

Recommended RESNET® Board Policy on Evaluating Insulation Installation and other Minimum Rated Features Where Documentation of Passing Pre-Drywall Inspection Items Is Not Available

Approved on October 15th, 2025

Background

The housing industry occasionally experiences situations where documentation of passing Pre-Drywall Inspection items is not available.

The Leading Builders of America (LBA) sent RESNET a communication on the issue of post-drywall compliance alternatives. LBA posed the central question of:

“What combination of verifiable evidence provides sufficient confidence that above code requirements have been met when a traditional visual inspection did not occur or cannot be relied upon before drywall was installed?”

The industry is not seeking to lower standards rather to recognize credible, performance-driven alternatives that uphold program integrity and prevent otherwise eligible homes from being disqualified due to missed or deficient field inspections.”

Furthermore, LBA’s memo contends that EPA’s current requirement for full drywall removal is impractical, costly, and wasteful, and highlights the need for more practical compliance pathways that still preserve program integrity.

In terms of insulation installation inspection, RESNET/ICC ANSI Standard 301 (4.2.2.2.1) requires that if a pre-drywall inspection is not conducted, it must be “modeled as Grade III and shall be recorded as ‘not inspected’ in the rating.”

The RESNET ANSI standard also provides for thermography:

“Thermographic inspection is permitted to be used to determine that an assembly is insulated achieves a Grade II rating if the person doing the

inspection is an ANST NDT Level III or a licensed engineer or if the person doing the inspection is working under the direction of an ANST NDT Level III or a licensed engineer. Thermographic inspection shall not be used to determine an assembly achieving a Grade I rating.”

In the LBA August 5, 2025, communication to RESNET, LBA requested that RESNET to define “sufficient evidence” in a way that supports the practical delivery of high performance housing. In the communication, which is attached, LBA provided elements of an alternative framework.

The RESNET/LBA Rating Quality Assurance Task Force has considered this issue and recommends that the RESNET Standard Development Committee 300 be tasked to address this issue through a Working Group comprised of broad stakeholder representation.

The Task Force recommends to the RESNET Board that it adopt the following policy:

Proposed RESNET Board Policy

It is the policy of the RESNET Board of Directors that RESNET/ICC ANSI Standard Development Committee (SDC) 300 and 900 immediately initiate the process, through a Working Group, to amend RESNET® HERS® Standard and Standard 301 to explore the creation of a protocol for evaluating the insulation that could result in Grade I when there is sufficient evidence through approved compliance methods to ensure homes are not penalized due to inspection disruptions and other MRFs that are required to be inspected at the pre-drywall stage when a certified RESNET Rater/Rating Field Inspector did not complete the required inspection, or when no verifiable records of that inspection are available. As part of this work, the SDC should outline differences in how any new compliance pathway would apply to multifamily and single-family homes, recognizing the distinct construction practices and verification challenges for each.

As part of this work, the Working Group shall also provide recommendations on the appropriate instances and frequency for which this alternative compliance pathway may be used, to ensure it

functions as a credible backstop rather than a routine substitute for pre-drywall inspections.

Furthermore, the Task Force urges the RESNET Board to communicate to the RESNET Standards Management Board that this amendment be a priority.

This protocol should be designed in a way that allows federal and voluntary above-code programs administered by EPA, DOE, and other entities that rely on RESNET standards to incorporate it into their compliance frameworks.”

It is not the intent of the Task Force that this policy lower standards rather to recognize credible, performance-driven alternatives that uphold program integrity and prevent otherwise eligible homes from being disqualified due to missed or deficient field inspections.

Upon adoption by the RESNET Board, the Task Force will develop a set of recommended elements of an alternative framework and guardrails that the SDC could base its work on.