**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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BER feels that RESNET should continue with the 100% review of Rating Quality Assurance providers. By removing the 100% review this could allow issues with providers to slip by and cause bigger issues for the HERS rating industry. This section should remain included as is.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

903.1.2.2 RESNET shall review 100% of the annual Rating Quality Assurance Provider Quality Assurance Reports submitted by Quality Assurance Designees. Quality Assurance Providers

**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BER objects to removing these items from the RESNET review. Items like agreement, remedial action plans, certification and training documents all show that Providers are properly serving their rater clients and ensuring their compliance with RESNET standards. Without reviewing, photo/video documentation, remdial action plans, Rater registry, training and certification how can you verify that raters are up to date on standards? This section should remain included as is.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

903.1.2.4.1.1 Rating electronic files;

903.1.2.4.1.2 Photo and/or video documentation associated with rating files;

903.1.2.4.1.3 Rating quality assurance records including, but not limited to the following:

903.1.2.4.1.3.1 Photo and/or video documentation from on-site field reviews;

903.1.2.4.1.3.2 The Rating Quality Assurance Provider’s file review reports of findings submitted to Raters;

903.1.2.4.1.3.3 The Rating Quality Assurance Provider’s field review of rating results that show a comparison with original ratings selected for on-site QA review;

903.1.2.4.1.3.4 If remedial action is required, the Rating Quality Assurance Provider’s plan of action to correct for non-compliance with the RESNET Standards and results of any action taken;

903.1.2.4.1.3.5 Complaint files;

903.1.2.4.1.3.6 Rater agreements;

903.1.2.4.1.3.7 Rater registry;

903.1.2.4.1.3.8 Disclosure files;

903.1.2.4.1.3.9 Certification and Training documents.

**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BER agrees with failure to maintain knowledge should not be a defense.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

903.1.3.4.2 Failure to maintain adequate knowledge of the RESNET Standards will not be considered a defense in the hearing process.

**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BER disagrees with this is time being five years as it is inconsistent with other provisions in this standard. This should be on a three-year period to be in line with other RESNET standards for certifications and training cycles.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 903.2.2.4.2.1 The Quality Assurance Designee has had more than one (1) Disciplinary Probation violation within a ~~five-year~~ three year period;

**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BER believe that at least one QA should be done in person each year. Allowing for remote QAs could lead to some items to be missed. In Person QA help ensure compliance, guidance, and provides an opportunity for any hands on training that is needed. Also, to qualify for remote QA a rater should have an average of 90% to ensure that they are knowledgeable in the rating process, as well as be approved by their provider. A two year period could go by without the rater having any in person QA which could result in inconsistent standards of HERS rating product which lead to inaccuracies on a large number of homes.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

904.3.3.3.5.1 “Remote” QA Field reviews. A HERS Rater or RFI is eligible to receive remote QA Field reviews to satisfy their Field QA requirement if they meet the following criteria and approved by their provider:

904.3.3.3.5.1.1 The HERS Rater or RFIs average Checklist Percentage Score from the RESNET Registry using the QA Review Checklist over the previous QA Evaluation Period within the evaluating Rating QA Provider’s organization is from 100% to ~~84%~~ 90%.

904.3.3.3.5.3: The HERS Rater has previously completed a minimum of one (1) passing in field QA for the calendar year period.