

The 21st Road To HUD Assisted ICC Market Allocation

A Road Mapped Out Behind Closed Doors With HUD, ICC, And NIBS

Introduction

I have created a report that documents how HUD has a relationship with the International Code Council that requires careful scrutiny and how HUD has used taxpayer-funded research grants to help build a private certification system for offsite construction giving complete market allocation to the International Code Council, that is already a vertically integrated organization and how this ties into the **21st Road To Housing Act** that went into effect on July 11, 2026 and the potential **S-2489- National Modular Production Act** that was introduced in 2025.

Here is the short version. HUD paid for two reports — **“Offsite Construction for Housing: Research Roadmap”** (2023) and **“HUD’s Past, Present, and Future Role in Accelerating U.S. Offsite Construction for Housing: A Comparative Study and Action Plan”** (2024–2025) — recommending changes to how these homes are regulated. The organizations paid to do that research — NIBS and MOD X — are led by, and closely tied to, the same people who run the International Code Council (ICC), the private organization that writes the building codes and standards these homes must follow and certifies compliance with them. That taxpayer-funded research has since become an actual certification program, already piloted in six states, before Congress has passed any law making it mandatory. The 21st ROAD to Housing Act would take that privately built system and make it federal law, requiring every state to certify compliance with it.

The report details the organizations, the individuals that are executives that overlap organizations, and relevant dates starting with the ICC board meeting on July 27, 2018 that approved the off-site construction standards with ICC, NIBS, and MBI that became the ICC/MBI 1200 series and how that ties into the two HUD off-site construction funded research plans, the 21st Road to Housing and the National Modular Production Act.

Bottom line- a handful of people wearing multiple institutional hats, in the same organizations with overlapping executives used federal research money to recommend, build, and pilot a private certification and identification system for off-site construction — routed around existing federal consumer protections — before the public or Congress had fully reckoned with what was being created which will eliminate consumer choice and competition to the International Code Council, with the full support of HUD.

Organizations

Organization	Role / Description
ICC (International Code Council)	Membership-based trade association; develops codes and standards (including the I-Codes: IBC, IRC); operates a family of solutions/subsidiaries including ICC-ES, ICC-NTA, and IAS; services include training, product evaluation, inspection, and certification.
NIBS (National Institute of Building Sciences)	Congressionally chartered (1974) nonprofit; holds statutory sole-source federal contracting authority for building-related work under Public Law 93-383 (12 U.S.C. § 1701j-2(g)(3)), which exempts HUD from standard competitive-bidding requirements (FAR Part 6.302-5) for such work; created Off-Site Construction Council (2013). Note: NIBS's \$499,878 Feb. 2024 HUD award was made under a competitive Notice of Funding Opportunity alongside nine other institutions — the sole-source statute is a general authority NIBS holds, not documentation that this specific award bypassed competition.
MBI (Modular Building Institute)	Trade association for the modular construction industry; co-developed ICC/MBI 1200 & 1205 with ICC.
MOD X	Research/advisory network on offsite/modular construction; authored both HUD-commissioned reports via NIBS subcontract.

Organization	Role / Description
ICC-NTA (formerly NTA Inc.)	Testing/inspection/certification firm for off-site construction, acquired by ICC in 2019; HUD-approved DAPIA/IPIA agency.
ICC-ES (ICC Evaluation Service)	Product Evaluation and Certification: ICC Evaluation Service (ICC-ES) performs technical evaluations of building products, materials, and systems for code compliance.
IAS (International Accreditation Service)	ICC-affiliated accreditation body for testing/inspection firms; accredits RESNET HERS raters.
Tiny House Alliance USA	501(c)(3) nonprofit advocacy organization; Janet Thome, Founder/President; author of the Dec. 2025 MHProNews op-ed.
Tiny Home Industry Association (THIA)	Trade association; co-branding partner with ICC on Standard 1215 (Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy).
MHARR (Manufactured Housing Association for Regulatory Reform)	Trade association representing independent HUD Code manufacturers; Mark Weiss, President/CEO.
Virginia DHCD / State Building Codes Office	State agency administering the Industrialized Building Safety Regulations (IBSR) and CAA approvals.
HUD Office of Policy Development & Research (PD&R)	HUD's research arm; commissioned both offsite-construction reports via NIBS/MOD X.
Saint-Gobain CertainTeed	Building-materials manufacturer; Dennis Michaud (Managing Director, Offsite Solutions) sits on the Housing System Certification steering committee.
Reframe Systems	Offsite housing-systems company; CEO Vikas Enti sits on the Housing System Certification steering committee.

