

Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Sub agency Originating Request: U.S. Department of Housing and Urban Development Office of Manufactured Housing and Standards	2. OMB Control Number: a. 2502-0562 b. <input type="checkbox"/> None
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3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input checked="" type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.	4. Type of review requested: (check one) a. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)
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7. Title:	Manufactured Housing Dispute Resolution – State Certification Form; Information for Federal Manufactured Housing Dispute Resolution
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8. Agency form number(s): (if applicable)	HUD-310-DRSC and HUD-311-DR
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9. Keywords:	Housing; Manufactured Housing; Dispute Resolution: States
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10. Abstract:
 HUD collects this information to establish a manufactured housing dispute resolution program for states that choose not to operate their own dispute resolution programs. Form HUD-310-DRSC allows a state to certify that its state dispute resolution program meets the program requirements. Form HUD-311-DR allows persons who have initiated their participation in the federal dispute resolution program to submit the necessary information regarding their request to the federal program for further action
 There are two groups of respondents. The first group is the 50 states; the second group consists of individual purchasers, manufacturers, retailers, and installers of manufactured housing. HUD has engaged dispute resolution professionals from various federal agencies to review the submissions and then possibly contact the submitting party or agency, and to act as neutrals, mediators, and arbitrators.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. P Individuals or households e. Farms b. X Business or other for-profit f. Federal Government c. Not-for-profit institutions g. X State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. P Voluntary b. X Required to obtain or retain benefits c. Mandatory
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13. Annual reporting and recordkeeping hour burden: a. Number of respondents: 228 b. Total annual responses: 228 Percentage of these responses collected electronically? 0% c. Total annual hours requested: 511 d. Current OMB inventory: 9,033 e. Difference (+, -): -8,522 f. Explanation of difference: 1. Program change: 2. Adjustment: -8,522	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13. a. Total annualized capital/startup costs b. Total annual costs (O&M) c. Total annualized cost requested d. Current OMB inventory e. Difference f. Explanation of difference: 1. Program change: 2. Adjustment:
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15. Purpose of information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits e. Program planning or management b. X Program evaluation f. Research c. General purpose statistics g. X Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input checked="" type="checkbox"/> On occasion 2. <input type="checkbox"/> Weekly 3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly 5. <input type="checkbox"/> Semi-annually 6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially 8. <input checked="" type="checkbox"/> Other (describe) Tri-annually
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17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Elizabeth Cocke Phone: 202-708-6409
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19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3). Appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of the information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official: X Mike Winiarski, Director, Organizational Policy, Planning and Analysis Division, HROA	Date:
Signature of Senior Officer or Designee: X Lillian Deitzer, Departmental Reports Management Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions
Manufactured Housing Dispute Resolution – State Certification Form; Information for Federal
Manufactured Housing Dispute Resolution
OMB Control Number 2502-0562
Forms HUD-310-DRSC and HUD-311-DR

A. Justification:

1. 42 U.S.C. 5401-5426, amended on December 27, 2000, by the Manufactured Housing Improvement Act of 2000, Public Law 106-569, required HUD to establish a manufactured housing dispute resolution program for states that choose not to operate their own dispute resolution programs. In order for a state to operate its own dispute resolution program, it will need to certify that its program meets the requirements of 42 U.S.C. 5401-5426, and must recertify every three years. For persons to provide the federal manufactured housing dispute resolution program information to resolve the dispute, they will need to submit information on the home and parties involved in the dispute.
2. There are two groups of respondents. The first group is the 50 states; the second group consists of individual purchasers, manufacturers, retailers, and installers of manufactured housing. HUD has engaged dispute resolution professionals from various federal agencies to review the submissions and then possibly contact the submitting party or agency, and to act as neutrals, mediators, and arbitrators.

The states will file form HUD-310-DRSC. The federal government uses the information on state certifications to determine whether the state programs comply with the minimum requirements set out in the regulations. The information is then filed until the agency receives the next certification form in three years.

Individual purchasers, manufacturers, retailers, and installers of manufactured housing use form HUD-311-DR. The federal government uses the required information for federal manufactured housing dispute resolution. The information is then filed for three years after the dispute has been resolved.

