
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 Monday, November 17, 2014 (Vol. 79, No. 221, pages 68460). No Comments.

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	114		114		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.
