



“Mobile” Homes No More: Policy Innovations in Manufactured Housing

By David Buchholz

When Hurricanes Katrina and Rita ripped through the Gulf Coast during late summer 2005, they put the issue of affordable housing at the forefront of the nation’s conscience. Unfortunately, the ensuing images of sprawling, “temporary” trailer park communities with low-quality “mobile homes” reinforced a negative, and outmoded, perception of today’s manufactured homes. No longer mobile, today’s manufactured homes—increasingly indistinguishable from site-built

homes—provide permanent residence for millions of Americans. State and local innovations in policy and practice that recognize and treat manufactured housing as homes, not cars, can offer creative ways to meet the country’s affordable housing crisis.

Manufactured housing is the most overlooked sector of the U.S. housing market, although it represents home to approximately 10 million families—about 8 percent of the population. From 1997 to 2002, a full two-

see “Mobile” Homes No More on page 3

Innovations in Manufactured Home Parks: Providing Affordable Homes for Working Families and Retirees

By Elizabeth Hager

Why have our policy-makers focused, albeit quietly, for more than 30 years on innovations in manufactured or “mobile” home parks?

In New Hampshire, the answer is simple. Manufactured homes in parks represent an important source of affordable housing for low-income working families and retirees. While declining as a percentage of the total housing stock, HUD-code manufactured homes still represent about 6 percent of the state’s total housing stock.

In the early years, the issues were very basic: Do residents have a right to buy home heating oil from any dealer or must they use the one approved by the park owner?

Over time, a more complicated issue emerged: How to balance park residents’ needs for land security and asset appreciation with park owners’ investment interests?

The New Hampshire Legislature has worked to come to grips with the competing interests of park owners and residents since the early 1970s, when RSA 205A was first enacted.

In the 1980s, park closures due to change of use motivated the Legislature to increase the notice period for park closure from 60 days to 18 months. Still, arguments ran both ways as to whether this was too much or too little protection.

In 1988, the Legislature passed what many believe is the long-term solution to the tension between landowners and park residents: a 60-day notice and the right to negotiate for the purchase of the park by the resident families themselves. With this



Elizabeth Hager is serving her 12th term in the New Hampshire Legislature.

approach, investor/ landlords receive fair market value for their property at a time of their choosing. And resident homeowners and their supporters, such as the New Hampshire Community Loan Fund, MOTA – New Hampshire, and the New Hampshire Housing Finance Authority, have risen to the challenge

by creating a highly effective statewide infrastructure to support resident ownership.

Looking forward, the manufactured housing sector is likely to become increasingly vital. Median existing home prices in New Hampshire have almost doubled since 1998, reaching \$245,000 statewide in the first four months of 2005. The intense pressure on developable land along with net immigration to the state have fueled a housing market that is leaving too many people unable to reach the American dream of homeownership. The state’s continued investment in preserving and improving existing manufactured home communities has been wise. The New Hampshire Legislature is proud that our state has truly embraced resident-ownership and is beginning to see the fruits of that investment — a stock of housing that is stable and secure for families and retirees.

Housing Facts & Findings

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- 1 ■ “Mobile” Homes No More: Policy Innovations in Manufactured Housing
- 2 ■ Perspectives: By Elizabeth Hager
- 4 ■ Promoting Economic Security for Manufactured Homeowners in Parks: New Hampshire’s Pioneering Cooperative Model
- 5 ■ Realizing the Promise of Manufactured Homes in Georgia: A Community Land Trust Model
- 8 ■ Insight
- 8 ■ Resources

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“Mobile” Homes No More

from page 1



thirds of all new homes affordable to families at or below 80 percent of area median income (AMI) were manufactured, nearly all of it unsubsidized. Manufactured housing also represents one of the few avenues to homeownership for very low-income households (at or below 50 percent AMI). Although manufactured housing is surprisingly abundant in urban and suburban settings, it is especially plentiful in rural areas, where it accounts for 16 percent of owner-occupied homes, and where factory technology can help overcome shortages of skilled labor and the difficulty of transporting construction materials to remote areas.

