

Supporting Statement for Paperwork Reduction Act Submissions

Title: Manufactured Housing Installation Program Reporting Requirements

OMB Control Number: 2502-0578

Forms: HUD-305, HUD-306, HUD-307, HUD-308, HUD-309, HUD-312

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The National Manufactured Housing Construction and Safety Standards Act (the Act) [42 U.S.C. 5401 et. seq., Public Law 93-383], as amended by the Manufactured Housing Improvement Act of 2000, authorizes HUD to establish and enforce construction and safety standards for manufactured homes and model manufactured home installation standards.

In 2008, the Department published a Final Rule to establish the Model Manufactured Home Installation Standards (Model Installation Standards), which required home manufacturers to evaluate their current installation instructions and make necessary revisions to ensure that minimum installation elements are addressed therein. In addition, the Department has published a Final Rule to establish the required Manufactured Housing Installation Program (Installation Program) for the enforcement of the Model Installation Standards in each State that does not have an installation program established by State law [42 U.S.C. 5404]. This supporting statement describes the reporting requirements for the Installation Program.

The Manufactured Home Construction and Safety Standards Act Reporting Requirements under OMB control number 2502-0253 describe the reporting requirements for the Construction Standards, the Regulations, and the Model Installation Standards.

Following is a compilation of the reports, records, labels, notices, and instructions that are required by the Installation Program. The authority in the Act and the CFR are indicated.

Title	Authority by Section (42 U.S.C. 5401)	Authority by Section (24 CFR)
State Plans	605(c)	3286.805, 3286.807
Manufacturer Records	605(c)	3286.102
Retailer Records	605(c)	3286.113, 3286.605, 3286.607
Installer Records	605(c)	3286.411, 3286.413, 3286.507(b)
Installation License	605(c)	3286.207, 3286.209, 3286.211
Trainer Records	605(c)	3286.303
Trainer Registration	605(c)	3286.307, 3286.311, 3286.313
Installation Instructions	605(a)	3286.5
Labels & Notices	605(c)	
Recommendations for Reinstallation		3286.7(a)
Retailer Disclosure to Purchaser		3286.7(b), 3286.503(b), 3286.603(a)
Installation Instructions to Purchaser		3286.103(a)
Installation Instructions to Installer		3286.103(b)
Notify of Inappropriate Site		3286.405(b)
Notify Failure to Comply with MHCSS		3286.405(c)
Retailer Notice to Subsequent Installers		3286.405(d)
Installer Provide Certification		3286.111, 3286.411(b)
Installer Provide Instructions to Inspector		3286.503(c)

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The respondents are the 33 States that have installation programs; 138 Manufacturing Facilities comprised of 32 separate Corporations; 586 Retailers in HUD-administered Installation Program States; 2,582 Retailers in non-HUD-administered Installation Program States; 725 Installers in HUD-administered Installation Program States; and 5 Trainers in HUD-administered Installation Program States.

HUD uses the information collected for the enforcement of the Model Installation Standards in each State that does not have an installation program established by State law to ensure that the minimum criteria of an installation program are met.

State Plans – Section 623 of the Act permits any State to assume responsibility for the Federal program within the State after approval of a State plan of enforcement by the Secretary. The State plan must meet the following requirements to provide satisfactory assurance to the Department that the State's plan will adequately enforce the provisions of the Act, the Construction and Safety Standards, and the Regulations. The Manufactured Home Construction and Safety Standards Act Reporting Requirements describe the reporting requirements for State Plans that the Construction Standards, Model Installation Standards, and the Regulations require under OMB control number 2502-0578.

Section 605(c) of the Act provides that each State may implement and administer its own installation program in such a way that it would not be covered by the HUD-administered Installation Program. To be accepted as a fully qualifying installation program, a State installation program must include the following elements:

- a. Installation standards that, in the determination of the Secretary, provide protection to the residents of manufactured homes that equals or exceeds the protection provided by the Model Installation Standards established by the Secretary;
- b. The training and licensing of manufactured home installers; and
- c. Inspection of the installation of manufactured homes.

