

**RESNET Training and Education Committee's Consideration of Public Comments
PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS**

Comment #: 1

Commentator: Matt Sharpe

Organization: Vermont Energy Investment Corp

Clause Number: 3

Paragraph: 805.3

Comment Type: Editorial

Supportive: No

Comment:

Edit for clarity, currently there is a both/or statement that needs to be made clear. Generally we support the field training aspect of the requirement however BPI certification should be accepted as equivalent training. This can be a separate decision than allowing BPI certification to be completely equivalent to the entire add-on of the CAZ/workscope standard. We do support BPI certification to be accepted as completely equivalent but at the very least the certification should be accepted as equivalent to the training requirement in this section.

Proposed Change:

805.3 RESNET-accredited Training Providers shall train HERS Auditors on these protocols through **both** ~~either~~ field exercises **or** and through simulated conditions. A work scope development written exam administered by a RESNET-accredited Trainer is also required. ~~provided by RESNET. The test shall cover the content of these guidelines with a minimum of 25 questions. A minimum score of 80% is required to pass.~~

Change to:

805.3 RESNET-accredited Training Providers shall train HERS Auditors on these protocols through ~~both~~ either a combination of field exercises or and through simulated conditions or as demonstrated with valid BPI certification. A work scope development written exam administered by a RESNET-accredited Trainer is also required. ~~provided by RESNET. The test shall cover the content of these guidelines with a minimum of 25 questions. A minimum score of 80% is required to pass.~~

Response:

Accept _____

Reject X _____

Reason: A certified RESNET Rater must have field training and pass the RESCAZ simulation based test and the 25 question online exam. The BPI standards are different from the RESNET standards, hence the rater must pass the RESNET test.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 2

Commentator: Sharla Riead

Organization: Accurate Rater Network

Clause Number: 1, 3

Paragraph: 102.1.4.7

Comment Type: Editorial

Supportive: Yes

Comment:

Because there are disciplinary and non-disciplinary probation types, the following lines should be clarified that they refer to disciplinary probation. I suggest the following changes:

Proposed Change:

102.1.4.7.2.1 For non-compliance with the terms of disciplinary probation;

102.1.4.7.2.3 Two disciplinary Probations within a twelve month period;

102.1.4.7.3.2 For non-compliance with the progressive terms of disciplinary probation or suspension;

102.1.4.7.3.3 Failure to reach an agreement on terms of disciplinary probation or suspension;

Response:

Accept

Reject

Reason: Not covered in proposed amendment

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 3

Commentator: Sharla Riead

Organization: Accurate Rater Network

Clause Number: 3,4

Paragraph: 102.1.4.7.3.6.5

Comment Type: Editorial

Supportive: Yes

Comment:

One of the reasons a Rater's certification may be revoked is detailed in: 102.1.4.7.3.1 A Rater chooses to not renew their certification; Since this is not a disciplinary matter but a personal Rater choice, it does not make sense that the 180 day wait period be instituted in this case. Raters many times choose to move from one Provider to another and the way 102.1.4.7.3.6.5 is currently written this would require a 180 day transition period between Providers. I suggest the following change:

Proposed Change:

102.1.4.7.3.6.5 Rater's who have their certification revoked for any disciplinary reason may not re-apply for certification until after a period of no less than 180 days from the date of revocation. A previously certified Rater may, at their initiative re-apply for certification to any QA Provider as a Rater candidate~~after a period of no less than 180 days from the date of revocation~~ provided the following conditions are met:

Response:

Accept___

Reject__X__

Reason: _Not covered in proposed amendment

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 4

Commentator: Sam Bowles

Organization: Newport Ventures

Clause Number: 2

Paragraph: 204.1.3

Comment Type: General

Supportive: No

Comment:

The idea of a simulation exam to replace a field evaluation I think removes a lot of education experience away from the potential rater. In my experience, going into the field with a professional who has been involved in a number of these ratings, understands the best practices, and can share knowledge and experience on a variety of components of a rating is invaluable. Automating this will take a lot of the learning experience out of it. No two houses are going to be the same and a new rater can easily miss out on important aspects if they are not aware of exactly what to look for. Shadowing and learning from an experience professional allows a prospective rater to feel more confident in his own ability and ask questions while performing a hands on task.

