

Factory Assembled Structures Advisory Board Meeting

Labor & Industries
February 20, 2020
10 a.m. – 12 p.m.
L&I Point Plaza East – Room 139

ATTENDEES:

Board Members Present: Joan Brown- Chair, Don Carlson, Alan Duer, Craig Hillis, Michael Lubliner, Mike Szramek

Absent: Wade Elliott, Steven Hart, Gary Stoskopf

L&I Staff: Craig Sedlacek, Shane Daugherty, Annette Taylor, Michael Luke, Bethany Mohr, Barbara Skiles, Alicia Curry, John McMillan, Matthew Erlich

Public: N/A

PROCEDURAL:

- Meeting called to order by Joan Brown.
- Introductions
- Approval of Minutes-
 - Approved and seconded the minutes from November 21, 2019 board meeting.
- Attendance sheet passed around with member information to update if needed.

PROGRAM UPDATE:

- Program staffing:
 - Assistant Director, David Puente is leaving. Steve Reinmuth is the new AD.
 - Plan Review Supervisor position was filled by Shane Daugherty.
 - Recruitment for a Factory Assembled Structured Program Manager has begun.
 - Open Positions:
 - Still making decision on Region 5/6 inspector supervisor.
 - Interviewing soon for the 2 open plan review positions.
- Workload:
 - Currently at 2 week turn around goal for everything except modular buildings which is around 4 weeks.
 - Making plans for upcoming building code change on July 1st and RV Code change.
- FAS program:
 - HUD Audit last week went very well with no issues.
 - New contract with Liberty Lake to do installation inspections, along with Medical

Lake.

UPDATE ON FEE INCREASE PUBLIC HEARING AND FILING OF THE CR103: (Alicia Curry)

- FAS has three separate rulemakings in process:
 - 1st rulemaking: Fiscal growth factor fee increase of 5.08% for all FAS fees, excluding Installer Fees. Scheduled to take effect on March 6th. Public Hearing held January 22nd. 1 written comment from an RV Manufacturer to consider eliminating WAC 296-150R-3000.
 - 2nd Rulemaking: Updates on Chapter 296-150F. Started in March 2019. Originally scope included changes to allow manufactured building panels to be inspected and approved before they get to construction site here in Washington. Changes were made to align with new legislation. New CR101 filed in July 2019. Craig is working on draft language and hoping to have finalized in the next month. Plan is to file CR 102 in April which starts the official public comment period. Public hearing planned for first part of June. Rules scheduled to take effect August 1st 2020.
 - 3rd Rulemaking: Updates on Chapter 296-150I and Chapter 296-150M rules to comply with HUD findings in SEBA report. Plan is to file CR 102 at the end of March which starts public comment process. Public hearing planned for first part of May. Rulemaking timeline aligns with that of 150F. Plans are to adopt the rules on June 30th for both chapters to take effect on August 1st 2020.
 - Adjusting timeline for filing CR 102 for rulemaking 2 and 3 until after next board meeting, so all board members have a chance to look over the drafts.

UPDATE ON INSTALLER RULES 150I/SEBA DISCUSSION OF DRAFT 150I RULES: (Craig Sedlacek)

- Board member input on the 296-150I and 296-150M revisions needed within the next week to get to code reviser's office. Scheduled to file CR102 March 31st.
- Discussion about policing using moving permits.
- Chapter 296-150I and 296-150M drafts- Refer to draft packet hand-outs. SEBA had 6 findings from the federal Audit 2 years ago:
 - Finding 1: Requiring homeowners setting up their own homes to hire certified installers to oversee installation work.
 - Response: Approved Homeowner Category requiring homeowners to take the installer training course, pass the test and then 1 WAINS label will be issued to the approved homeowner to place on their home.
 - Finding 2:

- Part 1: Installer Rules included the ANSI installation standard which is obsolete:
 - Response: Cleanup of 296-150I rules to clean up all references to this.
 - Part 2: Allowing installations to be installed to engineer/architect instructions. SEBA's comment is that these need to be sent to manufacturer and to their DAPIA for their approval of the engineer's design.
 - Response: No rules or requirement for that to happen. No change.
- Finding 3: Site Prep Issue. SEBA's comment is that they believe the certified installer should be approving the site prep for the home prior to installation. WA state law does not require this.
 - Response: Before the Installer installs the home they need to assure the site has been properly prepared.
- Finding 4: Withdrawn by HUD. They felt it was not warranted in the report.
- Finding 5: Homes damaged in transit. Similar to SEBA 2 where they are saying designs by engineer/architect need to be sent to the factory and their DAPIA for approval.
 - Response: Federal law does not require this. Repairs are also reviewed by FAS plan review to ensure compliance with federal standard
- SEBA finding 1 through 5 are complete and expect to clear up these 5 issues with HUD
- Finding 6: Lack of accurate and complete information about what is required for installation (300 jurisdictions).
 - Implementing website changes
 - Developing training targeted to city/county/FAS inspectors for how to conduct inspections on the installations of manufactured homes to offer to all jurisdictions.
 - Discussion regarding continuing education requirements.
 - Addressing jurisdiction push-back – Building officials have been receptive thus far.
 - Response: bullet point 6 will take several years to implement.

CAPSTONE OVERVIEW/SEBA OUTREACH: (Annette Taylor, Alicia Curry, Michael Luke)

- Annette: Grow L&I leaders from within with Capstone, a 6 month “training” program.
- Alicia: Capstone 11 graduate – Great program that gives the opportunity to really stop and take a look at what you want to do, strengths & weaknesses and grow as a leader.
- Michael: Capstone 12 graduate – Gives an introspective look at yourself through your outward engagement with your cohort.
 - Capstone project related to SEBA 6: Outreach to local jurisdictions based on the SEBA 6 findings. Updating 296-150I and 296-150M rules to fix old rule language that slipped through the cracks. Project included redesigning website to have a dedicated tab for local jurisdictions and developing specific inspector training.

BOARD RECOMMENDATIONS TO EXPAND THE BOARD ADDING FOOD TRUCK REPRESENTATION: (All)

- Discussed adding food truck representation or any other interest groups not represented on the board. Change would require agency requested legislation next year so it would need to be developed by June to move forward.
- Possibility of adding a representative from Department of Licensing.
- Have Washington State Food Truck Association send a representative to attend a meeting and get their perspective and then make a decision.
- Discussed inviting interested parties to board meetings without adding them to the board.

CONTRACTOR/TENANT AWARENESS: Deferred until further conversation with Jan Sylvester.

OTHER BUSINESS:

- Michael Lubliner:
 - Requested input for new State Energy Code.
 - WSU research project bid to US Department of Energy was accepted for 3 year research project on improving heating/cooling distribution systems in manufactured homes.

Meeting adjourned at 12:06 p.m.

Joan Brown, Chair

Craig Sedlacek, Secretary to the Board