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Factory built housing-HERS QII challenges

Hello,

We are starting to see more ADU and factory-built homes in today's construction environment. Traditional site-built homes have assemblies that are open for MEP, air barrier/sealing and insulation inspection. With prefabricated types there are challenges coordinating the QII inspection that require multiple trips out to the factory to inspect various assemblies on a single home. We'd like to propose to the CEC for homes that are not viable for QII inspection to lay out a clear insulation grading format or a potential blower door mandate for these types when QII cannot be effectively field verified based on production settings and logistic challenges to the factory. Please let me know what your thoughts or guidance might be when verifying panelized or modular type homes for the upcoming 2022 and 2025 code.

Respectfully,
Dan Granback