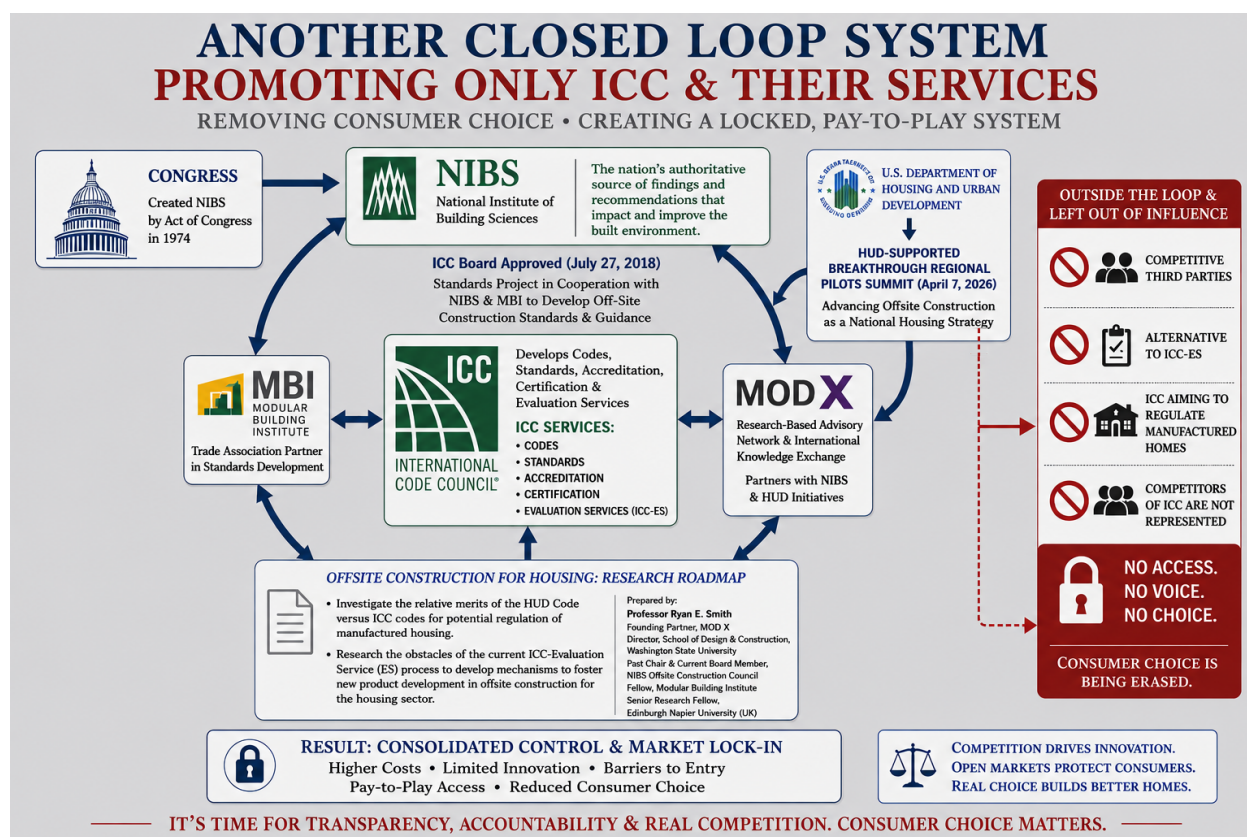




How HUD's Path To Accelerating The US Off-Site Construction Market Is A Trojan Horse To Fast Track ICC's Market Dominance: Connecting HUD, ICC, NIBS, And A MODX Interlock Funded By HUD

ICC Is Vying To Regulate Manufactured Homes Through I-Codes As An Alternative To The HUD Code

HUD Is Being Asked To Fund Research That Would Help ICC Grow Its Own Proprietary ICC-Evaluation Service — Expanding The ICC Family Of Solutions, Eliminating Consumer Choice And Competition

What this means to consumer choice and competitive third parties that also offer reports similar to ICC-ES.

Supportive documents include how this interlock is promoting the ICC/MBI 1200 series, including 1205, and how the New York Institute Center For Off- Construction is co-branding a standard with ICC promoting the proprietary ICC.MBI standards as well.

