

Thank you for this opportunity to voice my opinion.

QA Program:

Purpose of QA

Providers are required to monitor and supervise Rater testing and documentation performance of energy regulations via a "Quality Assurance" program.

- = Standardize the Tests of a Rater's performance of certified tasks for which the Rater is responsible.
- = Determine Rater's working knowledge of building sciences.
- = Reflects the Provider's training efficiency and mentoring responsibilities.

A good QA process may increase the work load, slightly, above CEC's current Provider requirements, but

- = Allows Provider to build good business relationships with Raters.
- = Organizational size determined by efficient training, mentoring, and QA testing.

Continuing Education is vital to producing quality Raters knowledgeable in the building sciences.

- = Relieve this industry of the attitudes of "I've been doing this for 20 years".
- = 20 years of poor quality installs is a shame!
- = What happened to American Pride in quality craftsmanship?
- = Give the Raters the opportunity to learn, both class room and field.
- = These Raters will be the next generation to lead CA into an energy efficient future.

Providers could "outsource" QA testing responsibilities, to reduce workloads, but...

- = Provider would lose the opportunity to mentor a new Rater in Training.
- = Provider could reduce overhead and save time using QA testing as part of mentoring.
- = QA mentoring could be used to "rehabilitant" Raters seeking re-certification.

All QA programs must have a standardized format and required information.

- = Providers QA program reviews must be current with installed projects and final reports filed within 90 days.
- = QA forms must be CEC approved, (CEC loves making forms)
- = QA forms should be posted on the Registry for all authorized parties. (Owner/ Builders, Contractors, Rating Companies, Raters, Building Departments, Utilities).
- = Nobody likes their dirty laundry open for inspection.
- = So Raters! Do it right. Be proud of your trade and take pride in your craftsmanship.

Discipline Process:

Current Provider Discipline Process seems to be a trade secret.

- = Define Rater testing responsibilities, task by task.
- = Document Rater deficiencies or infractions of the Energy Codes.
- = Define specific consequences for infractions, or dereliction of responsibilities.
- = Establish a process of redemption to allow Raters to "clean up their act", ONCE.
- = Discipline Process must be posted on the Registry.

Providers must have common ground agreements to stop transient Raters.

- = Raters will choose the Provider with the best customer services.
- = Unethical Raters may jump Providers during Discipline Process to avoid De-Certification.
- = De-Certified Raters must complete suspensions first.
- = De-Certified Raters must complete extensive class and field training.
- = De-Certified Raters must complete a Provider mentoring program.

CEC must review and approve Provider's written discipline process.

- = An Independent oversight committee must review serious infractions or disputes.

- = Oversight panel shall include trade experts and industry professionals.
- = Panel personnel may be elected or voluntary, but must be fair and unbiased.

Rating Companies:

Defining a Rating Company

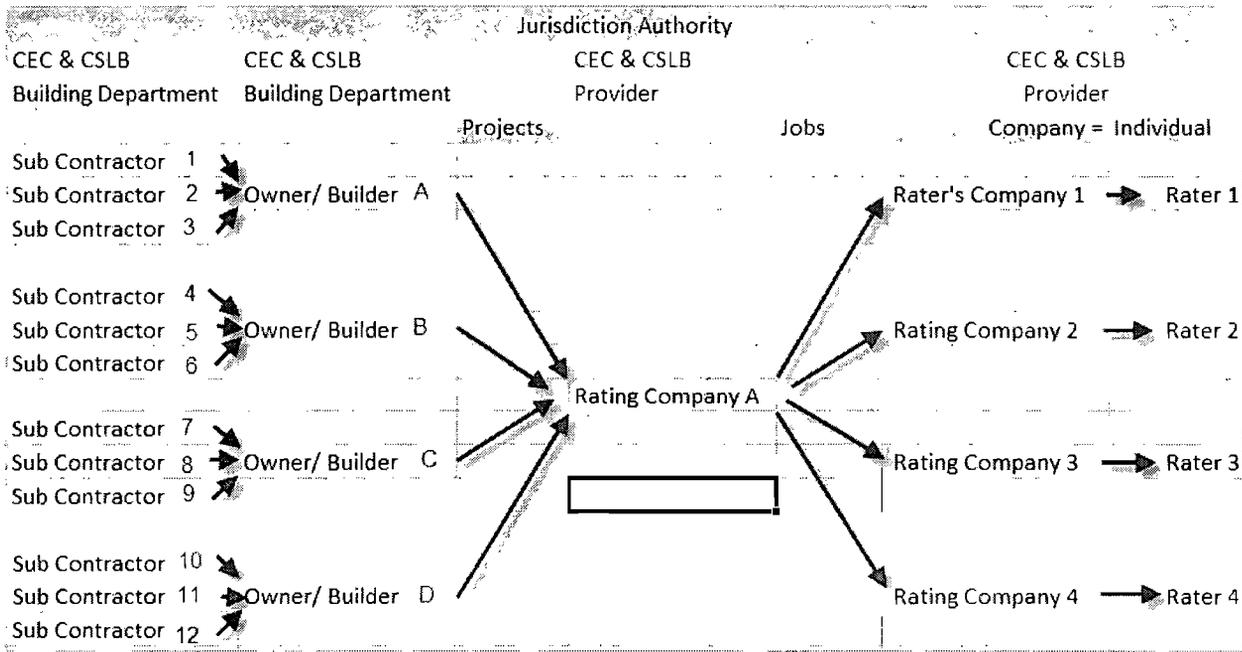
- = Business entity of the HERS Rater's operation.
- = Conducts all business duties, (billing, collection, records, etc.).
- = HERS Rater is the individual trained and certified to perform energy compliance testing.
- = A Rating Company must have currently certified Raters under contract to exist, a vested interest.
- = All Rating Company Owners, Officers, and principals must be currently certified and/ or licensed by all regulating authorities with jurisdiction.
- = Rating Company should have advanced knowledge and experience in the Building Sciences and construction services.
- = Rating Company contracts services to Owner/ Builders and subcontractors, to perform all required tasks to comply with government regulations.
- = Rating Company reviews project information and documentation from Owner/ Builders to ensure accuracy of data submitted to Providers.
- = Rating Company ensures a quality service of truthful, accurate HERS Ratings, thus assumes partial liability for errors or omissions by Raters or Office personnel.
- = Rating Company hires knowledgeable certified Raters, provides mentoring services, schedules and dispatches job assignments, administrates fees, billing, collection and payroll taxes, purchases project documentation from Provider, and pays Raters per contract agreement.
- = Rating Company secures liability, professional E&O, automobile, property, and possibly health insurance.
- = Rating Company assumes ultimate responsibility for the performance of the contracted Rating Services.
- = Rating Company size may range from 1 Rater to 100 Raters.
- = Rating Company may have additional regulatory requirements covering Contract Law.