Still, significant challenges face policymakers and practitioners in this sector. Done poorly—as has often been the case in the past—manufactured housing can represent a nightmare for families and communities: substandard homes, lack of land control and security, expensive and sometimes predatory lending, inadequate consumer protections, and an inability of homeowners to build wealth. But done well, manufactured housing can be virtually indistinguishable from site-built housing in terms of look, feel, and potential for appreciation, and at a significantly lower price. In some markets, square-foot costs can be as little as half those of comparable site-built homes.

The Evolution of Manufactured Homes

Over the years, what has been built in factories has changed completely. The origins of the industry are in the construction of cheap recreational travel-trailers built for a newly mobile country after World War II and meant to be toted behind the family car. These trailers were not homes, but they certainly were mobile. These recreational vehicles still exist a half-century later, but many of the plants evolved over time to create a very different product: true homes that are built in an efficient factory environment instead of on-site and that are moved one time to their permanent location where they are affixed to a foundation and then never moved again.

But the underlying business model, for much of the industry, has not changed. Because travel-trailers grew up as cousins to automobiles, they were sold and financed through dealerships. They still are, frequently generating some of the same kinds of consumer complaints heard about used-car dealers. Financing is arranged by dealers—often as personal loans, not mortgages—discouraging consumers from comparison shopping for the best terms. Consumer protections afforded most home buyers do not apply, and consumer abuses are often lightly monitored, if at all. They are often insured, taxed, and regulated more like cars than like

the permanent homes they are. And in many states, manufactured homes are still titled as vehicles rather than as real estate. As one perplexed homeowner put it, “Why do I have a title from the DMV? My home is not a car!”

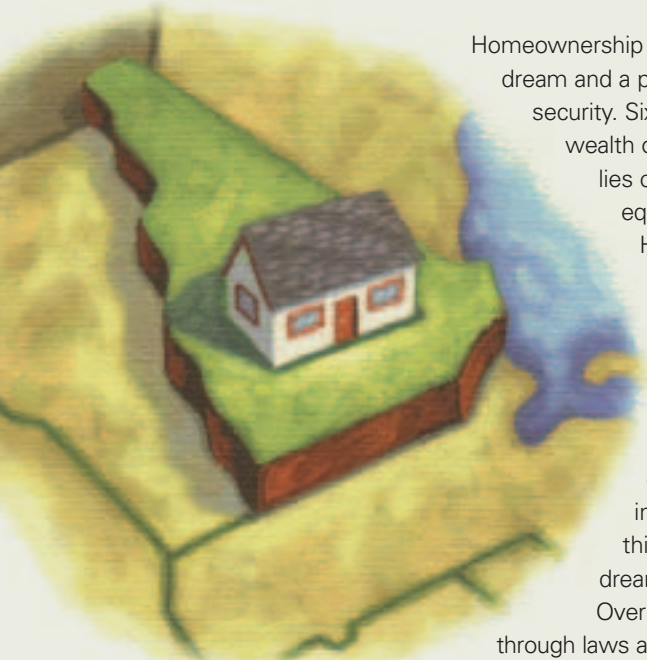
Two other critical differences affect this sector of the housing market. First, about one-third of manufactured homes sit on rented land—in “trailer parks” or “manufactured housing communities.” Families living in these homes have little protection from sudden rent increases, eviction, or park closure. In most states, little notice needs to be given to these residents if the lease is cancelled or a community is to be sold or closed. Because of zoning restrictions, as well as the difficulty and cost of transportation, owners of these purportedly “mobile” homes often have no choice but to abandon them when a lease ends or a park is closed. There are few controls, so rents may be raised excessively, and conditions in these communities may often be unsafe and unhealthy. Furthermore, because they lack long-term security, residents have little incentive to invest in the upkeep of their homes.

Second, although a fairly stringent federal building code (the HUD code) has applied to manufactured homes since 1976, many substandard units, most of which were built before this code, still exist.

continued on page 6

Promoting Economic Security for Manufactured Homeowners in Parks: New Hampshire's Pioneering Cooperative Model

By Paul Bradley



Homeownership is an American dream and a path to financial security. Sixty percent of the wealth of low-income families comes from the equity in their homes. However, for the approximately 3.5 million Americans who live in manufactured homes on land that is owned and controlled by an investor-landlord, this is too often a dream denied.

Over the past 22 years, through laws and public/private partnerships, New Hampshire has pioneered a way to help owners of manufactured homes achieve resident-ownership of their communities, ending these homes' tenuous relationship with the land.