Introduction

This report evaluates two documents HUD has funded and published: HUD's Past, Present, and Future Role in Accelerating U.S. Offsite Construction for Housing: A Comparative Study and Action Plan (2024–2025, the "Action Plan"), and its predecessor, Offsite Construction for

Housing: Research Roadmap (2023, the "Research Roadmap"). Using primary sources and direct quotations, it documents the organizations and individuals involved in producing these two reports, examines the specific recommendations the Action Plan makes to HUD, and identifies the existing accredited alternatives to the certification services those recommendations would route through.

Backstory: HUD's Operation Breakthrough and the HUD Code (1968–1976)

Before the current initiative, HUD had one earlier, direct experience with federally organized offsite housing certification. That history is relevant context, not part of the current chain of events, which begins in Section 1.

"[Operation Breakthrough] endeavored to 'demonstrate the value of industrialized (factory-built) housing construction methods' and to 'eliminate and reduce barriers to industrialized construction.'" — Offsite Construction for Housing: Research Roadmap, HUD PD&R (2023), citing Staats, 1976

The \$72 million program (nearly \$500 million in today's dollars) was deemed a "failure" by Congress in 1976, but it produced the HUD Code, the first national manufactured-housing building code.

1. How the Current Initiative Came About — Timeline

The current push for a federally sanctioned housing certification program traces through a documented sequence of industry agreements and consulting relationships beginning in 2016.

2016–2018: The Modular Building Institute Study

The HUD Action Plan report states its own genesis directly:

"The genesis of the research effort started in 2016 with a project for the Modular Building Institute (MBI), culminating with a report titled the 5 IN 5 MODULAR GROWTH INITIATIVE: RESEARCH, ROADMAP, RECOMMENDATIONS." — HUD Action Plan report, Introduction

July 27, 2018: The ICC Board of Directors Meeting

ICC's own approved board minutes record the vote directly. At the July 27, 2018 ICC Board of Directors meeting in Blaine, WA — with Director Cindy Davis present and voting — the board took up "R7.0 Initiation of Proposed Standards Project":

"CEO Sims provided background information on the modular building industry and ICC's communications with the industry thus far, and introduced Vice President of Technical Services Pfeiffer to further elaborate on a proposed standard focusing on the off-site construction industry. Motion made and seconded to approve a Standards Project in cooperation with the National Institute of Building Sciences (NIBS) and the Modular Building Institute (MBI) to explore and develop a portfolio of Standards and Guidance tools to support the off-site construction industry. A discussion ensued. Motion passed unanimously." — ICC Board of Directors Meeting Minutes, July 27, 2018, Item R7.0

The same approved minutes record CEO Dominic Sims briefing the board, earlier in that meeting, on a separate HUD action directly benefiting ICC's certification business:

"CEO Sims provided an update on The U.S. Department of Housing and Urban Development's (HUD) new rule to eliminate the HUD-inspector list and rely on ICC-certified inspectors to perform HUD inspections." — ICC Board of Directors Meeting Minutes, July 27, 2018, Item R2.0

Both items were reported to the same board, at the same meeting, by the same CEO: HUD had already moved inspection authority to ICC-certified inspectors, and the board then voted, unanimously, to formally enter the offsite-construction standards space with NIBS and MBI.

Six months later, ICC's own newsroom confirms the personnel interlock followed directly from that agreement:

"International Code Council CEO Dominic Sims joins the National Institute of Building Sciences board. The Code Council and NIBS have a long and close partnership as leaders in the built environment." — ICC newsroom, Jan. 25, 2019

The sequence is therefore documented and dated: ICC's board approved the NIBS/MBI offsite standards partnership on July 27, 2018; ICC's own CEO joined NIBS's board on January 25, 2019, less than six months later. The organization ICC agreed to co-develop offsite certification standards which is the same organization ICC's CEO then joined the governing board of.

2020–2023: HUD Contracts NIBS, NIBS Selects MOD X, the Research Roadmap Is Published

"In 2020, HUD PD&R and NIBS discussed the possibility of developing a roadmap... Following acceptance and award of the roadmap project to NIBS by HUD in June 2021, NIBS sought to form a PTC... NIBS selected MOD X, an industrialized construction research consultancy, to serve as the PTC Chair." — Offsite Construction for Housing: Research Roadmap, HUD PD&R (2023), p. 14–15

Published February 1, 2023.