Proposed Change:

204.1.3 ~~Mentored Field Simulated Practical Evaluations Examinations~~
Graded field evaluations ~~Simulated practical examinations~~ allow a candidate to demonstrate their ability to perform certain tasks appropriate to their desired certification. ~~Rater practical examinations will be administered through the RESNET Rater Simulation Practical Examination~~ Graded field evaluations are performed under the observation of a certified trainer, Quality Assurance Designee, or QAD Delegate who verifies the candidate's competency at performing certain tasks as defined by RESNET.

Response:

Accept _____

Reject_X _____

Reason: A Rater must pass the RESCAZ simulation based test and the 25 question online exam. The simulation exam is not intended to replace any field training that the candidate must complete. It is a tool to show that the candidate understands the procedures required by the RESNET standards, and in what order those steps must be conducted. The BPI standards are different from the RESNET standards, hence the rater must pass the RESNET tests.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 5

Commentator: Brett Pevear

Organization: Myself

Clause Number: 2

Paragraph:

Comment Type: General

Supportive: No

Comment:

What about the many Raters that have been practicing in the field for years? No exemption on the simulated practical exam? What does that simulated exam have to offer that trumps years of field work? This seems like nothing more than a money grab from RESNET. Minimum justification and effective dates proactive that don't seem to align with RESNET policy 024.

I would also offer that if this simulated practical exam is anything like the CAZ testing simulation then you have many flaws on your hands. In my opinion from years of CAZ testing this CAZ simulation exam is far from real world and has nothing to offer over actual in-field testing except for creating an influx of cash for RESNET.

I would suggest that if you feel you have an outdated training protocol you attack the specific problems. You require sensible changes for new candidates and you hold to your adopted RESNET policy while doing so. Take into consideration the time and money spent by your current Raters on continuing education, in-field ratings, real world sales, personal rating business development and help them better the building community by not taxing them with further financial and educational burden.

Proposed Change: **No Change Proposed**

Response:

Accept____

Reject__X__

Reason:

General comment. No proposed amendment language proposed. No action required.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 6

Commentator: Bob Tortorice

Organization: Building Alternatives

Clause Number: 204.1.6.2.10 204.1.6.4

Paragraph:

Comment Type: General

Supportive: No

Comment:

I believe that all certified raters should be grandfathered in and exempted from any such examination requirement, which should be reserved for newly trained rater candidates only. Being BPI & a HERS rater has earned me a minimum income, which gets diluted at times of my required field testing (10%) of my audits. I can't afford any additional cost to prove to others that I am doing the job my client hires me to do. Isn't our checks and balances (testing) already in place, by my utility company and my provider, which test my audits every time.

Proposed Change:

All certified raters should be grandfathered in and exempted from any such examination requirement, which should be reserved for newly trained rater candidates only.

Response:

Accept____

Reject_X____

Reason:

General comment. No proposed amendment language proposed. No action required.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 7

Commentator: John Rodenhizer

Organization: JSR Adaptive Energy Solutions LLC

Clause Number: page one

Paragraph: 102.1.2.2.1

Comment Type: Technical

Supportive: No

Comment:

As a practicing Rater for 4 years I am very upset that the spill over from Resnet and BPI not getting along is adding costs to its members. I also hold a BPI Building Analyst and Envelope certification and thus have already paid to be properly trained. It is absolutely ridiculous that Resnet has adopted a scorch and burn stance with an adversary that it used to recognise. Now because of political bickering and turf wars Resnet is not honoring the time and effort I have invested in training (already) to become a certified professional with multi university training.

Combustion safety is important and should be taught to new raters or those who have not already been trained. For those that already have received training and passed a recognised protocol by a nationally recognised organization such as BPI and are in good standing they should be grandfathered to this amendment.

It is also come to my attention that you have not finalized the training procedures, yet some providers in attempt to get more income are providing trainings. This is upserd and a cart before the horse approach that deminish the credibility of Resnet as a leader in residential energy arena.

