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Introduction to Closed-Wall Panels, Modular Pods, and Tiny Homes in Maine

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Off-Site Construction Standards

Maine regulates off-site construction differently from site-built construction. 1-2 unit modular and manufactured (HUD-code) homes are regulated under the Manufactured Housing Program (MHP). They are inspected in the factory by third-party inspection agencies (TPIA), which are nationally-recognized firms that specialize in factory quality assurance. Because these homes meet state standards and are inspected in the factory, they are not subject to the Maine Uniform Building and Energy Code (MUBEC) and do not require inspection during construction by local building officials.

Current Regulatory System for Pods and Panels

Modular pods and panels do ***not*** currently fall under Maine's Manufactured Housing Program. Unlike 1-2 unit modular homes and townhouses, these components are subject to the MUBEC. Maine has adopted ICC/MBI 1200 as part of the MUBEC, which establishes requirements for the planning, design, manufacturing, transportation, and on-site assembly of off-site construction, including closed-wall panel systems and modular pods.

Closed Wall Panels

Closed Wall Panels are prefabricated wall sections manufactured off-site in a controlled factory environment. Wall sections are inspected in the factory and fully enclosed before being transported to the site.



Closed-wall panels are contrasted with open-wall panels and other components such as roof trusses, which are delivered to the site unfinished, so they can still be inspected for criteria such as fastener type, fastener size, fastener spacing, blocking, lumber grade, load distribution, stud sizing, and adequate notching and boring.

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Modular Kitchen and Bathroom Pods



Modular Kitchen and Bathroom Pods are fully prefabricated, self-contained units manufactured off-site in a factory-controlled environment. The pod arrives at the building site complete with all internal finishes, fixtures, and integrated building services (plumbing, electrical, and HVAC), ready to be craned into place and connected to the main structure. Pods can be incorporated into either modular or site-built buildings and are most commonly used in large scale developments.

Tiny Homes

"Tiny homes" refer to a variety of small home types, typically 400 square feet or smaller. Tiny homes can be built on a permanent chassis or on a foundation, and on-site or off-site.

Tiny Homes on Permanent Foundations generally must be built to the MUBEC. The MUBEC includes Appendix AQ to the International Residential Code, which contains provisions specific to tiny home construction, like such as egress windows, ceiling heights, and lofts. Like any other home built on site, tiny homes are inspected by local building officials based on the requirements of the municipality.

Factory-built tiny homes can also be constructed as **state-certified modular homes**. This means that manufacturers must obtain a Maine modular manufacturer's license, and homes need to meet MHP standards.

Tiny Homes on Wheels/permanent chassis are required to meet either ANSI A 119.5 or NFPA 1195 (standards for recreational vehicles), and by statute must be allowed wherever single-family homes can be placed. The law does not provide for inspection and/or certification to ensure the homes meet these standards, and some local officials have denied Certificates of Occupancy because they were not able to verify that the homes complied with the standards.

Regulatory Framework for Modular Components

When a home or component is "closed in" in the factory, it is not able to be inspected on the site. ICC/MBI standards, used Virginia, Colorado, Utah, Montana, and Rhode Island, regulate these types of construction similar to modular homes. They are inspected in the factory by qualified TPIAs, and then are installed on site. The local CEO needs only to inspect the site-built connections. They can also request to see copies of the warranty seal/certification materials from the factory.

Discussion questions:

Round 1: Closed Wall Panels

- How and where are closed-wall panel systems and/or other panelized systems being manufactured and used in Maine today?
- What distinguishes closed-wall panel systems from open-wall panel systems and other types of building components (such as roof trusses)?
- How are structural insulated panels (SIPs) currently treated, and how should they be included in Maine's new regulatory framework?
- What specific training and knowledge are required to sell, install, and/or service closed-wall panel systems?
    - Should Maine require licenses or state certification/approval for these types of work?
    - Are there manufacturer or 3rd party certifications that Maine could rely on rather than licensure?
- To what extent are closed-wall panel systems mixed with site-built construction, and does this differ between residential and commercial systems?

Round 2: Bathroom & Kitchen Pods

- How should Maine define modular pods for the purposes of off-site construction regulation?
- How are bathroom and kitchen pods currently being used in Maine and in other states?
- What specific training and knowledge are required to sell, install, and/or service modular pods?
    - Should Maine require licenses or state certification/approval for these types of work?

    - Are there manufacturer or 3rd party certifications that Maine could rely on rather than licensure?
- To what extent are modular pods mixed with site-built components, and does this differ between residential and commercial systems?

Round 3: Tiny Homes and ADUs

- How are closed-wall panel systems, modular pods/panels, and tiny homes currently treated under Maine's code framework, and how should they be included in the new regulatory system for off-site construction?