A state seeking identification as a qualified installation program must submit the completed State Installation Program Certification Form (Form HUD-312).

Manufacturer Records – OMB has issued HUD the control number 2502-0578 for the information collection requirements under the current Manufactured Housing Construction and Safety Standards Program, which currently requires the manufacturer to provide the Department information regarding the construction and shipment of each manufactured home in 24 CFR part 3282.552.

The Installation Program requires the manufacturer to provide the Department and the retailer with initial tracking information about each manufactured home as described in 24 CFR 3286.9(a) and 24 CFR 3286.102(a), respectively. The information required in

24 CFR part 3282.552 under control number 2502-0578 will satisfy the requirements in 24 CFR 3286.9(a). Therefore, 3286.9(a) will not require additional information and is not included in this submission. The reporting requirement for 3286.102(a) requires the manufacturer must provide notice to the retailer or distributor that this tracking information for the home is being provided to HUD and is accounted for in this submission.

Retailer Records – The Installation Program requires that the retailer track the installations of manufactured homes in States which the Department administers the Installation Program per 24 CFR 3286.113 (see Form HUD-305 and Form HUD-306).

Installer Records – The Installation Program requires that the manufactured home installer certify that the home has been installed properly and have the installation inspected by a qualified inspector per 24 CFR 3286.111 (see Form HUD-309). The manufactured home installer is required to maintain these records along with the foundation designs used to install the home per 24 CFR 3286.413.

Installation License – Section 605 of the Act requires licensing of manufactured home installers as a requirement for the installation program. The process and requirements for obtaining a license is described in 24 CFR 3286.207. Form HUD-307 is the HUD Manufactured Home Installer License Application.

Trainer Records – Qualified trainers are required to maintain attendance records, provide attendees certificates of completion of training, and maintain all records for 3 years. The records of trainers must be made available to HUD upon request per 24 CFR 3286.303.

Trainer Registration – The process and requirements for obtaining trainer's qualification is described in 24 CFR 3286.307. The applicant must demonstrate the appropriate experience, list other states in which they possess similar training, registration, and certify that training curriculum is in accordance with the requirements established. Form HUD-308 is the HUD Manufactured Home Installation Trainer Registration Application.

Installation Instructions – OMB has issued HUD the control number 2502-0578 for the information collection requirements under the current Manufactured Housing Construction and Safety Standards Program, which currently requires manufacturer to provide each manufactured home with installation instructions in 24 CFR part 3280.306 and 24 CFR part 3285.2. Therefore, 24 CFR 3286.9(b) is not included in this submission.

Instructions for temporary storage are required in 24 CFR 3286.5(c)(2) and 3285.2(e) and is included with this submission.

Labels and Notices – The Installation Program requires specific notices and disclosure to be provided to specific parties during the manufactured home installation process in 24 CFR 3286. The purpose for the reporting system is to assure that the Department can determine whether a particular home was being installed in a State that is administering its own qualifying installation program or is being installed in a State where the Department would be administering the installation requirements. Since the entities involved in the construction, sale or lease, and installation of the home are separate entities, it is necessary for the Department to know the entities performing and responsible for each task in the process. This information is used to locate and use the home in the manner intended. By section, the labels and notices are listed below:

3286.7(a) Recommendations for Reinstallation – Manufacturers must provide a recommendation in each consumer manual that any home that has been reinstalled after its original installation should be inspected after it is set up in order to assure that it has not been damaged and is properly installed.

3286.7(b) Retailer Disclosure to Purchaser – Retailers must disclose to the purchaser that the manufactured home must be installed in accordance with applicable Federal and State law, including the requirements for a third-party inspection. (See also 3286.503(b) and 3286.603(a)).

3286.103(a) Installation Instructions to Purchaser or Lessee – The retailer or must provide the purchaser or lessee with a copy of the manufacturer's DAPIA-approved installation instructions for the home; or an installation design and instructions that have been reviewed and certified by licensed engineer or registered architect as providing a level of protection that equals or exceeds the protection provided by the Federal Installation Standards located in 3285.