The state's innovative public policy and market-based strategies are based on two related tenets: homeowners need control of the land under their homes, and they need access to conventional residential mortgage loan products.

First, in 1988, the New Hampshire Legislature adopted a "60-day Notice" law that gives residents living in manufactured housing parks notice and an opportunity to negotiate in good faith to acquire the park when the investor puts the property up for sale or accepts an offer to sell it. Under the law, the investor is allowed to sell for fair market value and in a timely manner, while the residents gain the potential benefits of land ownership through their right to purchase.

Second, under New Hampshire law, once installed on site, a manufactured home is defined as real estate rather than as personal property. It is taxed, sold, and recorded as real estate. Home loans are secured by mortgages, eliminating the repossession risk that plagues consumers in states where manufactured homes are treated and financed as personal property. Treating manufactured homes as real estate also is key to attracting conventional residential lenders, who can provide far more favorable financing terms than personal property lenders.

Finally, the state's co-op statute is easy to use and ensures long-term affordability and security. The statute is rooted in a democratic "one member/one vote" principle. Directors and officers are elected by members at prescribed annual meetings, and the assets of the corporation cannot be sold without a membership vote. Were the co-op to decide to sell its park, the proceeds beyond each member's share and home value would be turned over to a 501(c)(3) nonprofit.

For more than 22 years, the nonprofit New Hampshire Community Loan Fund (Loan Fund) has served as principal architect of statewide institutional relationships that form a supportive infrastructure for resident-ownership. In addition to the Loan Fund, this network includes homeowners and the Manufactured Homeowners and Tenants Association (MOTA), a statewide advocacy group; the New Hampshire Housing Finance Authority, a quasi-public lender; USDA-Rural Development; HUD's Community Development Block Grant Program; the New Hampshire Department of Environmental Services; and the Federal Home Loan Bank of Boston along with private banks.

Homeowners who have a secure relationship with the land beneath them and who gain access to residential mortgage loans are on solid ground to build wealth and economic security for their families. New Hampshire's public policy and market-based solutions are helping residents do just that.

The Benefits of New Hampshire's Cooperative Model

- Owners of manufactured homes in resident-owned communities (ROCs) have greater cost stability and, over time, lower monthly land fees. In research recently conducted by the University of New Hampshire, homeowners in ROCs are paying on average \$40 less per month after five years of ownership compared with homeowners in investor-owned communities.
- These homeowners see their assets appreciating because of lower monthly fees and improved financing options, evidenced by a 12 percent price per square foot margin over homes sold in the last year in investor-owned communities.
- These homeowners are safe from park closure and change-of-use evictions.
- These homeowners are maintaining and improving their water, septic, and road systems because revenues are used locally, not exported as profits.

Paul Bradley is vice president of the New Hampshire Community Loan Fund and director of The Meredith Institute, a new program to advance sectoral manufactured housing strategies in the United States.

Realizing the Promise of Manufactured Homes in Georgia: A Community Land Trust Model

By Skipper G. StipeMaas

More than 10 percent of Georgia's families live in manufactured homes, many of them in parks. Families who live in manufactured homes cannot become homeowners without owning and controlling the land beneath their homes. And, without an ownership stake in the land, these families are subject to sudden eviction, high-cost financing, and other hardships. Residents of manufactured housing communities and their allies have discovered this the hard way, by experience. But they also have learned that there is hope in the form of innovative policies and practices that can bring the American dream of homeownership within reach.

Georgia has had a decade-long economic boom and many new homes are available, however, most residents with annual household incomes below \$30,000 cannot afford housing that is priced above \$86,800.

The 950,000 Georgians living in manufactured homes often lack the monetary resources, necessary documents, or credit to qualify for traditional-market housing or other forms of subsidized, affordable housing. And very low incomes, negative public perceptions, racism, lack of tenants' rights, lack of supportive legislation, lack of access to capital, and other barriers make Georgia a difficult place to fight for manufactured housing.

However, because manufactured housing parks house a large segment of Georgia's population, Georgians are showing a growing commitment to making these homes secure and permanently affordable. As illustrated by the following story, solutions include giving manufactured housing park residents the rights of notice and first refusal to purchase the property beneath their homes when an owner decides to sell the park. Further, Georgians are finding that a community land trust model ensures long-term control and affordability, improves financing options, and lets residents share in the appreciation of the value of their homes.

