



PFS Corporation d/b/a PFS-TECO

An Employee-Owned Company

October 30, 2017

Ms. Chris Clouse
Director, Code Enforcement Division
State of Indiana
Office of the State Building Commissioner
302 W. Washington St., Room E-241
Indianapolis, IN 46204-2739

Dear Ms. Clouse:

This letter serves as PFS Corporation's request for re-certification in the Indiana Third Party Certification and Inspection program. As per the requirements of the *Indiana Administrative Code, Rules for Industrialized Building Systems and Mobile Structures Systems, Section 675 IAC 15-1-19 Third party Inspection Agency Authorization: Application*, the check for \$550 and the following PFS documents are enclosed (items with no change I have not resent):

- Statement of Independence
- Board of Directors
- PFS Registered Engineers and Architects
- PFS Officers and Managers
- PFS Corporation Recognition List
- PFS HUD Manufactured Home Inspection Flow Chart
- PFS Quality Control Listing/Inspection Program Flow Chart (FBH Flowchart for IN)
- PFS QA Inspectors and Assigned Plants
- Resumes of Personnel Corresponding to Flow Chart (no change)
- PFS Audit Procedures Covering HUD Manufactured Homes (PFS 1401A)
- PFS Inspection and Certification Procedures Covering Factory Built Construction Systems (PFS 1401B)

If you have any questions or require any additional information, please let me know and we will submit it promptly. We look forward to receiving confirmation of PFS Corporation's acceptance as a third party inspection agency for the State of Indiana.

Sincerely,

Robert A. Gorleski
General Manager
Manufactured Housing Division

Attachments

20492



ORGANIZATIONAL CHART
October, 2017

PFS TE

Jim Hus

MANUFACTURED STRUCTURES DIVISION

Bob Gorleski - Director

MIDWEST REGION and CORPORATE HEADQUARTERS

Bob Nelson - SVP

PLAN REVIEW

PLAN REVIEW

INSPECTIONS

LABEL CONTROL

Steve Winistorfer - SVP

MODULAR

DAPIA

IPIA PROGRAM

Gretchen Gullixson

ENGINEERING
Larry Turner
Susan Ulvenes

Paul Tibbits

Eddie McKinney

ENGINEERING
Larry Turner

HUD MOD
Inspections

ADMINISTRATION

Steve Verhey - VP

Examiners
Mark Severson
Tim Busche
Jeremy Kaukl

Examiners
Jessica Jewett
Harold Mouser
Justin Tibbits

Inspectors
CorDale Keyser
Brad Smrcina
Mike Walter

Debbie Stephenson

Steve Winistorfer - SVP

NORTHEAST REGION

Rick Wenner - VP

PLAN REVIEW

INSPECTIONS

Examiners
Renee Moist
Harold Raup

Inspectors
Mike Cyphert
Keith Lamey
Kirby Smith
Tony Steimling
Daryl Weaver

Ron Reindl - VP

SOUTH CENTRAL REGION

Jeremy Hopland - GM

INSPECTIONS

Inspectors
Jake Hopland
Frank Schultz
Rick Holman
Adam Holman

Wayne Terpstra - Dir.

Dan Shoman - Dir.

SOUTHEAST REGION

Bob Gorleski - Dir.

PLAN REVIEW

INSPECTIONS

Examiners
Sharon Barry

Inspectors
Shawn Tibbits
Dan Moore

Wisconsin LAB

WESTERN REGION

Bob Nelson - SVP

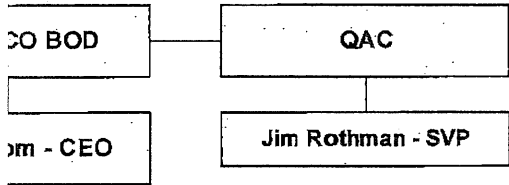
PLAN REVIEW

INSPECTIONS

Examiners
Kelly Walker

Inspectors
Kelly Walker

TECHNICIANS
Patrick Kenealy
Jim Sheldon
Michael Yee



BUILDING PRODUCTS DIVISION

ENGINEERED WOOD PRODUCTS

Graham McFarland

PANEL PRODUCTS

Dan Hovanec

Sam Smidansky

**PLYWOOD TECHNICIANS/
INSPECTORS**
Ed Drier - Insp.
Bruce Ellsworth
Barry Garcia
Robert Stoppleworth
Jeremy Threadgill

BUILDING COMPONENTS

James Van Schoyck

Pam Brugger

HEARTH PRODUCTS

LABORATORIES

Steve Verhey - VP

Oregon LAB

Brian Thompson

SCIENTISTS

Deepak Shrestha

Zhaozhen Bao

TECHNICIANS
Duane Jacobson
Dylan Mark
Pete McBride

CORPORATE ADMINISTRATION

Scott Drake - VP

ACCOUNTING

Debbie McDaniel -
Controller / Treasurer

Jodi Gulling

Open

INFORMATION TECHNOLOGY

Darren Robertson

QUALITY SYSTEMS

Wayne Terpstra - Dir

QMS Coordinator



STATEMENT OF INDEPENDENCE

I, James J. Husom, residing at 7737 Westman Way, Middleton, Wisconsin, am the President of PFS Corporation d/b/a PFS TECO, a corporation duly incorporated under the laws of the State of Wisconsin, and having its principal place of business at 1507 Matt Pass, Cottage Grove, Wisconsin 53527, Hereby Certify That:

- 1. Neither PFS TECO nor any of its personnel has any affiliation with manufacturers and/or producers of products certified by PFS TECO, suppliers, vendors or producers of products or equipment or materials used in products certified by PFS TECO.
2. PFS TECO is not engaged in, and does not engage in, the sale or promotion of any product, material, equipment or products certified by PFS TECO.
3. PFS TECO, as a result of its work and/or service, accrues no financial benefits via stock ownership, and the like of any manufacturers of products certified by PFS TECO, producers, vendors, or suppliers of the products involved, EXCEPTING the standard published fees paid to PFS TECO for its services rendered.
4. The directors, officers, or any personnel of PFS TECO receive no stock option, nor any other financial benefit from any building manufacturer, producer, supplier or vendor of products, materials, or equipment used in products certified by PFS TECO.
5. The employment security status of the personnel of PFS TECO is free of influence or control of manufacturers of products certified by PFS TECO and of producers, suppliers, or vendors of products, materials, equipment or products certified by PFS TECO.

Dated this 25th day of August, 2016

By: [Signature]
President - PFS Corporation

Subscribed & sworn to before me this 25th day of August, 2016

Notary Public: Deborah F. Stephenson
Notary Public in and for the State of: Wisconsin
My Commission Expires: 6-25-19

Notary Public
State of Wisconsin
Deborah F. Stephenson



PFS Corporation d/b/a PFS TECO

An Employee-Owned Company

BOARD OF DIRECTORS

Listed below are the names, addresses and business affiliations of the Officers and Board of Directors of PFS Corporation

BOARD OF DIRECTORS	Business Affiliations
Bob Tramburg <i>Chairman</i> 8385 S. Kollath Road Verona, WI 53593 608.832.6225	President/CEO -- Vita Plus Corporation 2514 Fish Hatchery Road ~ 53713 P.O. Box 259126 ~ 53725 Madison WI 608.256.1988
James J. Husom 7737 Westman Way Middleton, WI 53562 608.831.9077	President/CEO -- PFS Corporation 1507 Matt Pass Cottage Grove, WI 53527 609.839.1372
J. Robert Nelson, P.E. 3981 Lamarr Avenue Culver City CA 90230 310.837.8507	Sr. VP, Western Region -- PFS Corporation 3637 Motor Avenue, #380 Los Angeles CA 90034 310.559.7287
Mike Larson 313 Everglade Drive Madison, WI 53717 608.833.3372	Retired President -- Bank One Chairman of the Board -- Bock Water Heaters Principal -- Southwestern Financial Services
Terry Mullen 1006 Franconia Ct Waunakee, WI 53597 608.850.6817	President/CEO -- Bock Water Heaters 110 S. Dickinson Street Madison, WI 53703 608.227.3303

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608.839.1013 · 1507 Matt Pass · Cottage Grove, WI 53527

WWW.PFSTECO.COM



PFS REGISTERED ENGINEERS AND ARCHITECTS

J. Robert Nelson, P.E. Senior Vice President Western Region	California California	CE19824 FPE000958
James A. Rothman, P.E. Senior Vice President Quality Control	Minnesota Wisconsin North Carolina Georgia Florida	13235 E15421 16656 20557 60507
Ronald H. Reindl, R.A. Vice President Midwest Region	Wisconsin Arizona Minnesota Illinois Virginia New Jersey Pennsylvania Maryland	A-6033 20152 018382-0 001-011904 006690 AI09964 RA-010454-B 7598
Larry A. Beineke, Ph.D., P.E. Vice President Southeast Region	Wisconsin	31170
Richard L. Wenner, P.E. Vice President Northeast Region	Pennsylvania New York	039319-E 068197
Larry Turner, P.E. Engineer Midwest Region	Wisconsin Texas North Carolina	20148-006 98832 042433
Deepak ShrestHa, Ph.D., PE Engineer Laboratory	Wisconsin	E-30357
Susan Ulvenes, P.E. Engineer	California Colorado Florida Georgia North Carolina South Carolina Texas New York	73113 44823 76254 PE-037986 040225 30815 114069 098356-1
Steve Winistorfer	Wisconsin Florida	24987-6 39330



PFS Corporation d/b/a PFS TECO

An Employee-Owned Company

PFS TECO OFFICERS and MANAGERS

J. Robert Nelson, P.E.
Sr. Vice President
3981 Lamarr Avenue
Culver City, CA 90230
(310) 559-7287
(310)413-2214 Cell

Ronald H. Reindl, A.I.A.
Vice President
1253 Mockingbird Lane
Sun Prairie, WI 53590
(608)839-1170
(608)215-8027 Cell

James A. Rothman, P.E.
Sr. Vice President
799 Central Avenue
Deerfield, WI 53532
(608)764-5855
(608)206-7207 Cell

Richard L. Wenner, P.E.
Vice President
RR3, Box 268C
Benton, PA 17814
(570) 784-7859
(570)204-2647 Cell

Wayne Terpstra
Director of Quality
2002 Tiffany Court
Holland, MI 49424
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Jeremy Hopland
General Manager
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Plano, TX 75074
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Jim Husom
President & CEO
7737 Westman Way
Middleton, WI 53562
(608)839-1372
(608)576-8977 Cell

Deepak Shrestha
General Manager
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Bob Gorleski
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(608)239-9676 Cell

Steve Winistorfer
Sr. Vice President
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Madison, WI 53704
(608)334-3450 Cell

Scott Drake
Vice President
786 Thomas Drive
Sun Prairie, WI 53590
(608)334-9335 Cell

Steven Verhey
Vice President
505 Folsom Street
Columbus, WI 53925
(608)335-2399

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SD-033

PFS Corporation d/b/a PFS TECO

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PFS CORPORATION RECOGNITION LIST

Many model code organizations, federal, state and municipal agencies across the nation and in Canada recognize PFS Corporation as an independent full service testing and listing agency. Although all states do not provide for formal recognition of laboratories, wherever such formal procedures do exist, PFS has made application and has been accepted.

CODES/STANDARDS

ALSC - American Lumber Standards Committee

Accredited as an auditing agency in accordance with the Pellet Fuel Institute (PFI) Wood Pellet Program.

HUD - Dept. of Housing and Urban Development - Federal Housing Administration

Recognized as a qualified independent testing and inspection agency - Approximately 1965

Approved as a Primary Inspection Agency (DAPIA and IPIA) under Title IV of HUD Mobile Homes Procedural and Enforcement Regulations - 1976

HUD has accepted the official opinion of PFS concerning fire resistance of building assemblies - 1976

Recognized Agency in Field Glued Plywood and Wood Frame Structural Floor Systems (AFG-01) under Bulletin UM 60a - 1970

Accepted as a testing and labeling agency for cabinets - 1976

Accepted as an administrator for wood windows as defined in Bulletin UM 59 - 1980 (Revised when updated to UM 111)

Accepted for approval of plastic bathtub units for installation in mobile homes under IAPMO-TSC-11-72 test standard - 1981

IAS - International Accreditation Service, Inc.

IAS AA-652, Type A (Third-Party) Body: Certificate stating PFS has demonstrated compliance with the ISO/IEC Standard 17020, General criteria for the operation of various types of bodies performing inspections (encompassing the relevant requirements of the ISO 9000 series of standards), and has been accredited commencing April 1, 2003, to provide inspection services in the approved scope of accreditation.

IAS Testing Laboratory TL-109: Certificate states PFS has demonstrated compliance with ISO/IEC Standard 17025, General criteria for the competence of testing and calibration laboratories (encompassing the relevant requirements of the ISO 9000 series of standards), and has been accredited commencing April 1, 2000, for the test methods listed in the approved scope of accreditation.

IBC - Industrialized Building Commission

Interstate compact-recognized third party for evaluation, inspection and labeling of all modular units being shipped into a member state (modular units include industrialized or modular buildings or building components). As of August 1, 1993, member states include New Jersey, Rhode Island and Minnesota - 1993. Expanded July 2002 to include the State of North Dakota.

RPTIA - Recreational Park Trailer Industry Association, Inc.

Accepted as a third party inspection agency - 1994

RVIA - Recreational Vehicle Industry Association

Recognized as a testing and listing agency of RV components - 1987

SCC - Standards Council of Canada

~~Accredited as a certifying body for wood-based products, including general wood products; particleboard and medium-density fiberboard; formaldehyde; structural-use panels; hardwood plywood; structural composite lumber, glulam, I-joists, LVL; and sandwich constructions - 1998.~~

Revised in 2000, as follows: Manufactured Wood Products pertaining to the physical characteristics, load carrying capability, dimensional stability, bond integrity and durability of products, materials, structural shapes and assemblies made of wood, wood fibres and composite materials including: sandwich panels, wood composite panels, structural glue laminated timber, sandwich panels with foam, wood I-joists, composite structural lumber and construction adhesives.

Revised in 2001 to include Fire Tested Products and Assemblies.

Revised in 2004 to include Thermoplastic Lumber.

Revised in 2009 to include Gas and Solid-Fuel Appliances.

TPI - Truss Plate Institute

Approved to perform quality control inspections of the fabrication of metal-plate-connected wood trusses - 1985

U.S. Army, Corps of Engineers

Registered with Department of Army, Corps of Engineers for architect/engineer and related services - 1989.
Qualification Data #012866.

STATES

ALABAMA

Recognized as a nationally-recognized testing and listing laboratory for heating appliances - 1982

ARIZONA

Accepted as a listing agency on manufactured products accepted by ICBO and which fall under the jurisdiction of the Division of Mobile and Manufactured Housing Standards (now the Office of Manufactured Housing) - 1979. Reissued 1992.

ARKANSAS

Accepted as a third-party certification agency for heating appliances- 1982

CALIFORNIA

Approved as a quality assurance agency (QAA) and design review agency (DAA) for the California Manufactured Housing Program Multi-Unit Manufactured Housing (MUMH), Commercial Modular (CM) and Special Purpose Commercial Modular (SPCM) and for Factory Built Housing (FBH) evaluations and inspections -- 2005

Approved as a design approval (DAA) and quality assurance agency (QAA) for the California Factory-Built Housing Program - 1987

Approved as a design approval (DAA) and quality assurance agency (QAA) for recreational vehicles, commercial coaches, special purpose commercial coaches and mobile homes - 1989

Approved as a testing and listing agency for mobilehomes, commercial coaches and recreational vehicles for structural components and fire safety, and heating appliances -- 1971

Approved as a third party certifier (#TPC-3) by the California Air Resources Board (CARB) for the following composite wood products: hardwood plywood, particleboard and medium density fiberboard (to prevent out-gassing of formaldehyde and improve air quality). -- 2008

Approved as a testing agency to ASTM D2898 by the California State Fire Marshal (CSFM)-Laboratory Accreditation - 2009

Approved as a vented gas fireplace heater test laboratory by the California Energy Commission, Appliance Energy Efficiency Program - 2010

COLORADO

Approved as an Authorized Inspection Agency to perform inspections in the following areas: factory built/modular homes; factory built nonresidential structures; recreational and park trailer vehicles -- 1998

Expanded to include recognition as a third party inspection agency -- 2003.

CONNECTICUT

Approved as a third party evaluation and inspection agency for mobile and modular housing - 1974

Recognized and approved for testing of waste oil heaters distributed and installed within the State of Connecticut -- 1983

DELAWARE

Approved as an independent evaluation and inspection agency of manufactured housing - 1985

Recognized as a third party inspection agency on rough wiring inspections only on the mobile and modular homes coming into the State of Delaware - 1976

FLORIDA

Under contract with the Department of Community Affairs to inspect factory-built housing for manufacturers as listed with the State of Florida – 1971

Florida Department of Community Affairs – Building Codes: Approved as a Quality Assurance Agency – 2003; a Product Testing Laboratory – 2003; a Product Certification Agency – 2004; and as a Validation Entity – 2005.

GEORGIA

Under Agreement with the Industrialized Buildings Agency as an inspection agency, evaluation agency and a design approval agency as provided in the Georgia Rules for Industrialized Buildings - 1988

HAWAII

Approved as a testing and quality control agency for manufacturers as listed by the State of Hawaii - 1971

IDAHO

Approved as a third party inspection agency for factory-built housing and commercial coaches - 1992

Recognized for PFS certification of solid-fuel-burning heating appliances based on ICBO Report AA-504 – 1982

Several PFS inspectors recognized by the Division of Building Safety as being capable of performing third party modular building inspections for manufacturers outside Idaho in the following inspection categories: commercial and residential modulars; building and mechanical inspections – 2001

ILLINOIS

Approved as an inspection agency in the interest of the State of Illinois in accordance with the Illinois Mobile Homes Safety Act, Administrative Rules and Regulations and Future Amendments – 1975

Approved as an independent testing laboratory for third party testing and as a certification agency for solid-fuel-burning appliances - 1979

INDIANA

Approved as a third party evaluation and inspection agency for mobile and modular structures - 1972

IOWA

Approved as a third-party agency for the following: plan and specification review and certification, manufacturing facilities and quality control review and certification; in-plant inspection and certification of seal and code compliance - 1973

Accepted as testing agency for solid fuel burning appliances - 1979

KANSAS

Approved as a third-party testing, inspection and certification agency under the Kansas Uniform Standards Code for Mobile Homes and Recreational Vehicles - 1974

Accepted as a testing agency for solid-fuel-burning appliances based on ICBO approval - 1980

KENTUCKY

Reciprocity agreement with the IBC as an interstate compact-recognized third party for inspection and labeling of all modular units being shipped into a member state (New Jersey, North Dakota added in 2002, Minnesota, Rhode Island) – 1997 {Note: Reciprocity agreement with IBC rescinded, January 1, 2005.}

LOUISIANA

Recognized as an approved third-party certification for heating appliances - 1982

MAINE

Approved as an evaluation and inspection agency as defined in the Rules and Regulations for Certification of Mobile Homes, Article III, and the Rules and Regulations for Certification of Industrialized Housing, Article III, called the Mobile Home Regulations respectively, adopted by the Maine State Housing Authority - 1974

Approved for testing of solid fuel burning appliances to State of Maine Standard - 1980

MARYLAND

Approved as a Maryland Approved Testing Facility (ATF) as defined in Article 41, Section 83B, Subsection 6-202 of the Maryland Industrialized Building and Mobile Home Act - 1972

MASSACHUSETTS

Certified in the Massachusetts Manufactured Building Program as a third party inspection agency (TPIA #02) - 1975

Approved as an accredited testing laboratory to test and label both solid and liquid fuel burning appliances – 1979

Approved testing laboratory and inspection agency for waste oil heaters, fire testing and fire rated products, and structural testing and listing of wood building components. Listed in Appendix "O" of Massachusetts State Building Code - 1990

MICHIGAN

Approved to conduct inplant construction inspection for approval of premanufactured units on behalf of the Construction Code Commission - 1974

Recognized as an approved testing laboratory to: ASTM E 84, ASTM E 119 and ASTM E 152 - 1993

Approved as an independent testing laboratory - 1978

Accepted as testing agency for solid fuel burning appliances - 1980

MINNESOTA

Reciprocity agreement with the IBC as an interstate compact-recognized third party for evaluation, inspection and labeling of all modular units being shipped into a member state (New Jersey, North Dakota added in 2002, Rhode Island) - 1993

Approved as an evaluation agency to review and approve construction documents for manufactured structures for compliance with the requirements of the Minnesota Building Code - 1978

Approved as an inspection agency qualified to conduct and supervise compliance assurance programs relating to manufactured buildings - 1972

Approved as a quality control inspection agency to approve and certify wood roof trusses for compliance with the Minnesota Building Code - 1973

Approved by Minnesota Department of Building Codes and Standards as evaluation and inspection agency in accordance with Minnesota Prefabricated Structures and Manufactured Building Codes Section of the Minnesota State Building Code - 1983

MISSISSIPPI

Authorized as an Approved Construction Inspection Agency and as an Approved Design Review Agency in the State of Mississippi under the Relocatable (Modular) Program – 2003

MISSOURI

Approved as an independent inspection agency authorized to inspect to mobile homes built or sold in the State of Missouri - 1975

Approved as an independent evaluation and inspection agency authorized to inspect to BOCA/UBC required codes for commercial modular homes built or sold in the State of Missouri. Approval in Missouri based on HUD approval - 1986

MONTANA

Approved as a third party inspection agency concerning the construction of recreational vehicles and factory-built buildings - 1978

Accepted as a third party testing and listing agency for solid fuel burning appliances based on ICBO's listing of PFS - 1980

Accepted as third-party testing and listing agency for heating appliances based on ICBO's listing of PFS - 1982

NEBRASKA

Under contract with the Department of Health of the State of Nebraska as an independent third party inspection agency relative to the administration of the Nebraska Uniform Standards for Modular Housing Act - 1977

Recognized as a quality assurance and inspection agency to perform electrical inspections by the Nebraska State Electrical Board using only nationally certified electrical inspectors - 1997

Authorized to practice engineering, Certificate Number CA0599E – 1998

NEVADA

Approved as an inspection agency for factory-built housing, including testing, listing and inspections - 1972

Approved as a third party testing facility under Nevada's rules and regulations covering plumbing, heating and electrical standards for mobile homes and travel trailers - 1972

Recognized by the Department of Commerce as a third-party inspection agency for modular construction with approval for individual projects and/or manufacturers - 1989

NEW HAMPSHIRE

Recognized as an accredited third party inspection agency in accordance with RSA 205C and SAF-C 3300 - 1992

Recognized as an accredited third party laboratory for modular building systems, building materials and heating appliances including waste oil heaters - 1991

NEW JERSEY

Approved as an Evaluation Agency and an Inspection Agency under the provisions of N.J.A.C. 5:23 – 4A.10 (c) – 2002.

Reciprocity agreement with the IBC as an interstate compact-recognized third party for evaluation, inspection and labeling of all modular units being shipped into a member state (Minnesota, Rhode Island, North Dakota added in 2002) - 1993

Approved as in-plant inspection agency for the following subcodes: building, electrical, plumbing and fire protection; permitted to approve building systems and compliance assurance programs - 1977

Accepted as testing agency for solid fuel burning appliances - 1979

NEW MEXICO

Approved by the Construction Industries Division as a third-party inspection agency for modular construction - 1987

NEW YORK

Approved to practice as a Professional Engineering Firm - 2000

Approved as a quality assurance agency for manufactured structures - 1990

Laboratory accredited for structural testing of building assemblies, building components and waste oil heaters - 1990. Additionally, accredited for the observation and reporting of ASTM E 84, ASTM E 119, and ASTM E 152 tests at an approved test facility - 1992

Accredited for structural testing of building assemblies and building components subject to approval by NVLAP, OSHA and NIST - 1998

Laboratory accredited to test and list liquid and solid fuel heating appliances - 1991

Laboratory acceptance as a testing or inspection agency for kerosene heaters - 1982

NORTH CAROLINA

Approved as a third party certification agency for buildings of modular construction - 1981

Accredited as a testing/listing agency for oil fired heating equipment and accessories, oil fired appliances, solid fuel heating equipment and gas fire heating appliances - 1988. Expanded in 1992 to include air conditioning equipment and accessories and heat pump equipment and accessories.