2024–2025: The HUD Action Plan Report

HUD funded a second, follow-on report, prepared under the same structure — MOD X as author, NIBS as project manager — expanding the Research Roadmap's findings into a formal three-part Action Plan. This report is examined in depth in Section 3.

December 13, 2025 – March 11, 2026: The Certification Work Group Launches and Is Publicly Tied to the Action Plan

"Most housing is still permitted as one-off buildings under prescriptive, fragmented codes, even when delivered using offsite methods." — George Guszczka, President and CEO, NIBS — NIBS/MOD X press release, Feb. 12, 2026

"MOD X and NIBS are currently applying the report's findings at the regional level across the United States, in collaboration with key partners, to create a Housing System Certification Program Standard." — NIBS/MOD X press release, March 11, 2026

NIBS and MOD X's own March 2026 press release confirms, in their own words, that the Action Plan report and the Housing System Certification Program Standard work group are one continuous initiative.

2. The Organizations and Individuals Involved — Documented Interconnections

The individuals and organizations below recur across every stage of the timeline above. Nothing here is inferred; each fact is drawn directly from the organizations' own published materials.

2.1 Organizations

Organization	Documented Role
HUD	U.S. Department of Housing and Urban Development, Office of Policy Development and Research (PD&R). Funded both the Research Roadmap (2023) and the Action Plan report (2024–2025) that recommend the certification program. Neither report discloses the ICC/NIBS/MOD X personnel overlap documented in this section.
ICC	Writes the IRC, IBC, and other I-Codes. Its subsidiary ICC-ES issues the dominant building-product evaluation reports. Joined the 2018 NIBS/MBI offsite standards project.
NIBS	"Created by an act of Congress in 1974." Managed both HUD-funded MOD X reports through staff project managers. Co-launched the Housing System Certification Program Standard work group with MOD X, Dec. 2025.
MOD X	Private consultancy (MOD X Advisory LLC), founded 2018 by Ryan E. Smith and Ivan Rupnik. Authored both HUD-funded reports under NIBS project management. Co-leads the certification work group.
MBI	Modular Building Institute; joined the 2018 ICC/NIBS standards project. Both Smith and Rupnik are MBI fellows.

2.2 Individuals

Ryan E. Smith — MOD X Founding Partner

*"He is the founding past chair and current board member of the National Institute of Building Sciences, Offsite Construction Council, a fellow of the Modular Building Institute and a Senior Research Fellow in the Centre for Offsite Construction + Innovative Structures at Edinburgh Napier University in the UK." — **modx.network/team***

Ivan Rupnik — MOD X Founding Partner

*"He is a fellow of MBI... In 2020, he served as an expert advisor for HUD's exploratory panel, facilitated by 2M." — **modx.network/team***

Kyle Barry — NIBS Senior Project Manager

Listed as "Project Manager" on the HUD Action Plan report and "Senior Project Manager, National Institute of Building Sciences" and "staff liaison to the NIBS Offsite Construction Council" on the Research Roadmap.

Dominic Sims — Former ICC CEO

*"Previous ICC CEO Is On The Board Of NIBS." — **How ICC Is Tied To Congress Through NIBS (submitted source document)***

John (JC) Hudgison — Senior ICC Board Member

*"Senior Board Member Of ICC and a Board Member of NIBS." — **How ICC Is Tied To Congress Through NIBS (submitted source document)***

Ryan Colker — VP, Innovation, ICC

*"Prior to joining ICC, Colker served as Vice President with the National Institute of Building Sciences, where he directed the Consultative Council and served as staff director of the Council on Finance, Insurance and Real Estate; the National Council on Building Codes and Standards; the Off-Site Construction Council and NIBS' STEM Education Program." — **How ICC Is Tied To Congress Through NIBS (submitted source document)***

Cindy Davis

Listed in the HUD Research Roadmap as "State of Virginia; ICC President Board of Directors," and quoted in that same HUD document recommending HUD adopt ICC/MBI standards nationally. Later listed in the Feb. 12, 2026 NIBS/MOD X press release as "former Director of Virginia's State Building Code Office," with no ICC title mentioned. ICC's own approved minutes list her as present and voting at the July 27, 2018 board meeting where the ICC/NIBS/MBI offsite standards project was unanimously approved.