3286.103(b) Installation Instruction to Installer – When the retailer or manufacturer agrees to provide any set-up in connection with the sale of the home, the retailer must provide a copy of the same DAPIA-approved installation instructions or, as applicable, installation design and instructions to each company or, in the case of a sole proprietor, individual who performs set-up or installation work on the home.

3286.405(b) Inappropriate Site – If the installer determines that the home cannot be installed properly at the site, the installer must notify the purchaser or other person with whom the installer contracted for the installation work and notify the retailer that contracted with the purchaser for the sale of the home identifying the reasons why the site is unsuitable.

3286.405(c) Failure to Comply with Manufactured Home Construction and Safety Standards – If the installer notices and recognizes failures to comply with the construction and safety standards in part 3280 of this chapter prior to beginning any installation work, during the course of the installation, or after the installation work is complete, the installer must notify the manufacturer and retailer of each failure to comply.

3286.405(d) Retailer Notification to Subsequent Installers – The retailer must provide a copy of the notification received in paragraphs (b) and (c) of this section to any subsequent installer.

3286.411(b) Installer Provide Certification – The installer must provide a signed copy of its certification to the retailer and must provide a copy of the certification to the purchaser or other person with whom the installer contracted for the installation work.

3286.503(c) – Installation instructions must be made available to the inspector at the installation site by the installer.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information

technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The forms are provided on the HUD website at [Manufactured Home Installation Forms | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](http://ManufacturedHomeInstallationForms.HUD.gov) and can be printed and sent electronically to the program office mailbox at www.mhs.gov, or filled, and then printed and sent hardcopy to US Department of Housing and Urban Development, Office of Manufactured Housing Programs, 451 7th Street SW, Room 9172, Washington DC 20410. States requesting certification of their installation programs must submit the State Certification forms with original or electronic signatures to the same address. 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. Installers submitting an Installer Application form may submit in hard copy or as an email attachment, at their option. Individuals may also submit the form online electronically at: www.manufacturedhousinginstallation.com. This is a secure website maintained by HUD's contractor for the installation program.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The federal government has not previously collected any of this information prior to the implementation of the installation program and no other HUD program collects this information. There is no duplication of collected information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Methods to minimize the burden on small business include availability of the forms electronically on the program office website, HUD website, and information on the web address in manufactured housing consumer materials. HUD's installation contractor also maintains a website which allows respondents to complete and submit required form on the website.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information is not collected, the program office will be unable to locate manufactured homes in HUD administered states. HUD would not be able to ensure that trained installers are installing the homes properly and ensuring the homes are inspected after installation.

7. Explain any special circumstances that would cause an information

collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)

- * Requiring respondents to report information to the agency more often than quarterly
 - Respondents are not required to report information to the agency more often than quarterly
- * Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - Respondents are not required to prepare a written response to a collection of information in fewer than 30 days after receipt of it.
- * Requiring respondents to submit more than an original and two copies of any document;
 - Respondents are not required to submit more than an original and two copies of any document.
- * Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - Respondents are not required to retain records for more than three years
- * In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - The information collection is not a statistical survey
- * Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - The information collection does not involve the use of any statistical data classification
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;

The information collection is not conducted in a manner that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use
- * Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

-The information collection does not require respondents to submit proprietary trade secrets, or other confidential information.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), a 60-day Federal Register Notice soliciting public comments was announced in the Federal Register on April 19, 2022, Volume 87, Page 23227. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on July 25, 2022, Volume 87, Page 44146. No comments were received.

A copy of both published notices is included in this package.

Consultation with 3 representatives are listed below. In each case, the original submitter of the comment is no longer with the organization:

1. Division of Building and Fire Regulation
VA Department of Housing and Community Development
Main Street Centre
600 East Main Street, Suite 300
Richmond, VA 23219
PH: (804) 371-7161
2. Factory Housing and Building Standards
PA Department of Community and Economic Development
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225
PH: (717) 720-7416
3. Ohio Manufactured Home Association
244 Bradenton Ave, Dublin, OH 43017
(614) 799-2340

Each respondent stated the same concern as follows:

Local code officials will not accept the additional responsibility to verify/inspect installations of manufactured homes as required by signing the HUD Form 309

HUD Response:

The local building code authority is not required to perform the inspection. There is a total of 5 eligible inspection entities that may sign the HUD Form 309.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

-There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

-No assurances of confidentiality are provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

- There are no questions of sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead,

this cost should be included in Item 13.