Accepted as a fire testing and listing agency for assemblies and components to ASTM E 84, ASTM E 119 and ASTM E 152 standards - 1989

Approved to practice Engineering as a Business Firm; Certificate No. F-0485 – 1995

NORTH DAKOTA

Reciprocity agreement with the IBC as an interstate compact-recognized third party for evaluation, inspection and labeling of all modular units being shipped into a member state (Minnesota, New Jersey, Rhode Island) - 2002

Recognized as a testing and certification agency for heating appliances - 1982

Designated as a third party inspection agency for the inspection of mobile homes shipped into the State of North Dakota - 1973

Recognized as a third party quality control and inspection agency for manufactured buildings - 1999

OHIO

Recognized by the Ohio Board of Approval as an approved testing and listing agency for fire testing of fire-rated products and safety testing of heating appliances in the State of Ohio - 1982

Approved as testing laboratory for ASTM E 84, E 119, E 152 and UL 1482 as referenced in the Ohio Basic Building Code (OBBC) - 1982. Expanded to approval for ASTM E 72 in December 1984. Expanded again in March 1996 by the Ohio Department of Commerce to encompass those tests listed in PFS' NVLAP Scope of Accreditation -- general wood based products; particleboard and medium-density fiberboard; formaldehyde; structural-use panels; hardwood plywood; structural composite lumber; glulam; I-joists; LVL; and sandwich constructions.

Recognized as an inspection agency for factory-built structures using PFS inspectors certified by the State of Ohio Board of Building Standards - 1997

OREGON

Approved as a certified testing laboratory for solid fuel burning appliances, including waste oil burning stoves - 1980

PENNSYLVANIA

Approved as a third party evaluation and inspection agency under the Pennsylvania Industrialized Housing Act - 1974

Accepted organization by Pennsylvania Power and Light to perform electrical inspections on one- and two-family residences - 1979

Approved as a testing laboratory covering all devices or equipment pursuant to Section 49.1 of the Fire and Panic Regulations - 1991

RHODE ISLAND

Approved as a third-party evaluation and inspection agency in accordance with the rules and regulations for manufactured buildings and building components - 1977.

Reciprocity agreement with the IBC as an interstate compact-recognized third party for evaluation, inspection and labeling of all modular units being shipped into a member state (New Jersey, North Dakota added in 2002, Minnesota) - 1993

Approved testing agency for solid fuel burning appliances based on BOCA, ICBO and SBCCI approvals - 1979

Approved testing laboratory based on NVLAP accreditation - 1982

SOUTH CAROLINA

Approved as a third party evaluation and inspection agency under the rules of the South Carolina Modular Buildings Construction Act - 1988

SOUTH DAKOTA

Approved as an electrical inspection agency for manufactured structures for the State of South Dakota - 1978

Reauthorized by the South Dakota State Electrical Commission - 1991

TENNESSEE

Approved as a construction inspection agency and a design review agency for modular building units - 1986

Authorized as an acceptable agency to perform alternate construction (AC) inspections on homes manufactured in the state of Tennessee - 2003

TEXAS

Registered as an industrialized housing third party inspection agency - 1986

Registered as an industrialized housing third party design review agency - 1994

UTAH

Approved by the Department of Commerce as a third-party inspection agency for recreational vehicles and park trailers in lieu of RVIA for individual manufacturers - 1991

VIRGINIA

Approved testing, evaluation and inspection quality assurance agency under the Virginia Industrialized Building and Manufactured Home Safety Regulations - 1976

WASHINGTON

Accredited as a testing and inspection agency for electrical products associated with residential and commercial heating, air conditioning and refrigeration equipment and electrical equipment associated with solid fuel burning appliances (categories #18, #19 and #29) - 1989

WISCONSIN

Approved as an independent inspection/evaluation agency for manufactured dwellings - 1978.

Approved testing and labeling agency for solid fuel burning appliances to UL Standards 737, 727, 1482 and 127 - 1978

Wisconsin Material Approval No. 960079-C -- Approved as an independent testing and certification laboratory for ASTM E 84, ASTM E 119 and ASTM E 152 tests. Also approved for the testing of gas, fuel oil, waste oil and solid fuel appliances - 1990

Approved as an agency for listing steel tanks for aboveground use in compliance with UL 80 or UL 142 - 1993

Authorized to practice Engineering; Certificate No. 957 - 1998

WYOMING

Approved as a third party quality control and inspection agency – reissued 1999

COUNTIES

COLORADO - CITY/COUNTY OF DENVER

Recognized testing laboratory for solid fuel burning appliances - 1980

Approved as a third party inspection agency for prefabricated dwelling assemblies - 1977, Reissued 1987

COLORADO – CLARK COUNTY

Approved as a third party fabricator inspection/audit/(and/or) Shop NDT agency - 2010

FLORIDA - DADE COUNTY

Approved as a compliance assurance and/or inspection agency - 1990

Approved as a compliance assurance and/or inspection agency and a testing laboratory in accordance with Dade County Building Code Compliance and Protocol PA301-94 to perform the following tests: per certification by SBCCI Compliance Report #TL-9337 and per BOCA Research and Evaluation Committee Report #90-46, includes Main office only (revised yearly)- 1994. Revised in 2001 to include: ...per SBCCI Compliance Report TL-9541 (renewed yearly), excludes section III (7) (revised yearly); BOCA Certificate No. 98-32 (renewed yearly & to include main office only); NVLAP Code 100421-0 (renewed yearly); and per TPI 1-95.

ILLINOIS - COUNTY OF ROCK ISLAND

Recognized as an approved third party inspection agency for modular/pre-fabricated homes (as identified by ICBO) and indicated in the Rock Island Modular/Pre-fabricated Housing Policy – 1994

NEW YORK - NASSAU COUNTY

Approved testing and labeling agency for kerosene heaters distributed by Glo International - 1981

For a more specific nature of approval (e.g., manufactured buildings, mobile homes, wood roof trusses, components, heating appliances, etc.), the official letter of approval is on file at the PFS offices. Persons interested in reviewing, in detail, the letters of approval may request copies from the PFS office in Madison, Wisconsin.

SD-033
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PFS CORPORATION d/b/a PFS TECO
IPIA DEPARTMENT
 REV. SEPTEMBER 15, 2017

PRESIDENT / CEO
 JIM HUSOM

**DIRECTOR -
 MANUFACTURED STRUCTURES /
 IPIA ADMINISTRATOR**
 ROBERT GORLESKI

REGIONAL OFFICE MANAGEMENT
 ROBERT GORLESKI - MW, SE, WR
 RICK WENNER, P.E. - NE
 JEREMY HOPLAND - SC

IPIA SUPERVISOR
 EDDIE MCKINNEY

NE AREA SUPERVISOR
 MIKE CYPHERT

IPIA INSPECTORS
 R. STEELE*
 M. CYPHERT
 T. LEMIEUX*
 K. SMITH
 D. WEAVER
 J. KROUSE*

MW AREA SUPERVISOR
 MIKE WALTER

IPIA INSPECTORS
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 B. SMRCINA
 H. MOUSER
 M. DASS*
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SE AREA SUPERVISOR
 SHAWN TIBBITS

IPIA INSPECTORS
 D. MOORE

WR AREA SUPERVISOR
 EDDIE MCKINNEY

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 G. EDWARDS*
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 J. MORGAN*
 K. WALKER

SC AREA SUPERVISOR
 FRANK SCHULTZ

IPIA INSPECTORS
 R. HOLMAN
 A. HOLMAN
 R. COLE*

* INDEPENDENT CONTRACTOR

IPIA - RESPONSIBILITIES AND AUTHORITIES:

- Monitors all functions of the IPIA program. Monitors and provides additional training for PFS quality assurance inspectors. Attends all meetings of HUD and IBTS and/or related activities.
 - It is the responsibility of the regional offices to monitor, evaluate and train all area supervisors and QAI assigned to that region.
 - It is the responsibility of the area training supervisors to monitor QA inspector assigned to them and make follow-up inspection at each plant periodically.
 - Conducts inspections at each fabricator's plant at intervals prescribed in PFS monthly inspection report form. All inspection forms are filled out as per Section 1.1 of PFS Operating Procedural Manual. ~~Makes in-plant inspections as per Inspection and Certification Procedures Covering Factory Built Construction Systems.~~
-

PFS QA INSPECTORS & ASSIGNED PLANTS

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PFS Corporation d/b/a PFS TECO

An Employee-Owned Company

Manufactured Structures Division

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1. SCOPE

- 1.1. This publication provides PFS Corporation's audit procedures for HUD manufactured homes within the framework of the "Manufactured Home Construction and Safety Standard", and the "Manufactured Home Procedural and Enforcement Regulations. The purpose of this publication is to spell out the sequence of events and actions that must take place from the time the manufacturer starts production of HUD manufactured homes with PFS to the time the HUD label may be applied to a product, as well as the procedures to maintain labeling privileges.

2. REFERENCE DOCUMENTS

Unless specified, the latest edition of all referenced standards and documents, are to be utilized.

- 2.1. Part 3280, "Manufactured Home Construction and Safety Standard"
- 2.2. Part 3282, "Manufactured Home Procedural and Enforcement Regulations"
- 2.3. NFPA 70, "National Electrical Code" (2005 Edition)
- 2.4. IBTS, "Computer Coded Items (CCI) Guidelines"
- 2.5. IBTS, "Guidelines for Investigating and Reporting of Quality System Issues"

3. DEFINITIONS

- 3.1. **Audit** - a systematic examination of the acts and decisions by people with respect to quality, in order to independently verify or evaluate and report compliance to the operational requirements of the quality program.
- 3.2. **CCI** (Computer Coded Items) - means a failure to conform for which IBTS has assigned a number for electronic tracking purposes.
- 3.3. **DAPIA** - Design Approval Primary Inspection Agency
- 3.4. **Defect** - means a failure to comply with the HUD standard that renders the manufactured home or any part or component thereof not fit for ordinary use for which it was intended, but does not result in an unreasonable risk of injury or death to occupants of the affected manufactured home.
- 3.5. **Failure to conform** (FTC) - means an imminent safety hazard related to the standards, a serious defect, defect or noncompliance and is used as a substitute for all of those terms.
- 3.6. **IBTS** - the Institute for Building Technology and Safety. IBTS acts as HUD's agent in monitoring the performance of IPIAs and DAPIAs.
- 3.7. **Imminent safety hazard** - means a hazard that presents an imminent and unreasonable risk of death or severe personal injury that may or may not be related to failure to comply with an applicable Federal manufactured home construction and safety standard.
- 3.8. **Inspection** - an examination of a product design, product, service, process or plant, and determination of their conformity with specific requirements or, on the basis of professional judgment, general requirements.
- 3.9. **IPIA** - Production Inspection Primary Inspection Agency

- 3.10. **Isolation** - means that the failure to conform was confined to manufactured homes still at the plant, and that the PFS Quality Auditor was able to identify all manufactured homes containing the failure to conform.
- 3.11. **Noncompliance** - means a failure of a manufactured home to comply with the HUD standard that does not constitute a defect, serious defect, or imminent safety hazard.
- 3.12. **QC/No** - Plant quality system did not detect the failure to conform.
- 3.13. **QC/Yes** - Plant quality system did detect the failure to conform.
- 3.14. **Quality System** - the program, procedures, methods, responsibilities, and resources developed by the manufacturer, approved by the DAPIA, and accepted by the IPIA to commit the manufacturer to conduct adequate inspections and/or tests that are required for compliance with the Standards.
- 3.15. **Red Tag** - means to affix a notice to a manufactured home which has been found to contain an imminent safety hazard or a failure to conform with any applicable standard. A red tag is the notice so affixed to the manufactured home.
- 3.16. **Repeat Status** - when the same CCI or Quality System Issue is detected in the same department three (3) times or more based on the ten (10) most current audits, it is considered to be at repeat status.
- 3.17. **Serious Defect** - means a failure of a manufactured home to comply with the HUD standard that renders the manufactured home or any part thereof not fit for the ordinary use for which it was intended and which results in an unreasonable risk of injury or death to occupants of the affected manufactured home.
- 3.18. **SAA** – State Administrative Agency
- 3.19. **Quality System Issue** - refers to a failure of the plant quality control program that typically effects multiple units and is evidence that personnel are not familiar with the design and/or quality control requirements.
- 3.20. **Yellow Condition (Y/C)** - means a failure to conform that is not an imminent safety hazard or serious defect, and is corrected immediately or during the PFS Quality Auditor's audit.

4. PURPOSE OF IPIA AUDIT

- 4.1. The purpose of the IPIA in-plant audit, as stated by Section 3282.362(a)(1) of the Federal Regulation is to assure:
- 4.1.1. That the plant is capable of following the quality control procedures set forth in the quality manual.
- 4.1.2. That the plant continues to follow the quality manual.
- 4.1.3. That any part of the home actually inspected conforms with the design, or where the design is not specific to the standards.
- 4.1.4. That whenever it finds a manufactured home in production which fails to conform to the design or where the design is not specific, to the standards, the failure to conform is corrected before the manufactured home leaves the manufacturing plant.

- 4.1.5. That if a failure to conform to the design or where the design is not specific, to the standard, is found in one manufactured home, all other homes still in the plant which the IPIA's records or manufacturer's records indicate might not conform to the design or standards are inspected, and if necessary, brought up to the standard before they leave the plant.

5. PFS QUALITY AUDITOR KNOWLEDGE

- 5.1. Each PFS Quality Auditor shall have a thorough knowledge of the "Federal Manufactured Home Construction and Safety Standards."
- 5.2. Each PFS Quality Auditor shall have a working knowledge of the "Federal Procedural and Enforcement Regulations". Sections 3282.362, 3282.364 and 3282.416 shall be thoroughly familiar to each PFS Quality Auditor.
- 5.3. The PFS Quality Auditor shall have a working knowledge of the "National Electrical Code", and must be thoroughly familiar with those sections dealing particularly with manufactured homes.
- 5.4. The PFS Quality Auditor shall have a working knowledge of IBTS's "Computer Coded Items (CCI) Guidelines".
- 5.5. The PFS Quality Auditor shall have a working knowledge of IBTS's "Guidelines for investigation and Reporting of Quality System Issues (QSI)".
- 5.6. The PFS Quality Auditor shall have a working knowledge of HUD's "Enhanced Checklist for Quality Manuals".
- 5.7. The PFS Quality Auditor shall have a working knowledge of the DAPIA approved drawings and quality manual for each assigned plant.
- 5.8. The PFS Quality Auditor shall be able to determine if the manufacturer can carry out all inspections and tests outlined in the accepted quality manual, and shall monitor accordingly.

6. AUDIT PROCEDURES

6.1. Overview

- 6.1.1. In order to ensure full compliance with the requirements stated above and all other requirements of PFS Corporation or Federal Manufactured Home laws, standards, rules and regulations, the following procedures have been developed. These procedures must be closely followed each and every time the PFS Quality Auditor visits a HUD manufactured home manufacturing facility.

6.2. Frequency

- 6.2.1. The routine audit frequency for each manufacturer shall be such that the PFS Quality Auditor can inspect every manufactured home in at least one stage of production. This shall be determined by each individual PFS Quality Auditor based on his/her audit schedule, and on each manufacturer's rate of production.

6.3. Complete Audit

- 6.3.1. In the course of every audit, the PFS Quality Auditor shall make a complete audit of every phase of production and a complete inspection of every visible part of every manufactured home which is at each stage of production (See 3282.362(c)(1)). This includes all off-line stations and subassembly areas identified in the manufacturer's quality manual.

6.4. Entrance Meeting

6.4.1. At the beginning of each audit, the PFS Quality Auditor shall notify the general manager or authorized representative of the facility that he/she is in the plant. The PFS Quality Auditor shall inform the general manager or authorized representative of the facility of the purpose of the audit. For routine audits, the PFS Quality Auditor shall request access to the following documents:

6.4.1.1. Manufacturer's DAPIA approved design manual.

6.4.1.2. Manufacturer's DAPIA approved quality manual.

6.4.1.3. PFS audit reports for the previous 2-4 audits.

6.4.1.4. The most current IBTS audit.

6.4.2. The PFS Quality Auditor shall request the manufacturer to notify him/her of any additions or revisions to the DAPIA approved quality control or design manual since the previous PFS audit, identify any such revisions, and provide them to the PFS Quality Auditor. The PFS Quality Auditor shall verify if there are any unapproved floor plans and any Alternate Construction units on Line.

6.5. Audit Preparation

6.5.1. The PFS Quality Auditor shall then request the manufacturer to provide an area where he/she may review the documents listed above. The PFS Quality Auditor shall then move to the area provided and review those documents.

6.5.2. Following the review of any revisions or additions to the design or quality manual, the PFS Quality Auditor shall review past audit records.

6.5.2.1. Based on the review of the past audit records, the PFS Quality Auditor shall record the number of outstanding red tags and determine the last manufactured home serial number inspected by PFS.

6.5.2.2. The PFS Quality Auditor shall follow up on all outstanding FTCs and QSIs to determine that root causes have been determined and that all corrective actions have been accomplished. This shall be documented on PFS Form A.

6.6. Factory Audit

6.6.1. When the PFS Quality Auditor is prepared, he/she shall then move into the factory and begin his/her audit. Each station (including work areas and sub-stations) shall be audited. Each station shall be listed on the PFS Form A, whether there is a HUD manufactured home in the station or not.

Note: If the plant lay out shows one station with multiple positions/work areas, example: (Station 9 has 4 positions/work areas) all 4 positions/ work areas of 9 must be listed and accounted for on the PFS Form A.

Note: The PFS Quality Auditor should periodically alter the sequence of the audit so that it does not always begin at the same station. When the normal sequence of the audit is altered, a notation shall be made on the audit form that the sequence of the audit was altered.

Note: The PFS Quality Auditor may use an alternate inspection form (electronic or digital) other than the PFS Form A as long as the forms meet or exceed the requirements of PFS 1401A, and they are reviewed by PFS Corporate Management before use.

6.6.2. Inspection Activities

- 6.6.2.1. The PFS Quality Auditor shall inspect the HUD manufactured home at each station, (including off-line stations and subassembly areas) until all stations and all critical aspects of construction are verified. This shall be performed on a continuing basis. During the audit the PFS Quality Auditor shall verify the Serial Number, Model Number or Floor Plan and the approval date for each unit inspected.
- 6.6.2.2. The PFS Quality Auditor shall inspect every visible part of the manufactured home for conformance with the accepted design and quality manual. If the design or quality manual is not specific with respect to some aspect of the construction, the PFS Quality Auditor shall inspect those aspects of construction to the Manufactured Home Construction and Safety Standards, and the CCI Guidelines.
- 6.6.2.3. The Form A must include some actual observations in each station, off-line station, or subassembly area, regarding the construction of each floor/unit. A default statement such as "No Non-conformances Noted" being used as the only observation is not permitted. The exception to this requirement is that a statement such as "No Non-conformances Noted" can still be used, as long as it is in conjunction with actual observations of the construction of each floor/unit.
- 6.6.2.4. Once the PFS Quality Auditor has inspected a station and all failures to conform observed are recorded, the manufacturer shall be notified so that the failure to conform can be corrected.

Note: The correction shall not be recorded on PFS Form A, until the PFS Quality Auditor has observed the correction performed by the manufacturer.

6.6.3. Audit Activities

- 6.6.3.1. Utilizing the Reference Information for HUD Manufactured Homes (Form A-3) and PFS Forms A and A-2, the PFS Quality Auditor shall verify that the manufacturer's quality control program functions as provided for by the accepted quality manual.
- 6.6.3.2. The manufacturer's quality control documents required at each station shall be examined to determine if they are being used correctly.
- 6.6.3.3. Whenever possible the PFS Quality Auditor shall verify that the manufacturer has inspected the station, and the findings have been recorded on the applicable forms identified in the quality manual. The inspection performed by the quality control inspector shall then be compared to the inspection of the PFS Quality Auditor. If the failure to conform was detected by the quality inspector, the PFS Quality Auditor shall note "QC/Yes" near the failure to conform on PFS Form A¹. If the quality inspector did not detect the failure to

¹ The quality inspector must find the failure to conform completely independent of the PFS Quality Auditor.

conform, the PFS Quality Auditor shall note "QC/No" near the failure to conform.

6.6.3.4. If the applicable form (traveler) has been signed and if the failure to conform has been noted and recorded as corrected, the PFS Quality Auditor shall inspect the failure to conform to verify that the correction has been made. If the failure to conform has been corrected, the PFS Quality Auditor shall note the failure to conform as "QC/Yes". If the failure to conform has not been corrected, the PFS Quality Auditor shall the failure to conform as "QC/No".

6.6.3.5. If the failure to conform has been covered up, and if the failure to conform has been recorded on the applicable form (traveler), and has been noted as corrected, the PFS Quality Auditor may, at his/her discretion,

6.6.3.5.1. require that the construction be uncovered to permit inspection of the correction of the failure to conform.² If the failure to conform has been corrected, the PFS Quality Auditor the failure to conform as "QC/Yes". If the failure to conform has not been corrected, the PFS Quality Auditor shall note the failure to conform as "QC/No".

6.6.3.5.2. accept the notation on the applicable form (traveler) that the failure to conform that has been corrected. The PFS Quality Auditor shall note the failure to conform as "QC/Yes".

6.6.3.6. If the failure to conform has been covered up, but has not been recorded on the applicable form (traveler), and has not been noted as corrected, the PFS Quality Auditor shall require that the construction be uncovered to permit inspection of the failure to conform. If the failure to conform has been corrected, the PFS Quality Auditor shall note the failure to conform as "QC/Yes". If the failure to conform has not been corrected, the PFS Quality Auditor shall note the failure to conform as "QC/No".

6.6.4. Most Frequently Occurring CCI Items

6.6.4.1. The most frequently occurring CCI items detected by IBTS are noted on PFS Form A-3. The PFS Quality Auditor shall give specific attention to these items during each audit.

6.7. Failures to Conform

6.7.1. All failures to conform shall be recorded in as clear and detailed a manner as possible. As many lines as are necessary shall be used to record failures to conform.

6.7.1.1. Example of inadequate report: "Improper slope to sink trap arm."

6.7.1.2. Example of adequate report: "Slope of trap arm for sink in front bath was only 1/16 inch per foot."

6.7.2. The PFS Quality Auditor shall not fail to record a failure to conform because it appears to be a minor one, or because it will be corrected at a later station. It is the responsibility of the PFS Quality Auditor to record every failure to conform observed. The PFS Quality Auditor shall not make value judgments about the relative severity of an observed failure to conform.

² The PFS Quality Auditor shall make every effort to return and observe the correction, before it is covered.

6.7.3. The PFS Quality Auditor shall not fail to record a failure to conform because it appears to be a minor one, or because it will be corrected at a later station. It is the responsibility of the PFS Quality Auditor to record every failure to conform observed. The PFS Quality Auditor shall not make value judgments about the relative severity of an observed failure to conform.

- 1.) the failure to conform,
- 2.) the reference to the DAPIA approved design manual, and where the DAPIA approved design manual is not specific, the HUD Standard, and where applicable the appropriate CCI number
- 3.) the location in the factory (origin) where the failure to conform was introduced
- 4.) the immediate correction (repair)
- 5.) the source (root cause) of the failure to conform
- 6.) whether the failure to conform was a QC/Yes or a QC/No
- 7.) whether the failure to conform was isolated,
- 8.) if the failure to conform was isolated, the serial number of the units used to determine that the failure to conform was isolated (See 6.14), and
- 9.) the issuance of a red tag, if the failure to conform resulted in the issuance of a red tag. (See 6.9)
- 10.) Document corrective measures to prevent FTC from repeating.

6.7.4. The PFS Quality Auditor shall relate the source of each failure to conform to the manufacturer's Quality Manual and record it on the form A.

Note: Since the report (PFS Form A) as written by the PFS Quality Auditor in the plant is the final report supplied to the manufacturer and will be kept on file by both the manufacturer and PFS, the report shall be easily understandable, neat and legible.

6.8. Quality System Issues

During each audit, the PFS Quality Auditor shall evaluate the plant for compliance with the Quality System Issues (QSI) listed on Form A-2. (See PFS Form A-3 for a complete list of Quality System Issues to be used by the PFS Quality Auditor and examples of compliance.)