Provider organizations should perform the hands on trainings not some computer game. Resnet members should have a say in the future course of Resnet not a select few that do not know how to play in the sand box with others .

The current amendmant in its current form is not supported by the Resnet flock!

Thank you,

Proposed Change:

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National Core Rater Test, the National Rating Practical Simulation Test and the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test. **(Current Resnet members that have and hold BPI Building Analyst professional certifications and training are exemt from additional combustion safety training and testing)** A maximum of one (1) of the three probationary ratings may be completed as a Projected Rating from plans, with the remaining two (2) being Confirmed Ratings. At least one (1) of the two (2) confirmed ratings shall be field

supervised, one-on-one, in person, by the Rating QA Provider's QA Designee or Delegate.

Resnet members that hold current certifications for combustion safety training through BPI are exempt from this amendment.

Finalize the training and impliment a reasonable timeline for adoption.

Response:

Accept_____

Reject __xx__

Reason: _RESNET standards are different from BPI.

RESNET, however, recognizes BPI field training for raters who are currently certified as BPI Building Analysts

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 8

Commentator: Pieter Opperman

Organization: All Star Energy Rater

Clause Number: 204.1.6.2.10

Paragraph:

Comment Type: General

Supportive: No

Comment:

I have a problem with the effective date of the amendment being retrospective. This is contrary to Resnet standards. I also have a problem with changing the CAZ and WS standards "to align with" the RESNET simulation. To my mind this is putting the cart before the horse.

Proposed Change:

Response:

Accept__

Reject__x__

Reason:

General comment. No proposed amendment language proposed. No action required.

The standard amendment states that raters who are certified must pass the RESNET tests before January 1, 2015 – over six months from now

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 9

Commentator: Pieter Opperman

Organization: All Star Energy Rater

Clause Number: 204.1.6.4

Paragraph:

Comment Type: General

Supportive: No

Comment:

I have a problem with the proposal that raters who have already invested heavily in training, tests, examinations, certifications, as well as having to perform supervised ratings in the field and being forced to attend RESNET conferences in order to get continuing education credits, and audited randomly, now should have to be retested to determine whether they are qualified to do HERS ratings, in spite of having done these tests in practice for years.

Proposed Change: **No Change Proposed**

Response:

Accept

Reject

Reason:

General comment. No proposed amendment language proposed. No action required.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 10

Commentator: William Ayers

Organization: Performance Home Ratings

Clause Number: 1

Paragraph:

Comment Type: General

Supportive: No

Comment:

I could understand adding to the rater training requirements for new raters but to now require raters who are already certified to take (and pay for) another test does not seem right to me. Maybe require inactive raters to re test if they do under a certain amount of ratings per year.

I currently am not CAZ certified and i am not apposed to becoming certified although it will be of little use in the area of the country that i work. What doesnt make sense to me is that you would not allow raters already BPI certified to use that certification. It seems to be the most widley used standard in the industry, would make sense to me to use it.

Proposed Change: **Non Proposed**

Response:

Accept____

Reject __X__

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 11

Commentator: Tom Moberg

Organization: New England Home Energy Audits

Clause Number: 2

Paragraph: 2.4.1.6.1

Comment Type: General

Supportive: No

Comment:

I find it hard to believe that raters have been working in the field for years and now you decide to change how you certify raters and expect the all ready certified raters to re cert and pay you(resnet) more money to now meet your new standards. Would you ask surgeons to go back to school after licensing and expect them to just say ok. Not all of us do wheatherization work and do not need combustion training, I only do new construction work. I do not need to have a BPI cert for what i do. If you want me to have it now pony up the fee or give free training and I will be happy to accommodate you. Other than that This was not required when I received my certification and in the middle you want to change things, are you my older brother and don't like the fact that I am winning the game so you want to change the rules. I thought this group had more character than that. I guess I was wrong.

Proposed Change: **None Proposed**

Response:

Accept____

Reject__X__

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 12

Commentator: Jared Powell

Organization: NMR Group, Inc.