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Hours Per Response	Annual Burden Hours	Hourly Cost	Annual Cost	Method of Providing Information
States with Installation Programs (HUD Form 312)								
§3286.805(a) – Initial State Installation Program Certification Form HUD-312	24.00	0.00	0.00	2.00	00.00	\$60.00	\$0.00	Fax Mail Electronic
§3286.807(a) – State Installation Program Recertification Form 312	10.00	1.00	10.00	2.00	20	\$60.00	\$1200	Fax Mail Electronic
§3286.809(a) – State Voluntary withdraw from administering its own program	2.00	2.00	4	2.00	8	\$60.00	\$480	Fax Mail Electronic
Subtotal	36		14		28		\$1,680.00	
Manufacturing Corporations/Facilities								
§3286.5(c)(2) - Manufacturer's temporary installation instructions	138	33	4554	.50	2,277	\$28.00	\$63,756	Hard Copy Fax Mail Electronic
§3286.7(a) - Manufacturer's notice in the consumer manual	138	675.00	93,150	0.50	46,575	\$28.00	\$1,304,100	Hard Copy
§3286.102(a) - Manufacturer providing notice to retailer at time of shipment	138	138.00	18,906	0.50	9,453	\$28.00	\$264,684	Fax Mail Electronic
§3286.102(b) - Manufacturer's notice in the installation instructions	138	138.00	18,906	0.50	9,453	\$28.00	\$264,684	Hard Copy
§3286.103(a)(2) – Manufacturer and DAPIA approval of installation designs and instructions that differ from standard instructions	138	27.00	3,726	2.50	9,315	\$66.00	\$614,790	Fax Mail Electronic
Subtotal	138		139,242		77,073		\$2,512,014	
Retailers in HUD-administered Installation Program States (HUD Forms 305 and 306)								
§3286.103(a) – Retailer providing installation instructions to the purchaser	586.00	20	11,720	0.50	5,860	\$57.00	\$334,020.00	Hard Copy
§3286.103(b) – Retailer providing installation instructions to the installer	586.00	20	11,720	0.50	5,860	\$57.00	\$334,020.00	Hard Copy Electronic
§3286.113(a) – Retailer providing additional tracking information to HUD – Form HUD-305(§3286.605)	586.00	20	11,720	0.50	5,860	\$57.00	\$334,020.00	Fax Mail Electronic
§3286.113(b) – Retailer providing installation information to HUD – Form HUD-306 (§3286.605)	586.00	20	11,720	0.50	5860	\$57.00	\$334,020.00	Fax Mail Electronic