Whenever a QSI is detected, the following steps shall be taken:

6.8.1. Cross reference the QSI to the Approved Documents

All Quality System Issues (QSI) shall be cross-referenced to the QA Manual. The section of the quality manual (page, section number, etc.) that is not being followed shall be documented. A complete description of the quality system issue and the cross-reference to the QA Manual shall be clearly documented on PFS Form A.

6.8.2. Document the Source (Root Cause)

For all Quality System Issues, the PFS Quality Auditor shall provide to the manufacturer a "HUD Manufactured Home Response Form", (PFS Form 55), directing the manufacturer to determine the root cause. (See 6.17 for other application of PFS Form 55.) The PFS Quality Auditor will fill in the date, the unit serial number, the DAPIA reference if applicable, and a description of the Quality System Issue. The manufacturer will be directed to document the symptom, the underlying cause (the root cause) and the solution (the corrective action). The underlying cause (root cause) can be one (1) isolated factor, a combination of elements that perpetuate or exacerbate a problem, or a series of cause-and-effect contributions that lead to a chain reaction. The solution (corrective action) should be a long term solution that will ensure that the problem does not recur. (For more information on determining root cause, refer to PFS Supporting Document SD-060, *Determining Root Cause*.)

Note: Whenever a Form 10A, "Unable to Isolate Notification" is issued, a Form 55 does not need to be issued.

6.8.3. Communicate the QSI to the Manufacturer

The Quality System Issue shall be clearly communicated to the manufacturer in writing on PFS Form A and on PFS Form 55. Sufficient explanation shall be provided so that the manufacturer clearly understands the problem. The Quality System Issue shall be discussed at the exit interview. The manufacturer shall be directed to determine the symptom, the underlying cause (the root cause) and the solution (the corrective action). The corrective action should provide long term relief from the symptoms and ensure that the problem does not recur.

6.8.4. Follow up to Determine that the Corrective Action is Effective

When the long term solution has been determined, the manufacturer shall complete PFS Form 55 and return it to the PFS Quality Auditor. The PFS Quality Auditor shall review the underlying cause (root cause) and the long term solution (corrective action) that will ensure that the problem does not recur. The PFS Quality Auditor should not accept the underlying cause (root cause) and the long term solution (corrective action) unless he/she is confident that corrective action will ensure that the problem does not recur. After the PFS Quality Auditor has accepted the manufacturer's response, the completed, signed PFS Form 55 shall be attached to the PFS Form A completed that day and filed at the manufacturing plant. A copy of the completed, signed PFS Form 55 shall also be submitted to PFS Headquarters with the PFS Form A completed that day.

The PFS Quality Auditor shall follow up on the manufacturer's corrective action to verify that the long term action has been effective. This shall be documented on PFS Form A.

6.9. Conditions for a Red Tag

There are four (4) conditions under which red tags are utilized:

1. Labeled Manufactured Home with Failure to Conform – at Plant

Whenever PFS determines that a manufactured home which has been labeled, but which has not yet been released by the manufacturer, may not conform to the design or, where the design is not specific with respect to an aspect of the standards, PFS by itself or through an agent shall red tag the manufactured home (see 3282.362(c)(2)(G)).

If any failures to conform are detected by IBTS during their audit on HUD labeled manufactured home(s), the PFS Quality Auditor shall note this on PFS Form A and red tag the manufactured home(s) until brought into compliance.

2. Labeled Manufactured Home with a Failure to Conform-at Dealer/Distributor

Where PFS determines that a manufactured home which has been labeled and released by the manufacturer, but not yet sold to a purchaser (as described in 3282.252(b)) may not conform, PFS may, in its discretion, proceed to red tag the manufactured home (see 3282.362(c)(2)(G)).

3. No Approved Floor Plan or Prints

If the PFS Quality Auditor encounters a manufactured home in the production line for which the manufacturer can supply no approved prints, the PFS Quality Auditor shall red tag the manufactured home. For multiple box manufactured homes, one red tag is acceptable. At such time as the manufacturer can provide the necessary approved prints, the PFS Quality Auditor shall then remove the red tag and inspect the manufactured home in question. At the time the PFS Quality Auditor initially encounters

the manufactured home for which no approved prints are available; he/she shall inform the general manager or their authorized representative that he/she shall inspect the manufactured home in question to the prints that are available. The PFS Quality Auditor shall further inform the manufacturer's representative that when approved prints become available for the manufactured home in question, if critical aspects of the construction of the manufactured home are covered it shall be necessary for the manufacturer to uncover those critical aspects of the construction so the PFS Quality Auditor may examine them if he/she has not inspected those areas of construction.

This procedure is also applicable when the PFS Quality Auditor is advised that a design is in error. (See 6.19, "Error in Current DAPIA Approved Design.")

4. Y/C not Corrected before PFS Quality Auditor Leaves Plant

Whenever any failure to conform that was originally designated as a Y/C is not corrected by the time the PFS Quality Auditor is ready to conclude his/her audit, the Y/C shall be changed to a red tag.

6.10. Red Tag Procedure

6.10.1. The PFS Quality Auditor shall record on PFS Form A "Quality Control Inspection

Report," every failure to conform (Yellow Condition (Y/C) or Red Tag (R/T)) observed. Each Y/C or R/T shall have a reference to the accepted documents. If the documents are not specific, reference to the Manufactured Home Construction and Safety Standards is acceptable. After each Y/C or R/T the PFS Quality Auditor shall record the failure to conform and how it was corrected. If it is not corrected, the red tag shall be outstanding and shall be followed up on the next audit. Each floor shall have its own red tag which can have one or more failures to conform. In addition, all red tags shall be logged in the upper right hand corner of PFS Form A "Red Tag Disposition" and the serial number of all red tags shall be indicated on the Form A or with a red tag log. When a red tag is issued, the upper portion shall be placed on or in the manufactured home where it is visible by the manufacturer and the bottom portion stapled to the Form A.

6.11. Red Tag Removal

6.11.1. When the red tag is cleared, the corrective action shall be noted on the back of the bottom portion of the red tag and on PFS Form A. The entire red tag shall then be stapled to the original Form A when the red tag was issued. This becomes a permanent part of the manufacturer's files. The corrective action for the red tag shall be noted on PFS Form A so that PFS has a permanent record of the corrective action taken for removal of the red tag.

6.11.2. When the failures to conform have been corrected, the red tag may be removed in accordance with Section 3282.362(c)(2)(G) which states: "Only the IPIA is authorized to remove red tags, though it may do so through agents which it deems qualified to determine that the failure to conform has been corrected. Red tags may be removed when the IPIA is satisfied through inspections, assurance from the manufacturer, or otherwise, that the affected homes conform." (Red tags shall be removed by the PFS Quality Auditor or his agent. All agents shall be accepted by the PFS IPIA Administrator.)

6.12. Correcting Failures to Conform

6.12.1. If the PFS Quality Auditor finds that a failure to conform exists in a manufactured home in production, per 3282.204(e), the manufacturer shall:

- correct the failure to conform in any manufactured homes still in the factory and held by distributors or dealers, and
- carry out remedial actions under 3282.404 and 3282.405 with respect to any other manufactured homes which may contain the same failure to conform.

6.13. Isolating Failures to Conform

- 6.13.1. Per 3282.362(a)(1)(iv), the IPIA (PFS Quality Auditor) shall assure that whenever it finds a manufactured home in production which "fails to conform", the "failure to conform" (FTC) is corrected before the manufactured home leaves the manufacturing plant.
- 6.13.2. Per 3282.362(a)(1)(v), the IPIA (PFS Quality Auditor) shall assure that if a "failure to conform"(FTC) is found in one manufactured home, all other homes still in the plant which the IPIA's records or the records of the manufacturer indicate might not conform, are inspected and, if necessary, brought up to the standards before they leave the plant.
- 6.13.3. When a failure to conform is observed on one manufactured home, the PFS Quality Auditor shall attempt to determine if the source of the failure to conform is such that the failure to conform would probably have been systematically introduced into more than one manufactured home during the course of production. Per 3282.404(a), examples that warrant checking additional manufactured homes include but are not limited to:
- 6.13.3.1. Complaints that can be traced to the same cause,
 - 6.13.3.2. Defects known to exist in supplies of components or parts,
 - 6.13.3.3. Information related to the performance of a particular employee, and
 - 6.13.3.4. Information indicating a failure to follow the QC procedures with respect to a particular aspect of the manufactured home.
- 6.13.4. If the PFS Quality Auditor concludes that the failure to conform may have been introduced into more than one manufactured home, the PFS Quality Auditor shall take action to:
- 6.13.4.1. stop the failure to conform from continuing to be introduced into production,
 - 6.13.4.2. attempt to isolate the failure to conform by checking additional manufactured homes forward and backward in the production line.

6.14. Isolation Procedure

6.14.1. Overview

- 6.14.1.1. The PFS Quality Auditor shall determine where the failure to conform was introduced into production. The PFS Quality Auditor shall then stop the failure to conform from continuing to be introduced into production and correct all affected units.
- 6.14.1.2. The PFS Quality Auditor shall inspect all manufactured homes between where the failure to conform was originally observed and the point in production where the failure to conform was may have been introduced, to determine if the failure to conform exists in these manufactured homes. The PFS Quality Auditor shall record the serial number of all manufactured homes inspected, and shall note whether the failure to conform was found.

6.14.1.3. The PFS Quality Auditor shall inspect manufactured homes at the plant forward and (backwards if applicable) in the production line, in order to isolate the failure to conform. The PFS Quality Auditor shall record the serial number of all manufactured homes inspected, and shall note whether the failure to conform was found.

6.14.2. Failure to Conform Introduced into Consecutive Units (Floors)

6.14.2.1. If the failure to conform has been introduced into consecutive floors, then from the point where the failure to conform was first observed, the PFS Quality Auditor shall continue forward and (backwards if applicable) in the production line as far as necessary to determine if the failure to conform exists in additional manufactured homes. If after inspecting the other manufactured homes in the production line, the PFS Quality Auditor finds the failure to conform does not exist, the PFS Quality Auditor can conclude that the failure to conform has been isolated.

6.14.2.2. If the PFS Quality Auditor finds the failure to conform still exists, the PFS Quality Auditor shall continue forward from the last work position where the failure to conform was observed to determine if the failure to conform continues to exist. This process shall continue to be followed until the PFS Quality Auditor finds the failure to conform no longer exists or concludes that the failure to conform cannot be isolated.

6.14.2.3. If the process of isolating the failure to conform requires the PFS Quality Auditor to inspect manufactured homes that have exited the production facility, the PFS Quality Auditor shall inspect manufactured homes in sequential order of production. If that is not possible, because certain manufactured homes have been shipped, the PFS Quality Auditor shall note on the inspection report "unable to isolate" and, per 3282.204(e), shall notify the manufacturer to (1) correct all affected manufactured homes still in the factory and/or held by distributors or dealers, and (2) carry out remedial action per 3282.404 and 3282.405 with respect to any other manufactured homes which may contain the same failure to conform. (Refer to Section 9, "Failure to Conform not Isolated at Plant.")

6.14.2.4. If the PFS Quality Auditor cannot conclude that the failure to conform has been isolated, the PFS Quality Auditor shall note on the inspection report "unable to isolate," issue PFS Form 10A and, per 3282.204(e), shall notify the manufacturer to (1) correct all affected manufactured homes still in the factory and/or held by distributors or dealers, and (2) carry out remedial action per 3282.404 and 3282.405 with respect to any other manufactured homes which may contain the same failure to conform. (Refer to Section 9, "Failure to Conform not Isolated at Plant.")

6.14.3. Failure to Conform Not Introduced into Consecutive Units (Floors)

6.14.3.1. It is critical to differentiate failures to conform that have likely been introduced into consecutive manufactured homes versus failures to conform that have likely been introduced only into specific manufactured homes (i.e. model specific, specific model groups, specific features, doublewides only, singlewides only, etc.). If the PFS Quality Auditor determines that the failure to conform likely has been introduced only into specific manufactured homes, the PFS Quality Auditor shall attempt to isolate the failure to conform. In this situation, if there is only one manufactured home forward in the production line with the specific feature, the PFS Quality Auditor will not be able to conclude that the

failure to conform has been isolated, without identifying other evidence. (See 6.13.4). Only with additional evidence can the PFS Quality Auditor conclude that the failure to conform has been isolated.

- 6.14.3.2. If there are no manufactured homes forward in the production line with the specific feature, the PFS Quality Auditor shall note on the inspection report "unable to isolate" and utilizing PFS Form 10A, shall notify the manufacturer per 3282.204(e), to (1) correct all affected manufactured homes still in the factory and/or held by distributors or dealers, and (2) carry out remedial action per 3282.404 and 3282.405 with respect to any other manufactured homes which may contain the same failure to conform. (Refer to Section 9, "Failure to Conform not Isolated at Plant.").

6.14.4. Failure to Conform May Be Covered Up

- 6.14.4.1. In attempting to isolate a failure to conform, if there may be manufactured homes further ahead in the production line where the failure to conform is covered up, the PFS Quality Auditor shall advise the manufacturer. If the manufacturer uncovers the portion of the manufactured home(s) where the suspected failure to conform is located, the PFS Quality Auditor shall monitor and observe whether the failure to conform exists or not. If the manufacturer does not open up the suspected manufactured home(s), the PFS Quality Auditor shall note on the inspection report "unable to isolate" and per 3282.204(e), shall notify the manufacturer to (1) correct all affected manufactured homes still in the factory and/or held by distributors or dealers, and (2) carry out remedial action per 3282.404 and 3282.405 with respect to any other manufactured homes which may contain the same failure to conform. (See Section 9, "Failure to Conform not Isolated at Plant.").

Exception: If the manufacturer's quality inspector can conclusively demonstrate through quality control documents, or other documents or other methods, that the failure to conform does not exist, the PFS Quality Auditor can conclude that the failure to conform has been isolated.

6.15. Failure to Conform in a Labeled Manufactured Home

- 6.15.1. Per 3282.362(c)(2)(i)(G), whenever the PFS Quality Auditor determines that a manufactured home which has been labeled, but which has not yet been released by the manufacturer, may not conform, the PFS Quality Auditor shall red tag the manufactured home. Where the PFS Quality Auditor determines that a manufactured home which has been labeled and has been released by the manufacturer, but not yet sold to a purchaser, may not conform, the PFS Quality Auditor can red tag the manufactured home. The PFS Quality Auditor should advise the dealer that per 3282.414(a), a dealer may not sell a manufactured home that contains a failure to conform or an imminent safety hazard.

6.16. Unable to Isolate Failure to Conform

- 6.16.1. During the course of the PFS Quality Auditor's audit or during an IBTS audit, if any failure to conform cannot be isolated, the PFS Quality Auditor shall record on the PFS Form A that the failure to conform could not be isolated. Utilizing PFS Form 10A, *Unable to Isolate Notification*, the PFS Quality Auditor shall immediately notify the manufacturer (and at the exit interview) that the failure to conform could not be isolated. Per 3282.204(e), "If during the course of production, an IPIA finds that a failure to conform to a standard exists in a manufactured home in production,

- 6.16.1.1. the manufacturer shall correct the failure to conform in any manufactured home still in the factory and held by dealers or distributors and
- 6.16.1.2. shall carry out remedial action under 3282.404 and 3282.405 with respect to any other homes which may contain the same failure to conform." (Refer to Section 9, "Failure to Conform not Isolated at Plant.")

6.17. CCI at Repeat Status

- 6.17.1. Whenever a CCI reaches repeat status (see definition), the PFS Quality Auditor shall provide to the manufacturer a *HUD Manufactured Home Response Form*, (PFS Form 55), directing the manufacturer to determine the underlying cause (root cause). (See 6.8.1 for other application of PFS Form 55.) The PFS Quality Auditor shall fill in the date, the unit serial number, the DAPIA reference if applicable, and a description of the CCI. Sufficient explanation shall be provided so that the manufacturer clearly understands the problem. The CCI shall be discussed at the exit interview. The manufacturer shall be directed to document the symptom, the underlying cause (the root cause) and the solution (the corrective action). The solution (corrective action) should be a long term solution that will ensure that the problem does not recur.

When the long term solution has been determined, the manufacturer shall complete PFS Form 55 and return it to the PFS Quality Auditor. The PFS Quality Auditor shall review the underlying cause (root cause) and the long term solution (corrective action) that will ensure that the problem does not recur. The completed, signed PFS Form 55 shall be filed with PFS audit/inspection forms at the manufacturing plant and a copy of the completed form sent to PFS headquarters with the Form A's. The PFS Quality Auditor shall follow up on the manufacturer's corrective action to verify that the long term action has been effective. This shall be documented on PFS Form A.

6.18. CCI at Repeat Status and Continues to Repeat

- 6.18.1. Whenever a CCI reaches repeat status and then continues to repeat (four (4) or more times in the ten (10) most current audits), the department shall be placed on Increased Audit Frequency (See Increased Audit Frequency, Section 8).

6.19. IPIA Request for Additional DAPIA Information

- 6.19.1. Whenever the PFS Quality Auditor has a question regarding the DAPIA package or requires an interpretation, that question/interpretation request can be submitted to the DAPIA on PFS Form 238, "IPIA Request for Additional DAPIA Information". Specific instances to use Form 238 include when the DAPIA package appears to contain conflicting information, or appears to be missing required information on an approved design.

6.20. Error in Current DAPIA Approved Design

- 6.20.1. Whenever the PFS IPIA Headquarters receives information from the PFS DAPIA (or other DAPIA) that a current floor plan or design detail is in error, that information shall be forwarded to the applicable plant PFS Quality Auditor and Area Training Supervisor.
- 6.20.2. The PFS Quality Auditor and Area Training Supervisor shall follow up to verify that the error does not continue to be introduced into future production. If it is not clear what the correct design should be, any affected home shall be red tagged, until approved DAPIA design information is provided.

6.21. Production Line Tests

- 6.21.1. The PFS Quality Auditor shall try to witness each test that is performed while he/she is in the plant and verify compliance to the accepted documents. The PFS Quality

Auditor shall notify the manufacturer's quality inspector to alert him/her when a test is about to be performed. The PFS Quality Auditor will then proceed to the area where the test will be conducted. The PFS Quality Auditor shall document that each test is conducted per the manufacturer's DAPIA approved quality manual. The PFS Quality Auditor shall note each test that was observed on PFS Form A.

6.22. Unlabeled Yard Manufactured Homes

6.22.1. As part of each audit, the PFS Quality Auditor shall check the status of unlabeled manufactured homes in storage on the manufacturer's property at the time of the audit. If there are no unlabeled units in storage on the manufacturer's property, the PFS Quality Auditor shall check Yes/No on PFS Form A-2 statement "No unlabeled units in yard".

6.22.2. If the manufacturer's documented and DAPIA-approved quality control system provides for a daily status report of all unlabeled manufactured homes and all unlabeled, red-tagged manufactured homes, then a minimum of one (1) unlabeled manufactured home shall be inspected to verify that the manufacturer's daily status report is complete and accurate. The serial number(s) of the manufactured home(s) inspected shall be recorded on the Form A.

6.22.3. If the manufacturer's documented and DAPIA-approved quality control system does not provide for a daily status report of all unlabeled and all unlabeled, red-tagged manufactured homes, then all such manufactured homes shall be inspected during each production line audit and the serial numbers noted on the Form A.

6.22.4. In order to audit the manufacturer's quality control system the PFS Quality Auditor shall randomly select an unlabeled manufactured home in storage and check to see if the quality control inspector has inspected the manufactured home and made note of the failures to conform or shortage items that exist. The PFS Quality Auditor shall then inspect the manufactured home and verify that the quality control inspector did or did not find all failures to conform or shortage items that existed in the manufactured home.

6.22.5. If the PFS Quality Auditor finds failures to conform that were not noted by the quality control inspector, this may be an indication the quality control system is not functioning properly. The PFS Quality Auditor shall then increase the number of audits (See Section 8-Increased Frequency of Audits) on unlabeled manufactured homes to the extent needed to ensure compliance with the accepted documents, before the manufactured homes are labeled. It is the responsibility of the PFS Quality Auditor to increase the frequency of audit on unlabeled manufactured homes in storage until such time the PFS Quality Auditor is satisfied that the manufacturer's quality control system is functioning in such a manner that all unlabeled manufactured homes in storage are in compliance with the accepted documents before labeling.

Note: These manufactured homes are typically in an unlabeled status due to shortages of materials, lack of design approvals, failures to conform and/or rework, etc. The intent of inspecting these manufactured homes is to confirm that the manufacturer's quality control procedures are being followed and verify all items are documented properly.

6.23. Label Control

6.23.1. Per 3282.362(c)(2)(i), if the PFS Quality Auditor and PFS Corporation are not satisfied that the manufacturer can and is producing manufactured homes which conform to the design and standards, then labels shall not be issued to that manufacturer. Where necessary, the PFS Quality Auditor shall reclaim labels already given to the manufacturer. In no event shall the PFS Quality Auditor allow a label to be affixed to a manufactured

home if the PFS Quality Auditor believes that the manufactured home fails to conform to the design and standard. Labels for such homes shall be provided only after the failure to conform has been remedied.

6.23.2. The label shall be permanently attached to the manufactured home by means of 4 blind rivets, drive screws, or other means that render it difficult to remove without defacing it. The label shall be located at the tail-light end of each transportable section of the manufactured home approximately one foot up from the floor and one foot in from the road side, or as near that location on a permanent part of the exterior of the manufactured home as practicable. The roadside is the right side of the manufactured home when one views the manufactured home from the tow bar end of the manufactured home. The label shall be applied to the manufactured home in the manufacturing plant.

6.23.3. For manufacturers with a very low production rate or if PFS is on-call for unit inspections, then PFS shall retain all labels.

6.24. Audit Conclusion

At the conclusion of the audit, the PFS Quality Auditor shall finish PFS Form A and PFS Form A-2, determine a PFS Rating, update the CCI Status Report Form (PFS Form 146), determine the audit frequency, and offer an exit meeting to the manufacturer.

6.24.1. PFS Rating

6.24.1.1. The PFS Quality Auditor shall determine a PFS Rating. When determining the PFS Rating, the PFS Quality Auditor shall count only failures to conform recorded as "QC/No's". "QC/Yes" findings shall not be counted in determining the PFS Rating. If the same failure to conform is detected more than once during an audit, it shall count as only one failure to conform (CCI), when determining the repeat status and total CCIs in determining the PFS Rating. Failures to conform that do not have a corresponding CCI number shall be coded "99.1" and shall also be recorded on PFS Form 146, CCI Status Report, in the affected department.

6.24.1.2. If the PFS Rating is greater than 2 Quality System Issues, 7 CCIs, or 2 Quality System Issues or CCIs at repeat status (greater than 2/7/2), the PFS Quality Auditor shall call the PFS IPIA Administrator or his designee to discuss the PFS ratings and determine the need to increase audit frequency (See Section 8 - Increased Audit Frequency).

6.24.2. CCI Status Report

6.24.2.1. The PFS Quality Auditor shall update the CCI Status Report (Form 146).

6.24.3. Audit Frequency

6.24.3.1. The PFS Quality Auditor shall determine if the next audit should be routine, or if an increased audit frequency should be considered (See Increased Audit Frequency).

6.25. Exit Meeting

When the PFS Quality Auditor has completed the audit forms (PFS Form A, Form A-2), determined a PFS Rating, updated the CCI Status Report Form (PFS Form 146), and determined the audit frequency, he/she shall offer the general manager or their authorized representative the opportunity to participate in an exit meeting. During the exit meeting, the PFS Quality Auditor shall review with the general manager or their authorized representative, the following items:

- 6.26.1 PFS Rating
- 6.26.2 Current audit status (Normal, Increased-Same Day, Increased-Separate Day, Increased and Retain Labels)
- 6.26.3 Conditions that would warrant increasing audit frequency (Refer to Section 8 – Contact Area Training Supervisor)
- 6.26.4 Quality System Issues observed during audit (Discuss Root Causes)
- 6.26.5 Failure(s) to Conform observed during audit (Discuss Root Causes)
- 6.26.6 CCIs and/or QSI at repeat status (specify)
- 6.26.7 CCIs and/or QSIs that will reach repeat status, if detected at next audit (Specify)
- 6.26.8 CCIs, FTCs or QSIs that the PFS Quality Auditor was unable to isolate (Form 10A)
- 6.26.9 Red Tag Disposition (List)
- 6.26.10 Any DAPIA issues (Complete PFS Form 238)
- 6.26.11 Monthly Audit Items from PFS Form 316
- 6.26.12 Other (Specify)

7. MONTHLY AUDIT/INSPECTION

At least monthly, the PFS Quality Auditor shall evaluate the plant for compliance with the items listed on PFS Form 316, *IPIA Monthly Plant Report*.

