



Manufactured Home Construction and Safety Standards – Carbon Monoxide Alarm Requirements

In this issue of the Code Outreach Program we are alerting local Authorities Having Jurisdiction (AHJs) of an amendment to HUD's Manufactured Home Construction and Safety Standards (MHCSS), scheduled to be effective as of July 12, 2021 (the "effective date"). This issue is focused on the addition of 24 CFR § 3280.211 to MHCSS, titled Carbon Monoxide Alarm Requirements.

MHCSS governs all equipment and installations in the design, construction, transportation, fire safety, plumbing, heat-production, and electrical systems of manufactured homes which are designed to be used as dwelling units. Local AHJs are required to inspect the assembly and installation of these manufactured homes in accordance with Section R101.7 of the 2020 Residential Code of New York State as required by 19 NYCRR Part 1203 and local law, ordinance, or regulation.¹

Manufactured homes built prior to the effective date are required to comply with the applicable provisions of the Uniform Code for carbon monoxide detectors and alarms. Before the effective date, the MHCSS did not include provisions for carbon monoxide detectors and/or alarms; due to the absence of such provisions, and pursuant to Executive Law §378 (5-a.), New York State provided the carbon monoxide detectors and/or alarms provisions in the Uniform Code. These requirements are provided through Section 705.1 of the 2020 Property Maintenance Code of New York State, which states:

"Carbon monoxide alarms and carbon monoxide detection systems shall be installed and maintained in accordance with Section 915 of the *Fire Code of New York State*."

Currently, Section 915 of the 2020 Fire Code of New York State sets forth the specific requirements relating to carbon monoxide detectors and/or alarms.

The Uniform Code provisions shall be enforced by the local AHJ as required by 19 NYCRR Part 1203 and local law, ordinance, or regulation. The provisions include, but are not limited to, the location, manner of installation, labeling, and testing of carbon monoxide detectors and/or alarms.

In response to complaints about carbon monoxide detectors and/or alarms in manufactured homes that are built before the effective date, the local AHJ shall inspect and cite violations, as necessary.

Manufactured homes built on or after the effective date are required to comply with the provisions of 24 CFR § 3280.211. Provisions for labeling, installation locations, interconnectivity, connection to power source, combination alarms, basement applications, and the testing of carbon monoxide alarms are included.

For manufactured homes built on or after the effective date, local AHJs should not include proper carbon monoxide alarm placement as part of their inspection. However, they may want to check carbon monoxide alarms that are installed to be sure they are operational, as is currently done with smoke detectors.

In response to complaints about potential carbon monoxide alarm violations in manufactured homes built on or after the effective date, the local AHJ shall forward the complaint to the DBSC. Local AHJs do not have the authority to enforce the MHCSS.

¹ Additional information, and links to pertinent laws and regulations can be found in the [Manufactured Housing Program](#) section of the DBSC website.