George Guszczka — President and CEO, NIBS; Stephanie Stubbs — VP, NIBS

Named institutional leadership on both 2026 press releases and the certification work group's steering committee.

Dennis Michaud and Vikas Enti

Dennis Michaud, Managing Director of Offsite Solutions at Saint-Gobain CertainTeed, and Vikas Enti, CEO of Reframe Systems, are steering committee members alongside Davis (Feb. 12, 2026 press release).

2.3a Who Actually Staffs the Work Group — the Full Composition

The Feb. 12, 2026 press release names the complete steering-committee roster for the Housing System Certification Program Standard work group. It is worth reproducing in full, because it shows NIBS and MOD X are not merely partners on this initiative — their own named leadership is the initiative's leadership:

*"NIBS is represented by George Guszczka and Stephanie Stubbs, Vice President of NIBS. MOD X's representation includes Founding Partners Ivan Rupnik and Ryan E. Smith and Managing Partner Tyler Schmetterer." — **NIBS/MOD X press release, Feb. 12, 2026***

Of the six named steering-committee figures in that release — Guszczka, Stubbs, Rupnik, Smith, Schmetterer, and Davis — five are NIBS's or MOD X's own officers, and the sixth (Davis) is the individual whose ICC Board presidency is documented, under a different title, in the HUD Research Roadmap (Section 2.2 above). The release also states the work is supported by "a 16-person Technical Committee composed of prominent experts from design, engineering, construction, and manufacturing," whose individual membership is not disclosed in the release.

2.3b Why NIBS, Specifically: A Statutory Sole-Source Contracting Advantage

NIBS is not simply a nonprofit HUD chose to work with. By statute, NIBS holds a formal, congressionally granted contracting advantage unavailable to any of its competitors, including every alternative certifier documented in Section 4:

"Every department, agency, and establishment of the Federal Government having responsibility for building or construction, or for building- or construction-related programs, is authorized and encouraged to request authorization and appropriations for grants to the Institute for its general support, and is authorized to contract with and accept contracts from the Institute for specific services where deemed appropriate by the responsible Federal

official involved." — **Public Law No. 93-38, 12 U.S.C. §1701j-2(g)(3), as summarized on Wikipedia, "National Institute of Building Sciences"**

This provision permits federal agencies, including HUD, to award NIBS sole-source contracts for building- and construction-related work — exempt from standard competitive-bidding requirements under FAR Part 6.302-5 — on the basis of NIBS's "unique technical expertise and capabilities." In practical terms, this is a documented, legal explanation for why HUD did not need to run a competitive process before directing its offsite construction research contracts to NIBS: the law already permits it to skip competition and go straight to NIBS. That sole-source pathway is also why IAPMO, Intertek, PFS-TECO, RADCO, and Qualtim — all accredited, all already performing evaluation and certification work — were never in a position to bid for this HUD funding at all. It never went out for bid.

2.3 The Interconnection

The individual and organizational overlaps documented in this section are summarized below:

Person / Entity	Documented Connection
Dominic Sims	Former ICC CEO; sits on NIBS's Board of Directors.
John (JC) Hudgison	Senior ICC board member; also sits on NIBS's Board of Directors.
Ryan Colker	Former NIBS VP who directed NIBS's own Offsite Construction Council; moved directly into a VP, Innovation role at ICC.
Kyle Barry	NIBS staff; project-managed both HUD-funded MOD X reports on HUD's behalf.
Ryan E. Smith & Ivan Rupnik	MOD X Founding Partners; both hold standing seats/fellowships on NIBS's Offsite Construction Council and MBI. NIBS selected their firm, MOD X, to author both HUD-funded reports.
Cindy Davis	Listed as ICC Board President in the HUD Research Roadmap's PTC roster (2023); present and voting at ICC's July 2018 board meeting; later a HUD report co-author and a certification work group steering-committee member.
NIBS & MOD X	Both named parties to the 2018 ICC/NIBS/MBI standards agreement; now co-run the Housing System Certification Program Standard work group together.