People

Individual	Role / Ties
Dominic Sims	ICC CEO (2012–2024, counting predecessor roles from 2003); NIBS Board of Directors (2019–2022; 2025–2028).
Ryan M. Colker	VP, Innovation, ICC; Executive Director, ANCR; former NIBS VP; Chair, NIBS Off-Site Construction Council (2023–2025).
John "JC" Hudgison	ICC Board Member; Chair, ICC Emerging Leaders Membership Council; NIBS Board of Directors; founding past chair, NIBS Off-Site Construction Council.
Mark Johnson	COO, ICC (formerly EVP, Content & Service Group); President, RESNET Board of Directors (2023–2026); RESNET board member since 2017.
Cindy Davis	Past President, International Code Council; concurrently Virginia Deputy Director of Building and Fire Regulations (2018 minutes); named as "former Director, VA State Building Code Office" and steering-committee member, NIBS/MOD X Housing System Certification work group (2026).
Jeff Brown	Director, Virginia State Building Codes Office; authored both 2023 and 2024 CAA accreditation memos.

Individual	Role / Ties
Ryan E. Smith	Founding Partner, MOD X; Director, School of Design and Construction, WSU; author of HUD's 2023 Research Roadmap; NIBS Off-Site Construction Council founding past chair.
Janet Thome	Founder/President, Tiny House Alliance USA; author of Dec. 2025 MHProNews op-ed on ICC/THIA Standard 1215; correspondent to VA DHCD.
Mark Weiss	President/CEO, MHARR; author/co-author of MHARR white papers and op-eds on the ROAD to Housing Act and chassis legislation.
David Tompos Sr.	ICC staff member; VP of Sales, ICC-NTA; named by Janet Thome as a voting member on the ICC/THIA 1215 committee.
David A. Tompos	EVP, ICC Conformity Assessment Group (ICC-NTA, ICC-ES, IAS); son of David Tompos Sr., per Janet Thome's account. Corresponded directly with Thome by email starting 5/16/2025 on the chassis/NHTSA-certification question, predating the ICC Board's first formal letter on the same question by roughly seven months.
George Guszcza	President and CEO, NIBS; quoted announcing the Housing System Certification Program work group (Feb. 2026).
Stephanie Stubbs	Vice President, NIBS; NIBS representative on the Housing System Certification work group.
Ivan Rupnik	Founding Partner, MOD X; quoted announcing the Housing System Certification Program (Feb. 2026).
Tyler Schmetterer	Managing Partner, MOD X; MOD X representative on the Housing System Certification work group.
Dennis Michaud	Managing Director, Offsite Solutions, Saint-Gobain CertainTeed; Housing System Certification steering committee member.
Vikas Enti	CEO, Reframe Systems; Housing System Certification steering committee member.
Competing Evaluation Agencies	Third-party building-material evaluation agencies competing with ICC-ES, none referenced in HUD's Research Roadmap "New Products" recommendation: IAPMO Uniform Evaluation Service (IAPMO UES), Intertek, PFS-TECO, RADCO, DrJ Engineering, QAI Laboratories, CSA Group, UL Solutions (Underwriters Laboratories). List as supplied; not exhaustive.
Washington State University (WSU)	Public university; academic home of Ryan E. Smith (Director, School of Design and Construction), concurrently Founding Partner of MOD X and author of HUD's 2023 Research Roadmap. Per HUD Press Release No. 24-036 (Feb. 23, 2024), WSU received its own separate \$226,756.05 award directly from HUD — not a sub-award of NIBS's \$499,878 award — under the same "Offsite Construction and Land Use Reform" NOFO, for a project on modular mass-timber hybrid construction. Correction: this record initially misread the supplied funding-flow diagram's arrows as indicating a subcontract from NIBS's award; the primary source shows it is in fact an independent, separately awarded grant, and the diagram is not read as asserting otherwise.
MHI (Manufactured Housing Institute)	Named per a federal-funding flow chart supplied by the user as a downstream recipient in the WSU/Ryan E. Smith funding chain; per HUD Press Release No. 24-036 (Feb. 23, 2024), MHI received its own separate \$263,544.87 award directly from HUD under the same NOFO as NIBS and WSU, to examine the impact of local barriers on manufactured-home placement and propose regulatory reforms — not a sub-award of NIBS's or WSU's funding.
Purdue University	Named per the same funding flow chart as a further downstream recipient; per HUD Press Release No. 24-036 (Feb. 23, 2024), Purdue received its own separate \$263,847 award directly from HUD under the same NOFO, specifically to study the role of building codes as a land-use restriction and how proposed revisions to the International Building Code and the International Code Council

