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## **Answers to CEC questions**

**Question 1 – Is there value in having an Installation Certificate that the installer has to sign to establish liability and accountability for compliance and to document compliance?**

Yes there is value to the certificate, but the process is cumbersome.

- a) The 2013 process requires that the installer must sign the certificate and in many cases, two signatures are required. For example, if a rater inputs the CF-2R data for an installer, the rater can only sign the document as the 'Document Author'. In order to make it a registered certificate, the installer must also log in with their username and password and sign as the 'Responsible Party'. That same cumbersome extra step has also been added to the completion of the CF-3Rs. The administrative staff will typically input the CF-3R on behalf of a rater, but can only sign as the 'Document Author'. In order to print the certificate, each rater is required to log in using their individual login and password and sign the document as the 'Responsible Person'. This is creating a significant bottleneck for 2013. Under the 2008 Standards, not only were two signatures not required, the installer also had the option to grant signature authority to another user, usually the rater. The 2008 workflow is much quicker because of this option. Even by allowing the installer to grant signature authority, the final liability for quality installation still remains with the installer.
- b) Installers have been having an issue with the absence of their ability to sign off on individual measures. They feel uncomfortable signing against the phrase "The responsible person's signature affirms that all applicable requirements have been met". If the installer's signature is required, they should be allowed to comment on the measures they are actually vouching for. Also, considering the measures included in the QII form, more than one installer may actually be involved in the installation, so it does not necessarily make sense to make the insulation contractor sign for all measures.
- c) There are 15 non-HERS forms (12 of which are not necessary) and 7 worksheets that have to be signed and registered in a HERS registry. Non-HERS forms and worksheets were not previously required to be entered into a HERS Registry in 2008. This dramatic increase in paperwork and administrative requirements creates an even larger bottleneck for users in the Registry.

- d) We see no need for these non-HERS forms to be required to be entered into a HERS Registry. We have gone from approximately **10 pages** required for a typical house under 2008 to more than **90 plus pages** under the 2013 Standards.
- e) If QII is required then there should be no need for the ENV-03. There is already an ENV-21 through ENV-24.

**Question 2 – Is there value in having the Installation Certificates registered to establish a consistent and systematic record?**

Yes, HERS required installation certificates should be entered as long as they can be entered into the Registries with significantly less administrative burden and confusion. Non-HERS forms add little value to the registry.

**Question 3 – Are there improvements that can be made to the signature process required for residential compliance documents through the HERS Provider Registry?**

Bring back the Signature Authority process that was used in the 2008 Standards. That includes all levels of signature authority, builder, installer and rater. The current system which requires everyone to sign their own certificate creates too many bottlenecks.

**Question 4 – How can the registration process be designed to be of most value to Enforcement Agencies in carrying-out their plan check and inspection responsibilities?**

The two major components to achieving this goal are: 1) Involve the agencies (your customer) in the design process. 2) Keep the final product/solution for them simple, but useful. Along these lines, here are a few ideas:

- a) Create an electronic report delivered weekly listing completed activity by Jurisdiction, builder, and project. The report should include hyperlinks that will take the User to 1R/2R/3R documents within the HERS Registry
- b) Provide agencies with a simplified query tool that they can use to retrieve data and reports based on their needs. Again, the agencies should be involved in the design process before any coding is done.

**Question 5 – How can usability of the current system be improved?**

This entire system is too complicated and often does not consider the challenges with implementing regulations in the field. The regulations are too complicated and confusing, the forms are too long and have unnecessary information, there are too many forms, and many of the regulations regarding implementation (e.g. – signature authority) make the system even more difficult.

**Question 6 – What is the best process for collecting the data needed for further program development, evaluation and enforcement purposes?**

- a) Create an advisory group
- b) Gather the proper stakeholders from key portions of the industry
  - a. Builders
  - b. Raters
  - c. Providers
  - d. Installers

**Question 7 – For Nonresidential registries, same questions as above**

We do not have any experience with non-residential requirements.