7.1. Test Equipment

The manufacturer's test equipment as listed in their QA Manual shall be inspected for any visible damage, suitability for use and current calibration.

Note: While the manufacturer's test equipment must be inspected minimum monthly, the witnessing or verification of production line tests is not a monthly requirement. However, when the witnessing or verification of production line tests takes place, it shall be documented.

7.2. Material Receiving and Storage

The PFS Quality Auditor shall confirm that receivers are trained and are receiving materials per the procedures specified in the manufacturer's quality manual. The PFS Quality Auditor shall confirm that materials and products used in the construction of HUD manufactured homes are adequately stored and protected, until utilized in the construction of a HUD manufactured home. Examples of storage conditions that shall be considered include: general protection from weather elements, including temperature (cold/heat), rain/snow/water/humidity, UV, and general storage damage (stacking, handling, etc.). The PFS Quality Auditor shall verify all equipment and tools used to verify material acceptance is functional and calibrated if applicable and note on PFS Form 316. (Moisture Meters, Micrometers and etc.)

7.3. Data Plates

The PFS Quality Auditor shall audit data plates for accuracy. The data plates Date of Manufacture (DOM) shall agree with the HUD 302 report DOM. The data plate appliance model numbers shall agree with actual model numbers. The data plate HUD label number shall agree with the actual HUD label number, which shall agree with the HUD 302 report.

7.4. Notifications & Corrections

The PFS Quality Auditor shall request to see any HUD/SAA approved notification plans or Final Determination orders. If any approved notification plans or Final Determination orders exist, the PFS Quality Auditor shall audit and record (on PFS Form 316) the progress regarding notification letters being sent to owners of the class of potentially affected manufactured homes, and if corrections are required, the progress of correcting the affected manufactured homes.

- 7.4.1 To audit the progress made in sending out notification letters, determine the number of letters that need to be sent (size of the class); then determine the number of letters that have been actually sent out. The PFS Quality Auditor shall monitor this activity, until it

can be documented that all notification letters have been sent out. Evidence that notification has been completed is via a copy of the notification letter in the home file.

- 7.4.2 To audit the progress made in completing corrections, determine the number of homes in the class; subtract the number of homes inspected by the manufacturer and determined to be in compliance without further correction; subtract the number of homes inspected by the manufacturer and corrected; and subtract the number of homes where the manufacturer's records indicate that the homeowner refused to allow the repair, leaving those homes that still need to be inspected.

7.5. AC Activity

If the manufacturer has any Alternative Construction (AC) approvals, the PFS Quality Auditor shall audit the manufacturer's records to determine if there are any AC homes that have not yet had the on-site inspection-completed.

7.6. Plan of Corrective Action (POCA)

If the manufacturer is currently operating under a Plan of Corrective Action (POCA), at least monthly, the PFS Quality Auditor shall audit all portions of the POCA to verify their continued adherence and effectiveness.

7.7. Labeled Manufactured Homes in Storage

7.7.1. The PFS Quality Auditor shall check the status of labeled manufactured homes in storage on the manufacturer's property at least once a month. If the PFS Quality Auditor discovers a failure to conform on a labeled manufactured home, he/she shall red tag the manufactured home and indicate on PFS Form A the following information:

- 7.7.1.1. Red tag serial number
- 7.7.1.2. Serial and HUD label number
- 7.7.1.3. Date of audit and name of the PFS Quality Auditor
- 7.7.1.4. The nature of the failure to conform(s), including applicable code reference and when applicable, the CCI reference

7.7.2. During the exit interview the PFS Quality Auditor shall inform the general manager or their authorized representative as to which labeled manufactured home(s) were found not to be in conformance.

7.8. Audit of Frame Shops

7.8.1. When the manufacturing plant has a Frame shop on the plant's property but is in a separate building, all frames in production in the frame shop shall be inspected during each regular inspection as an offline station.

If the manufacturing plant is receiving frames from a plant that is owned by the same company or an independent owned chassis shop, the manufacturer must have an inspection procedure and process for inspecting the frames for compliance approved in their QC manual. The manufacturer must also have an approved inspection checklist of all applicable items that are to be inspected on each frame.

Also, an inspection and documentation on a checklist of the inspection must be done for each frame before it enters production.

7.8.2 For each Frame shop that is owned by the Manufacturer and is not located on the plant's manufacturing property, the frame shop shall have an approved inspection process. The frame shop shall also have an approved inspection checklist to be filled out for each frame built. The checklist shall identify which plant the frame is being built for. These frame shops are to be audited by PFS a minimum of once per quarter.

7.9. Monthly Reports

At the end of each month, for each manufacturer, the PFS Quality Auditor shall complete and forward the *Monthly Plant Condition Report* (Form 316) and the *CCI Status Report Form* (Form 146) to the PFS QC Department. A copy both forms shall also be left with the manufacturer's records (Form As) for auditing by IBTS.

7.10. IPIA Monthly Service Determination Records Review

Minimum once a month the PFS Quality Auditor will review the manufacturer's service records for determinations on all complaints per 3282.366.

During this review the PFS Quality Auditor will review the determinations and basis for determinations from a minimum of 5 complaints and record the results on PFS Form 325. The 5 complaints should be from more than one (1) home file.

During this review the PFS Quality Auditor will review the Manufacturer's records to assure the manufacturer is making determinations for every complaint from any source: (Consumer complaint, Dealer complaint, S.A.A. complaint, IBTS audit, IPIA Form 10A, supplier recall, from the manufacturer themselves or any other source) and whether the determination is reasonable and made within 30 days of receiving the complaint. Also, the PFS Quality Auditor is to verify that the manufacturer is providing a basis for the determinations. During the review the PFS Quality Auditor shall record the name of the person responsible for making the determinations. The determinations shall be classified by the manufacturer as one of the following: (Noncompliance, Defect, Serious Defect, Imminent Safety Hazard or No Further Action). See definitions below.

Imminent Safety Hazard - means a hazard that presents an imminent and unreasonable risk of injury or death or severe personal injury that may or may not be related to failure to comply with an applicable Federal manufactured home construction and safety standard.

Serious Defect - means any failure to comply with an applicable Federal manufactured home construction and safety standard that renders the manufactured home or any part thereof not fit for the ordinary use for which it was intended, but does not results in an unreasonable risk of injury or death to occupants of the affected manufactured home.

Defect - means a failure to comply with an applicable Federal manufactured home construction and safety standard that renders the manufactured home or any part thereof not fit for the ordinary use for which it was intended, but does not result in an unreasonable risk of injury or death to occupants of the affected manufactured home.

Noncompliance - means a failure of a manufactured home to comply with a Federal Manufactured Home Construction and Safety Standard that does not constitute a defect, serious defect or imminent safety hazard.

No Further Action - means not a nonconformance, not an imminent safety hazard, not a standards related issue, or not the responsibility of the manufacturer.

The PFS Quality Auditor is also to review the records to assure the manufacturer is making a final determination including if a class homes may be affected within 20 days of the initial determination. The PFS Quality Auditor will explain in the comments section of PFS Form 325 any discrepancies noted and all items checked no during the records review. The PFS Quality Auditor may use additional pages if needed.

The PFS Auditor will verify and document on PFS Form 325 if the manufacturer record keeping is in accordance with 3282.417.

The PFS Form 325 will be signed by the PFS Quality Auditor and the Manufacturer's Representative and a copy left at the plant for future review.

8.0. INCREASED AUDIT FREQUENCY

8.1 Overview

Per 3282.362(c)(1), when manufactured homes repeatedly fail to conform in the same assembly station or when there is evidence that the manufacturer is ignoring or not performing under its approved quality manual, the IPIA (PFS Corporation) shall increase frequency of these inspections until it is satisfied that the manufacturer is performing to its approved quality manual. Failure to perform justifies withholding labels until an adequate level of performance is attained.

8.1.1 Conditions that warrant increasing audit frequency and the corresponding action to be taken by PFS are contained in the table titled "Increased Audit Frequency"

8.1.2 Increased audits are performed by the assigned PFS Quality Auditor. Increased audits shall be performed at stations or departments where the problems have been identified, rather than randomly made throughout the plant. A letter is sent by PFS Headquarters with a copy to HUD and IBTS, advising the manufacturer of the problem areas and of the increased audit decision.

8.1.3 When conducting an increased audit, the PFS Quality Auditor shall note on the top of the first page of PFS Form A, the reason for the increased audit as well as the department(s), CCIs, QSIs, etc. being audited.

8.1.4 PFS Rating Adjustment

8.1.4.1 The PFS Rating under which Increased Audit Frequency can occur shall consider the number of floors inspected and be adjusted per the following:

- 8.1.4.1.1 2/7/2 - Up to 25 floors
- 8.1.4.1.2 2/10/2 - 26 to 37 floors
- 8.1.4.1.3 2/13/2 - 38 to 50 floors

8.1.4.2 The PFS Rating under which Increased Audit Frequency and Lift Labels can occur shall consider the number of floors inspected and be adjusted per the following:

- 8.1.4.2.1 3/8/3 - Up to 25 floors
- 8.1.4.2.2 3/11/3 - 26 to 37 floors
- 8.1.4.2.3 3/14/3 - 38 to 50 floors

8.2 Returning to Normal Audit Frequency

8.2.1 When the condition that warranted increasing audit frequency is corrected per the table titled "Increased Audit Frequency", the PFS Quality Auditor shall make a recommendation to the PFS Headquarters concerning returning to normal audit frequency. The manufacturer shall be notified in writing that the plant has been returned to normal audit frequency.

8.3 Need for a Plant Evaluation

8.3.1 If plant conditions are not improving and completely back to normal audit frequency after three (3) audits or one (1) week (whichever is greater), or if any IBTS audit and/or PFS Rating exceeds the parameters set forth in Section 8.1.5 (see PFS Rating Adjustment), the PFS IPIA Administrator or his designee may require a plant evaluation (see Plant Evaluation).

Increased Audit Frequency³		
Conditions that Warrant Increasing Audit Frequency	PFS Action	Criteria to Return to Normal Audit Frequency
A specific CCI or QSI reaches repeat status (The same CCI or QSI is detected three (3) times in a department, based on the ten (10) most current audits)	No increased audit frequency. See 6.17.1. Complete Form 55. Direct manufacturer to determine root cause and long term corrective action that will prevent recurrence.	N/A
A specific CCI or QSI continues to repeat after reaching repeat status (i.e. the CCI is detected more than 3 times in the department based on the 10 most current audits)	Place department(s) affected on increased audit frequency. 1-2 departments - Conduct increased audit following regular audit. Over 2 departments - Conduct increased audit on separate day from regular audit.	Following 3 consecutive regular audits or an increased audit on a separate day, when the CCI or QSI at repeat status is not detected, the affected department(s) can be returned to normal audit frequency.
6 or more CCIs and/or QSIs in any one production department within the 10 most current audits	Place department(s) on increased audit frequency. 1-2 departments - Conduct increased audit following regular audit. Over 2 departments - Conduct increased audit on separate day from regular audit.	Following a regular audit or an increased audit on a separate day, when findings drop below the conditions that warranted increasing audit frequency, the department(s) can be returned to normal audit frequency.
A PFS Rating of greater than 2 Quality System Issues, 7 CCIs, or 2 CCIs or Quality System Issues at repeat status ⁴	Place plant on increased audit frequency. Conduct plant-wide increased audit on separate day from regular audit. Focus audit on items that caused the PFS rating to exceed 2/7/2 in addition to all CCIs and/or QSIs documented in the last 10 audits.	PFS Rating must reach 1/7/0 or less for 3 consecutive regular or special audits with no more than 2 CCIs or QSIs continuing to be detected in any specific department.
A PFS Rating of greater than 3 Quality System Issues, 8 CCIs, or 3 CCIs or Quality System Issues at repeat status	Place plant on increased audit frequency. Take possession of HUD labels. Conduct plant-wide increased audit on separate day from regular audit. Focus audit on items that caused the PFS rating to exceed 3/8/3 in addition to all CCIs and/or QSIs documented in the last 10 audits. Conduct final finish inspection on each unit prior to releasing HUD label.	When PFS Rating reaches 2/8/0 or less for 3 consecutive regular or special audits with no more than 2 CCIs or QSIs continuing to be detected in any specific department, HUD labels can be returned to the plant's possession and final finish inspections on each unit prior to labeling can be discontinued. When PFS Rating reaches 1/7/0 or less for 3 consecutive regular or special audits with no more than 2 CCIs or QSIs continuing to be detected in any specific department, plant can be returned to normal audit frequency.
Large turnover in any one production department	Place department on increased audit frequency. Conduct increased audit following regular audit.	Following 3 consecutive regular audits, with no more than 2 CCIs detected in that department, the department may be returned to normal audit frequency.

³ This is a guideline. Increased audit frequency decisions shall be determined by the PFS IPIA Administrator or his designee with input from the PFS Quality Auditor and/or the PFS Area Training Supervisor, and shall consider all circumstances and conditions involved.

⁴ When the same CCI or Quality System Issue is detected three (3) times or more in a department, based on the ten (10) most current audits, the CCI or Quality System Issue is considered to be at repeat status. See 6.17, CCI at Repeat Status.

Increased Audit Frequency³		
Absence, loss and/or change of key personnel (i.e. foremen, managers, or QC personnel)	Place department(s) affected on increased audit frequency. Conduct increased audit following regular audit.	Following 3 consecutive regular audits, with no more than 2 CCIs detected in the affected department(s), the department(s) may be returned to normal audit frequency.
New process and/or equipment that results in a failure to conform not being detected by the plant	Place department on increased audit frequency. Conduct increased audit following regular audit.	Following 3 consecutive regular audits, with no more than 2 CCIs detected in that department, the department may be returned to normal audit frequency.

9. FAILURE TO CONFORM NOT ISOLATED AT PLANT

9.1 General

- 9.1.1 During the course of any audit, if any failure to conform is observed and cannot be isolated at the plant, the PFS Quality Auditor shall record on the PFS Form A that the failure to conform could not be isolated. The PFS Quality Auditor shall immediately notify the manufacturer that he/she was unable to isolate the failure to conform.
- 9.1.2 At the exit interview, the PFS Quality Auditor shall again inform the manufacturer that he/she was unable to isolate the failure to conform. This will be noted on the Form A in the Summary section (last page).
- 9.1.3 If the PFS Quality Auditor is unable to isolate a failure to conform at the manufacturing plant, the PFS Quality Auditor shall advise the manufacturer in writing that he/she was unable to isolate the failure to conform. Utilizing PFS Form 10A, the PFS Quality Auditor shall describe the failure to conform that could not be isolated. The PFS Form 10A shall be provided to the manufacturer, with copies to the PFS Area Training Supervisor and PFS Headquarters. Per 3282.204(e), the PFS Quality Auditor shall direct the manufacturer to:
- correct the failure to conform in any manufactured homes still in the factory and held by distributors or dealers (Homes not yet Sold at Retail), and
 - for homes already sold at retail, to carry out an investigation under 3282.404 and 3282.405 (Investigation for Possible Subpart I Activity), and determine if the manufacturer is required to notify the homeowners and make corrections to these homes.

9.2 Background

- 9.2.1 3282.363 requires the IPIA to secure from the manufacturer the right to inspect manufactured homes in the hands of dealers or distributors at any reasonable time.
- 9.2.2 Per 3282.364, "... the IPIA shall have primary responsibility for inspecting actual units produced and, where necessary, for inspecting units released by the manufacturer."
- 9.2.3 Per 3282.362(c)2(G), "Where the IPIA determines that a manufactured home which has been labeled and released by the manufacturer, but not yet sold to a purchaser (as described in 3282.252(b)) may not conform, the IPIA may, in its discretion, proceed to red tag the manufactured home."

9.3 Homes Not Yet Sold at Retail

- 9.3.1 In order for PFS to follow up on corrections at the factory and/or dealer lot, the manufacturer shall provide PFS with a list of all potentially affected homes that have not yet been sold at retail. The list shall include serial number and address (dealer, street address, city, state) for each potentially affected home. The manufacturer shall provide an explanation of how the class was determined. The explanation shall include specific information on how the first home in the class was determined and specific information on how the last home in the class was determined.
- 9.3.2 PFS shall review and concur with the method used by the manufacturer to determine the class of homes potentially affected. If PFS does not concur with the method used by the manufacturer to determine the class of homes potentially affected, it shall state why it finds the method to be inadequate, inappropriate or incorrect.

Note: Per 3282.362(c)2(G), PFS has the option of red tagging all affected homes not yet sold at retail. As the manufacturer and dealer cannot sell homes that contain failures to conform or that are red tagged, it is in everyone's interest to resolve this issue quickly.

- 9.3.3 The manufacturer shall make the required corrections and provide a written periodic progress report to PFS regarding the corrective action status of each affected home in the class.
- 9.3.4 When it deems it necessary, PFS Corporate shall direct the PFS Quality Auditor to follow up at the plant and/or at dealer lots (utilizing PFS Form 83, *Dealer Lot Follow-up Inspection*) to verify that corrective actions by the manufacturer have been effective in removing any identified failures to conform.
- 9.3.5 When PFS is satisfied that the corrective action has been accomplished, it shall remove any red tags, or per 3282.362(c)2(G), have the red tags removed by its agents.
- 9.3.6 All notices sent to manufacturers involving homes located at either the factory and/or the retailer shall be logged by PFS and followed up for closure. Each instance shall be followed through to conclusion that the correction has been satisfactorily completed.

9.4 Homes Already Sold at Retail (Investigation for Possible Subpart I Activity)

9.4.1 General

- 9.4.1.1 For homes already sold at retail, PFS' initial involvement as IPIA ends with notice to the manufacturer to conduct an investigation per 3282.404 and 3282.405.
- 9.4.1.2 Following the manufacturer's investigation, if the manufacturer determines that notification or, notification and correction are required, the manufacturer shall request IPIA concurrence per 3282.366(b) and 3282.409(d), regarding the method used to determine the class of potentially affected homes. PFS shall review and concur with the method used by the manufacturer to determine the class of homes potentially affected or shall state why it finds the method to be inadequate, inappropriate or incorrect.
- 9.4.1.3 Per 3282.416(a) PFS shall monitor to conclusion, the manufacturer's progress regarding notifications or, notifications and corrections. This progress shall be documented on PFS Form 316.

9.4.2 Manufacturer's Investigation

9.4.2.1 Per 3282.404(b), whenever the manufacturer receives from any source information that a problem may exist (including notification from PFS that it was unable to isolate a failure to conform), the manufacturer shall within 20 days after the receipt of the information, carry out any necessary investigations and inspections and shall determine whether the manufacturer is responsible for providing notification under 3282.404. The manufacturer may use PFS Form 10 (Subpart I Determination), in determining if notification is required.

9.4.3 Manufacturer's Determination

9.4.3.1 If the manufacturer's investigation determines that the failure to conform does not exist, or may exist but is determined to be a noncompliance, then notification to the consumer is not required. Exception: The SAA or HUD can order such notification after issuance of a final determination under 3282.407.

9.4.3.2 If the manufacturer has information that a defect exists or may exist in a class of homes that is identifiable because the defect is such that it would probably have been introduced into more than one manufactured home during the course of production, per 3282.404(a), the manufacturer shall provide notification.

9.4.3.2.1 The information may include but is not limited to:

- Complaints that can be traced to the same cause,
- Defects known to exist in supplies of components or parts,
- Information related to the performance of a particular employee,
- Information indicating a failure to follow quality control procedures with respect to a particular aspect of the manufactured home.

9.4.3.3 If the manufacturer's investigation determines that an imminent safety hazard or serious defect exists or may exist, per 3282.404(a), the manufacturer shall provide notification.

9.4.3.3.1 If the imminent safety hazard or serious defect can be related to an error in design or assembly of the manufactured home by the manufacturer, including an error in design or assembly of any component or system incorporated in the manufactured home by the manufacturer, per 3282.406 the imminent safety hazard or serious defect shall be corrected.

9.4.4 Manufacturer's Record of Investigations and Determinations

9.4.4.1 The manufacturer shall maintain complete records of all such investigations and determinations in a form that will allow HUD or the SAA to readily discern who made the determination with respect to a particular piece of information, what the determination was and the basis for the determination. Per 3282.404(b), the manufacturer shall keep the records for a minimum of five (5) years from the date the manufacturer received the information.

9.4.5 Manufacturer's Plan

9.4.5.1 Voluntary Notification and Correction

9.4.5.1.1 If the manufacturer determines that an imminent safety hazard or serious defect exists or may exist in any home, or a defect exists or may exist in a class of homes, the manufacturer is responsible for providing notification, per 3282.404(c). The manufacturer shall prepare a plan for notification as set out in 3282.409.

9.4.5.1.2 The plan shall identify by serial number and other appropriate identifying criteria all homes to which notification is to be provided. Methods used to determine the extent of the class of homes include, but are not limited to:

9.4.5.1.2.1 Inspection of homes produced before and after the homes known to be affected;

9.4.5.1.2.2 Inspection of the manufacturer's quality control records to determine whether quality control procedures were followed;

9.4.5.1.2.3 Inspection of IPIA records to determine whether the imminent safety hazard or failure to conform was either detected or specifically found not to exist in some homes;

9.4.5.1.2.4 Inspection of the design of the home in question to determine whether the imminent safety hazard or failure to conform resulted from the design itself;

9.4.5.1.2.5 Identification of the cause as relating to a particular employee or process that was employed for a known period of time or in producing the homes manufactured during that time;

9.4.5.1.2.6 Inspection of records relating to components supplied by other parties and known to contain or suspected of containing imminent safety hazards or failures to conform.

9.4.5.1.3 The class of homes identified by these methods may include only homes actually affected by the imminent safety hazard or failure to conform if the manufacturer can identify the precise homes. If it is not possible to identify the precise homes, the class shall include all homes suspected of containing the imminent safety hazard or failure to conform because the evidence shows that they may be affected.

9.4.5.1.4 Where the manufacturer is required to correct the failure to conform per 3282.406, the manufacturer shall include in the plan provision for correction of the affected manufactured homes. The manufacturer shall not later than 20 days after making the determination, submit the plan to the SAA and/or HUD.

9.4.5.1.5 Per 3282.409(e), the plan shall include a deadline for completion of all notifications and corrections.

9.4.5.1.6 Per 3282.411(a), imminent safety hazards and serious defects shall be corrected no more than 60 days after approval of the plan.

9.4.5.2 Notification and Correction Ordered

9.4.5.2.1 When the manufacturer is ordered to undertake remedial action under 3282.407(c), per 3282.411, notification and correction shall be carried out on or before the deadline establishing the order. In no case shall the time limit exceed:

9.4.5.2.2 in the case of a Final Determination of an imminent safety hazard, 30 days after issuance of the Final Determination.

9.4.5.2.3 in the case of a Final Determination of a serious defect, defect or noncompliance, 60 days after the issuance of the Final Determination.

Note: Per 3282.411(c), the State Administrative Agency (SAA) may grant an extension of the deadlines included in a plan or order.

9.4.5.3 Accomplishing the Notification

9.4.5.3.1 Per 3282.409(f), the plan shall provide for notification to be accomplished:

9.4.5.3.1.1 by certified mail or other more expeditious means to the dealers or distributors of such manufacturer to whom such manufactured home was delivered. Where a serious defect or imminent safety hazard is involved, notification shall be sent by certified mail if it is mailed; and

9.4.5.3.1.2 by certified mail to the first purchaser of each manufactured home in the class of manufactured homes set out in the plan, and to any subsequent owner to whom any warranty provided by the manufacturer or required by law, on such manufactured home has been transferred, to the extent feasible, except that notification need not be sent to any person known by the manufacturer not to own the manufactured home in question if the manufacturer has a record of a subsequent owner of the manufactured home; and

9.4.5.3.1.3 by certified mail to any other person who is a registered owner of each manufactured home containing the imminent safety hazard, serious defect, defect or noncompliance and whose name has been ascertained pursuant to 3282.211.