Individual	Role / Ties
	(ICC) would affect housing supply and affordability — a federally funded study directly examining ICC's regulatory role, not a sub-award of NIBS's or WSU's funding.

Timeline

Date / Name	Event	Category	Notes / Source
1971–72 NHTSA Letter	- Modular homes towed to site are not “motor vehicles” — no certification/labeling required - But trailers built by the manufacturer ARE motor vehicles requiring certification	<i>NHTSA / Individual</i>	NHTSA letter to Gerald Schlegel, reply to 12/13/1971 (nht72-549). Cited by both ICC and Thome.
Jul 27, 2018 ICC Board / NIBS-MBI Project	Board approves cooperative project to develop off-site construction standards/guidance	<i>ICC / NIBS / MBI</i>	ICC Board Minutes, 7/27/2018 (Item R7.0).
Jul 27, 2018 ICC Board / HUD Inspectors	Same meeting: CEO Sims briefs board on HUD rule dropping HUD's own inspector list for ICC-certified ones	<i>ICC / HUD</i>	ICC Board Minutes, 7/27/2018 (Item R2.0).
2019 ICC Acquires NTA → ICC-NTA	- Testing/inspection/certification firm - Pre-existing HUD-approved DAPIA/IPIA status	<i>ICC</i>	ICC Federal Funding Report; Off-Site Construction Consolidation memo.
2019 ASTM E541 Withdrawn	Standard for compliance-assurance agencies in manufactured building	<i>ASTM</i>	ASTM official withdrawal record.
2022 ASTM E541 Reinstated	- Thome advocated for reinstatement - Positioned as alternative to ICC/MBI 1205 (ISO-based) requirement	<i>ASTM / Individual</i>	Per Thome. Still accepted in VA's Dec. 2023 / Jul. 2024 CAA memos.
2021 ICC/MBI 1200 & 1205	- First comprehensive off-site construction standards - Press release: “do not apply to HUD Manufactured Housing”	<i>ICC / MBI</i>	ICC/MBI press release, 2021; Sims quote on “lowering regulatory barriers.”
2021 Virginia Adopts 1200/1205	New CAA accreditation requirement under 1205 §401.1(6)	<i>State (VA)</i>	VA DHCD Memo, 7/1/2024 (referencing 2021 IBSR).
2022 ICC/THIA vs. ASTM Committee	Precursor to ICC/THIA's own co-branded standard the following year	<i>ICC / THIA</i>	Per Janet Thome, Tiny House Alliance USA.
2023	- Based on IRC Appendix AQ - Developed via ICC's ANSI-consensus process	<i>ICC / THIA</i>	ICC/THIA press release, 2023.

