



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-8000

OFFICE OF HOUSING

October 30, 2015

**MEMORANDUM FOR:** Primary Inspection Agency (PIA)  
State Administrative Agency (SAA)  
Installation Inspectors

**FROM:** Pamela Beck Danner, Administrator  
Office of Manufactured Programs

**SUBJECT:** Responsibilities of Inspectors of Manufactured Homes

A handwritten signature in cursive script, appearing to read "Pamela Beck Danner".

The Department of Housing and Urban Development (HUD) has received a number of questions regarding the verification of installation inspections required by 24 CFR Subpart F of HUD's Manufactured Home Installation Program Regulations and the Installation Inspector's certification required on the HUD Manufactured Home Installer Certification and Verification Report (Form HUD 309). This memorandum is being issued to provide clarification and guidance as to the intended responsibilities and extent of the verification being documented by the Installation Inspector's signature on the Form HUD 309

24 CFR § 3286.507 of the Regulations states:

- (a) *Verification by inspector: When an inspector is satisfied that the manufactured home has been installed in accordance with the requirements of this part, the inspector must provide verification of the installation in writing and return the evidence of such verification to the installer.*

The Installation Inspector is responsible to inspect and verify compliance for several inspection elements at a minimum that are visually observable around, beneath and inside the home as necessary and applicable to each installation. The minimum inspection elements of each home are listed in 24 CFR 3286.505 and are as follows:

- (a) Site location with respect to home design and construction;
- (b) Consideration of site-specific conditions;
- (c) Site preparation and grading for drainage;
- (d) Foundation construction;
- (e) Anchorage;
- (f) Installation of optional features;
- (g) Completion of ductwork, plumbing, and fuel supply systems;
- (h) Electrical systems;
- (i) Exterior and interior close-up;
- (j) Skirting, if installed; and
- (k) Completion of operational checks and adjustments.

In addition to the inspection items listed above, it is also recommended that the inspector perform the following checks to complete the installation verification:

- Check the Data Plate to verify the correct DAPIA-approved manufacturer installation instructions have been provided and used for the installation.
- Check the Data Plate to confirm that the home is appropriate for the wind, thermal, and roof load zone in which the home is installed.
- As requirements may vary across manufacturers and models, review the DAPIA approved manufacturer's installation instructions provided with the home to ensure familiarity with any specific requirements for the home's installation as related to the minimum inspection elements. It is not the intent that the installation inspector be responsible to verify compliance with other aspects, such as cosmetic features, that may also be covered by the manufacturer's installation design and instructions.

If all items are installed correctly, check the appropriate "Pass" box on the HUD 309 form. If items are not installed correctly, check the "Fail" box and write a brief but self-explanatory description of the failure to comply on the form where indicated. If the inspection item does not apply to the home that has been installed, then the "N/A" box must be checked. All items inspected must pass or be checked "N/A" in order for the home to pass the inspection.

If the installation does not pass the inspection, the inspector shall provide a brief description of the specific items that must be addressed in order to pass the inspection in Section 2 of the form (using additional sheets if necessary). Upon re-inspection, the inspector shall briefly describe the work performed to address the specific failure(s) following the initial inspection and if the re-inspected item(s) are in compliance, shall initial those items.

Upon satisfactory completion of the visual inspection that verifies the home's installation complies, the installation inspector is to sign the Form HUD 309. This signature verifies that all of the visual inspections addressing the minimum elements have been completed and to the extent observable during the inspection, passes.

Should you have any questions regarding this matter, you may contact Mr. Angelo Wallace of this office at (202) 402-3848 or Mr. Jason McJury at (202) 402-2480.