9.4.6 PFS IPIA Responsibilities

9.4.6.1 Concurrence

9.4.6.1.1 If it is determined that a plan for notification, or notification and correction is required, then per 3282.409(d), the plan shall include a statement by the IPIA (PFS Corporation). In this statement, the IPIA shall concur in the methods used by the manufacturer to determine the class of potentially affected manufactured homes, or state why it believes the

methods to have been inappropriate, inadequate or incorrect (See PFS Form 10).

9.4.6.1.2 The PFS Quality Auditor shall review and verify all records the manufacturer used in determining the class of potentially affected manufactured homes. If the PFS Quality Auditor is satisfied that the methods used by the manufacturer to determine the class of potentially affected manufactured homes are appropriate, adequate and correct, he/she shall acknowledge so by signing the PFS Form 10. If the PFS Quality Auditor is not satisfied that the methods used by the manufacturer to determine the class of potentially affected manufactured homes are appropriate, adequate and correct, he/she shall so acknowledge that on the PFS Form 10. The PFS Form 10 shall then be forwarded to the PFS QC Department for final concurrence and then be returned to the manufacturer.

Note: The use of PFS Form 10 by the manufacturer is optional. However if the manufacturer elects not to use PFS Form 10, the manufacturer's explanation of how the class was determined shall clearly (1) document the first home in the class and explain how it knows this is the first home in the class, and (2) explain how it determined which homes it included in the class and which homes it excluded from the class.

9.4.6.2 Notifications and Corrections

9.4.6.2.1 Per 3282.416(a), the IPIA shall be responsible for assuring that notifications are sent to all owners, purchasers, dealers, or distributors or whom the manufacturer has knowledge under 3282.211 ("Record of Purchasers"), or otherwise as required by the regulations. Notifications shall be accomplished by the deadline specified in the approved plan.

9.4.6.2.2 If a correction is required, the IPIA shall be responsible for assuring that the required corrections are carried out by auditing the certificates required by 3282.412. Certificates consist of:

9.4.6.2.2.1 Per 3282.412(b)(1), where the correction is made, certification by the manufacturer that the repair was made to satisfy completely the standards in effect at the time the manufactured home was manufactured and that any imminent safety hazard has been eliminated, or

9.4.6.2.2.2 Per 3282.412(b)(2), where the owner refuses to allow the manufacturer to repair the home, a certification by the manufacturer that the owner has been informed of the problem which may exist in the manufactured home, that the owner has been informed of any risk to safety or durability of the manufactured home which may result from the problem, and that an attempt has been made to repair the problems only to have the owner refuse the repair.

9.4.6.2.3 Minimum monthly, the PFS Quality Auditor shall request to see any HUD/SAA approved notification plans or Final Determination orders. If any approved notification plans or Final Determination orders exist, and if the plans or orders involve corrections, per 3282.416, the PFS

Quality Auditor shall audit the certificates required by 3282.412 and record on the PFS Monthly Form 316, the progress regarding the corrections being made to the class of potential affected manufactured homes.

10. IBTS AUDITS

10.1 Retailer Lot Audits

- 10.1.1 When IBTS conducts a dealer lot audit, following receipt of the audit at PFS Headquarters, a copy of the audit will be provided to the manufacturer and the PFS Quality Auditor. The manufacturer will be directed to correct any failures to conform identified during the audit. When a home is found that is not in compliance, the Retailer will be notified that the home is Red Tagged and cannot be sold or shown until any and all non-conformances as corrected on the home.
- 10.1.2 The manufacturer shall make the required corrections and provide a written periodic progress report to PFS regarding the corrective action status of each affected home.
- 10.1.3 When it deems it necessary, PFS Headquarters shall direct the PFS Quality Auditor to follow up at the dealer lot (utilizing PFS Form 83) to verify that corrective actions by the manufacturer have been effective in removing any identified failures to conform.
- 10.1.4 All notices sent to manufacturers involving homes located at either the factory and/or the retailer shall be logged by PFS and followed up for closure. Each instance shall be followed through to conclusion that the correction has been satisfactorily completed.
- 10.1.5 If the same FTC is found at retailer lot and at the plant, the PFS Quality Auditor shall issue a Form 10A requiring the manufacturer to investigate for a possible class of homes that may be affected.

10.2 Plant Audits

- 10.2.1 If a FTC is found during the IBTS plant audit, the PFS Quality Auditor shall make every effort to isolate the FTC at the plant. If the FTC cannot be isolated at the plant, then the PFS Quality Auditor shall issue a Form 10A requiring the manufacturer to investigate the issue for a possible class of homes that could be affected.
- 10.2.2 The PFS Quality Auditor shall verify that all FTC cited by IBTS are corrected. If any FTC are cited on any HUD labeled units, the PFS Quality Auditor shall Red Tag the affected unit or units.
- 10.2.3 At the conclusion of the IBTS plant audit, the PFS Quality Auditor is to respond to all FTC and System issues cited by IBTS using Form 282. These responses shall be forwarded to the PFS IPIA Coordinator for review and submission to IBTS headquarters.

11. PLANT CERTIFICATION

11.1 Full Plant Certification

11.1.1 A full plant certification is required:

- 11.1.1.1 if the plant is a new plant,
- 11.1.1.2 if the plant has never produced HUD manufactured homes,
- 11.1.1.3 if the manufacturer changes IPIA,
- 11.1.1.4 or if the plant has not produced HUD manufactured homes for over one (1) year.

- 11.1.2 PFS Corporation shall conduct 100% inspection of all homes in all stations and sub-stations, until PFS is satisfied through comprehensive audit and inspection of all Quality Assurance Manual elements identified in HUD's Enhanced Checklist for Quality Assurance Manuals, that the manufacturer is conforming to the DAPIA-approved designs and has implemented adequate and effective quality control procedures.
- 11.1.3 PFS will interview all accountable personnel and determine that each individual is knowledgeable of his/her inspection responsibilities.
- 11.1.4 PFS will meet daily with plant management to discuss progress that has been made and issues that must be resolved in order to certify the plant.
- 11.1.5 PFS will retain control of the HUD labels, until the plant is certified. Labels will be issued for each home, following final inspection by PFS and documentation that all failures to conform on the home have been corrected.
- 11.1.6 PFS will utilize PFS Form 169, *HUD Code Plant Certification Report*, as the primary form in certifying the plant. ~~The production rate (floors/day) shall be documented.~~
- 11.1.7 PFS shall utilize and complete PFS Form 90, *HUD Plant Certification Inspection Report*, as a traveler (100% inspection) on all homes, until the plant is certified.
- 11.1.8 PFS shall utilize Form A or PFS Form 90 to document all observations, including failures to conform and quality system issues.

11.2 Plant Re-Certification

11.2.1 The PFS Quality Auditor and/or PFS Area Training Supervisor will advise the PFS IPIA Administrator or his designee about the need for a plant re-certification. This recommendation will generally be based on a plant evaluation.

11.2.2 Existing Certification Reports

11.2.2.1 HUD manufacturers with prior certifications may be recertified as per HUD Interpretive Bulletin H-1-78, if the certification report is current (i.e. production facility, product line, design criteria, QC procedures, production rate, etc.).

11.2.2.1.1 Previous plant certification(s) can only be accepted with the prior review and approval of the PFS IPIA Administrator or his designee. The PFS IPIA Administrator or his designee will also review and consider the last two (2) IBTS audits in deciding whether to accept the previous plant certification(s). If acceptance of the previous plant certification(s) has been authorized, the PFS Quality Auditor shall clearly refer to and state on the Form A that the previous plant certification report is being accepted. The PFS Quality Auditor shall inspect 100% of the manufacturing process, when accepting previous plant certification(s). This shall be noted on the Form A.

NOTE: These are the general guidelines and are subject to change and/or adjustment by the PFS IPIA Administrator or his designee.

11.3 Plant Addendum

11.3.1 The PFS IPIA Administrator or his designee shall evaluate the following situations and schedule a plant addendum if necessary. Criteria that can require a plant addendum include:

- 11.3.1.1 New manufacturer's processes
- 11.3.1.2 Change in design parameters authorized for plant (Wind/Snow/Thermal Zones, SW/DW)
- 11.3.1.3 Major DAPIA manual changes
- 11.3.1.4 New model type(s)
- 11.3.1.5 Changes in key production or QC personnel.

11.3.2 The PFS Quality Auditor shall complete PFS Form 305, *IPIA Plant Certification Addendum* stating that the change that warranted the addendum has been successfully implemented, and that PFS Corporation is satisfied that the manufacturer can produce conforming homes on a continuing basis at a specified production rate (transportable sections per day). The completed addendum shall be forwarded to PFS Headquarters for review and forwarding to HUD and IBTS.

11.4 Plant Certification Update

11.4.1 The PFS IPIA Administrator or his designee shall evaluate the following situations and request a plant certification update if necessary. The PFS Quality Auditor shall use the PFS Certification Update Form for the certification update. Criteria that can require a plant certification update include:

- 11.4.1.2 Plant Expansion
- 11.4.1.3 Production rate increase/decrease of 25% or more than 1 (one) unit per day
- 11.4.1.4 Extended Plant Shutdown (Exceeding 3 Months)
- 11.4.1.5 Major QC Manual changes
- 11.4.1.6 Additional Shifts

12. PLANT EVALUATION

12.1 A plant evaluation is a special audit performed by the Area Training Supervisor or the PFS IPIA Administrator's designee. The PFS IPIA Administrator shall provide specific direction to the individual conducting the audit regarding the purpose of the plant evaluation. A written report shall be developed and kept on file at PFS Headquarters.

12.2 The following topics are part of a plant evaluation:

- 12.2.1 An evaluation of the knowledge/experience level of personnel responsible for Q.C. functions.
- 12.2.2 Total number of failures to conform recorded in the past six calendar months broken down into monthly subtotals.
- 12.2.3 The number of failures to conform in product observed while conducting the evaluation.
- 12.2.4 Discussion of any recognizable trends in number, frequency of occurrence, or types of failures to conform for the period of time under consideration.
- 12.2.5 Any correlation between outside factors such as changes or loss of key employees, decrease or increase in production, material or component shortages etc., with the trends highlighted in the recorded failure to conforms.
- 12.2.6 An evaluation to determine if the Q.C. program is operating as stated in approved Q.A. manual.
- 12.2.7 Any continued deficiencies in the quality assurance program.

- 12.2.8 A determination of whether the Q.C. program is defined well enough in the approved Q.A. manual to assure continued conformance.
- 12.2.9 Any correlation between any consumer complaints received and failures to conform recorded during the time period under consideration shall be discussed. Special attention shall be given to any implication a consumer complaint might make about undetected failures to conform or possible consequences if plant performance remains unimproved.
- 12.2.10 Discussion of plant "attitude" based on review of audit and personal knowledge, etc.
- 12.2.11 Summary and recommendations. There are (4) four possible recommendations:
- 1) There is not justification or sufficient information to warrant plant recertification.
 - 2) Available information suggests the possible need for a plant recertification but additional monitoring and investigation is needed to verify.
 - 3) A need exists for assigning a PFS Quality Auditor full time at the plant.
 - 4) A need exists for plant recertification.
- 12.3 If a defect in the plant or in a unit is documented as being serious or an "imminent safety hazard," there will be sufficient cause for an immediate plant evaluation and possible implementation of increased audit frequency procedures.
- 12.4 Due to the sensitive nature of the information contained in a plant evaluation, such reviews are confidential and considered to be the same as proprietary material.

13. ALTERNATIVE CONSTRUCTION (AC) AUDIT/INSPECTION

13.1 In-plant Procedure

- 13.1.1 The PFS Quality Auditor shall note "AC" on his/her PFS Form A when inspecting the unit and auditing the quality control procedure on the AC unit.
- 13.1.1.1 The PFS Quality Auditor is to verify that the HUD AC letter is current and is encouraged to note the HUD AC approval number or the type of alternative construction on the Form A.
 - 13.1.1.2 If the HUD AC approval letter does not require an on-site inspection (i.e. handicap shower, whole house ventilation, etc.) the PFS Quality Auditor shall note this on the Form A.
- 13.1.2 The PFS Quality Auditor shall confirm that the manufacturer has noted "AC" in the serial number in all documents related to the unit and containing the serial number. In particular, the PFS Quality Auditor shall verify that "AC" has been noted in the serial number on:
- 13.1.2.1 the frame,
 - 13.1.2.2 the data plate and
 - 13.1.2.3 the traveler.

- 13.1.3 The PFS Quality Auditor shall confirm that in-plant construction conditions are complied with as set forth in the DAPIA package and the HUD approval letter and verify that QC reports are completed and filed in accordance with the AC letter.
- 13.1.4 The PFS Quality Auditor shall confirm that the plant QC department utilizes the unique AC checklist (QC Checklist) supplied by HUD. The PFS Quality Auditor shall submit a copy of the QC Checklist completed by the plant QC department to PFS with his/her completed Form A.
- 13.1.5 The PFS Quality Auditor shall verify that the "Notice to Purchaser" is supplied with the unit.
- 13.1.6 Monthly, PFS Corporation will prepare and send a copy of a report titled "Open ACs" to the manufacturer with a copy to the PFS Quality Auditor assigned to the plant. The manufacturer will be directed to review the report for accuracy, and provide a status report on each open AC unit. The manufacturer will also be directed to identify units for which no on-site inspection is required (e.g. handicap shower stall, whole house ventilation, etc.). For units for which the on-site inspection has been completed, but for which the "Open AC" report still indicates that the on-site inspection has not been completed, the manufacturer will be directed to provide a copy of the completed on-site inspection report to PFS. The manufacturer will be directed to return the "Open AC" report to PFS within two (2) weeks of the date of the report being issued.
- 13.1.7 The PFS Quality Auditor shall follow up with the manufacturer to confirm that the "Open AC" report is being reviewed and completed by the manufacturer. The PFS Auditor shall verify the manufacturer is reporting production of AC homes in accordance with AC letter requirements.
- 13.1.8 Where multiple auditors are assigned to the plant, the report will be sent to the Area Training Supervisor responsible for the plant. The ATS will be responsible for confirming that this obligation is accomplished.
- 13.1.9 All AC site inspections are to be conducted by a PFS Quality Auditor or an Inspector who is approved by PFS Corporation.

13.2 On-Site Procedure

Procedures for On-Site AC inspections are contained in a separate document. See "PFS Corporation On-Site Procedure for Alternative Construction (AC) Inspections".

14. ON-SITE CONSTRUCTION (SC) AUDIT/INSPECTION

14.1 In-plant Procedure

- 14.1.1 The PFS Quality Auditor shall note "SC" on his/her PFS Form A when inspecting the unit and auditing the quality control procedure on the SC unit.
 - 14.1.1.1 The PFS Quality Auditor is to verify that the HUD SC letter is current and is encouraged to note the DAPIA SC approval number or the type of site construction on the Form A.
- 14.1.2 The PFS Quality Auditor shall confirm that the manufacturer has noted "SC" in the Prefix or Suffix of the serial number in all documents related to the unit and containing the serial number. In particular, the PFS Quality Auditor shall verify that "SC" has been noted in the Prefix or Suffix of the serial number on:
 - 14.1.2.1 the frame,
 - 14.1.2.2 the data plate and
 - 14.1.2.3 the traveler.

- 14.1.3 The PFS Quality Auditor shall confirm that in-plant construction conditions are complied with as set forth in the DAPIA package and the DAPIA approval letter and verify that QC reports are completed and filed in accordance with the SC letter.
- 14.1.4 The PFS Quality Auditor shall confirm that the plant QC department utilizes the unique SC checklist (QC Checklist) supplied by DAPIA. The PFS Quality Auditor shall submit a copy of the QC Checklist completed by the plant QC department to PFS with his/her completed Form A.
- 14.1.5 The PFS Quality Auditor shall verify that the "Notice to Purchaser" is supplied with the unit.
- 14.1.6 Monthly, PFS Corporation will prepare and send a copy of a report titled "Open SCs" to the manufacturer with a copy to the PFS Quality Auditor assigned to the plant. The manufacturer will be directed to review the report for accuracy, and provide a status report on each open SC unit. For units for which the on-site inspection has been completed, but for which the "Open SC" report still indicates that the on-site inspection has not been completed, the manufacturer will be directed to provide a copy of the completed on-site inspection report to PFS. The manufacturer will be directed to return the "Open SC" report to PFS within two (2) weeks of the date of the report being issued.
- 14.1.7 The PFS Quality Auditor shall follow up with the manufacturer to confirm that the "Open SC" report is being reviewed and completed by the manufacturer. The PFS Quality Auditor shall verify the manufacturer is reporting production of SC homes in accordance with SC letter requirements.
- 14.1.8 Where multiple auditors are assigned to the plant, the report will be sent to the Area Supervisor responsible for the plant. The Area Supervisor will be responsible for confirming that this obligation is accomplished.
- 14.1.9 All AC site inspections are to be conducted by a PFS Quality Auditor or an Inspector who is approved by PFS Corporation.

14.2 On-Site Procedure

Procedures for On-Site SC inspections are contained in a separate document. See "PFS Corporation On-Site Procedure for On-Site Construction (SC) Inspections".

APPENDIX A - FORMS

Form No.	Title	Revision Date
A	Quality Control Inspection Report	3/07
A-2	Quality Control Inspection Sheet	9/3/15
A-3	Daily Reference Information for HUD Manufactured Homes	4/20/16
10	Subpart I Determination Form	4/19/16
10A	Subpart I Determination-Notification to Manufacturer	4/23/14
55	HUD Manufactured Home Response Form	3/1/16
65	Monthly Monitoring Checks-HUD Manufactured Homes	5/31/13
83	Dealer Lot Follow-up Inspection	9/21/08
90S	HUD Plant Certification Inspection Report (Single Wide)*	2/2/17
90D	HUD Plant Certification Inspection Report (Double Wide)*	2/2/17
146	CCI Status Report	11/29/07
169	HUD Code Plant Certification Report*	4/19/13
238	IPIA Request for Additional DAPIA Information	5/16/07
282	IBTS Response Form	4/11/16
305	IPIA Plant Certification Addendum	7/31/14
316	IPIA Monthly Plant Condition Report	4/5/16
325	IPIA Monthly HUD Service Records Review	8/9/16

* Because of size and infrequency of use, this form is not reprinted in this document.



QUALITY CONTROL INSPECTION SHEET

Form A-2
Page ___ of ___

Manufacturer/Location _____ Date _____

QUALITY SYSTEM ISSUES
A QUALITY CONTROL ELEMENTS
A-1a Are approved checklists being completed per the QA manual, including the QC inspections being conducted at the stations by accountable persons as identified in the QA manual?
A-1b Are QC inspections being thoroughly and effectively conducted by the accountable personnel identified in the QA manual?
A-3 Are the tests being performed per the QA manual?
A-4 Is the work process, as defined by the QA manual, being followed on the production line?
A-5 Is the list of QC inspections defined in the QA manual and used on the production line compatible with the production process?
A-7 Is re-training of personnel conducted on an as-needed basis?
B SYSTEM TO COMPLY WITH THE FEDERAL STANDARDS DAPIA-APPROVED DESIGNS
B-1 Is the DAPIA-approved design package kept up to date?
B-2 Is the DAPIA-approved design effectively used by the manufacturer's personnel?
B-3 For homes under construction during this audit, are all applicable DAPIA-approved design details available?
C SYSTEM TO COMPLY WITH REQUIREMENTS REGARDING CONSTRUCTION MATERIALS
C-2 Are the materials used on the production line installed in accordance with the listing conditions, and/or product manufacturer's installation instructions?
Other
1. Unlabeled unit status checked
2. (A). Are all AC units documented on Form A? (B). Is a site inspection Required/Not required documented on Form A?
3. Follow up on Most Frequently written CCI'S items by IBTS ?
Explain all No answers in detail on Form A. (Relate each QSI to the Manufacturer's Q A Manual). (Per 1401A, 6.8.2, issue a Form 55 for each QSI)

EXIT MEETING (6.27.4)
Attendees GM__ PM__ QAM__ QC__ Other (List) _____
1. Discuss Audit Findings (Comments) _____
2. Discuss CCI/QSI at repeat or will become repeat at next audit _____
3. Discuss items that auditor was unable to isolate (Form 10A) _____
4. Were there any Key production or QC personnel changes, QA manual or DAPIA revisions since last audit per 1401A Section 11.3 and 11.4?
5. Did the changes require a certification addendum or update?
6. Other (Specify): _____

PFS Quality Auditor _____ Mfr. Representative _____

**REFERENCE INFORMATION
FOR
HUD MANUFACTURED HOMES**

Form A-3

Quality System Issues	
QSI	Description
	Quality Assurance System Elements
	A – Use of Manual
A-1a	Use of approved checklists <ul style="list-style-type: none"> • Approved checklist is being signed off in the appropriate stations • Inspections are being conducted prior to items being concealed, in accordance with the QA Manual • Homes are not progressing beyond the inspection point, in accordance with the QA Manual • The approved checklist is being completed properly. Failures to Conform are written on the approved checklist as required by the DAPIA-approved QA Manual
A-1b	Thoroughness of Inspections <ul style="list-style-type: none"> • The QC inspections that are being conducted by accountable personnel are identifying failures to conform • Failures to conform, documented by accountability inspections as corrected, are in compliance • The accountability inspections are being conducted in the appropriate stations in accordance with the QA Manual • The accountability inspections have not missed identifying failures to conform on multiple units
A-2	QA Manual accountability <ul style="list-style-type: none"> • In accordance with organizational chart, assigned positions are filled by adequately qualified individuals • Each accountable individual, by job title, responsible for specific inspections is as defined in the QA Manual • This is a list by job title or name of qualified individuals who sign the on-line inspection records (traveler) in accordance with the QA Manual available at the time of the audit • There is a method/process in place to determine who made an inspection on a given production day
A-3	Production line testing <ul style="list-style-type: none"> • The egress window, plumbing system, gas system, electrical system, truss testing (non-listed trusses) or other component tests are being performed properly, routinely, adequately, and completely in accordance with the QA Manual • The equipment is adequate to perform the test • The equipment is functioning correctly, is not broken, and is properly calibrated • The tests are conducted at the stage of production defined in the QA Manual • The time required to conduct the tests is compatible with the production rate • Tests were completed by testers without assistance from other personnel (except for the person in training) • Tests are performed by the accountable personnel
A-4	Work process and description correspond to QA Manual <ul style="list-style-type: none"> • The work process (station-by-station description of the manufacturing process) and component assembly points defined in the QA Manual correspond to the actual production process • Definitive control points are identified in so much as the completion of accountable inspections should be identifiable • A list of production stations and the major elements completed at each station is provided, including all off-line assembly areas • The process for the control of rejected work is to be described, including follow-up acceptance verification • Off-line component assemblies are being accounted for • Failures to conform are occurring because the work process is not being followed • The approved work process allows for overlapping work to occur without adequate accountability • The environmental controls are able to maintain proper temperature and humidity for components such as foam, glues, vapor barriers, sprays, paints, etc. • Equipment such as tools, jigs, and lifts do not cause failures to conform
A-5	Compatibility of the work process and approved checklist

**REFERENCE INFORMATION
FOR
HUD MANUFACTURED HOMES**

Form A-3

	<ul style="list-style-type: none"> • The work process, the identification of required inspections and the point in the production process where each inspection is conducted and where accountability inspections take place, is in accordance with the QA Manual • There is clear compatibility between the station-by-station description and the list of quality control inspections • There are provisions for the inspection of all component aspects of each unit of a multi-section home • There is no contradiction between the station-by-station production process and the QC inspection. The work and its accountability, as defined in the QA Manual, can be accomplished as set forth • The QA process clearly establishes certain control points to ensure that QC inspections are conducted before components are covered • Ongoing production line inspections and accountability for completed work are conducted at a point in the production process that enables repairs to be adequately completed. Special equipment and/or tools needed for the repairs are available at the required point in the production process
	<ul style="list-style-type: none"> • For trusses fabricated in the plant, the inspection procedures are being conducted as required • For components built outside the plant (chassis, trusses, built-up ridge beams, recycled axles, etc.), inspections are being conducted in accordance with the QA Manual • For yard rework of units beyond final finish or rework to be completed out of station, there is documentation of all such work to be completed. All shortages and needed rework are specifically documented on the QC traveler. These need to be documented before a home is labeled • Required repair work that is completed out of station or in the yard is accounted for by the appropriate accountable personnel • QC inspections and repairs of certain components are required to be made at, or near the point of assembly
<p>A-6</p>	<p>QA Manual Program</p> <ul style="list-style-type: none"> • Communication methods, particularly with regard to any language barriers within the plant, are functioning • The management coordination and support system for the QA Program are in place and functioning • There is an internal auditing or review procedure to determine the source of failures to conform. This includes the procedures to review and analyze in-plant QA findings, findings documented in IPIA reports and/or findings from any other source • Identified sources of failures to conform result in corrective actions being instituted to prevent reoccurrences • When a failure to conform is identified, and when that failure to conform may have been introduced into a potential class of homes, Subpart I procedures are followed in accordance with the QA Manual and the HUD Regulations
<p>A-7</p>	<p>Training</p> <ul style="list-style-type: none"> • Personnel responsible for training are routinely providing it • Technical training is conducted for new personnel or recently transferred personnel • Training is inclusive of both technical and procedural material for accountable personnel • Re-training of personnel is conducted on an as-needed basis • Training documentation includes use of approved designs, standards requirements, and component material installation instructions. This also includes new product or product updates and changes. • Completed training is documented • For personnel with inspection accountability responsibilities, backup or replacement personnel have been trained to fulfill these responsibilities, and the training has been documented
<p>System to Comply with the Federal Standards DAPIA-Approved Designs</p>	