Date / Name	Event	Category	Notes / Source
ICC/THIA Standard 1215 Announced			
Dec 5, 2023 VA CAA Memo	- Describes new 1205 accreditation requirement - Omits that ASTM E541 remains separately valid under state law	<i>State (VA) / Individual</i>	Cindy Davis (ICC past President / VA Deputy Director) cc'd. Source: Thome email to VA.
2023 HUD Research Roadmap	“Offsite Construction for Housing: Research Roadmap” (2023), authored by Ryan Smith (MOD X); recommends “HUD Code vs. ICC codes” study - Flags obstacles in ICC-ES evaluation process	<i>HUD / MOD X</i>	HUD Research Roadmap; NIBS Federal Funding Report (Award H-21760CA, \$499,878).
Feb 23, 2024 HUD Announces \$4M in Research Awards	- HUD Press Release No. 24-036: nearly \$4 million awarded to 11 grantees under two NOFOs - Offsite Construction and Land Use Reform NOFO (\$3M/10 institutions) includes: NIBS \$499,878; Purdue \$263,847 (building codes/ICC-IBC impact study); MHI \$263,544.87 (manufactured-home placement barriers); WSU \$226,756.05 (modular mass-timber construction); plus UCLA, UC Irvine, Urban Institute, LSU, ADL Ventures, Lehigh - Office to Residential Conversions NOFO: \$858,261.91 to M. Arthur Gensler Jr. & Associates - Press release states these awards "build upon the research needs... identified in the Offsite Construction for Housing: Research Roadmap" (HUD's 2023 report, above)	<i>HUD</i>	Source: HUD Press Release No. 24-036, 2/23/2024. All listed awards are separate, independently awarded grants under the same competitive NOFO — not sub-awards of one another.
Jul 1, 2024 VA Confirms ASTM E541	Acceptable alternative to ISO/IEC 17065/17020 for CAA approval	<i>State (VA)</i>	VA DHCD Memo, 7/1/2024.
Sep 11, 2024 HUD Code Revision	- Biggest revision in 30+ years - Incorporates ICC's IRC as benchmark	<i>HUD / ICC</i>	ICC Building Safety Journal, Oct. 2024.
2024–2025 Second MOD X / HUD Report	“HUD's Past, Present, and Future Role in Accelerating U.S. Offsite Construction for Housing: A Comparative Study and Action Plan” (2024–2025)	<i>HUD / MOD X</i>	NIBS Federal Funding Report source list.
May 2025–Jul 2026 ICC / Thome Correspondence	- Direct correspondence between ICC leadership (David A. Tompos Jr.; ICC's President's office) and Janet Thome over the ICC 1215 chassis/transportation classification - Full analysis, arguments, and citations summarized in Sections 6–7 below	<i>ICC / Individual</i>	Underlying letters and emails held as source material; see Sections 6–7 for the substantive dispute.
Jul 28, 2025 S. 2489 (“National Modular Act”)	- Sen. Warren & Sen. Banks introduce bill; HUD to review FHA financing barriers to modular methods - Authorizes HUD grant to study module serialization/coding (Sec. 4) - STATUS: Not enacted — pending in Senate Banking Committee	<i>Federal / HUD-FHA (Bill, Not Enacted)</i>	S. 2489, 119th Congress, introduced 7/28/2025 (Secs. 3–4). NIBS holds sole-source federal contracting authority.
Aug 14, 2025	Objects to conflating HUD Code homes with IRC-based modular homes	<i>Individual / Org (MHARR)</i>	MHARR white paper, 8/14/2025.

Date / Name	Event	Category	Notes / Source
MHARR White Paper			
2025 ICC Adds “Small Residential Unit” to 1215	• Tiny houses become a subcategory of the new “Small Residential Unit” classification	<i>ICC / THIA</i>	Per Janet Thome, Tiny House Alliance USA. Prompts her Dec. 15, 2025 op-ed.
Dec 15, 2025 Thome Op-Ed on Small Residential Unit	• Alleges personnel ties between ICC-NTA staff and the 1215 committee	<i>Individual</i>	MHProNews, 12/15/2025.
Dec 13, 2025 NIBS/MOD X Work Group Launches	• System-level certification model, analogous to auto/aircraft certification	<i>NIBS / MOD X</i>	NIBS/MOD X press release, 2/12/2026.
Feb 12, 2026 Work Group Announced Publicly	• Cindy Davis on steering committee • Pilot-ready spec targeted by end of 2026	<i>NIBS / MOD X / Individual</i>	NIBS/MOD X press release, 2/12/2026.
Apr 7, 2026 Regional Pilots Summit	• Six states: MN, VA, Greater Boston, UT, WA, CA • Tied to HUD Breakthrough Pilot Handbook; NIBS prime, MOD X lead technical partner	<i>NIBS / MOD X / HUD</i>	NIBS/MOD X press release, 4/9/2026.
Later 2026 (pending) HUD Breakthrough Pilot Handbook	• Not yet published as of this timeline's compilation	<i>NIBS / MOD X / HUD</i>	NIBS/MOD X press release, 4/9/2026.
Jul 11, 2026 ROAD to Housing Act (Enacted)	• Redefines “manufactured home”; new certification/recertification mandate • HUD directed to coordinate with ICC on IBC incorporation	<i>Federal / ICC</i>	Enacted into law 7/11/2026; bill text, Sec. 301.
Jul 21, 2026 ICC/NIBS Funding Reports	• \$4,347,960 cumulative ICC federal obligations (FY2008–FY2025) • \$300,182,572 cumulative NIBS federal obligations (FY2008–FY2026, partial)	<i>ICC / NIBS</i>	ICC Federal Funding Record; NIBS Federal Funding Record.
As of Jul 26, 2026 S. 2489 — Sec. 4 Status	• HUD may study a standardized coding system for serializing/securing modules • Purpose: streamline design/construction, improve innovation; coordinate with financing incentives • Status: still Introduced — no committee vote recorded	<i>Introduced (Pending)</i>	S. 2489, 119th Congress; congress.gov.