Provider Certification:

Providers are responsible to provide class room education and field training to potential Raters for enforcing energy regulations.

- = Provider specialization in a specific sector on the HERS Industry, (new construction, Alterations, etc.), provides better training by experts in this specific field.
- = Specialized Providers build better business relationships with Owner/ Builders, Contractors & Raters/ Rating Companies.
- = Specialized Providers may develop local market interest and participation, with Builder & Contractors, through education and certification programs.
- = Providers should be responsible to train and certify contractors, and installers, to know and comply with energy regulations.
- = Specialized Providers offer great customer service, efficient and flexible education programs at reasonable costs.
- = Specialized Providers invest in this diversity to develop greater market awareness and increase opportunities within the HERS and construction industries.

Client Type Relationships and Roles



Jurisdictional Authority may monitor any aspect of a construction project within the Authority's jurisdiction.

Builders should know the requirements, obtain permits, and usually hire Rating Companies to perform tests, provide documentation, and to comply with government regulations.

Owner/ Builder hire subcontractors to perform construction services which comply with government regulations.

Building Owners do not know the requirements, and usually pays subcontractor to obtain permits, and hire Rating Companies to perform tests, provide documentation, and to comply with government regulations.

Owner/ Builders are ultimately responsibility for compliance of government regulations.

A Rating Company is the business entity of a HERS Rater, which conducts all business duties, (billing, collection, records, etc.), while the HERS Rater is the individual trained and certified to perform energy compliance testing. A Rating Company must have currently certified Raters under contract to exist.

All Rating Company Owners, Officers, and principals must be currently certified and/ or licensed by all regulating authorities with jurisdiction.

Rating Company should have advanced knowledge and experience in the Building Sciences and construction services.

Rating Company contracts services to Owner/ Builders and subcontractors, to perform all required tasks to comply with government regulations.

Rating Company reviews project information and documentation from Owner/ Builders to ensure accuracy of data submitted to Providers.

Rating Company ensures a quality service of truthful, accurate HERS Ratings, thus assumes partial liability for errors or omissions by Raters or Office personnel.

Rating Company hires knowledgeable certified Raters, provides mentoring services, schedules and dispatches job assignments, administrates fees, billing, collection and payroll taxes, purchases project documentation from Provider, and pays Raters per contract agreement.

Rating Company secures liability, professional E&O, automobile, property, and possibly health insurance.

Rating Company assumes ultimate responsibility for the performance of the contracted Rating Services.

Rating Company size may range from 1 Rater to 100 Raters.

Rating Company may have additional regulatory requirements covering Contract Law.

Rater performs required verification and tests to comply with the energy regulations.

Rater enters test data truthfully and accurately to comply with the energy regulations.

Rater accepts full responsibility for test accuracy and quality assurance performance evaluations.

Rater provides the Rating Company completed job and fee payment reports to be paid.

Rater may have additional regulatory requirements covering Contract Law.

Providers are responsible to provide class room education and field training to potential Raters for enforcing energy regulations.

Providers are required to monitor and supervise Rater testing and documentation performance of energy regulations via a "Quality Assurance" program.

Providers QA program reviews must be current with installed projects and final reports filed within 90 days. These QA reports should be on the "Provider Registry" and available to all involved parties, (Owner/ Builders, Contractors, Rating Companies, Raters, Building Departments, Utilities).

A Providers responsibility is to ensure that the energy regulations are properly followed by contractors during construction projects. Therefore, it should be the responsibility of Providers to train and certify contractors to know and comply with energy regulations.

Contractors are only as good as their installers. Therefore, Providers should be required to train and certify all Installers so that Installer performance can be tracked. If an Installer is de-certified, then the Installer may not perform any installation tasks which require certification.

Providers should be transformed into "Training Operations" to teach the current energy requirements to all involved parties, (Owner/ Builders, Contractors, Rating Companies, Raters, Building Departments, Utilities).