Because of NIBS's sole-source statutory contracting status (Section 2.3b, above), none of this required HUD to ever put the work out for competitive bid.

3. The HUD Action Plan Report — The Core Document

This is the document that operationalizes everything above into federal policy recommendations. It deserves close reading on its own terms, not just as a link in a chain.

3.1 What HUD's Own Foreword Says the Report Recommends

"The report highlights that success in offsite construction cannot be achieved by government alone. It suggests that HUD's role should focus on enabling innovation and removing outdated institutional barriers to empower the private market to innovate and grow." — **John Gibbs, Principal Deputy Assistant Secretary, PD&R — HUD Action Plan report, Foreword**

"The Action Plan outlined in the report offers immediate, intermediate, and long-term strategies—from standardizing federal award criteria to advancing housing system certification and performance-based building codes." — **John Gibbs, Foreword**

Notably, the Foreword itself warns against the exact outcome this report's earlier sections document as already underway:

"The report warns against federal overreach and actions, such as favoring one construction method over another, that could distort the private market." — John Gibbs, Foreword

3.2 The Three-Part Action Plan, in the Report's Own Words

The report structures its recommendations around three sequenced strategies:

Timescale	Strategy	Report's Own Stated Goal
Immediate	Standard Award Criteria	"To increase housing supply rapidly by accelerating offsite construction capacity through demand aggregation."
Intermediate	Housing System Certification	"To cost-effectively streamline building regulations to expand the overall supply, variety, and performance of housing."
Long-term	Performance-Based Building Code	"To create a national innovation system and a high-technology housing sector to sustain housing supply into the future."

3.3 The Certification Strategy, in Full — the Section That Names NIBS

"The strategy for accomplishing the intermediate goal is to develop and implement a performance-based, federally sanctioned housing system certification program for offsite housing construction." — HUD Action Plan report, Section A.2.2

"HUD's Operation Breakthrough culminated with a U.S. congressional mandate for HUD and the newly formed National Institute of Building Sciences (NIBS) to partner on creating the Advanced Building Technology Council and the Advanced Building Technology Program. Following a similar pattern, the researchers recommend that HUD establish a new partnership with NIBS to define future performance-based regulatory reform, starting with housing system certification." — HUD Action Plan report, Section A.2.2, 'Who Develops and Implements a Housing System Certification Program?'

The report also explains what certification would functionally do once adopted:

"When a specific instance of a housing system is configured for a particular use on a specific site, that project is permitted and inspected in reference to that certification and not to the general building code. This method creates cost savings for the housing system developer in terms of project development, permitting, and inspection, and allows production of more units in each development cycle." — HUD Action Plan report, Section A.2.2

"When a specific instance of a housing system is configured for a particular use, future owners can access certain project awards, subsidies, and incentive programs without going through a lengthy and often unpredictable review process." — HUD Action Plan report, Section A.2.2

3.4 The Standard Award Criteria Strategy — Where Federal Money Follows Certification

"Standard award criteria can prioritize the use of IHD over other forms of project delivery for housing project subsidies and awards. The researchers recommended that applicants practicing IHD be allotted additional points as part of the award review process versus applicants practicing traditional project delivery." — HUD Action Plan report, Section A.2.1

Read together with Section 3.3 above, the mechanism is explicit in the report's own language: certification status becomes an award-scoring advantage for federal housing funds.

3.5 The Report's Own Warning, Applied to Itself

The report cautions against the very structure its recommendations create. Its Foreword warns against "federal overreach and actions, such as favoring one construction method over another, that could distort the private market." Section 3.3 above recommends HUD build a certification pathway administered by NIBS — an organization documented in Section 2 to share board members, staff history, and standing council leadership with ICC. The report does not address this overlap or disclose it as a potential conflict anywhere in its text.