**REFERENCE INFORMATION
FOR
HUD MANUFACTURED HOMES**

Form A-3

	B – Use of Designs
B-1	<p>Current design approvals</p> <ul style="list-style-type: none"> • All copies of the DAPIA-approved drawings or sections thereof in use at the plant or the production line are maintained in an up-to-date manner • The manufacturer's design package includes the drawings with the latest revisions that have been received from the DAPIA or corporate headquarters. The superseded material is removed or marked as such • The individual designated in the QA Manual is issuing designs and keeping them up-to-date • The process to issue and keep designs up-to-date is being followed • In the event that designs cannot be followed on the production line, a clear procedure on how to coordinate design changes exists and is being followed • Procedures for making changes to DAPIA-approved drawings are in place, and are being followed in accordance with the QA Manual • Production personnel are using the most current designs
B-2	<p>Designs used by plant personnel</p> <ul style="list-style-type: none"> • There is a method or procedure implemented to ensure required design approvals and Standards information gets to the workers on the production line in accordance with the QA Manual • The designs are effectively used by the accountability inspectors • Plant personnel can use and follow the design and are able to locate necessary information in a reasonable time frame • Calculations should not be made in order to determine whether specific aspects of construction are in compliance with the Standards, or DAPIA-approved designs • All necessary documents applicable to the accountable individual's area(s) of responsibility are available • Drawings used on the production line to construct units are not substituted for, or modified from, the DAPIA-approved designs. Written comments, red lining, and/or work details that conflict with the DAPIA-approved designs are not used. • Design packages are presented with a system of organization, making the design workable. This includes documents that are not poorly reproduced, illegible, or otherwise unreadable • Inappropriate or superseded designs are not being used for inspection purposes
B-3	<p>Availability of all applicable designs</p> <ul style="list-style-type: none"> • Homes are being produced with DAPIA-approved floor plans • Necessary details are available in order to determine the requirements of the DAPIA-approved designs under the QA system • The approved designs are specific for the systems or components being constructed <p>Designs for options being built are included in the appropriate section of the DAPIA-approved design</p>
System to Comply with Requirements Regarding Construction Materials	
	C – Use of Materials
C-1	<p>Receipt and storage of materials</p> <ul style="list-style-type: none"> • Purchasing manager/receivers identified in QA Manual are fulfilling their roles/responsibilities • The receivers are trained, and understand how to accept incoming material and components before they are stored • Instructions on how materials meet the designs and standard specs are available for receivers • A process for product substitutions from the supplier is in place and being followed in accordance with the QA Manual • Receiving verification procedures for incoming materials are being followed per the QA Manual • Material/component receipt and storage inspection instructions/procedures are being followed • When the bill of lading is used in lieu of the purchase order to accept incoming materials and components, the procedures to reconcile the bill of lading with the purchase order are routinely being conducted and completed • When required, materials will have a stamp, label, or tag identifying the certification of compliance with the requirements of DAPIA-approved designs or Standards • The manufacturer is following procedures outlined in the QA Manual, ensuring that the materials

**REFERENCE INFORMATION
FOR
HUD MANUFACTURED HOMES**

Form A-3

	<p>used are in conformance with the requirements</p> <ul style="list-style-type: none"> • Materials are stored according to their listing, in order to prevent damage and maintain usability • Materials are adequately protected from weather or environmental consideration (moisture, heat, light, cold, etc) • Materials are rotated according to their listing to ensure that they are used within the recommended shelf life • Rejected materials are marked or stored in an appropriate manner to prevent accidental use
C-2	<p>Installation of materials</p> <ul style="list-style-type: none"> • There is a method or procedure used to get component material installation instructions or listing information to the workers on the production line • The components are installed in accordance with the listing conditions. Any variance or repair method not in the listing must be DAPIA-approved. In some cases, the listing agency or materials manufacturer will permit variances to the listing or installation requirements • The listed components are not modified or altered and damaged pieces are culled • Manufacturer's product installation instructions are current and are followed if the listing of a component or DAPIA-approved design is based on the installation instructions • There is a method to identify remanufactured material in order to ensure that the material will meet the requirements when used in the construction of the home • When recycled material is used or components are recycled by the manufacturer, it is done in accordance with the DAPIA-approved designs or QA Manual

CCI	MOST FREQUENTLY WRITTEN ITEMS BY IBTS (2015)
3.2	Homes permitted to be constructed to an active AC letter meet all the requirements of the AC letter
4.2	Whole ventilation provisions provided
11.1	Installation and repair of bottom board
14.1	Floor system compatibility with chassis, set up instructions, and spacing of floor joists.
22.3	Shear wall to floor and side wall required fastening
29.3	Horizontal metal and vinyl siding installation
29.5	Cementitious lap and vertical panel siding installation
29.1	Hardboard and wood products siding installation
39.1	Application/ installation of insulation in floors
47.3	Other plumbing fixture and material applications and installation
51.1	Heating and cooling supply systems constructed and installed per requirements
53.1	Gas piping systems sized per requirements
64.4	All electrical connections are made in a workmanship like manner
66.2	Branch circuits for the appropriate appliance and motor loads provided in accordance with requirements
68.1	Receptacle and lighting outlets location: Appliance disconnecting means
68.7	Receptacle outlets based on the circuit rating are of adequate amperage in accordance with NEC
69.2	Installation of service equipment and raceway
71.1	Bonding of non-current-carrying metal parts.

Rev. 4/20/16 em



SUBPART I DETERMINATION

Manufacturer: _____ Complaint ID _____

Address: _____

Serial # _____ D.O.M. _____ Model #: _____

Dealer: _____ Consumer: _____

Address: _____ Address: _____

Date Information Received _____

Description of Problem(s): _____

Source of Problem

- 1. Source of Information: [] Customer Complaint [] SAA On-Site Inspection [] SAA Review [] IPIA Reports [] IBTS Reports [] Design Deviation Reports [] Suppliers Product Alert Information [] Quality Control Records [] Service Records [] Dealer/Outside Repairs [] Other (Describe): _____

- 2. The problem was caused by: [] Design [] Defective Material [] Workmanship [] Transit [] Dealer [] Homeowner [] Other _____

Explain _____

- 3. Have all units affected at the plant been corrected? [] Yes [] No Have all the units affected at dealer lots been corrected? [] Yes [] No

If no, what is the estimated date of completion? _____

Classification of Problem

Table with 5 columns: Imminent Safety Hazard, Serious Defect, Defect, Noncompliance, Does Not Apply. Each column contains specific conditions for classification.

4. What is the basis for the classification determination? _____

Notification

- 5. Based on classification of the problem and 3282.404, is notification required? [] Yes [] No
6. Will waiver of notification per 3282.404 be requested? [] Yes [] No
7. Per 3282.407, is notification required? [] Yes [] No
8. If the responses to 4, 5 and 6 are all no, does manufacturer still plan to notify, or notify and correct? [] Yes [] No

Note: If the answers to 5, 6, 7 & 8 are all answered no, responses to 9 & 10 are not required.

SUBPART I DETERMINATION (continued)

Page 2

Complaint ID _____

Determine Class of Homes (Complete this section, if Notification is required or planned)

9. List serial number of first unit affected by this problem. _____
10. Substantiate how it is known that the unit listed in Item #9 is the first unit affected by this problem (attach separate explanation if additional space is required). _____

11. Is more than one home affected (class of homes)? Yes No
If Yes, list serial numbers of all homes affected (Attach separate list if additional space is required). _____

12. What basis was used to determine the number of homes affected? Customer Complaint Records & Unit Files
 Site Inspection & Service Reports Quality Control & In-Process Inspection Records
 Particular Employee or Manufacturing Records IPIA Reports & Letters IBTS Audit Reports
 IBTS Dealer Lot Audit Design Deviation Reports Suppliers Records & Product Alert Information
 Transportation Damage & Delivery Inspection Reports Other

(explain) _____

13. Substantiate how it is known that the units listed in Item #11 comprise all units that may be affected by this problem (attach separate explanation if additional space is required). _____

Manufacturer's Certification

I certify that the above information is true and complete to the best of my knowledge.

Manufacturer's Representative: _____ Date: _____

IPIA Concurrence

- PFS agrees with the basis/method used by the manufacturer to determine the class of homes affected.
 The method used by the manufacturer to determine the class of affected homes is inappropriate, inadequate or incorrect. (Explain)

PFS Quality Auditor/Date

PFS IPIA Coordinator/Date



UNABLE TO ISOLATE NOTIFICATION

To: _____
(Manufacturer/Plant Number)

Date: _____

(Address)

(City/State/Zip)

This is to inform you that today, I was unable to isolate a possible failure to conform with the Federal Manufactured Construction and Safety Standards Act of 1974, amended, in your production of HUD Manufactured Homes. Per 24 CFR 3282.204(e) of the Federal Manufactured Home Procedural and Enforcement Regulations, I am notifying you to correct all affected manufactured homes still in the factory and/or held by distributors or dealers, and to carry out remedial action per 3282.404 and 3282.405 with respect to any other manufactured homes which may contain the same failure to conform.

Description of Failure to Conform _____

DAPIA Reference/HUD Standard Reference/CCI Number _____

Additional Information (including serial numbers of known affected units) _____

PFS Quality Auditor

Manufacturer Representative

Determination Reviewed _____
PFS Quality Auditor

Date: _____

CC: PFS Corporation



HUD MANUFACTURED HOME RESPONSE FORM

PROPERTY

Manufacturer _____ Location _____ Date _____

Unit Serial No. _____ CCI/System No. _____ DAPIA/QA Manual Ref. _____

(Describe the FTC, Repeat Item or Quality System Issue) _____

ISSUE

Source: _____

QA MANUAL REF. _____

Solution (Corrective Measures Taken to prevent recurrence) _____

Manufacturer's Representative Name _____ (Print) Initials _____

Manufacturer's Representative Name _____ (Print) Initials _____

Manufacturer's Representative Name _____ (Print) Initials _____

Return to IPIA Inspector at next scheduled inspection.

IPIA Review and Verify: _____ Signature: _____ Date: _____



**MONTHLY MONITORING CHECKS
HUD MANUFACTURED HOMES**

MANUFACTURER _____ LOCATION _____

INSPECTOR _____

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Monthly Equipment Check												
Continuity												
Dielectric Strength												
Operational												
Smoke Alarms												
Polarity												
Equipment Check												
3 lb. Gas Test												
8 oz. Gas Test												
Water Line												
Witnessing of Tests*												
Continuity												
Dielectric Strength												
Operational												
Smoke Alarms												
Polarity												
3 lb. Gas Test												
8 oz. Gas Test												
Water Line												
Flood Level												
Fixture Flow												
Egress Operational Test												
Other Monthly Checks												
Labeled Yard Units												
Data Plate												
Health Notice												
Inside Material Storage												
Outside Material Storage												
Product Listing												

* While the manufacturer's test equipment must be inspected minimum monthly, the witnessing or verification of production line tests is not a monthly requirement. However, when the witnessing or verification of production line tests takes place, it shall be documented.

Note: This form can be used to track monthly checks, however these items must still be recorded on PFS Form 316.



DEALER LOT FOLLOW-UP INSPECTION

To: _____ From: _____

Date: _____ DL # _____

Manufacturer/City, State: _____

Sub 08- _____ or other (specify) _____

Failure to Conform: _____

Correction: _____

Dealer (Name, Address, Phone Number): _____

Unit Serial Number(s), HUD Label Number(s), Date(s) of Manufacture: _____

Per 3282.204(e), manufacturers are required to correct any failures to conform in any manufactured home held by dealers or distributors. Per 3282.362(c)2(G) and 3282.364, PFS as the IPIA is obligated to follow up at dealers or distributors to verify that corrections to manufactured homes have been made and that the corrections are effective. Please contact the dealer listed below and arrange to inspect the correction.

Correction(s) Adequate: Yes No

Comments: _____

PFS Quality Auditor/Date of Inspection

PFS IPIA Coordinator/Date

CC: Manufacturer
PFS Headquarters



CCI STATUS REPORT

PLANT / LOCATION: _____

INSPECTOR'S NAME: _____

*LAST IBTS AUDIT FINDINGS

DEPT	CH	FL	PL	EL	WB	WS	RB	RS	EXT	RD	SH	FF	OTHER	PFS Rating	ENG	PA	PD	QC	
DATE	SYSTEMS													SYSTEMS					

NOTE:

- Indicate the CCI in space provided under each department. QC/NO's only.
- Repeat status is when the same CCI is detected 3 times in 10 inspections in the same department.
- Remedial action is a rating of 2/7/2 or greater, or 3 CCIs at repeat status in the same department.
- Record the most recent CCI items detected by IBTS on this line.
- Attach a copy of the Systems Checklist and submit to IPIA Administrator monthly.

LEGEND (Dept.)

CH = Chassis	RB = Roof Build
FL = Floor Build/Decking	RS = Roof Set
PL = Plumbing	EXT = Sliding/Windows
PD = Production #	RD = Roof Decking
QC = Quality Control	WB = Wall Build
	WS = Wall Set
	SH = Shingles
	FF = Final Finish

Provide individual dept. legend



IPIA REQUEST FOR ADDITIONAL DAPIA INFORMATION

Date: _____

Manufacturer's Name/Location: _____

Manufacturer's Representative: _____ Email: _____

Manufacturer's Telephone Number: _____ Fax: _____

PFS Inspector's Name: _____

DAPIA Review Agency: PFS Corporation

Drawing Number(s) in Question: _____

Code Reference(s): _____

ENCLOSE A COPY OF ALL DRAWINGS IN QUESTION.

Description of Questioned Approval: _____

BOX BELOW IS FOR DAPIA DEPARTMENT USE ONLY. PLEASE LEAVE BLANK.

Date received: _____ Submittal number: _____ Client: _____ Date completed: _____

Fax to DAPIA Department at 608/839-3966

Note: DAPIA Response will be sent with a separate letter.



IBTS RESPONSE REPORT

Page ____ of ____

IBTS REPORT # _____ Date _____ PFS QA Auditor _____

Item # _____ CCI/System # _____ Page # _____

(Attach additional paper if additional response space is required)

1. Identify the Failure to Conform (FTC) _____

2. Dispute the FTC? Yes No If yes, provide documentation to substantiate the dispute. _____

3. Explain how the FTC was corrected _____

4. Identify source (Root Cause) of FTC _____

5. List corrective action taken to prevent recurrences of this FTC _____

6(a) Is the FTC related to the performance of a particular employee? Yes No

6(b) Does the FTC involve a defect known to exist in supplies of components or parts? Yes No

6(c) Is there information indicating a failure to follow quality control procedures with respect to a particular aspect of the manufactured home? Yes No

6(d) Is the FTC such that it may have been systematically introduced into more than one manufactured home? Yes No

If yes to any questions in 6, describe _____

If any of the questions in 6 were checked yes, then the FTC was probably introduced into more than one manufactured home during the course of production. Perform isolation procedure per 1401A. Go to question 7.
If all of the questions in 6 are checked no, then FTC is likely confined to one unit. Go to question 8.

7. Is the FTC such that it was introduced into consecutive units (floors)? Yes No

a. If yes, check as many units (floors) forward and backward as needed to verify if the FTC exists in other units per 1401A isolation procedures.

In consecutive order, list all units (floors) checked forward in production line _____

In consecutive order, list all units (floors) checked backward in production line _____

b. If no, is FTC is confined to units with a specific feature. Describe _____

8. Was the FTC successfully isolated? Yes No If no, advise manufacturer, issue Form 10A and note on Form A.

If yes, describe what basis/method was used to isolate the FTC: If method was inspection of other units, list all units inspected. _____

9. Were all the units affected at the plant corrected? Yes No

PFS Quality Auditor/Date

PFS Area Training Supervisor/Date

PFS IPIA Coordinator/Date



**PFS CORPORATION
IPIA PLANT CERTIFICATION ADDENDUM**

MANUFACTURER INFORMATION

Manufacturer's Name _____ Phone Number (____) _____
 Plant Address _____
 General Manager _____
 Production Manager _____
 Quality Control Manager/Inspector _____
 No. of Stations _____ Sub Assembly Stations _____ Number of Shifts _____ Start Date _____
 Plant Production Rate (Floors/Day) _____ Max Production Rate (Floors/Day) _____ No. of Employees _____

PRE-EVALUATION PROCEDURE - PFS staff will verify that the documents listed below are available at the plant:

	YES	NO*
All Models DAPIA/PFS Stamped	_____	_____
Q.C. Inspection Forms	_____	_____
Incoming Materials Control	_____	_____
Red Tag File	_____	_____
Q.C. Traveler	_____	_____
Label Control (verify order/report procedures)	_____	_____
Q.C. Manual DAPIA/PFS Stamped	_____	_____
Plant Organization Chart Current	_____	_____

ADDENDUM CRITERIA

	YES**	NO
New Manufacturer's Processes	_____	_____
Major DAPIA Manual Changes	_____	_____
Change in Design Parameters (wind/snow/thermal, SW/DW) authorized for plant	_____	_____
New Model Type(s)	_____	_____
Changes in Key Production/QC Personnel	_____	_____

*Explain any no answers: _____

**Describe the change in detail: _____

The change that warranted this addendum has been successfully implemented. PFS Certifying Staff _____ is satisfied that the manufacturer can produce conforming homes on a continuing basis at a production rate of _____ transportable sections per day.

 PFS Certifying Staff/Date

 PFS QC Department/Date



IPIA MONTHLY PLANT REPORT

MANUFACTURER/LOCATION _____ MONTH/YEAR _____

PFS AUDITOR _____ ATS REVIEW/DATE _____

QSI No.	Monthly Quality System Issues (Check minimum monthly)
A3	Test Equipment is adequate to perform the test, is functioning correctly is not broken and is properly calibrated: <input type="checkbox"/> Yes <input type="checkbox"/> No (Note Date Checked) Continuity Tester _____ GFI Tester _____ Dielectric Tester _____ Polarity/Operational Tester _____ Torque Devices _____ Smoke Alarm Crossover Tester _____ Water Line Pressure Test Equipment _____ Gas Line Test Equipment: 3 lb. Gauge _____ 8oz. Gauge _____ Lumber Moisture Meter _____
A4	The work process, including work stations and offline stations is compatible with the QA Manual. <input type="checkbox"/> Yes <input type="checkbox"/> No
A6	The various elements of the manufacturer's QA program, including the ways in which the different parts of the quality system are intended to function together, are actually in place and functioning (Example: language barriers). <input type="checkbox"/> Yes <input type="checkbox"/> No
A7	Training is provided to personnel per QA Manual and documented. <input type="checkbox"/> Yes <input type="checkbox"/> No
C1	Receipt and Storage of Materials (Date Checked _____) <ul style="list-style-type: none"> • Receivers are trained and are receiving materials per the QA Manual. <input type="checkbox"/>Yes <input type="checkbox"/>No • A process for product substitution is being followed in accordance with the QA Manual <input type="checkbox"/>Yes <input type="checkbox"/>No • Materials and products received are marked/labeled per requirements <input type="checkbox"/>Yes <input type="checkbox"/>No • Materials are stored per their listing, in order to prevent damage and maintain usability <input type="checkbox"/>Yes <input type="checkbox"/>No • Two part foam adhesives systems temperature is being monitored per manufacturer's instructions. <input type="checkbox"/>Yes <input type="checkbox"/>No • Equipment/ Tools used for material verification functional and calibrated if applicable? <input type="checkbox"/>Yes <input type="checkbox"/>No
Comment on all "No" answers _____ _____ _____	

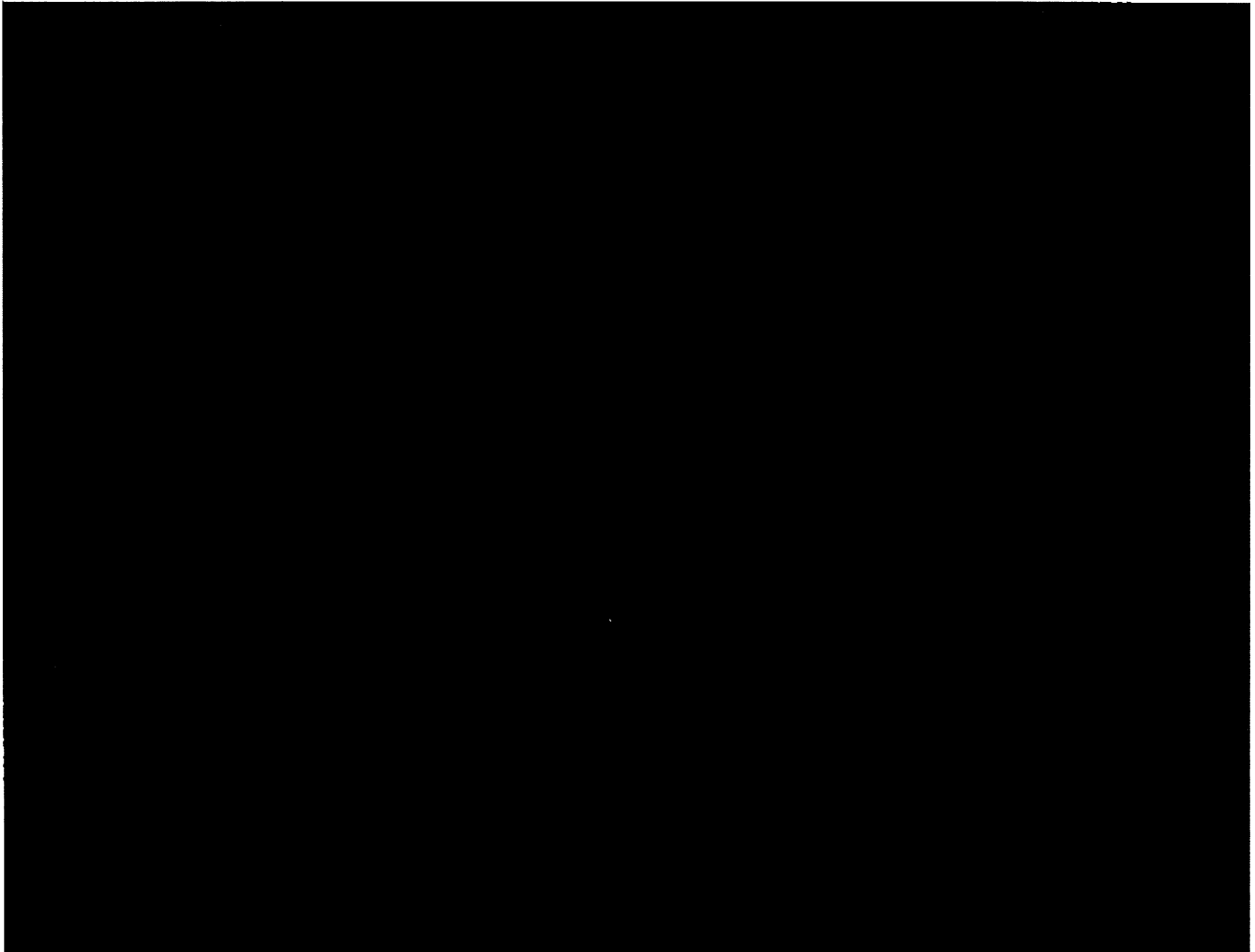
	Other Monthly Items
1	Data Plate Review (Serial Number _____ Date Checked _____) <ul style="list-style-type: none"> • Data Plate DOM agrees with HUD 302 report DOM Yes <input type="checkbox"/> No <input type="checkbox"/> • Data plate appliance model numbers agree with actual model numbers. Yes <input type="checkbox"/> No <input type="checkbox"/> • Data plate HUD label number agrees with actual HUD Label numbers agrees with HUD 302 report Yes <input type="checkbox"/> No <input type="checkbox"/> • All additional information appears correct Yes <input type="checkbox"/> No <input type="checkbox"/>
2	Inspection of Labeled Unit (Serial Number _____ Date Checked _____) <ul style="list-style-type: none"> • All visible parts have been inspected for FTC (Note: Any FTC must be noted on PFS Form A) Yes <input type="checkbox"/> No <input type="checkbox"/> • All required labels comply Yes <input type="checkbox"/> No <input type="checkbox"/> • Homeowner package is complete Yes <input type="checkbox"/> No <input type="checkbox"/>
3	Were failures noted from the list of most frequently occurring CCI/QSI items (PFS Form A-3)? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, list item and date noted.
4	Key production/QC personnel changes? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, list who and position involved:
5	Major turnover in labor force/department? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, explain:
6	Has production rate increased/decreased since the plant was certified (see 1401A, Section 11.3)? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, explain:
7	Were conditions met that warranted increasing audit frequency? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, explain (reference Section 8 of PFS 1401A audit procedures) Document areas removed from Increased Audit Frequency also.
8	Any DAPIA or Quality Manual issues documented? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, explain
9	Special audits conducted by ATS or IPIA Headquarters? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, explain
10	Any current or active Subpart I investigations, notifications or corrections? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, what is the issue? What is the date that the IPIA followed up on the issue? (see 1401A, 7.1.4 Are there any outstanding or current Form 10A issues? Yes <input type="checkbox"/> No <input type="checkbox"/> Comments: _____ _____
11	Are AC on-site inspections being completed and are monthly reports being submitted to PFS? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12	Rate overall performance of the QC program this month. (Explain if needed)
Comments _____ _____ _____	

