How the industry is regulated needs to be carefully understood and the inspection options proposed need to take into account systems already in place.   By utilizing the current in house Quality Control Inspector of a modular plant to verify compliance is the most effective process to implement.

An off-site/Modular construction plant is a manufacturing environment within a controlled environment and is very different than a builder out in the field building a house.   The manufacturing plant is building components/sections of a house and multiple houses at anyone time through work cells on a production line.   The checklists and the accountability processes in place today can be used to accomplish what this Pilot program is after.

Your concern is really trying to verify what is behind the “closed wall” construction method and you should look no further than the current process of what is being done to verify structural, electrical and plumbing work.  For example:    Modular manufacturers perform structural, electrical and plumbing work that is verified by the plant QC inspector and an outside Third party inspector such as NTA, T.R. Arnold, or PFS.

Looking at the building envelope and insulation process is not complete until these components are assembled into the final house out in the field.  The building envelope is only as strong as its weakest link and the weakest link with the manufactured components is at the connection points of the components creating the house.  This area should then be verified by an in the field Energy Rater performing a blower door test on the entirety of the house.   Much like a plumber and an electrician doing their connections from each component in order to achieve a working system of the entirety of the house.

Creating another process that does not build upon offsite/modular processes in place through the plant Quality Control and third party agencies such as NTA, TRA, PFS is going to cause unnecessary burden on the offsite and modular industry.  I strongly recommend you pursue utilizing modular plants QC process by working through the Quality Assurance programs that are managed by NTA, T.R. Arnold, or PFS to address your concern of closed wall construction methods.