

Regulatory Requirements for Permanent Chassis Identification: Serial Numbers and VINs in Manufactured and Modular Housing

This briefing document outlines the federal requirements and interpretative guidelines regarding the application of serial numbers and Vehicle Identification Numbers (VINs) for manufactured homes and excluded modular structures built on a chassis. It specifically addresses the responsibilities of Production Inspection Primary Inspection Agencies (IPIAs) in ensuring compliance with these standards.

Executive Summary of Regulatory Standards

Under the federal regulatory framework, both manufactured homes (HUD Code) and excluded modular structures (built on a chassis) are subject to mandatory permanent identification requirements. While the Department of Housing and Urban Development (HUD) primarily uses the term “serial number,” it acknowledges that these identifiers often function as VINs depending on state-level regulations. The Production Inspection Primary Inspection Agency (IPIA) holds the specific responsibility of verifying that these numbers are permanently stamped on the chassis during the initial phase of manufacturing.

IPIA Responsibility for Serial Number Verification

Pursuant to Enforcement Interpretative Bulletin H-2-77 and 24 CFR § 3282.362(c), the IPIA is charged with specific oversight regarding the physical application of serial numbers:

- **Verification of Placement:** The IPIA must assure that the serial number specified in 3280.6 is permanently stamped on the foremost cross member of the chassis, nearest the drawbar.
- **Timing of Application:** This identification must be applied when the unit enters the first stage of production, which must occur prior to or coincident with IPIA inspections.
- **Record Consistency:** The IPIA is responsible for ensuring that the serial number stamped on the chassis corresponds exactly with the numbers reported on inspection and labeling records.
- **Integrity of Identification:** The IPIA must assure that the serial number is never changed, unless a corresponding change is documented in both inspection and labeling records.

Comparative Requirements: Manufactured vs. Modular (Excluded) Structures

The following table demonstrates that the requirements for permanent chassis-based identification are effectively identical for both manufactured homes and excluded modular structures.

Requirement	Manufactured Homes (HUD Code)	Excluded Structures (Modular)
Permanent Serial / VIN Number	Mandatory	Mandatory
Placement Requirement	Foremost cross member of chassis	Foremost cross member of chassis
Timing of Application	First stage of production	First stage of production
Production Identification System	Permanent chassis-based identifier tied to manufacturing and inspection records	Permanent chassis-based identifier tied to manufacturing and inspection records
Identifier Terminology	HUD refers to as a “serial number”; some states may treat it as a VIN	HUD refers to as a “serial number”; some states may treat it as a VIN
Record Association	Inspection records and labeling records	Manufacturer records and certification records
Regulatory Basis	24 CFR § 3280.6 and HUD Bulletin H-2-77	24 CFR § 3282.12(e) interpreted with HUD Bulletin H-2-77
Distinguishable Number Series	Required	Required to be distinguishable from HUD-certified manufactured homes

Regulatory Mandates for Excluded Structures (Modular Homes)

Under 24 CFR § 3282.12, modular homes may be excluded from the National Manufactured Housing Construction and Safety Standards Act if the manufacturer elects and certifies the exclusion. However, this exclusion does not remove the requirement for permanent identification.

Mandatory Identification for Excluded Units

24 CFR § 3282.12(e) explicitly states: “As part of this certification, the manufacturer shall identify each certified structure by a permanent serial number placed on the structure during the first stage of production.”

Distinguishable Series

If a manufacturer produces both HUD-certified manufactured homes and excluded modular structures, the serial numbers for the excluded structures must be distinguishable from those used for manufactured homes, both on the physical structure and within the manufacturer's records.

The “First Stage of Production” Connection

For any transportable structure built on a steel chassis, the “first stage of production” is effectively defined as the chassis stage. HUD Bulletin H-2-77 connects this production stage directly to the stamping of the foremost cross member of the chassis. Thus, for chassis-based modular structures, the chassis serves as the foundational platform where the permanent serial number must be established.

The Relationship Between Serial Numbers and VINs

A common point of contention involves the terminology used for these identifiers. HUD provides the following clarification regarding the intersection of federal serial numbers and state-level VIN requirements:

“In some states, the Serial number and VIN number may be one and the same; however, this can vary by State. HUD does not issue VIN numbers.”

Key Interpretations

1. **Functional Equivalence:** While HUD consistently utilizes the term “serial number” in its regulatory language, it acknowledges that some states treat this identifier as a VIN.
2. **State Variation:** The distinction between a serial number and a VIN is determined by state law, not by HUD.
3. **Federal Requirement:** The federal mandate requires a permanent chassis-based production identifier (serial or VIN) during the first stage of production. Excluded status for a modular home does not eliminate this requirement.

Conclusion

The regulatory framework established by 24 CFR § 3280.6, 24 CFR § 3282.12, and HUD Bulletin H-2-77 confirms that permanent serial-number identification is tied to the chassis and must exist during the first stage of production for all transportable, chassis-based structures. IPIAs are required to enforce these identification standards, ensuring that every unit—whether manufactured or modular—carries a permanent identifier on its foremost cross member that matches all associated inspection and certification records.