Origins: Eight Years in Motion (2018–2026)

- **Note:** This section documents organizational/personnel continuity from 2018 to today. It does not prove a 2018 plan for federal certification specifically — no internal document states that. Treat the pattern, not premeditation, as established.
- **2018** — ICC Board approves the NIBS/MBI standards project AND is briefed on HUD's reliance on ICC-certified inspectors — same board meeting, same day.
- **2019** — ICC acquires NTA Inc. (→ ICC-NTA), converting the 2018 "certified inspectors" relationship into an owned asset.
- **2021** — The 2018 project delivers ICC/MBI 1200 & 1205; Virginia adopts them the same year.
- **2023** — HUD commissions Ryan Smith (MOD X, also NIBS Off-Site Council founding chair) to recommend a certification apparatus built on the ICC framework.
- **2024–25** — MOD X's second HUD report proposes the certification program directly.
- **Dec 2025–Feb 2026** — NIBS/MOD X build it — Cindy Davis (past ICC President) sits on the steering committee.
- **Apr 2026** — Already running as live pilots in six states.
- **Jul 11, 2026** — Congress enacts a parallel certification mandate into federal law (ROAD Act).
- **S. 2489 (2025, pending)** — HUD may fund a study to build a module serialization system — same HUD-study-to-standardization pattern, a fifth instance, aimed at the VIN/ID gap (see Section 7).

1. HUD Publication One — "Offsite Construction for Housing: Research Roadmap" (2023)

- **Author:** Ryan E. Smith, Founding Partner MOD X; commissioned by HUD PD&R via \$499,878 NIBS subcontract (Award H-21760CA).
- **Key recommendation:** "Vertical Integration" — recommends researching supply-chain consolidation models from Sweden/Japan for U.S. offsite construction.
- **Two HUD-directed asks:** (1) Investigate HUD Code vs. ICC codes for manufactured housing; (2) research obstacles in the ICC-ES evaluation process.
- **Author's ties:** Smith sits in leadership of 3 of the 4 orgs (MOD X, NIBS, MBI) his own report's recommendations benefit.

2. HUD Publication Two — "Comparative Study and Action Plan" (2024–2025)

- **Authorship:** Same chain — HUD PD&R commission, MOD X authorship via NIBS.
- **Claim:** Per this record's hub-and-spoke analysis, proposes a "federally sanctioned housing system certification program" with a "Standard Award Criteria" funding advantage for projects that route through it.
- **Sourcing gap:** Report Two's primary text is still not in hand — this claim is sourced to this record's own analysis, not the report itself.
- **Don't conflate:** Thome's Dec. 2025 op-ed uses "hub-and-spoke" for a different mechanism (ICC/ICC-NTA/ICC-ES) — don't conflate the two.

3. The Recommendation Becomes a Program (Dec 2025–Feb 2026)

- **What happened:** NIBS + MOD X launch a work group to build the certification model HUD's research recommended — a system-level certification (like auto/aircraft) replacing full prescriptive-code review.
- **Steering committee:** Cindy Davis; NIBS CEO George Guszczka and MOD X's Ivan Rupnik quoted publicly.

3a. The Closed-Loop Certification Chain

- **ICC's Conformity Assessment Group:** ICC-NTA, ICC-ES, IAS — ICC's own subsidiaries certify against standards ICC itself writes.
- **Personnel overlap:** David Tompos Sr. (ICC-NTA VP Sales) sits on the 1215 committee; his son David A. Tompos runs the Conformity Assessment Group overseeing ICC-NTA/ICC-ES/IAS (per Thome).
- **Second overlap:** Cindy Davis, a past ICC President, now sits on the NIBS/MOD X certification steering committee — a former-leadership tie, not a concurrent one.