3.6 HUD Is Being Asked to Fund Research That Would Help ICC Grow — Not to Create Competition

The companion Research Roadmap — funded by HUD, authored by MOD X under NIBS project management, with Cindy Davis, listed in that document as ICC Board President at the time, as a named contributor — lists this as one of a small number of research items specifically directed to HUD:

"New Products: Research the obstacles of the current ICC-Evaluation Service (ES) process to develop mechanisms to foster new product development in offsite construction for the housing sector." — Offsite Construction for Housing: Research Roadmap, HUD PD&R (2023), p. vi

ICC-ES is not a public utility or a neutral standards body — it is a for-profit-structured, proprietary subsidiary of ICC that manufacturers already pay to use. The obstacles researchers cite are not a defect ICC needs to be pressured to fix; they are the byproduct of ICC-ES's existing market position. The document elsewhere confirms this directly:

"The current ICC Evaluation Service (ES) process and associated cost and time were noted as significant hindrances to fostering innovation, standardization, and competitiveness within the housing industry." — Offsite Construction for Housing: Research Roadmap, HUD PD&R (2023), Section 3.2

The research item as written does not ask whether manufacturers should be able to route around ICC-ES entirely, and it does not propose funding for any of the accredited competitors documented in Section 4 below. It asks HUD to fund research into how to make ICC's own proprietary process work better — which would grow ICC-ES's business and reinforce its position as the default pathway, using federal research dollars, while its already-accredited competitors go unmentioned and unfunded in either HUD report.

4. Means for Consumer Choice: Businesses That Already Offer the Same Services as ICC

A central premise of the certification push is that a centralized "one simple set of construction rules" administered through the ICC/NIBS/MOD X network is necessary. This premise is undercut by the fact that multiple accredited, code-recognized alternatives to ICC-ES and ICC-NTA already exist and already perform this exact function.

IAPMO Uniform Evaluation Service (Uniform ES)

"Remember that IAPMO is one national model code organization that did not participate in the formation of ICC... In 2005, industry recognizing IAPMO's great success in the plumbing

program asked us to enter the building product arena to provide an alternate source for evaluation reports." — **IAPMO Uniform ES FAQ**

"Furthermore, while ICC-ES and IAPMO ES are the prominent ER Providers, there are several other organizations that provide reports." — **Mark A. Moore, Chair, SEAOC Evaluation Reports Committee, 2011**

Intertek — Code Compliance Research Reports (CCRR)

"According to International Building Code (IBC) Section 1703, an approved agency must be objective, competent, and independent from the contractor responsible for the work being inspected. This provision means qualified companies, like Intertek, can evaluate products." — **Intertek, Code Evaluation Services FAQ**

PFS·TECO — Building Product Evaluation Reports

"PFS TECO, through our Building Product Evaluation Report program, satisfies that need, having been recognized as an ISO 17065 certification agency for a wide variety of products and components... Architects, engineers, builders, designers and specifiers know and trust the PFS TECO marks, as do building inspectors and contractors." — **PFS·TECO, Building Product Evaluation Reports**

RADCO (Twining) — DAPIA and Third-Party Inspection for Manufactured and Modular Housing

"RADCO is a nationally recognized Independent Third-party Testing, Listing and Inspection company for new, special and innovative building systems and materials. RADCO is also a nationally recognized Design Approval & Plan Inspection Agency (DAPIA) for manufactured and modular homes and buildings." — **RADCO / Twining company description**

RADCO has served the manufactured housing industry as a HUD-recognized DAPIA since the HUD Code program's inception in 1976 — directly comparable to ICC-NTA's DAPIA/IPIA role for manufactured housing, and predating ICC's 2019 acquisition of NTA.

Qualtim, Inc.

"If you have an innovative product, design, and/or method of construction, Qualtim is the place to start... Generate test data and engineering analysis to meet regulatory needs, create duly authenticated reports for regulatory approval." — **Qualtim, Inc., company website**

Why This Matters for the Certification Push

At least five accredited, functioning alternatives to ICC's evaluation and certification services already operate in the U.S. market: IAPMO Uniform ES, Intertek, PFS-TECO, RADCO/Twining, and Qualtim. If HUD's "federally sanctioned housing system certification program" is developed and administered exclusively through the NIBS/MOD X initiative — without an explicit, structural role for these existing accredited competitors — federal sanction would favor one already-dominant, interconnected network over its existing competitors, narrowing rather than expanding consumer and manufacturer choice.

