**Comment/Explanation\*:***Please be as specific as possible as to what should be changed and why.*
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**Comment 6 – Comparative Reporting & Program Assessment Phase added to those program phases already suggested by the pilot program.**

The pilot program should define performance indicators to determining effectiveness and should require final performance testing on both fully rated homes and “pilot program” rated homes.

A suggestion for the required Phases for the pilot might look like:

Objective

This pilot program seeks to refine the modular construction verification process by integrating Certified HERS Raters, structured training, balanced documentation protocols, and a comparative analysis of fully verified vs. remotely verified homes.

Goals

* Rate one million homes per year with sabotaging RESNET as the gold standard.
* Work with ICC, EPA, and DOE to ensure compliance and collaboration.
* Ensure that participating in the pilot does not invalidate ENERGY STAR or DOE ZERH certifications.

Program Phases

Phase 1: Establish Collaboration with Certified HERS Raters

* Encourage modular plants to continue working with their existing HERS Raters to maintain consistency.
* Offer a searchable directory of HERS Raters within a plant’s region.

Phase 2: Orientation and Training for Inspection & Remote Verification

* Training byCertified Independent HERS Rater or a Rating Training Provider
	+ Initial orientation on HERS and EEP requirements.
	+ Annual updates and continuous training on material changes to HERS or EEP.

Phase 3: QA Manual Enhancement & Balanced Documentation Tracking

* Development of Remote Inspection QA Addendum for Plant QA Manual/Plant Guide
	+ Define remote inspection protocols vs. full on-site verification.
		- "Rater Sourced" vs. "Plant Sourced" documentation.
		- "Rater Verified" vs. "Builder/Plant Verified" inspection criteria.
* Define Documentation Protocols:
	+ Chronologically cataloged, geotagged still imagery of critical rated features.
	+ Optional use of continuous video recording should remain optional.
		- Lacks the precise verification needed for HERS Ratings.
	+ Raters should be responsible for confirming verification via either Rater Sourced or Plant Sourced documentation.

Phase 4: Comparative Reporting & Program Assessment

* Conduct final performance testing on both fully verified and remotely verified homes.
* Analyze the effectiveness of remote verification vs. traditional verification, considering:
	+ Quality assurance standards.
	+ Efficiency improvements.
	+ Cost savings for modular plants.
* Use findings to refine future modular plant certification models.
* Position RESNET as the gold standard for quality assurance, demonstrating that innovation can increase both quantity and quality in inspections.

Definition of Success

This structured pilot program aims to balance innovation with quality assurance, leveraging existing relationships between Modular Plants and HERS Raters while ensuring that remote verification meets the highest industry standards.