3. The forms are provided on the HUD website, HUDCLIPS, and via e-mail, and can be printed and sent electronically, or filled, and then printed and sent hardcopy. States requesting certification of their dispute resolution programs must submit the State Certification forms with original signatures. Original signatures are required because of the harm to the program or to individuals that may result if the information is inaccurate. Violations of the statute are also a possibility, for which HUD would be liable. Individuals submitting the Dispute Resolution Information form may submit in hard copy or as an email attachment, at their option.
4. The federal government has not previously collected any of this information prior to the implementation of the dispute resolution program and no other HUD program collects this information.
5. Methods to minimize the burden on small business include availability of the forms electronically on the program office website, HUD website, HUDCLIPS, and information on the web address in manufactured housing consumer materials.
6. If the collection is not conducted for the state certification process, the states will be required to collect and send to the federal government copies of over five documents, or accommodate an on-site audit by the federal program. Both alternate actions would require a greater amount of labor, time, and cost. For the request for dispute resolution, the information is required, or the federal program will not be able to contact the parties to initiate the dispute resolution, thereby preventing the federal program from carrying out its statutory requirement.
7. There are no special circumstances involved in this collection.

8. In accordance with 5 CFR 1320.8(d), the agency's notice soliciting public comments was announced in the *Federal Register* on October 21, 2008 (Vol. 73, No. 204, pages 62518). No comments were received.

Comments were solicited from state and industry representatives who normally submit or review the forms. Respondents indicated satisfactorily to the amount of data, frequency of collection, and all aspects of the data elements.

The initial estimation of respondents was provided with no previous program history. The current number of possible respondents reflects a more accurate number. The number of responses reported are significantly less than the anticipated number of respondents who actually use the dispute resolution program.

9. There are no payments or gifts to respondents.
10. No assurance of confidentiality is provided.
11. There are no questions of a sensitive nature.
12. Estimate of public burden:

	Number of Respondents	Frequency of response	Number of Annual Responses	Hours per Response	Total Annual Burden Hours	Cost per Hour	Total Annual Cost
State Certification Form	*29	1	29	1	29	\$40	\$1,160
Homeowner							
Initial filing	100	1	100	1	100	\$22	\$2,200
Mediation	50	1	50	2.5	125	\$22	2,750
Arbitration	5	1	5	1	5	\$22	110
Subtotal - Homeowners	100		100		230		\$5,060
Installer							
Initial filing	33	1	33	1	33	\$38	\$1,254
Mediation	16	1	16	3	48	\$38	1,824
Arbitration	2	1	2	1.5	3	\$38	114
Subtotal - Installers	33		33		84		\$3,192
Retailer							
Initial filing	33	1	33	1	33	\$54	\$1,782
Mediation	16	1	16	3	48	\$54	2,592
Arbitration	2	1	2	1.5	3	\$54	162
Subtotal - Retailers	33		33		84		\$4,536
Manufacturer							
Initial filing	33	1	33	1	33	\$54	\$1,782
Mediation	16	1	16	3	48	\$54	2,592
Arbitration	2	1	2	1.5	3	\$54	162
Subtotal - Manufacturers	33		33		84		\$4,536
Grand Totals	228		228		511		\$17,324

Cost per hour is based on \$46,000 as an average annual salary for purchasers, \$83,000 as an average annual salary for State employees, \$78,000 as an average salary for installers, and \$113,000 as an average salary for retailers and manufacturers.

*Each of the 50 states files once every three years.

13. There are no additional costs to respondents.

14. Cost to the Federal Government:

	Number of Annual Responses	Hours per Response	Total Annual Hours	Cost per Hour	Total Annual Cost
State Certification Form	29	1	29	\$40	\$1,160
Initial filing	200	1.5	300	\$40	12,000
Mediation	100	3	300	\$40	12,000
Arbitration	10	2	20	\$40	800
Determination Letter	10	1	10	\$40	400
Totals	349		659		\$26,360

Cost per hour is based on a GS-13/1 annual salary of \$82,961.

15. This is an extension of a currently approved collection, as required by 42 U.S.C. 5401-5426 amended on December 27, 2000, by the Manufactured Housing Improvement Act of 2000, Public Law 106-569. This law required that HUD establish a manufactured housing dispute resolution program for states that choose not to operate their own dispute resolution programs. There is a decrease in the number of respondents, responses, and burden hours due to low usage of the program.

16. HUD has no plans to publish this information.

17. HUD is not seeking not to display the OMB approval number.

18. There are no exceptions to the certification statement in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB form 83-I.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.