This story begins in June 2001, when 108 low-income families (450 people) were served eviction notices by the new owner of the Garden Springs Mobile Home Park in Athens, Ga. Even though these long-time residents collectively paid \$17,000 a month in lot fees, they were not notified that the 30-year-old manufactured housing park in which they lived was for sale. No mechanism existed to help them leverage their collective economic power to purchase the park, which was sold for \$1.7 million.

Frightened and angered by the potential loss of their supportive neighborhood, residents began to organize. Helped by their non-park neighbors, area churches, the Georgia Legal Services Program, and the law firm of

Sutherland Asbill & Brennan LLP, the residents incorporated as People of Hope, Inc., a nonprofit organization.

People of Hope initially tried to buy the park back, but the new owner, who planned to build a luxury apartment complex, would not sell. Searching for other ways to keep their homes and keep their community intact, the displaced residents began developing Georgia's first permanently affordable, resident-controlled manufactured housing park.

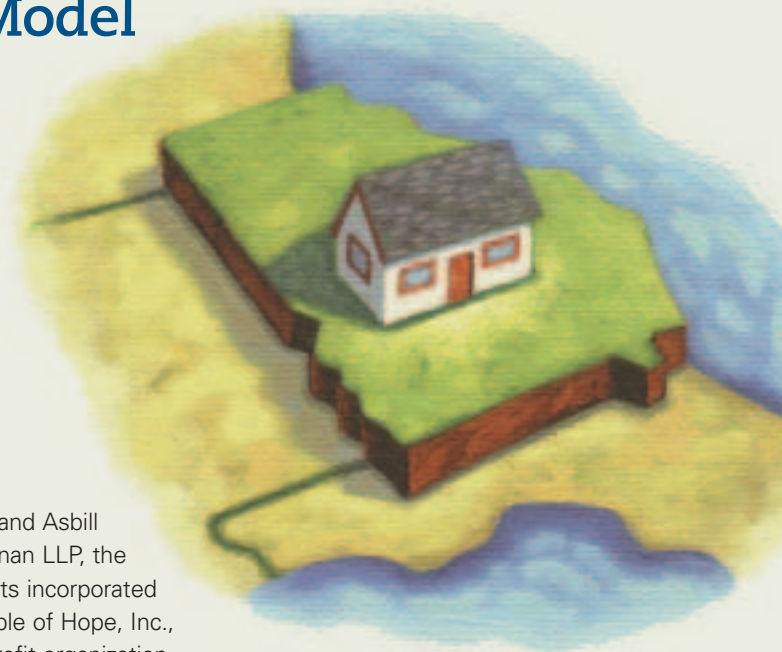
People of Hope purchased 17.2 acres and placed it in trust with the Athens Land Trust, Inc. (ALT), a nonprofit community land trust whose mission includes providing affordable housing. ALT will give People of Hope a 99-year ground lease and will retain a right of first refusal if the land is sold, ensuring that the mobile home park will remain permanently affordable. The housing pads, streets, community center, and amenities will be owned and managed by People of Hope, Inc.

Using lessons learned from the People of Hope Park, many of the same partners who joined to solve the initial crisis in 2001 began to explore ways of changing the system statewide.

These partners have developed the Manufactured Housing Initiative, a program of the Georgia Community Loan Fund, Inc. to influence ownership, control, affordability, and financing through policy and practice.

This initiative has the potential to meet the long-term affordable housing needs of an underserved and under-represented population in Georgia. And, more important, the strategy shows great promise for sustainability precisely because it is driven by the families who need it most.

Skipper G. StipeMaas is a Community Economic Development Attorney with Georgia Legal Services Program, Inc. and serves as President of the Board of the Georgia Community Loan Fund, Inc.



“Mobile” Homes No More

from page 1

What Is Manufactured Housing?

Manufactured housing is the technical term used to describe factory-built housing constructed according to the HUD Code and transported whole — or in sections — to a home site. Many people think of this housing as “mobile” because, to be transported, the homes must have a chassis and a supporting frame with removable axle and wheels. However, once fixed to the home site, only 1 percent of these homes are ever moved again. Depending on the size, these homes are often called single- or double-wide, with many featuring decks, porches, or other structures that can add to their “curb appeal” and ability to blend into a community.