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Hours Per Response	Annual Burden Hours	Hourly Cost	Annual Cost	Method of Providing Information
§3286.113(d) – Retailer correcting information (§3286.605)	586.00	2	1,172	0.50	586	\$57.00	\$33,402.00	Fax Mail Electronic
§3286.113(e) – Retailer record retention requirement (§3286.607)	586.00	1	586	1	586	\$57.00	\$33,402.00	Hard Copy Electronic
§3286.405(d) – Retailer notification to subsequent installers	586.00	1	586	0.50	146.50	\$57.00	\$8350.50	Hard Copy Electronic
Subtotal	586		49,224		24,758.50		\$1,411,234.50	
Retailers in non HUD-administered Installation Program States (HUD Forms 305 and 306)								
§3286.7(b) - Retailer disclosure before sale or lease	2,582	31.00	80,042	0..50	40,021	\$57.00	\$2,281,197.00	Hard Copy Electronic
Subtotal	2,582		80,042		40,021		\$2,281,197.00	
Installers in HUD-administered Installation Program States (HUD Forms 307 and 309)								
§3286.111(a)(1) – Installer conducting installation certification – Form HUD-309(§3286.411(a), 3286.507(b))	725	8	5800	1	5,800	\$47.00	\$272,600.00	Hard Copy Electronic
§3286.111(a)(2) – Inspector must verify installation	725	50	36250	1	36,250	\$47.00	\$1,703,750.00	Hard Copy Electronic
§3286.111(b) – Installer providing installation certification to purchaser or lessee (§3286.411(b), 3286.507(b))	725	8	5800	.50	2900	\$47.00	\$136,300.00	Hard Copy Electronic
§3286.207 – Installation license application, w/required information – Form HUD-307	725	30	21,750	2.50	54,375	\$47.00	\$2,555,625.00	Fax Mail Electronic
§3286.211(b) – Installation license renewal	725	50	36,250	1	36,250	\$47.00	\$1,703,750.00	Fax Mail Electronic
§3286.405(b) – Installer notification of inappropriate site	725	5	3,625	1	3,625	\$47.00	\$170,375.00	Hard Copy Electronic
§3286.405(c) – Installer notification of failure to comply with MHCSS	725	5	3,625	1	3,625	\$47.00	\$170,375.00	Hard Copy Electronic
§3286.413 – Installer recordkeeping requirements	725	1	725	2	1450	\$47.00	\$68,150.00	Hard Copy Electronic
§3286.503(c) – Installer providing instructions to inspector	725	8	5,800	0.50	2,900	\$47.00	\$136,300.00	Hard Copy Electronic
	725		119,625		147,175		\$6,917,225.00	
Trainers in HUD-administered Installation Program States (HUD Form 308)								
§3286.303(b) – Trainers required to keep attendance records	5	5	25	50	1250	\$33.00	\$41,250.00	Hard Copy Electronic

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Hours Per Response	Annual Burden Hours	Hourly Cost	Annual Cost	Method of Providing Information
§3286.303(c) – Trainers required to provide completion certificates	5	30	150	1	150	\$33.00	\$4,950.00	Hard Copy
§3286.307 – Trainer registration application, w/required information – Form HUD-307	5	5	25	2.0	50	\$33.00	\$1650.00	Fax Mail Electronic
§3286.307(c)(2) – Initial trainer qualification required (Certification of curriculum) Form HUD 308	5	1	5	2.5	12.5	\$33.00	\$412.50	Fax Mail Electronic
§3286.313 – Expiration and renewal of trainer qualification	5	1	5	1	5.00	\$33.00	\$165.00	Fax Mail Electronic
Subtotal	5		210		1,467.50		\$48,427.50	
TOTALS	4,072		388,357		290,523		\$13,171,778.00	

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Administrator (State Administrator)** is estimated to be \$60 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents **Administrator** is estimated to be \$2,726 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Installer** is estimated to be \$47 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents **Installers** is estimated to be \$6,917,225.00 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Retailer (Sales Representative)** is estimated to be \$57 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents **Retailer (Sales Representative)** is estimated to be \$3,692,431.00 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Manufacturer (Engineer)** is estimated to be \$66 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents **Manufacturer (Engineer)** is estimated to be \$610,335.00 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Manufacturer Clerical (Correspondence Clerk)** is estimated to be \$28 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents **Manufacturer Clerical (Correspondence Clerk)** is estimated to be \$2,493,811.00 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Trainer** is estimated to be \$33 per hour including the wage rate multiplier,

therefore, the estimated burden hour cost to respondents **Trainer** is estimated to be **\$48,427.5** annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for **Inspector (Construction Inspector)** is estimated to be **\$47** per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents **Inspector** is estimated to be **\$1,703.750.00** annually.

