgage Program** -DHCD currently excludes manufactured homes from all mortgage programs which limits affordable options for low-and-moderate income individuals. DHCD should offer a mortgage program that is appropriate for manufactured home buyers or open the current programs to manufactured home buyers.
- **Manufactured Home as Real Property**-Maryland should adopt the Uniform Law Commission's Uniform Manufactured Housing Act which would enable owners of manufactured homes to be titled as real estate and build wealth for the home owners.
- **Purchase Opportunity**-Maryland should adopt policies that require or encourage community owners to give residents the opportunity to purchase the land on which their homes sit.

Thank you again for your consideration of these comments. Please don't hesitate to contact me at marceline@marylandconsumers.org with any questions or clarifications.

Best,

Marceline White
Executive Director



Maryland Consumer Rights Coalition

Consumer Law Center
GBCHRB
Meals on Wheels of Central Maryland
Public Justice Center
Santoni, Vocci & Ortega, LLC