Like manufactured homes, modular homes also are factory-built. The principal distinction is that modular homes are assembled on site and built to various local building codes, rather than a standard, national code. While they may look and feel almost identical, state and local laws often treat manufactured and modular homes very differently.

Policy-makers and the public often confuse manufactured housing with recreational vehicles (RVs), which are frequently referred to as “trailers” or “campers,” intended for travel and leisure. To further confuse things, RVs are sometimes referred to as “mobile homes.” However, the manufactured housing industry evolved decades ago from producing the leisure vehicles of the RV industry, to focus on permanent homes.

How State and Local Policies Can Help

State and local policies can make an enormous difference in addressing the challenges facing owners of manufactured homes today. Some policy fixes, in fact, are relatively straightforward and low-cost. At its simplest, any public policies should treat these as the permanent homes they are, not as the recreational vehicles that are only their distant ancestors. There are four primary policy issues that impact the millions of families in these homes: ownership or control of the land, legal status and financing, zoning, and consumer protections.

Ownership or Control of the Land

Approximately one-third of the owners of manufactured housing live on rented land in “parks” or “communities.” Sudden eviction, large rent increases, and poor maintenance are risks faced every day by these families because they don’t have land tenure or security. Moreover, without control of the land, buyers of manufactured housing, unlike other homeowners, often can’t get conventional mortgages. They have to finance their homes through higher-interest personal property loans with less favorable terms.

State leaders are tackling this challenge with innovative solutions tailored to their own political and cultural environments. For example, in New Hampshire (see related article), aided by a model state law, groups



are working to help tenants in manufactured housing parks purchase the land beneath their homes from outside investors using a cooperative ownership structure. Meanwhile, in other states, such as Georgia (see related article), a community land trust model (CLT) has been adopted to address land control issues.

In both models, state policies play a key role. The policies include providing effective notice to park residents when a park owner or investor seeks to sell or change the use of the park, and giving residents the opportunity to match any bona fide offer before a community is sold to another investor. States also can provide technical and financial assistance to help residents acquire the land. For park residents who are unable to purchase the park upon a change of use or sale, some states, such as California, Delaware, and Florida, assist with an often difficult relocation process. For the existing families who remain park tenants, states such as Florida, Minnesota, Nevada, and Rhode Island have statutes that address increases in rent or lot fees. Other helpful state policies for existing park tenants include protections against non-renewal of a lease except for cause as well as diligent monitoring and enforcement of health and safety requirements, such as water and septic issues.

Legal Status and Financing

Two-thirds of the owners of manufactured homes do own the land beneath their homes, but outmoded state laws may still treat their dwellings as personal property, like

continued on page 7

cars. In these states, millions of families are deprived of conventional mortgage financing and forced to take out personal consumer loans. These loans tend to be much more expensive and are often loaded with features that are widely considered to be “predatory” in the mainstream mortgage market. In addition, personal property loans often lack consumer protections equivalent to those of the Real Estate Settlement Procedures Act (RESPA), which requires disclosure of settlement costs and prohibits kickbacks or referral fees for mortgage brokers.

There are simple, straightforward solutions to this problem. States can title manufactured homes as real estate, not personal property, and they can define any loan backed by a manufactured home as a mortgage. In Texas, for example, manufactured homes are titled as real estate once they are transported from the factory to the land, affixed to a foundation, and attached to utilities. Other states have adopted similar titling remedies.

Zoning

Many communities have zoned out all manufactured homes—throwing out the good (newer, good-quality, affordable homes) with the bad (older and substandard homes). Local governments should seek to exclude all substandard and dangerous homes—but exclusions should be based on the shortcomings of the homes rather than on their method of construction. Some states, such as California, have passed laws that prevent municipalities from banning homes solely because they were built mainly in factories instead of on site.

Because community resistance is often due to NIMBY (not in my backyard) fears based on old stereotypes, policy leaders can look for opportunities to help educate the public about the new realities and potential of manufactured homes, which can be virtually indistinguishable in design and appearance from stick-built homes.