5. Existing Concerns That Manufactured Homes (HUD Code) Are Converging With IRC Homes

"Today's version of the HUD code is almost exactly like the IRC in many areas." — Home Nation, "Manufactured vs Modular Building Codes"

"Manufactured housing should not become another niche housing product." — Mark Weiss, President/CEO, MHARR — HousingWire op-ed, July 2026

"[Removing the permanent-chassis requirement risks] self-interested 'offsite construction' players [reinventing] manufactured housing in their own proprietary image." — MHARR White Paper on Pending Chassis Legislation, Oct. 2023

Janet Thome of Tiny House Alliance USA has separately alleged a "closed loop system" regarding ICC/THIA Standard 1215, in which ICC develops standards, ICC-affiliated subsidiaries certify against them, and ICC-affiliated individuals sit on the boards of co-branding partners and NIBS — invoking a "hub-and-spoke" antitrust framing.

NIBS's Stated Mission, and the Ramifications Documented in This Report

NIBS describes itself, in its own published words, as follows:

"We were created by act of Congress in 1974 to be the nation's authoritative source of findings and recommendations that impact and improve the built environment for the American people. At the National Institute of Building Sciences (NIBS), we connect research, policy, and practical application to advance innovation in the built environment. Our mission is to create a safer, more resilient, and technologically advanced infrastructure that serves American communities and strengthens our nation's future." — NIBS, "About"

"From shaping industry standards to guiding digital transformation, we empower building professionals, policymakers, and owners to make informed decisions that enhance sustainability, efficiency, and resilience. We convene experts across sectors to develop solutions that ensure construction, infrastructure, and disaster preparedness keep pace with evolving challenges. Through initiatives such as the Digital Technology Council (DTC) and the Facility Management & Operations Council (FMOC), NIBS is at the forefront of advancing best practices. We help develop and refine standards, including NBIMS, NCS, and ANSI/ASHRAE/NIBS SPC 224, to support industry-wide adoption of data-centric approaches and emerging technologies. We are stewards of the Whole Building Design Guide and the SF Tool, and we keep these comprehensive resources, which guide public buildings and infrastructure, freely available to the public." — NIBS, "About"

"Building American Innovation isn't just our tagline—it's our commitment. We foster collaboration between government, industry, and academia to drive forward-thinking strategies for resilient communities. Because at NIBS, we don't just build structures, we build solutions." — NIBS, "About"

The stated mission is to "create a safer, more resilient, and technologically advanced infrastructure that serves American communities and strengthens our nation's future." The facts documented in this report describe a different practical effect:

- Less consumer choice: A HUD-funded certification pathway is being developed and administered by NIBS in partnership with MOD X, whose leadership already sits inside

NIBS's own Offsite Construction Council, and with sitting or former ICC board leadership named as co-authors and steering-committee members (Sections 2–3). Five accredited companies that already perform this exact evaluation and certification work — IAPMO, Intertek, PFS-TECO, RADCO, and Qualtim — are never named, evaluated, or funded in either HUD report (Section 4).

- A closing market, not an open one: The HUD-directed research item on ICC-ES asks how to make ICC's own proprietary process work better, not whether manufacturers should be able to route around it (Section 3.6). "Federal sanction" of a certification program administered this way would extend taxpayer-funded legitimacy to the same interconnected group already positioned inside it.
- Favoring board members and associated entities: The individuals and organizations named throughout this report — Sims, Hudgison, Colker, Davis, Smith, Rupnik, Barry, ICC, NIBS, and MOD X — recur at every stage of the process that produced these recommendations, from the 2018 ICC/NIBS/MBI standards agreement through the 2026 certification work group (Section 2).
- Enabled, not caused, by statute: None of this required competitive bidding. NIBS's congressionally granted sole-source contracting authority (Section 2.3b) means federal agencies, including HUD, can direct this work to NIBS without ever opening it to the accredited competitors documented in this report.

Whether this arrangement "strengthens our nation's future," as NIBS's mission states, or narrows the market to the benefit of a specific, interconnected group of organizations and individuals, is a judgment left to the reader — but it is a judgment that should be made with the facts in Sections 1 through 4 in view, not with NIBS's mission statement alone.

Janet Thome President
Tiny House Alliance UISA