**Comment/Explanation\*:***Please be as specific as possible as to what should be changed and why.*  
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**Comment 5 - Use the plant certification process for ENEGY STAR Manufactured New Homes** for guidance in developing this process.

The benefit to the modular plant operator will be for pursuing ENERGY STAR and DOE ZERH certifications. For the time being these certifications can result in tax credits.

1. Use the ENERGY STAR for Manufactured homes process (already utilized for certifications) as a guideline for creating a similar process for Modular Plant Certification Process. Here is how they laid out that program:
   1. QAP Guidelines already existing that would outline a process for certification and quality control.
   2. The HERS Rater is to Modular Plants as the ENERGY STAR QAP is to manufactured housing. <https://www.energystar.gov/partner-resources/residential_new/working/other_participants/manufactured_homes_quality_assurance_providers>
   3. SRBA and NEEM conduct ENERGY STAR certification as manufactured plants. You could just say all of those are HERS rated, to get to 1 million homes. (kidding, I know the program isn’t pursuing HUD homes)
2. Appended the Plant QA Manual with additional checkpoints/progress milestones to be completed by the certifying HERS Rater for jobs seeking HERS or other EEP Certifications.
   1. One simple idea is to offer a budget for “Builder Verified” or “Plant Verified” inspection criteria. (e.g. HERS verify must seek to balance verification between “Builder/Plant Verified and Rater Verified” criteria, between “Rater Sourced” and “Plant Sourced” Documentation.
3. Encourage the plant operator to work with their existing HERS Rater to develop a periodically delivered training at least once per year.
4. Allow provisions in the inspection protocols to allow the HERS Rater authority to confirm minimum rated features and program requirements as “Verified” from either “Rater Sourced” or “Plant Sourced” still image or video documentation.