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Innovations in Manufactured Housing

CFED, a national nonprofit organization that expands economic opportunity, is working on the issues of manufactured housing. With initial funding from the Ford Foundation, and in partnership with a number of other national and regional organizations, CFED recently launched Innovations in Manufactured Homes (I’M HOME). This multiyear, multimillion dollar initiative seeks to demonstrate responsible and innovative uses of manufactured housing as an affordable housing and asset-building strategy. Through I’M HOME, CFED is investing in organizations around the country that are addressing the gaps and problems in the existing marketplace and exploring ways that good-quality manufactured housing can be used to increase the supply of affordable housing in a cost-effective way.

I’M HOME partners have a range of approaches to policy changes. For example:

- The Delaware Housing Coalition is partnering with state agencies to address aging or failing infrastructure in manufactured housing parks and to keep people in those communities from being displaced.
- The Georgia Community Loan Fund is looking into the legislative, regulatory, and cultural issues that affect the way Georgia treats manufactured housing.
- In Minnesota, the Housing Preservation Partnership and Northcountry Cooperative Development Fund are advocating policies that will improve land security for residents of manufactured housing communities.
- The Montana Homeownership Network plans to partner with state and local officials to change zoning procedures and simplify the real estate titling process.
- The Community Reinvestment Coalition of North Carolina is leading a campaign in that state to remove 40,000 abandoned manufactured homes over the next 10 years.

Consumer Protections

Families in manufactured homes should enjoy the same consumer protections as residents of stick-built homes. But more often than not, homeowners are confounded by unclear and inadequate oversight. For example, is a defect in the unit the responsibility of the manufacturer, the retailer, or the installer, and to whom can the owner turn when there are problems?

Most states have some form of special regulation and consumer recourse for residents of manufactured homes. These protections, however, are often enforced sporadically, if at all. Required inspections do not always occur, and the entities that are supposed to redress consumer complaints may be represented disproportionately by friends of the industry rather than by consumer advocates. More visible protections, well-staffed and well-funded regulators, and consumer as well as industry representation on consumer protection boards could reduce the opportunities for abuse.

The Promise of Manufactured Housing

Despite its challenges, manufactured housing can be a significant part of the solution to the affordable housing crisis. The combination of dwindling government housing subsidies, relatively sluggish rates of income growth, and robust appreciation of home prices increasingly tests the creativity of affordable housing advocates. Despite manufactured housing’s traditional base in rural areas, opportunities may be most significant in urban areas, where both construction costs and land prices have escalated most quickly. With important changes to the marketplace and policy environment, manufactured housing done poorly can, over time, become a thing of the past. With the same changes, manufactured housing done well holds the promise of providing more high-quality affordable homes across the United States.

David Buchholz is the director of Applied Research and Innovation at CFED.

Web Sites

The Delaware General Assembly adopted new laws regarding the lease of lots in manufactured housing communities on August 25, 2003. The Act (Title 25, Chapter 70) applies to all rental agreements for manufactured home lots (www.delcode.state.de.us/title25/c070/sc01/).

The Georgia Community Loan Fund provides loans, grants, and technical assistance to community groups who do not have access to traditional sources of capital for accessing affordable housing (<http://gacjf.org/>).

The Institute for Community Economics providestechnical, financial, and other support to a national network of community land trusts and other organizations for permanently affordable housing and economic development (www.iceclt.org).

The New Hampshire Community Loan Fund works to improve the economic security and enhance the value of owning a manufactured home in "manufactured housing communities" by helping homeowners purchase their communities from investor-owners (www.theloanfund.org).

CFED established the Innovations in Manufactured Homes (I'M HOME) initiative as a multi-year, multi-million dollar initiative that supports demonstration

projects exploring manufactured homes as an affordable housing issue (www.cfed.org/focus.m?parentid=314&siteid=317&id=317).

The Vermont Advisory Commission on Manufactured and Mobile Homes, created by Governor Jim Douglas in July 2004, investigates issues affecting mobile home living in Vermont and recommends programs, rules, and legislation to address them (www.dhca.state.vt.us/Housing/advisory_commission_docs.htm).

Articles and Reports

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Insight

"I see manufactured housing as a critical piece of the affordable housing equation. Policy-makers need to know that today these homes can be affordable, high-quality assets to their communities."

**Delaware State Senator
George Bunting**

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