

Eastern States Installation Program Kick-off Call
Questions and Answers
January 12, 2016

- 1. As a local building inspector, are we required to register with (HUD and/or SEBA) to verify that we have the appropriate credentials, etc.?**

No, registration and/or listing is not required. HUD and SEBA collect information voluntarily provided by third party inspectors (architects, engineers and ICC certified individuals) to publish so that installers are able to find a third party if local inspectors are not available. However, registration is not required for either local inspectors or third party inspectors.

- 2. Will HUD consider reciprocity for installers licensed in states that have approved installation programs?**

No. If an installer does not have a HUD-issued Manufactured Home Installer License, he/she cannot install homes in a HUD-Administered state.

- 3. Is there a homeowner exemption for installations?**

Yes. Homeowners can install a home that they will be residing in without being a licensed installer (refer to 24 CFR 3286.107(d). However, they will still need to install the home per the requirements and have the home's installation certified by a licensed installer and inspected by a qualified inspector.

- 4. Are states that are operating their own qualifying installation program managing the licensing of installers?**

Yes, states that administer their own qualifying installation programs are required to establish a mechanism to license, certify, or otherwise approve manufactured home installers (refer to 24 CFR 3286.803) . The HUD-Administered program only applies to, and is therefore only issuing licenses for, the 13 states under the HUD-Administered Manufactured Home Installation Program.

- 5. Can several employees of the same company get their training from the purchase of one "multicourse module?"**

The training and examination process for each HUD-approved installer training course is controlled by the training provider. Each individual must take their own training and test. To discuss alternate purchase options you must contact the training provider. All contact information can be found at <http://www.manufacturedhousinginstallation.com/installers>.

6. Can a local building inspector require that additional measures be taken that are outside of the HUD installation code?

Yes, a building inspector can require additional measures as per their local code, as long as those measures: 1) meet or exceed the requirements of the Model Installation Standards, and 2) do not take the home out of compliance with the Manufactured Home Construction and Safety Standards. For guidance on this aspect in states that administer a qualifying installation program, seek guidance from that state's agency responsible for administration of the installation program.

7. How does a retailer submit their required forms if they do not have the home serial number at the time of the sale?

The retailer can file the required form(s) with the information they have available at the time. However, retailers should remain vigilant in receiving any missing information. Upon receiving any new or updated information, the retailer must submit a revised form with the new information (HUD 305 and/or HUD 306) within 10 days of receiving the information.

8. Are there manufacturer liabilities for homes not installed to the program requirements?

In general, manufacturers are not liable for homes not installed in accordance with Program requirements. However, manufacturer's may be liable if there are issues regarding the manufacturer's installation instructions that would either take the home out of compliance with the Manufactured Home construction and Safety Standards, or if the instructions used are deemed to not meet or exceed the Manufactured Home Model Installation Standards. The requirements regarding the physical installation work and related paperwork requirements are generally not tied directly to the manufacturer, unless the manufacturer is involved in the installation of the home and/or selling homes directly to consumers. If a manufacturer is acting as a retailer then it would be required to comply with all retailer responsibilities.

9. Are Native American Reservations exempt?

Per 24 CFR 3286.2(d) any manufactured home installed on an Indian reservation is exempt so long as the reservation is federally recognized and as such has tribal sovereignty.