Average cost per hour is based on \$52,000 as an average salary for purchasers/homeowners.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

Annual Cost Burden to Respondents or Recordkeepers

Information Collection	Description of Cost	Number of Respondents	One-Time Cost	Total One-Time Cost
Manufacturing Corporations				
§3286.7(a) -Manufacturer's notice in the consumer manual	One-time development of the disclosure	32	\$75	\$2,400
§3286.7(a) -Manufacturer's notice in the consumer manual	Initial placement of notice in the consumer manual	32	\$15	\$480
§3286.102(b) - Manufacturer's notice in the installation instructions	One-time development of the disclosure	32	\$75	\$2,400
§3286.102(b) - Manufacturer's notice in the installation instructions	Initial placement of notice in the installation instructions	32	\$15	\$480
Subtotal		32		\$5,760
Retailers in HUD-administered Installation Program States				
§3286.113(e) – Retailer record retention requirements (§3286.607)	File cabinets and computer disk space	586	\$100	\$58,600
Subtotal		586		\$58,600
Retailers in non-HUD-administered Installation Program States				
§3286.7(b) - Retailer disclosure before sale	One-time development of the disclosure	2,582	\$75	\$193,650
Subtotal		2,582		\$193,650
Installers in HUD-administered Installation Program States				
§3286.413 - Installer recordkeeping requirements	File cabinets and computer disk space	725	\$100	\$72,500.00
Subtotal		725		\$72,500
Trainers in HUD-administered Installation Program States				
§3286.303(b) - Trainers required to keep attendance records	File cabinets and computer disk space	5	\$100	\$500
Subtotal		5		\$500
Totals		3931		\$331,010

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Item	Cost (\$)
Contract Costs: Contract costs include services provided to assist HUD's Office of Manufactured Housing Programs with administering the Model Installation program within states (16 states) that do not administer the program. Services include intake and review of initial application, intake of retailer forms, review of installation instruction manuals, consumer complaint investigations, review of state programs and the intake and review of trainer applications. The contract services provided for 5 years (one base period and four option periods). SEBA Professional Services is the contractor	\$4,000,000.00 \$704.50 per week \$36,634.00 per year
Staff Salaries* 1 of GS 14, step 7 employees spending approximately 80% of time annually with administration and oversight of contract services; reviewing state certifications review of audit reports, review of approval of installer licenses; travel for seminars and industry conferences. Calculations: 1 x \$147,034 = \$147,034 x 1.46 = \$214,669.64 x .80 = \$171,735.71	\$704.50 \$171,735.71
Facilities for handling, overhead, etc. for data collection activity	\$70.45
Computer Hardware and Software [cost of annual maintenance/service agreements for equipment]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel includes the following: - Perform site inspections and audits in 4 of the 15 HUD Administered installation states on a yearly basis. - Meet with local code officials in HUD Administered states - Presentations at Manufactured Housing Associations through attendance at association conferences	\$8,000.00 \$282.80 per year
Printing [number of data collection instruments x postage]	\$0
Postage [annual number of data collection instruments x postage]	\$0
Grand Total = \$83,413.80 per year	
Total	\$4,179,735.71

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a revision of a currently approved collection. Since the last collection, two states, Michigan and Pennsylvania no longer administers their own installation program. As a result, HUD is required to administer the installation program in these two states. The number of manufacturing plants increased to 138 but the number of corporations decreased to 32 due to corporate consolidation within the

industry. The number of retailers in HUD states rose from 327 to 586. The number of installers has rose from 488 to 971 with an active installer number of 725. The increased retailers under the HUD program in these states has resulted in the increased collection of HUD Form 305 and 306. In the same instance the increased number of installers in these states has resulted in the increase collection of HUD Form 307 and 309s.

HUD Form 307 has been modified to add two additional contact information. The request for business phone number and email address was to add additional contact information for the installer. The additional information would allow the program office to notify installers of license application status (approval, disapproval or more information is needed) more quickly. During consumer complaint investigations and enforcement actions, the additional information will allow HUD and installer to provide information more quickly to all stakeholders and resolve complaint and disputed issue more effectively with the ability to transmit drawings and documentation in a timely manner.

Also, please note that Form HUD-302 is being removed from this OMB collection. Form HUD-302 is not and should not have been a part of this collection. Form HUD-302 is a part of and is included in OMB Collection 2502-0233.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

HUD will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

HUD does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods

There is no statistical methodology involved in this collection.