4. The Recommendation Becomes Law — ROAD to Housing Act, §604(i) (Enacted July 11, 2026)

- **Initial certification:** Every state must certify to HUD, within 1–2 years, that its laws treat chassis-less manufactured homes at parity with chassis-based ones.
- **Form:** Via existing State Plan or a standalone attestation; may require amending the state's "manufactured home" definition.
- **Annual recertification:** Required every year, with law changes disclosed.
- **Public compliance list:** HUD publishes which states are current, in the Federal Register and online.

- **Enforcement:** A state that misses its deadline must itself prohibit chassis-less manufactured homes — or HUD does it for them.
- **Preemption saved:** HUD's existing MHIA federal-preemption authority is preserved by rule of construction — the same protection MHARR and Thome flagged as at risk.

5. Already Implementing: The Regional Pilots (Apr 2026)

- **What's live:** NIBS (prime) + MOD X (lead technical partner) run a HUD-supported pilot summit across six states: MN, VA, Greater Boston, UT, WA, CA.
- **Tied to:** HUD Breakthrough Pilot Handbook, due later 2026, to scale the methodology nationally.
- **Why it matters:** The certification model was already operating before the ROAD Act's enactment on July 11, 2026 — independent of that legislation.

6. The Transportation Classification (Dec 2025–Jul 2026)

- **Integrated-chassis exemption:** ICC Board (Dec 9, 2025): integrated-chassis units aren't "motor vehicles" (49 U.S.C. § 30102(a)(7)) — so VIN/DOT label rules (49 CFR §§ 565, 567) don't apply.
- **Temporary-carrier gap:** The 1215 draft's Transportation section is silent on units moved by a separate/temporary carrier — confirmed twice (Dec 2025, Jul 2026 letters).
- **Unresolved allegation:** Thome's May 8, 2026 email alleged the 1215 Foreword implies an HUD "opt-out." ICC didn't dispute the characterization — only said it wasn't a CP-49-triggering claim.
- **Inquiry closed:** The Board told Thome it will not respond to further motor-vehicle-based preemption claims.

7. The "Independent Carrier System": A Renamed Trailer

- **Two-category rule:** Property is personal or real — nothing else. Real property requires affixation to land. Before that, a chassis-based unit is personal property.
 - **Jurisdictional hook:** Personal property on wheels, on public roads, uses DOT's right-of-way — that's the jurisdictional trigger for registration/VIN law, independent of the unit's eventual classification.
 - **Renamed trailer:** ICC/MBI 1200 calls this a "separate trailer"; ICC/THIA 1215 calls the same thing an "independent carrier system" and never says "trailer" (per Thome's direct comparison).
 - **Skipped sequence:** NM law: home titled as a vehicle first → axles removed at permanent foundation → then reclassified real property. Thome argues 1215 skips the vehicle phase.
 - **Predates the Board:** David A. Tompos Jr. gave Thome this same "permanent chassis → not a motor vehicle" answer starting May 16, 2025 — seven months before the Board's formal letter.
 - **Double-edged precedent:** The 1971–72 NHTSA letter both sides cite confirms the home isn't a motor vehicle — but confirms the trailer (if built by the same manufacturer) IS one. That fact pattern involved a separable trailer, not an integrated chassis.
 - **Legislative echo (S. 2489):** Thome: 1215 substitutes a private serial number for a VIN. S. 2489 Sec. 4 would build the same kind of substitute at the federal level — a study for "serializing and securing modules."
 - **HUD's own baseline:** HUD Code homes already use a serial number (24 CFR § 3280.6), not a VIN. The real risk: if ICC 1215 units sit outside HUD Code AND outside NHTSA, they may have no federal identifier at all — which is what a buyer needs to sell or refinance.
- This section reflects an active, unresolved dispute between Thome and ICC — not a settled legal conclusion.

Summary of Findings and Connecting the Dots

The chronological chain from HUD's commissioned research to pending federal legislation is documented in the “Connecting the Dots” table below. The findings here cover what that table does not: personnel overlap, the chassis/transportation classification dispute, and the scope of HUD's research recommendation.