Fax or email to Area Supervisor by 5th of the month (Area Supervisor: Fax or email to PFS Headquarters by 10th of the month.)
Form 316
rev. 4.5.16 em



MONTHLY HUD SERVICE RECORDS REVIEW

Manufacturer / Location: _____		Date: _____					
	Are initial determinations for classification made for all complaints (NONCOMPLIANCE, DEFECT, SERIOUS DEFECT, OR IMMINENT SAFETY HAZARD)?	Are the basis for determinations of classification adequate?		Are determinations investigated for possible class of homes affected?			
	Yes No	Yes	No	Yes	No	Yes No	
SN _____ DOM _____ Complaint Date _____ Determination by _____							
SN _____ DOM _____ Complaint Date _____ Determination by _____							
SN _____ DOM _____ Complaint Date _____ Determination by _____							
SN _____ DOM _____ Complaint Date _____ Determination by _____							
SN _____ DOM _____ Complaint Date _____ Determination by _____							
Are all the initial determinations for classification made within 30 days of receiving a complaint? Yes <input type="checkbox"/> No <input type="checkbox"/>							
Are all the final determinations for classifications (including if class affected) made within 20 days of the initial determination Yes <input type="checkbox"/> No <input type="checkbox"/>							
Is the Manufacturer making determinations for complaints from all applicable sources? Yes <input type="checkbox"/> No <input type="checkbox"/>							
Are the manufacturer's records of determination, Notifications, Corrections and home file records in compliance with 3282.417(b),(c),(d),(e)? Yes <input type="checkbox"/> No <input type="checkbox"/>							
NOTE: All discrepancies and items checked "NO" shall be documented in detail in the Comments Section. Use additional pages if necessary.							
COMMENTS: _____ _____ _____ _____							
PFS Quality Auditor (Signature) / Date _____				Manufacturer's Representative (Signature) / Date _____			





**PFS CORPORATION
INSPECTION AND CERTIFICATION PROCEDURES
COVERING
FACTORY BUILT CONSTRUCTION SYSTEMS
(PFS 1401B)**

1. SCOPE

This publication provides PFS Corporation's procedures for factory built construction systems within the framework of nationally recognized codes and standards. The purpose of this publication is to spell out the sequence of events and actions that must take place from the time the manufacturer contacts PFS to the time PFS Corporation's trademark may be applied to a product as well as the procedures to maintain trademarking privileges.

Whenever applicable the guidance provided by ASTM E-541 shall be used to further clarify the intent and policies of PFS. It shall be a matter of record that PFS strongly supports the intentions of ASTM E-541 and meets the criteria described therein.

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2. REFERENCE DOCUMENTS

Unless specified, the latest edition of all referenced standards and documents, are to be utilized.

- 2.1 Industrialized Buildings Commission Model Rules and Regulations for Industrialized/Modular Buildings.
- 2.2 ICC-ES Acceptance Criteria for Quality Control Manuals (AC10).
- 2.3 California Title 25, "Housing and Community Development."

3. PURPOSE OF IN-PLANT INSPECTIONS

3.1 The purpose of the in-plant inspection is:

- 3.1.1 To ensure the plant is capable of following the quality control procedures set forth in the quality control manual.
- 3.1.2 To ensure the plant continues to follow the quality control manual.
- 3.1.3 To ensure any part of the manufactured structure actually inspected conforms with the design, or where the design is not specific to the state building codes.
- 3.1.4 To ensure that whenever it finds a manufactured structure in production which fails to conform to the design or the state building codes, the nonconformance is corrected before the manufactured structure leaves the manufacturing plant.
- 3.1.5 To ensure if a nonconformance to the design or standard is found in one manufactured structure, all other manufactured structures still in the plant which PFS or manufacturer's records indicate might not conform to the design or state building codes, are inspected. The units must be brought up to the state building codes before they leave the plant.

3.2 In order to ensure full compliance with the requirements stated above and all other requirements of PFS or state, rules and regulations, the following procedures have been developed. These procedures must be closely followed each and every time the inspector visits a manufactured structure, manufacturing facility.

4. REQUIRED REFERENCES, STANDARDS AND REGULATIONS

- 4.1 Each PFS representative is required to have a thorough knowledge of the state building codes.
- 4.2 The PFS representative must have a good working knowledge of the "National Electrical Code", and must be thoroughly familiar with those sections dealing particularly with manufactured structures.
- 4.3 The PFS representative must determine if the manufacturer can carry out all inspections and tests outlined in the accepted quality control manual and monitor accordingly.
- 4.4 The PFS representative must have a working knowledge of the accepted drawings and quality control manual for each assigned plant.

5. INSPECTION PROCEDURES

~~Inspection frequency for each manufacturer will be such that the PFS representative can inspect every~~
manufactured structure in at least one stage of production. This will be determined by each individual PFS representative based on his/her weekly inspection schedule and each manufacturer's volume of production.

- 5.1 At the beginning of each inspection the PFS representative shall notify the general manager or authorized representative of the facility that he/she is in the plant, and requests access to the following documents:
 - 5.1.1 Manufacturer's accepted design manual.
 - 5.1.2 Manufacturer's accepted quality control manual.
 - 5.1.3 The PFS inspection reports for the previous two weeks.
 - 5.1.4 Any state inspection reports since the last inspection performed by PFS. If any nonconformances are detected by the state during their audit on labeled unit(s) the PFS representative must fill out PFS Form A or Form 13 (see Appendix A) as well as red tag the unit(s) until brought into compliance.
- 5.2 The PFS representative will then request the manufacturer provide an area where he/she may review the documents listed in Paragraph 5.1.
- 5.3 The PFS representative will request the manufacturer notify him/her of any additions or revisions to the accepted quality control or design manual since the previous PFS inspection, identify any such revisions and provide them to the PFS representative.
- 5.4 The PFS representative will then move to the area provided and review the above mentioned documents.
- 5.5 Following the review of any revisions or additions to the design or quality control manual, the PFS representative shall review past inspection records.
- 5.6 Based on the review of the last inspection records, the PFS representative shall record the number of outstanding red tags and check on the last unit serial number inspected by PFS.
- 5.7 The PFS representative shall then move to the production line and inform the manufacturer's authorized representative of the following:

- 5.7.1 The manufacturer's quality control program must function normally as provided for by the accepted quality control manual for that plant.
- 5.7.2 Whenever possible the PFS representative should verify that one of the manufacturer's quality control personnel designated in the accepted quality control manual has inspected the station and the findings have been recorded on the applicable forms identified in the same manual.
- 5.7.3 When applicable the inspection performed by the quality control inspector will be compared to the inspection of the PFS representative.
- 5.7.4 The manufacturer's quality control documents required at each station shall be examined to determine if they are being used correctly.
- 5.7.5 While inspecting on the production line, the PFS representative must inspect all critical aspects of construction verifying compliance to the accepted documents and QEC checklist (see Appendix A) ~~in conjunction with the Systems Checklist during each inspection on the~~ production line. Check the design at each inspection on a rotating basis until all stations and all critical aspects of construction are verified. This must be performed on a continuing basis. Reference on PFS Form A all system of control violations, master checklist nonconformances (i.e., QEC items) when they are referenced as QC/No. Also, summarize on PFS Form A the PFS rating. Refer to the PFS monitoring procedures as set forth in SOP 1-92 for acceptance criteria. (See appendix A.) Whenever the criteria set forth in SOP 1-92 (see appendix A) is exceeded, the PFS rating must be relayed to the PFS regional vice president as well as the recommended method of corrective action. At the end of each month, forward the Systems Checklist and QEC Status Report to the PFS corporate office. (See Systems Checklist and QEC Status Report in Appendix A.)
- 5.8 The PFS representative shall begin his/her inspection at a station in the production process. The PFS representative may periodically alter the sequence of inspection so that it does not always begin at the same station. When the normal sequence of inspection is altered, a notation should be made on the inspection form that the sequence of inspection was altered. A typical production line inspection should take approximately three hours for 14 stations. Each station shall be listed on PFS Form A whether there is a unit in the line or not.
- 5.9 The PFS representative shall inspect every visible part of the unit for conformance with the accepted design and quality control manual. If the design or quality control manual is not specific with respect to some aspect of the construction, the PFS representative shall inspect those aspects of construction to the applicable state building code. The PFS representative should note that primary emphasis is placed on inspecting to the accepted design and quality control manuals. Only when the design or quality control manual is not specific should the PFS representative rely on the state building codes.
- 5.10 The PFS representative must record on PFS Form A "Quality Control Inspection Report," every nonconformance (Y/C or R/T) observed. Each Y/C or R/T shall have a reference to the accepted documents and if, and only if, the documents are not specific, reference to the code or manufacturing instructions is acceptable. After each Y/C or R/T record the nonconformance and how it was corrected. If it is not corrected the red tag will be outstanding and must be followed up on the next inspection. Each floor shall have its own red tag which can have one or more nonconformance. In addition, all red tags shall be logged in the upper right hand corner of the PFS Form A "Red Tag Disposition" and the serial number of all red tags shall be indicated on the Form A. Only the PFS representative can remove a red tag from units after the nonconformance has been corrected. When a red tag is issued the upper portion should be placed on or in the unit where it is visible by the manufacturer and the bottom portion stapled to the Form A. When the red tag is cleared, the corrective action should be noted on the back of the

bottom portion of the red tag and on the PFS Form A. The entire red tag should then be stapled to the original Form A when the red tag was issued. This becomes a permanent part of the manufacturer's files. The corrective action for the red tag is noted on PFS Form A so PFS has a permanent record of the corrective action taken for removal of the red tag. The PFS representative must not fail to record a nonconformance because it appears to be a minor one, or because it will be corrected at a later station. It is the responsibility of the PFS representative to record everything observed and not make value judgments about the relative severity of observed nonconformances.

- 5.11 Once the PFS representative inspector has completed the inspection of a particular station he/she shall then determine how many of the nonconformances identified were located by the manufacturer's quality inspector. If the nonconformance was detected by the quality inspector, note "QC/Yes" near the nonconformance on PFS Form A. If the quality inspector did not detect the nonconformance, note "QC/No" near the nonconformance and if the quality inspector did not yet inspect the unit, indicate "QC/NI" near the nonconformance on the PFS Form A. The quality inspector must find the nonconformance completely independent of the PFS representative. All nonconformances must be corrected before the unit is labeled or leaves the manufacturer's facility.

NOTE: Record QC/No's only when filling out the QEC Status Report.

- 5.12 All nonconformances must be recorded in as clear and detailed a manner as possible. As many lines as are necessary may be used to record nonconformances.

5.12.1 Example of incorrect report: "Improper slope to sink trap arm."

5.12.2 Example of correct report: "Slope of trap arm for sink in front bath was only 1/16 inch per foot."

The writing skills of the PFS representative must be developed so the report is written neatly and legibly. Since the report as written by the PFS representative in the plant is the final report supplied to the manufacturer and will be kept on permanent file, it must be easily understandable, neat and legible.

- 5.13 Once the PFS representative has inspected a station and all nonconformances observed are recorded, notify the manufacturer so that the nonconformance can be corrected. The corrective action must not be recorded on PFS Form A until the PFS representative has observed the correction performed by the manufacturer.
- 5.14 When a nonconformance is observed on one unit, the PFS representative must specifically check each unit on the manufacturer's property as well as in storage to ensure the nonconformance does not occur in any other units. If the aspect the PFS representative wishes to see is covered by construction, the PFS representative must require the manufacturer to uncover that aspect of the unit so he/she may examine it, unless the manufacturer's quality inspector located the nonconformance on the unit in question and was assured it was corrected, or can conclusively demonstrate through quality control documents that the nonconformance does not exist.
- 5.15 The PFS representative will try to witness each test that is performed while he/she is in the plant and verify compliance to the accepted documents. The PFS representative will notify the manufacturer's quality inspector to alert him/her when a test is about to be performed. The PFS representative will then proceed to the area where the test will be conducted. The PFS representative will note each test that was observed on PFS Form A. The PFS representative will inspect and/or check data plates for accuracy, and all test equipment and storage of materials at least monthly on the system checklist. The PFS representative is responsible for assuring the manufacturer is conforming to the accepted quality control manual for the plant.

- 5.16 Following completion of the inspection, the PFS representative will provide for each nonconformance noted, the correct Q.C. or code reference. The reference will be entered on PFS Form A "Quality Control Inspection Report" as well as the QEC reference. When the PFS representative has completed the inspection form, he/she will offer the general manager or their authorized representative the opportunity to participate in an exit interview. During the exit interview the PFS representative shall provide the general manager or their authorized representative with the PFS rating, discuss the nonconformances noted, the performance of the quality control program, and any observations made regarding the plant performance. The PFS representative will also notify the general manager or their authorized representative of the number and identity of units at his/her facility which have not been corrected.
- 5.17 As part of his/her inspections the PFS representative will at least once a month randomly select an unlabeled unit in storage and check to see if the quality inspector has inspected the unit and made note of the nonconformances or shortage items that exist. The PFS representative should then inspect the unit and verify that the quality inspector did or did not find all nonconformances or shortage items that existed in the unit. If the PFS representative finds nonconformances that were not noted by the quality inspector, this may be an indication the quality control system is not functioning properly, and the PFS representative must then increase the number of inspections on unlabeled units to the extent needed to ensure compliance with the accepted documents before the units are labeled. It is the responsibility of the PFS representative to increase frequency of inspection on unlabeled units in storage until such time the quality assurance inspector is satisfied the manufacturer's quality control system is functioning in such a manner that all unlabeled units in storage are in compliance with the accepted documents before labeling.
- 5.18 If the PFS representative encounters a unit in the production line for which the manufacturer can supply no accepted prints, the inspector will red tag the unit. (See SOP 1-91 in Appendix A.) For multiple box units one red tag is acceptable. At such time as the manufacturer can provide the necessary accepted prints, the PFS representative will then remove the red tag and inspect the unit in question. At the time the PFS representative initially encounters the unit for which no accepted prints are available, he/she will inform the general manager or their authorized representative that he/she will inspect the unit in question to the prints that are available. The PFS representative will further inform the manufacturer's representative that when accepted prints become available for the unit in question, if critical aspects of the construction of the unit are covered it will be necessary for the manufacturer to uncover those critical aspects of the construction so the PFS representative may examine them if he/she has not inspected those areas of construction.

6. INCREASED FREQUENCY OF INSPECTION PROCEDURES

6.1 Overview

A PFS representative is required to inspect the manufacturers for whom it is responsible to ensure they are capable of following acceptable quality control procedures; they continue to follow the accepted quality control manual; and all parts of a manufactured structure inspected are in conformance with the design or the state building codes when the design is not specific. The PFS representative is to continue monitoring the manufacturer and set procedures that must be followed when nonconformances are noted. (See Increased Frequency of Inspection Procedures SOP 1-92 for modular units in Appendix A.) This requires PFS to increase the frequency of inspection when manufactured structures repeatedly fail to conform to the design or state building codes, or when there is evidence the manufacturer is ignoring or failing to conform to the requirements of their accepted quality control manual.

6.2 Determination of Need for Increased Frequency of Inspection

The PFS vice president of quality control or their authorized representative will monitor plant inspection reports, consumer complaints, and all other available sources of information and determine when increased frequency of inspection procedures need to be instituted based on the following guidelines and SOP 1-92. (See Appendix A.)

- 6.2.1 If a defect in the plant or in a unit is documented as being serious or an "imminent safety hazard," there will be sufficient cause for immediate administrative review of the plant and possible implementation of increased frequency of inspection procedures.
- 6.2.2 The analysis of ten consecutive inspection reports indicating a consistent pattern or an excessive frequency (i.e. detecting three different nonconformances three times in ten inspections) of accepted quality control manual is developing will be cause for possible implementation of increased frequency of inspection procedures. If the same nonconformance is detected more than once during any given inspection it counts as one nonconformance when tabulating the repeat status and total nonconformances for the PFS rating.
- 6.2.3 The PFS vice president of quality control may at their discretion require an administrative review of the plant in order to determine if implementation of increased frequency of inspection procedures is necessary.
- 6.2.4 If the PFS representative continues to find units that have repeated nonconformances and these nonconformances are not being corrected by the manufacturer's quality control procedures, the PFS representative will request the PFS vice president of quality control to increase frequency of inspection and/or withdraw labeling privileges.

All information upon which a determination to increase frequency of inspection is based, will be documented in writing and sent to the manufacturer and state agency, if applicable. The manufacturer may be notified of the intent to perform an "increased frequency production surveillance inspection" verbally or in writing either prior to or at the entrance of the inspection party into the plant. The PFS vice president of quality control or their authorized representative will make all determinations as to the form and method of notification.

6.3 Administrative Review

An administrative review of a plant is a written report analyzing or summarizing several aspects of the plant's performance and is compiled jointly by members of the administrative, engineering and field staff assigned by the PFS vice president of quality control. The following topics are part of an administrative review:

- 6.3.1 Total number of nonconformances recorded in the past six calendar months broken down into monthly subtotals.
- 6.3.2 Discussion of any recognizable trends in number, frequency of occurrence, or types of nonconformances for the period of time under consideration.
- 6.3.3 Any correlation between outside factors such as changes or loss of key employees, decrease or increase in production, material or component shortages etc., with the trends highlighted in the recorded nonconformances.

- 6.3.4 Any correlation between the consumer complaints received and non-conformances recorded during the time period under consideration will be discussed. Special attention will be given to any implication the consumer complaint might make about undetected nonconformances, or possible consequences if plant performance remains unimproved.
- 6.3.5 Discussion of plant "attitude" based on interrogation of inspection and personal knowledge, etc.
- 6.3.6 Summary and recommendations. There are four possible recommendations:
 - 6.3.6.1 There is not justification or sufficient information to warrant plant recertification.
 - 6.3.6.2 Available information suggests the possible need for a plant recertification but additional monitoring and investigation is needed to verify.
 - 6.3.6.3 A need exists for assigning a PFS representative full time at the plant.
 - 6.3.6.4 A need exists for plant recertification.
- 6.3.7 Due to the sensitive nature of the information contained in an administrative review, such reviews are confidential and considered to be the same as proprietary material.

7. PLANT EVALUATION PROCEDURES

7.1 Overview

Prior to the issuance of labels to a manufacturer, the PFS representative in accordance with PFS Certification Requirements for Factory Built Structures shall make a complete inspection of the fabrication process. The purpose of this initial factory inspection is to determine whether the manufacturer is capable of producing manufactured structures in conformance with the accepted design and with the state building codes if the design is not specific. The PFS representative will also determine if the manufacturer's quality control procedures, plant equipment and personnel, as set out in the accepted quality control manual will ensure that such compliance continues.

7.2 Determination of Need for Plant Re-Certification Inspection

The PFS vice president of quality control or their authorized representative shall evaluate the following situations and schedule a plant re-certification inspection if necessary:

- 7.2.1 An administrative review recommendation to re-certify a plant.
- 7.2.2 An accepted manufacturer re-opens after an extended shut down.
- 7.2.3 An accepted manufacturer makes a significant change in the manufacturing process

7.3 Personnel Required

This inspection should be made by one or more qualified engineer or supervisor who has reviewed the accepted designs and by one or more PFS representatives who have been carefully briefed by the engineers on the restrictive aspects of the design.

7.4 Process

The PFS representative (s), engineer(s), or supervisor shall meet at the plant at a time designated by the PFS vice president of quality control or their authorized representative.

- 7.4.1 The team leader will identify the team and request a meeting with the plant general manager or their representative. At this meeting, the team leader will explain the purpose of the inspection, the procedures to be followed, the form and disposition of all results and recommendations for any changes to the manufacturer.
- 7.4.2 Following the meeting with the general manager or their representative, the team will go to a quiet location where the accepted design and quality control manuals can be examined. The engineer or supervisor shall brief the quality assurance inspectors on any restrictive aspects of the design.
- 7.4.3 ~~The PFS representatives and the engineer or supervisor shall proceed to the first station on the production line. If possible, the accepted package or portions of it will be carried to the manufacturing plant. The PFS representatives must inspect every work station and sub-station, verify all Quality Control functions in the accepted Quality Control Manual and every application of installation of every component for this manufactured structure. The engineer or supervisor shall assist with the inspection, brief the PFS representatives about restrictive aspects of the design, and evaluate the manufacturing process and quality control procedures.~~
- 7.4.4 The PFS representatives will notify the in-plant quality control personnel when a nonconformance is about to be covered up. The PFS representatives will note which nonconformances were not detected by the quality inspection personnel. If an aspect of the manufactured structure is covered up before it can be inspected or corrected, the PFS representative must notify the quality inspection personnel that this aspect must be inspected or corrected before this plant is certified. The PFS representatives will inspect manufactured structures entering production after the initial unit to ensure that corrective measures are implemented to prevent repeat violations.
- 7.4.5 The PFS representative will review their reports with the engineer or supervisor at the end of the inspection. If the engineer or supervisor leaves before the end of the inspection, the PFS representative will mail the report to the engineer or supervisor.

The engineer or supervisor will prepare a draft certification report and forward it to the manufacturer, PFS representative, and the state, if applicable. The issuance of the certification report is a pre-requisite to the commencement of production surveillance and to the issuance of labels.

The PFS regional vice president will prepare the final certification report and forward it to the manufacturer and the state, applicable.

7.5 Plant Certification Procedures

- 7.5.1 See Section 7B of the PFS Field Operations Procedural Manual.

7.6 On-Site Inspection Procedures

7.6.1 See SOP 1-94 in Appendix A.

7.7 Re-Hab Inspection Procedures

7.7.7 See SOP 4-93 in Appendix A.

8. COMPLAINTS TO MANUFACTURERS

At a minimum of once each year, the PFS representative shall examine records of complaints to the manufacturer. The PFS representative shall verify that the manufacturer is keeping a record of all complaints made known to the manufacturer relating to a product's compliance with requirements of the relevant standard.

~~The PFS representative shall verify that the manufacturer is taking appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification.~~

The PFS representative shall verify that the manufacturer documents all action taken in response to such complaints and shall note this in the audit report.

