**Comment/Explanation\*:***Please be as specific as possible as to what should be changed and why.*  
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This is a good start, but I don’t think there should be any option that does not require the on-site presence of a HERS Rater or RFI at some point, especially at the beginning. Then periodically throughout the project.

I recommend adding a hybrid option where a HERS Rater or RFI would conduct an in-person verification of the first (or one of the first) walls/units produced. The HERS Rater or RFI could then return to sample additional walls/units following the typical HERS sampling protocol or a sampling protocol appropriately modified for modular construction could be considered. The factory representative should be brought into conversations early in design – and kept in project communication throughout - so that they know requirements and expectations.

Alternatively, the [ENERGY STAR Manufactured Homes protocol](https://www.energystar.gov/sites/default/files/2024-07/ENERGY%20STAR%20Manufactured%20New%20Homes%20Program%20Requirements%2C%20Version%202%20%28Rev.%2002%29.pdf) is also a great guide that’s already flushed out and published. This was brought up by another colleague. Any reason we can’t follow that? For our company, we rarely do HERS ratings by themselves, so combining HERS verification with these other certification requirements is a win-win. Obviously the plant would charge more for the additional work, and additional QA would have to be done that lines up with RESNET protocols.