

**ENFORCEMENT INTERPRETATIVE
BULLETIN H-1-78
IPIA Responsibility for Plant Approval
3282.362(b)**

1. To perform the “complete inspection” required by section 3282.362(b)(1), the IPIA personnel must inspect or test every operation, every cut, every joint, every connection, every aspect and function, and every application or installation of every component of one mobile home, so that the IPIA can determine that the mobile home conforms in every way to the requirements of the Federal standards. This inspection must be carried out on a single mobile home before the particular aspect of production of the home is covered up or rendered difficult to inspect. If an aspect of the home is covered before it can be inspected, the IPIA must require that the manufacturer tear down or uncover that aspect of the home so that the inspection can be carried out. Inspection of the same aspect of a later mobile home is not acceptable as fulfilling this requirement.

2. When an IPIA is performing the plant approval procedures under section 3282.362(b)(1) and preparing the certification report required by section 3282.362(b)(2), the IPIA must not only perform the complete inspection, but must otherwise carry out the complete evaluation of the manufacturing process and quality control procedures required by that section.
In particular, the IPIA must require that the manufacturer take corrective action to improve its production or quality control procedures to assure that it will produce homes in conformance with the standards. This corrective action may include reassignment or training of personnel, implementation of a more effective check-off list, improvement of factory equipment and other measures. The corrective actions must be reported in the certification report pursuant to section 3282.362(b)(3)(iii).

3. Although an IPIA is not required to have an engineer participate in the plant approval process, it must assure that those personnel who are carrying out the procedures have been carefully briefed by qualified engineers on the restrictive aspects of the design and that they fully understand every problem they may encounter in the factory that will require engineering judgement. Where issues arise for which non-engineers are not adequately qualified, an engineer must participate. The Department believes that it will be very difficult to carry out any plant approvals without the participation of an engineer during at least some portion of the process

4. Where an IPIA takes over the production surveillance function from another IPIA, it must carry out a basic plant approval and issue a certification report. The IPIA may accept the previous certification report with any modifications that are needed if it carries out such inspections as it considers necessary and finds that report to be accurate based on its evaluation of the manufacturing and quality control procedures. The IPIA’s certification report must show what inspections it has made, what corrective action has been taken, if any, and a certification by the IPIA that it is satisfied that the manufacturer can produce mobile homes in conformance with the approved design and with the standards on a continuing basis.