APPENDIX A

DOCUMENT	REVISION DATE
PFS Form A	3/07
PFS Form 13	8/07/07
PFS SOP 1-91	1/30/04
PFS SOP 1-92	5/12/97
PFS SOP 1-94	2/08/11
Form 25 – Site Inspection Form	5/20/03
PFS SOP 4-93	2/06/98
Form 306 – Systems Checklist for Modular Units	1/14/05
Form 138 - QEC Status Report	6/1/05
Form 141 - QEC Checklist	2/14/02



PFS CORPORATION
1507 Matt Pass
Cottage Grove, WI 53527

Page 1 of _____

Quality Control Inspection Report

Time in _____ Time out _____ PFS Supervisor _____

California Commercial Modular / Special Purpose C.M. / Multi-Unit M.H.

Date: _____ Inspector: _____

Mfgr/Loc: _____

R/T DISPOSITION
outstanding _____
cleared _____
issued _____
current _____

Legend: S - Structural, P - Plumbing, M - Mechanical, E - Electrical, T - Thermal, FS - Fire Sprinkler,
N/A - Not Applicable, OK - Acceptable, R/T - Red Tag (Not Acceptable),
Y/C - Yellow Condition (Minor Violation-Corrected Immediately)

Type: CM = Commercial Modular, SPCM = Special Purpose CM, MUMH = Multi-Unit Manufactured Housing

Type Inspection: [] Production [] Finished Units [] Materials [] Testing
[] Plant Quality Control [] State of California Fire Sprinkler

INSIGNIA SECURITY: [] ADEQUATE [] NEEDS IMPROVEMENT (specify on page _____)
Q.C. PROGRAM EFFECTIVENESS: [] [] NEEDS IMPROVEMENT (specify on page _____)

Table with 4 columns: Serial Number, Model ID, Plan Approval Number, Type. Multiple empty rows for data entry.

Table with 6 columns: Station, Serial No., Sys, Material, Workmanship, Comments. Multiple empty rows for data entry.

MFGS Representative: _____ PFS Inspector: _____
PFS Rating: / /

Copies to: Manufacturer, PFS Corporate Office

PFS CORPORATION - 1507 MATT PASS - COTTAGE GROVE, WI 53527

Providing Quality Control and Certification Services to the Building Industry

**RED TAG PROCEDURES
FOR
FACTORY BUILT STRUCTURES
SOP 1-91**

The following procedures must be followed when you make an in-plant inspection and you encounter a model(s) that is not approved by PFS or a state, and/or you find a nonconformance in a labeled unit.

UNAPPROVED MODELS

- A. If approvals are not available the PFS inspector must red tag the unit(s).
- B. Identify the documents used to inspect the unit(s) on the red tag and PFS Form A. (i.e. print number, date drawn and by whom.) Also add to our documents that the unit can not be shipped until released by PFS.

- C. Obtain label(s) for the unit(s) until such time the approvals arrive and the unit is in compliance with the approvals. At the exit interview, indicate to all parties that the units can not be shipped until released by PFS.
- D. If a state (e.g. Indiana, Massachusetts, Michigan and Tennessee) does not allow the manufacturer to put a unit on the production lines without proper approvals, PFS can not inspect or red-tag the unit and you must notify your supervisor immediately via phone or fax.
- E. If unit(s) needs to be shipped with a red-tag before we can make our final inspection with approved drawings, PFS is required to make a field inspection with the approved drawings and affix all label(s) to all unit(s). All field inspections would be invoiced for time and expenses. If any of those unit(s) are to be labeled for Missouri, Pennsylvania, Ohio, South Carolina, Texas or Virginia, we must notify those states and follow their directions if we can inspect and label in the field. For IBC units, follow the attached Formal Interpretation Bulletin 98-02.
- F. If the manufacturer indicates we do not have to inspect or label the unit and you know the unit is being shipped to a state with a labeling program or you find out the manufacturer shipped any red tagged unit(s) without our authorization, notify your supervisor immediately via phone or fax.

LABELED UNITS

- A. If the PFS inspector detects nonconformances on a labeled unit you must red tag the unit until such time the unit is brought into compliance.

**INCREASED FREQUENCY OF INSPECTION PROCEDURES
FOR
FACTORY BUILT MODULAR UNITS
SOP 1-92**

1. Increased frequency of inspection.

This can occur if the PFS quality assurance inspector has a PFS rating of 3 or more systems of control violations, 8 or more QEC nonconformances and/or 3 or more items at repeat status. The increased frequency of inspection must be authorized by the Vice President of Quality Control or regional vice president or general manager. Increased inspections are performed by the assigned PFS quality assurance inspector. Increased inspections shall be performed at stations where the problems have been identified, rather than randomly made throughout the plant.

NOTE: The PFS QAI must contact the Regional Vice President and/or Vice President of Quality Control or his designee when the PFS rating exceeds 2/7/2.

-
2. Increased frequency of inspection and lift labels.

This can occur if the PFS quality assurance inspector has a PFS rating of 4 or more system of control violations, 12 or more QEC nonconformances and/or 4 or more items at repeat status. The increased frequency of inspection must be authorized by the Vice President of Quality Control or regional vice president or general manager. Increased inspections are performed by the PFS quality assurance inspector and/or the area training supervisor. Increased inspections shall be performed at stations where the problems have been identified rather than randomly made throughout the plant.

NOTE: In addition to the above criteria, the following may also constitute increased frequency of inspection:

- a. Absence, loss, and/or change of key personnel (i.e. foremen, managers, or quality control personnel).
 - b. Large turnover in any one production department.
 - c. Increase in production and/or new models.
 - d. New process and/or equipment.
3. When the plant is on increased frequency of inspection, the PFS quality assurance inspector will follow-up on all QEC nonconformances noted on the past ten inspection reports. When the QEC nonconformances on repeat status are under three and/or the manufacturer has corrected all nonconformances, the PFS quality assurance inspector will conduct another PFS rating in the plant. With an adequate rating, the frequency of inspection will be reduced to normal and/or release labels back to the manufacturer.

NOTE: However, if the PFS quality assurance inspector has three consecutive inspections without a recurrence of a QEC nonconformance on repeat status, then the QEC nonconformance is not considered at repeat status and not reported in the PFS rating.

4. When the plant is on increased frequency of inspection, the PFS quality assurance inspector assigned to the plant reports conditions of the plant after each inspection, to his Regional Vice President or Vice President of Quality Control or his designee. If the plant conditions do not improve with each inspection, the regional vice president or Vice President of Quality Control may institute an administrative review at that time.

5. Administrative Review

An administrative review is a special inspection to be performed by the Regional Vice President or his designee to determine if a plant recertification is warranted.

This will occur if the manufacturer is not back to normal frequency of inspection (100%) after a reasonable time depending on production, or if the PFS rating is 4/12/4 or more. (i.e. 4 systems, 12 QEC nonconformances, 4 items at repeat status.)

**PFS ON-SITE INSPECTION PROCEDURES
FOR
FACTORY BUILT STRUCTURES**

SOP 1-94

1. PFS will perform site inspections as required by the authority having jurisdiction and as directed by the PFS Regional Vice President.
 2. These inspections will be conducted using PFS Form 25 as a guideline. (See attached Form 25)
 3. Upon completion of the inspection, the PFS quality assurance inspector will send the original to their regional office. The regional office will send copies to the PFS Corporate office, to the state (if required) and to the manufacturer.
-



SITE INSPECTION FORM

Form 25
rev. 5/20/03 kc

MANUFACTURER _____
 BUILDER/OWNER _____
 DATE OF INSPECTION _____
 STATE/IBC LABEL _____
 UNIT SERIAL NUMBER: _____

LOCATION _____
 LOCATION _____
 PFS LABEL # _____
 DATE OF MFG _____

ITEMS TO CHECK	COMPLIES		REMARKS
	YES	NO/NA	
1. FOUNDATION: per approved plans for a. CRAWL SPACE b. BASEMENT			
2. COLUMN SUPPORT AS PER APPROVED DRAWINGS*			
3. COLUMN SUPPORTS INSTALLED SO THAT CENTER BEAM BEARS 100% ON SUPPORT COLUMN PLATE			
4. CENTER BEAM BOLTED AS PER APPROVED DRAWINGS*			
5. INSULATION INSTALLED AS PER CODE/DRAWINGS*			
6. HOUSE SECURED TO SILL PLATE PER CODE/DWGS*			
7. FIELD INSTALLED SIDING PER MFG. INSTRUCTIONS			
8. GUTTERS INSTALLED			
9. SHINGLE INSTALLATION			
10. DWV VENTS INSTALLED THRU ROOF			
11. BATHROOM VENT TO EXTERIOR			
12. KITCHEN RANGE HOOD VENTED TO EXTERIOR			
13. DRYER VENTS TO OUTSIDE			
14. UNIT MADE ENERGY EFFICIENT AT JOINTS			
15. UTILITY CONNECTIONS			
16. HWH DISCHARGE PROPERLY			
17. ATTACHED GARAGE & 20 MIN. DOOR			
18. REQUIRED FIRE STOPPING ACCOMPLISHED			
19. ATTIC INSULATION CORRECT			
20. DATA PLATE CORRECT/COMPLETED			
21. RECORD ANY TRANSPORTATION DAMAGE			

*APPROVED PFS/STATE DRAWINGS AVAILABLE YES () NO () OCCUPIED: YES () NO ()

*SITE INSEPTION BASED ON THE ABOVE

ALL "NO" FINDINGS SHALL BE FOLLOWED UP AND/OR CORRECTED/COMPLETED/VERIFIED BY THE MFGR.

cc: PFS Madison Office
 State
 Manufacturer

INSPECTOR _____
 signature

**PFS PLAN REVIEW AND INSPECTION PROCEDURES
FOR
REHAB UNITS**

SOP 4-93

1. Unit had a state label, label is missing, and unit is to be relocated within the state.
 1. Request (3) sets of drawings of the unit, review and approve for PFS inspector to use. Return (1) stamped copy to person requesting replacement label.
 2. Inspect the unit and if it meets code requirements as of date of manufacturer request by letter and insignia application from the applicable state for a replacement label.
 3. After label is received, schedule final inspection and apply state and PFS label (PFS label cost should be \$50.00).

2. Unit has a state label but is to be located in another state.
 1. Request (3) sets of drawings of the unit, review and approve for PFS inspector to use.

 2. Inspect unit, removed whatever is necessary to verify that unit will meet requirements of the intended state codes. Issue a deviation list (if necessary).
 3. After unit is updated request from the state, with letter, insignia request and copy of stamped drawings, permission to label unit.
 4. After label is received from the state, apply state and PFS label (PFS label cost should be (\$50.00)).

3. Unit does not have state label and requires state certification.
 1. Same as item 2 above.

4. Unit does not require a state label but a certificate of inspection is requested.
 1. Request drawing of the unit, review and approve for PFS inspector to use.
 2. Inspect unit, remove whatever is necessary to verify that unit meets requirements of the applicable state codes and/or model code.
 3. After unit is updated, inspect and issue PFS certificate of inspection (PFS Certificate of Inspection cost (\$50.00)).

NOTE: INSPECTION PROCESS:

- a. 1st inspection - Rough in inspection and deviation list (if necessary)
- b. 2nd inspection - Follow-up inspection to verify that items on deviation list or rough in inspection report have been corrected.
- c. 3rd inspection - Final inspection and apply labels or issue certificate of inspection.
- d. Be sure and add "RH" after the serial number when reporting your inspections on PFS Form A or Form C.
- e. For IBC units, you need to secure labels from PFS prior to your final inspection, fill out the attached IBC Relabeling Report form and send to PFS Headquarters along with the payment for the label(s).

• INDUSTRIALIZED BUILDINGS COMMISSION •

RELABELING REPORT FORM

We, _____ (name of inspection agency), Code # _____, have relabeled existing units for the following company at the location indicated with IBC certification labels in accordance with the Uniform Administrative Procedures, Part IV, Section 4(A)(7).

PART I: CORPORATION REQUESTING RE-LABELING

Corporate Name:

Mailing Address:

City:

State:

Zip:

Contact:

Phone:

PART II: LOCATION OF RE-LABELED UNIT(S)

Street Address:

City:

State:

Zip:

PART III: DESCRIPTION OF RE-LABELED UNIT(S)

IBC Label No.	Model No./Size	Existing Label No	Date of Mfr.	Module Number	Use Group

- **IBC Label No.:** IBC Certification Label number affixed to unit.
- **Model No./Size:** Model of unit from data plate. If unavailable, nominal size of unit.
- **Existing Label No.:** If applicable, original state label number attached to unit.
- **Date of Mfr.:** If available, date of manufacture from data plate.
- **Module Number:** Module number per total number of modules that make up building (1 of 4, 2 of 4, etc.)
- **Use Group:** Primary occupancy or use group designation per model building code.

PART IV: PAYMENT FOR IBC CERTIFICATION LABELS

MODULAR/CLOSED PANEL LABELS	Quantity	Fee	Amount (A)
		\$60.00	
COMPONENT LABELS	Quantity	Fee	Amount (B)
		\$36.00	
Make Checks Payable to: INDUSTRIALIZED BUILDINGS COMMISSION	Check No.	Dated	Amount (A+B)

PART V: INSTRUCTIONS

Inspection Agency:

A completed form must be submitted along with payment no later than 30 calendar days after labels have been affixed.

1. Complete all parts and make one copy.
2. Retain copy for your records.
3. Submit original along with check to:

INDUSTRIALIZED BUILDINGS COMMISSION
505 Huntmar Park Drive, Suite 210
Herndon, VA 20170

Revised 11/05



**SYSTEMS CHECKLIST
FOR
MODULAR UNITS**

Manufacturer Name _____ Location _____ Month _____

Inspector Name _____ **Supervisors Initials _____

<u>Date Evaluated</u>	<u>Compliance</u>	<u>Yes</u>	<u>No*</u>
------------------------------	--------------------------	-------------------	-------------------

1. DOES REVIEW OF THE MANUFACTURER'S ON-LINE INSPECTIONS AND HIS/HER COMPLETION OF THE Q.C. CHECKLIST INDICATE THE REQUIRED INSPECTIONS ARE BEING PERFORMED EFFECTIVELY?

- | | | | |
|--|-------|-------|-------|
| _____ A) Nonconformances were noted by Q.C. and corrected properly. | _____ | _____ | _____ |
| _____ B) Approved plans, production drawings, details or installation instructions are available on line for all units or components being constructed and are adhered to. | _____ | _____ | _____ |
| _____ C) Items were inspected, checklist signed and nonconformances were documented per Q.C. procedures. | _____ | _____ | _____ |

2. IS THE Q.C. PROGRAM BEING FOLLOWED AS APPROVED IN THE Q.C. MANUAL?

- | | | | |
|---|-------|-------|-------|
| *** A) Is the manufacturer conducting inspections at the identified control points in the Q.C. manual? | _____ | _____ | _____ |
| *** B) Are the inspections being conducted by the proper personnel? | _____ | _____ | _____ |
| _____ C) Based on review of completed checklists, does the Q.C. program perform in a consistent manner? | _____ | _____ | _____ |
| _____ D) Is the Data Plate complete and accurate? | _____ | _____ | _____ |
| E) Are the witnessed tests by PFS being conducted properly? | _____ | _____ | _____ |
| Electrical _____ Water _____ DWV _____ Gas _____ Other _____ | | | |
| *** F) Manufacturers material storage in compliance with procedures? | _____ | _____ | _____ |

3. DO THE PROCEDURES APPROVED IN THE Q.C. MANUAL ASSURE THE MANUFACTURER CAN PRODUCE CONFORMING UNITS?

- | | | | |
|--|-------|-------|-------|
| *** A) Does the Q.C. checklist sufficiently describe the major construction items to be inspected at each control point? | _____ | _____ | _____ |
| _____ B) Does the Q.C. manual describe proper testing procedures and equipment including usage and maintenance to assure complying structures will be built? | _____ | _____ | _____ |
| *** C) Does the Q.C. manual identify personnel including procedures they must follow to properly complete their quality control traveler? | _____ | _____ | _____ |
| _____ D) Is the list of inspections as defined in the Q.C. Manual compatible with the production process? | _____ | _____ | _____ |

* If no, explain on reverse side.

** This certifies that the supervisor is reviewing a minimum of 20% of in-plant inspection forms.

*** Items to be verified at each inspection and recorded on PFS Form A.

QUALITY EVALUATION CRITERIA (QEC) CHECKLIST

BUILDING PLANNING

- | | |
|---|---|
| <p>1. Light and Ventilation
1.1 Habitable rooms
1.2 Alcove rooms
1.3 Bathrooms</p> <p>3. Glazing
3.1 Hazardous locations</p> <p>5. Exits
5.1 Exit door
5.2 Egress from sleeping rooms</p> <p>7. Smoke Detectors
7.1 Location
7.2 Power source</p> <p>9. Dwelling Separation
9.1 Fire resistive rating
9.2 Construction</p> | <p>2. Ceiling Height
2.1 Habitable rooms
2.2 Kitchens, baths, hallways</p> <p>4. Attached Garage
4.1 Openings
4.2 Separation</p> <p>6. Stairways
6.1 Stairways
6.2 Handrails
6.3 Guardrails</p> <p>8. Flame Spread
8.1 Flame spread
8.2 Smoke density</p> |
|---|---|

FLOORS

- | | |
|--|---|
| <p>10. Floors
10.1 Grade mark
10.2 Maximum span
10.3 Minimum bearing
10.4 Boring
10.5 Bridging
10.6 Cutting and notching
10.7 Fastening
10.8 Joists at bearing locations
10.9 Framing
10.10 Insulation installation</p> | <p>11. Subfloor (plywood/OSB)
11.1 Fastening
11.2 Grade/span</p> <p>12. Compressible Floor Covering
12.1 Under load bearing walls</p> |
|--|---|

WALL CONSTRUCTION

- | | |
|--|--|
| <p>13. Load Bearing Walls
13.1 Fastening of studs
13.2 Stud-grade stamp, size
13.3 Bracking
13.4 Spacing of studs
13.5 Location of studs (with respect to trusses or floor joists)
13.6 Header Spans/construction/support
13.7 Header fastening
13.8 Column supports
13.9 Uplift straps</p> | <p>14. Interior Partitions
14.1 Fastening of studs
14.2 Stud-grade stamp, size
14.3 Spacing of studs
14.4 Cutting and notching</p> <p>15. Firestopping
15.1 Location
15.2 Material/application</p> <p>16. Draftstopping
16.1 Location
16.2 Material/application
16.2 Material/application</p> |
|--|--|

WALL COVERING

17. Interior covering

- 17.1 Vertical support
- 17.2 Support spacing
- 17.3 Shower and bath spaces
- 17.4 Wood veneer or hardboard inst.
- 17.5 Fastening

18. Exterior Covering

- 18.1 Condensation control
- 18.2 Flashing at doors & windows
- 18.3 Flashing at wall/roof intersection
- 18.4 Corrosion resistant fasteners
- 18.5 Insulation installation
- 18.6 Sheathing/siding/installation including fastening

ROOF/CEILING CONSTRUCTION

19. Rafters/Trusses/Ceiling Joists

- 19.1 Grade/specie
- 19.2 Rafter ties
- 19.3 Fastening
- 19.4 Spans
- 19.5 Bearing
- 19.6 Cutting and notching
- 19.7 Boring
- 19.8 Bracing

20. Plywood, OSB

- 20.1 Grade
- 20.2 Spans
- 20.3 Fastening
- 20.4 Edge/End Spacing

21. Attic

- 21.1 Access
- 21.2 Ventilation
- 21.3 Insulation installation

ROOF COVERING

22. Shingles/Underlayment

- 22.1 Underlayment
- 22.2 Shingle installation per manufacturer specifications
- 22.3 Flashing
- 22.4 Valley construction

23. Built-up Roofing

- 23.1 Built-up roofing
- 23.2 Dormer construction

FIREPLACES

24. Factory-built Fireplaces

- 24.1 Installation per manufacturer's specifications
- 24.2 Chimney/Thimble Installation
- 24.3 Hearth Extension
- 24.4 Mantel location

MECHANICAL EQUIPMENT

- 25. Heat producing/comfort cooling**
25.1 Clearances
25.2 Shutoff valves
25.3 Access and working space
25.4 Range vertical clearance
25.5 Range hood
25.6 Range horizontal clearance
25.7 Dryer exhaust
25.8 Mechanical exhaust fans

- 26. Combustion Air**
26.1 Air supply
26.2 Opening location/size
26.3 Air source
26.4 Air supply ducts

- 27. Warm Air Furnace/Hot Water Heat**
27.1 Access to room
27.2 Working Space
27.3 Access to components
27.4 Location
27.5 Clearance
27.6 Attic furnace
27.7 Under floor furnace

- 28. Circulating Air Supply**
28.1 For ventilation
(i.l.o. windows)
28.2 Supply openings
28.3 Source
28.4 Air duct area

**DECORATIVE APPLIANCES, FLOOR FURNACES,
VENTED WALL FURNACES AND ROOM HEATERS**

- 29. Decorative Appliances, Floor Furnaces,
Vented Wall Furnaces and Room Heaters**
29.1 Vented decorative appliances
29.2 Floor furnace location
29.3 Floor furnace access
29.4 Wall furnace location
29.5 Wall furnace installation
29.6 Room heaters

- 30. Venting of Appliances**
30.1 Vent installation per mfr.
30.2 Vent off-sets
30.3 Vent termination
30.4 Location of vent
termination
30.5 Vent size
30.6 Connectors

DUCTS

- 31. Ducts**
31.1 Material
31.2 Joints and seams
31.3 Insulation R-value
31.4 Under floor plenum

ENERGY

- 32. Energy Requirements**
32.1 Interior Air Barrier/Vapor retarder
32.2 Exterior Air Barrier
32.3 Penetrations sealed
32.4 U values of fenestration products

FUEL SUPPLY SYSTEMS

33. **Gas Piping**
- 33.1 Gas piping support
 - 33.2 Approved connections
 - 33.3 Valves listed
 - 33.4 Appliance connectors
 - 33.5 Sizing of gas lines
 - 33.6 Testing

MATERIALS

35. **Materials**
- 35.1 Approved materials DWV
 - 35.2 Approved materials water piping
 - 35.3 Copper tubing bend radius
 - 35.4 Plumbing fixtures listed
 - 35.5 Solder specifications

DWV

36. **Waste Piping**
- 36.1 Fitting direction
 - 36.2 Cleanouts
 - 36.3 Piping slope
 - 36.4 Pipe sizing
 - 36.5 Prohibited traps
 - 36.6 Vertical distance to trap
 - 36.7 Trap size
 - 36.8 Trap arm length
 - 36.9 Trap arm slope
 - 36.10 Vertical leg of trap arm
 - 36.11 Testing

PLUMBING FIXTURES

38. **Plumbing Fixtures**
- 38.1 Tailpiece size
 - 38.2 Installation of fixtures
 - 38.3 Combination fixtures
 - 38.4 Shower compartment
 - 38.5 Whirlpool bathtubs

PLUMBING

34. **General**
- 34.1 Notching and boring
 - 34.2 Watertightness
 - 34.3 Piping support
 - 34.4 Slip joint access
 - 34.5 Fitting directions

VENT PIPING

37. **Vent Piping**
- 37.1 Vent termination
 - 37.2 Minimum vent area
 - 37.3 Vent connection to horizontal waste pipe
 - 37.4 Vent connection to vent stack
 - 37.5 Common vent
 - 37.6 Mechanical vents (listing)
 - 37.7 Vent extension
 - 37.8 Wet venting

WATER SUPPLY

39. **Water Supply**
- 39.1 Water service pipe
 - 39.2 Joints and connections
 - 39.3 Valves
 - 39.4 Size of piping
 - 39.5 Support/protection
 - 39.6 Testing

ELECTRICAL

40. Electrical

- 40.1 Unused openings are plugged
- 40.2 Wire continuous
- 40.3 Correct box size
- 40.4 Wire size/rating/type
- 40.5 Over current protection
- 40.6 Number of circuits and identification
- 40.7 GFCI recepts location and 20 amp
- 40.8 Covering of combustibile material
- 40.9 Bonding
- 40.10 Protection of cable
- 40.11 Testing
- 40.12 Recept location/spacing/
- 40.13 Equipment installation per listing
- 40.14 Arc-Fault Circuit-Interrupter Protection
recepts and circuits
- 40.15 Wire protected for shipping

HANDICAPPED

41. Handicapped

- 41.1 Grab bar installation
- 41.2 Plumbing fixture installation
- 41.3 Accessible route
- 41.4 Restroom floor space
- 41.5 Door width/hardware
- 41.6 Electrical outlet installation
(15" above floor)