Personnel Overlap

- **Ryan E. Smith:** Founding Partner, MOD X; founding past chair, NIBS Off-Site Construction Council; Fellow, Modular Building Institute — leadership in 3 of the 4 organizations his own HUD-commissioned report's recommendations benefit. Smith is concurrently Director, School of Design and Construction, Washington State University (WSU) — meaning the HUD grant money awarded to NIBS and subcontracted to MOD X for this work also runs through, and benefits, the academic institution employing the report's author. WSU's separate \$226,756.05 HUD award is detailed in the Organizations table above. Smith is also named, per a separately supplied flow chart, as a NIBS board member, in addition to his MOD X and NIBS Off-Site Construction Council roles already documented above — this specific board-membership claim has not yet been independently confirmed against NIBS's own records.
- **The NIBS/ICC board chain:** Per the same chart, Ryan Smith (MOD X founder, NIBS board member) connects through Dominic Sims (ex-ICC CEO, NIBS board member), John Hudgison (ICC and NIBS board member), and Ryan Colker (ICC VP, former NIBS board

member, NIBS Off-Site Construction Council Chair) into the Housing System Certification Program's development — four people holding NIBS board or leadership positions while concurrently holding ICC or MOD X roles. Each individual's dual role is separately documented in the People table above; the sequential chain connecting them into the certification program specifically is per the chart and not yet independently verified against primary board records.

- **David Tompos Sr. / David A. Tompos:** ICC-NTA VP of Sales, named as a voting member on the ICC/THIA 1215 committee; his son David A. Tompos is EVP of ICC's Conformity Assessment Group, which oversees ICC-NTA, ICC-ES, and IAS.
- **Cindy Davis:** Past ICC President, now on the steering committee of the NIBS/MOD X Housing System Certification Program — a former-leadership tie between the code-writing body and its successor certification framework.

The Chassis/Transportation Classification

- **Integrated chassis:** ICC correspondence (Dec. 9, 2025; Jul. 13, 2026) states an integrated chassis is not a “motor vehicle” under 49 U.S.C. § 30102(a)(7); no VIN or DOT certification label required.
- **Temporary/independent carrier:** The 1215 draft's Transportation section is confirmed silent on units moved by a separate carrier system.
- **Renamed trailer:** ICC's own Standard 1200/1205 calls this a “separate trailer”; the 1215 draft calls the same mechanism an “independent carrier system” and avoids the word “trailer” entirely.
- **No federal identifier:** HUD Code homes already use a serial number (24 CFR § 3280.6), not a VIN. If ICC 1215 units fall outside both HUD Code and NHTSA's VIN system, they may carry no federal identifier at all — the identifier a homeowner needs to sell or refinance.

Scope of HUD's Research Recommendation

- **ICC-ES named; competitors excluded:** HUD's Research Roadmap directs study of obstacles specifically within the ICC-Evaluation Service (ICC-ES) process. It does not reference any competing third-party evaluation agency — IAPMO UES, Intertek, PFS-TECO, RADCO, DrJ Engineering, QAI Laboratories, CSA Group, or UL Solutions.

Chronology: HUD Research to Federal Legislation

When	What Happened
2023	HUD PD&R publishes the Research Roadmap (MOD X/Ryan Smith): recommends investigating "HUD Code vs. ICC codes," obstacles in the ICC-ES process, and vertical integration around a certification/standards apparatus.
2024–2025	HUD PD&R publishes the companion Comparative Study and Action Plan (also MOD X-authored). Per the hub-and-spoke analysis, one of these two reports proposes a "federally sanctioned housing system certification program" with a "Standard Award Criteria" funding-advantage strategy for projects that route through it.
Dec 13, 2025 – Feb 12, 2026	NIBS and MOD X — the same organization HUD paid to write both reports — launch, then publicly announce, an actual "Housing System Certification Program" work group, targeting a pilot-ready specification by end of 2026.
Apr 7, 2026	NIBS/MOD X hold a HUD-supported Regional Pilots Summit with six state/regional offsite-construction programs already underway — showing the certification model's underlying methodology (regulatory assessment, system-level review) is being implemented in practice, not waiting on legislation.
Jul 11, 2026	21st Century ROAD to Housing Act is enacted into law, imposing a parallel, statutory state-level certification mandate: every state must certify parity treatment for chassis-less manufactured homes within 1–2 years or face a market prohibition on those homes within its borders.