ENERGY STAR Certification System Quality Assurance and Quality Control Enhancements

Stakeholder Comment Form

Please submit written comments to energystarhomes@energystar.gov no later than January 19, 2024, using this template. Please note that all submitted comments will be posted on the ENERGY STAR website.

Organization Name: *Northeast HERS Alliance (NEHERS)* - This proposal is being issued on behalf of the Standards Committee of the Northeast Home Energy Rating System Alliance, which represents more than 260 Raters and 11 Providers from New Jersey to Maine.

Respondent Last Name: Zeis

Respondent First Name: Cindy

Comments:

General

1) Do you have any general feedback on EPA's proposed enhancements to the ENERGY STAR Certification System's Quality Assurance and Quality Control (QAQC) requirements?

Given the increased complexity of QA requirements, any policy changes should try to align as closely as possible to existing HCO QA policies to aid in streamlining processes which would more effectively align with the purposes of the Paperwork Reduction Act of 1995. It will be important that much of this is managed through the modeling software.

The goal would be to have consistency and alignment with RESENT EPA and DOE Programs to eliminate duplicate documentation and reporting requirements.

2) Can you foresee any unintended consequences from implementing any of these elements?

Increased cost for certification is a primary concern. The more human controls we put into place, prices will need to be increased for HCOs, Providers, and Raters/Verifiers. Creating additional barriers to certification could result in a decline of certified units. This has real consequences for projects/project teams considering whether to certify. Especially in the multifamily market where non-prevailing wage projects will elect not to certify their projects since the Rating cost far outweighs any benefit from 45L tax credits.

3) Are there significant implementation challenges for any proposed elements that EPA needs to consider?
How do we manage common files (docs, photos) for a large multifamily project?
Is it going to be assumed that if a unit is pulled, all the duplicated data should be available in that record or how do we manage this? This will need to be managed at the building level with the ability to associate units with the common files for the building. Any software enhancements to facilitate data, document and photo uploads needs to be clear and concise with respect to unit level, common area and building wide requirements. Please make this easy for the end user!

4) Do you have suggestions for additional or alternative measures that could provide the same or more benefits that EPA should consider?

[Add comments]

Centralized collection of ENERGY STAR checklist data in HCO database

1) For the sake of consistency, when digital data collection software is used by Raters to complete the ENERGY STAR checklists, should EPA require that it be based on an EPA-created data schema/stylesheet and/or should EPA require HCOs to operate a review and approval process for such software to ensure ENERGY STAR checklists are accurately translated to digital formats?

Guidance on which photos are required would be beneficial. See Item 3 above for challenges regarding large multifamily projects, particularly those using sampling as unverified units/components may not have an associated photo from the unit being QA'd.

Consider requiring the accredited software platforms to include the EPA and DOE Program checklists. When creating a Rating, choosing the State, permit date and levels of certifications would then automatically produce the checklists

for the applicable Program version/revision. An additional feature to override this to voluntarily to a newer version of each of the programs would also be useful. This would allow for the checklist data to be completed in process as the Rating progresses as well as embedding the data with the Rating file. It would then be available to QA Providers, HCO's and the EPA/DOE for review.

2) Do you have additional general feedback on this topic?

[Add comments]

Centralized Collection of Rater Photos in HCO Database

1) Beyond photos of installed checklist measure, are there other photos that would provide significant QAQC value, such as elevation photos or Rater 'selfies' during the on-site inspections?

Elevations, common areas, and mechanical rooms with shared/common equipment. The existing photo documentation criteria is adequate.

2) How should HCOs address situations where mandatory photos are unavailable, for example due to accidental data loss?

Allow for resubmission of post inspection/post construction photos. An attestation that the home meets the Program requirements would need to be provided.

3) Do you have additional general feedback on this topic?
How do we maintain geotag data, etc. for raters who use cameras, and other devices without this option? Do not require geo tagging for cameras. This limits the use of "point and shoot" cameras for photo documentation and file management of photos.

Formalized List of Automated Validations in Approved Rating Software and Databases

1) Do you have additional general feedback on this topic?
Moving to a builder number rather than company name may alleviate some issues with matching firm names. There have also been character limit issues within software that have made these validations challenging i.e. "Habitat for Humanity of ….". Also, it's imperative that software be aligned in such a way as to allow for seamless integration. Could we use the existing OID number in HOST.

Printing ENERGY STAR Certificates and Labels Exclusively in Approved Rating Software

1) Do partners find value in the ENERGY STAR label sticker and what is your reaction to the concept of eliminating the sticker, making it optional, and/or replacing it with a preprinted QR-code format that would link to a web address lookup?

If the QR code is linked to the HCO database, this may make looking up ENERGY STAR, IAP, and ZERH projects easier to verify. There are challenges with getting the stickers affixed to each property after the final inspection has been completed since the dwelling/sleeping units are often occupied shortly after. Having a placard/certificate for the building level would be beneficial.

For MF or Townhome projects- a Building label or plaque would be more desirable than panel labels.

2) Do you have additional general feedback on this topic?

[Add comments]

Performing Quality Control of Installed Features During File Review Step

1) Is it practical for QC reviewers to complete File Review activities prior to the time of certification?

No, at least not the full review that may require additional QA/QC for other programs and standards. The QA process is becoming more complex with new programs and QA checklists as with the new IAP and ZERH programs.

2) If not, are there concrete reasons the File Review could not at least be completed within 10 business days of certification?

We would like to see this moved out to 60 days to help align with some HCOs where the file QA requirement is to be completed quarterly. Unless this is a modified file review to just check off that specific checklists and photos have been received. This would allow QADs/QA Inspectors to be able to perform the full QA at the HCOs interval while providing a streamlined process that could be verified by trained administrative personnel. We understand the need to avoid liability of potentially taking tax credits and other funding where not earned. It is our hope we can come to a reasonable conclusion that works across all levels and organizations.

3) Do you have additional general feedback on this topic?

[Add comments]

Adding "Skills and Knowledge" Check as Purpose of Field Evaluations

1) Are the proposed minimum rates of Field Evaluation appropriate to ensure Raters maintain adequate skills and knowledge of the latest policies, protocols, and program requirements?

Yes. Allowing the HCO/Provider the flexibility of requiring additional QA for those who need the extra mentoring seems to work without imposing an additional monetary penalty for those who are performing well.

2) Do you have additional general feedback on this topic?

There may be challenges in getting the required pre-drywall / final every other year for Raters who are only certifying a few units each year. Would recommend moving to pre-drywall being an acceptable Field QA but not for 2 consecutive years, aligning with RESNET protocols. This would allow a small Rater to use final inspections for 2 consecutive years if necessary. We understand the importance of pre-drywall inspections and believe moving to this structure would allow flexibility while ensuring these types of QA inspections are being performed.

Layering On HCO Direct (Non-Delegated) Quality Control Review

1) Is the rate of 0.5% HCO direct File Review an appropriate and practical frequency given that the scope is a detailed human review?

This may place an unfair burden on some HCOs depending on existing organizational structure.

2) Do you have additional general feedback on this topic?

[Add comments]

Requiring Builders to Facilitate HCO Site Visits

1) What issues (e.g., legal, liability, scheduling) do builder partners foresee with HCO personnel directly arranging site visits and how can those considerations be addressed?

Timing more than anything would likely be challenging since HCO personnel (not delegates) may not be in close geographic proximity to the sites. Another challenge may be in the HCO getting builders placed as additional insured on their general liability policies. If this is to be used as a complaint resolution process only, the challenges stated here would be minimized.

2) Do you have additional general feedback on this topic?

[Add comments]