Clause Number: 204.1.6.2.10

Paragraph:

Comment Type: General

Supportive: Yes

Comment:

I support the idea of a CAZ training element into the HERS standards. I think the cost and length of training, however, should be minimized. I would appreciate knowing more about how to properly perform and characterize CAZ tests so that safety can be more thoroughly incorporated into our recommendations. That said, I think this is something that is largely in the realm of HVAC technicians, and if a Rater can work with an HVAC technician, that decreases the need for a HERS rater to know the details of the testing procedures.

Proposed Change: **Non Proposed**

Response:

Accept____

Reject__X__

Reason: _No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 13

Commentator: Jared Powell

Organization: NMR Group, Inc.

Clause Number: 204.1.6.4

Paragraph:

Comment Type: General

Supportive: No

Comment:

I do not see the need for a practical test for currently certified HERS raters. I think that this is something that is enforced through the Provider QA process. I think that the most effective training opportunity would perhaps be to require that Providers do a "ride-along" HERS rating visit with current raters. A computer simulation does not seem like a helpful training mechanism. If you have to add an additional training requirement, I would prefer an in-person, on-site training with a Provider, where the Provider goes through the site with you and provides guidance and QA as you go.

Proposed Change: **None Proposed**

Response:

Accept_____

Reject_X_____

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 14

Commentator: t hardy

Organization: hardy

Clause Number: 204.1.6.4

Paragraph: rater simulation exam

Comment Type: General

Supportive: No

Comment:

Existing raters shall not need to pass a rater simulation exam - the training and testing already received shall be deemed sufficient evidence of competence..

Proposed Change: **None Proposed**

Response:

Accept___

Reject___X___

Reason:

No specific amending language proposed. No action required.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 15

Commentator: Dan Silvestri

Organization: D. Silvestri Sons Inc.

Clause Number: 1

Paragraph:

Comment Type: General

Supportive: No

Comment:

I do not want to have to pay for and take 3 exams to prove to you I know what to do what I have already been trained, tested, certified, re-certified, earned countless credit hours for and have had years of experience doing as a professional. Offer the additional CAZ training on line at no cost, period. More bureaucracy, mandates and fees in todays business climate is a sure path to the demise of our main goal of promoting and insuring building performance.

Proposed Change:

Response: **None Proposed**

Accept____

Reject__X__

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 16

Commentator: Steve Baden

Organization: On behalf of RESNET staff

Clause Number: Addendum 6

Paragraph: Section 102.1.2.2.1

Comment Type: Technical

Supportive: Yes

Comment:

There are inconsistencies within the RESNET standards. When the amended Chapter 2 was adopted the rater and rating field inspector standards were not also amended to reflect the requirement of a CAZ test and work scope test.

This proposed changes addresses this inconsistency.

Proposed Change:

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National Core Rater Test, practical testing described in Section 204.1.6.2 the rating practical test and CAZ and Workslope tests

Response:

Accept __xx__ with the following modification:

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National Core Rater Test, practical testing described in Section 204.1.6.2 of this standard and RESNET CAZ and Workslope tests

Reject _____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 17

Commentator: Steve Baden

Organization: On behalf of RESNET staff

Clause Number: Addendum 6

Paragraph: 102.1.2.2.2

Comment Type: Editorial

Supportive: Yes

Comment:

The section refers to the wrong section in the amended Chapter 2 and presents an inconsistency in the standard among chapters.

Proposed Change:

102.1.2.2.2 In order for a Rater Field Inspector "Candidate" to be certified as a Rating Field Inspector, they must meet the requirements set forth in Section ~~205.2.4~~ 204.1.5.2.9 .

Response:

Accept __xx__ with below modification:

102.1.2.2.2 In order for a Rater Field Inspector "Candidate" to be certified as a Rating Field Inspector, they must meet the requirements set forth in Section ~~205.2.4~~ 204.1.5 "Certification for Rating Field Inspector (RFI)" .

Reject _____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 18

Commentator: Mark Lesperance

Organization: GreenEdge of Michigan

Clause Number: 1

Paragraph:

Comment Type: General

Supportive: No

Comment:

My comment concerns the amendment to Chapter 2 of the RESNET Standards, "National Standard for Training and Certification".

1. The proposed amendment was released for public comment on February 21, 2014. In spite of this, the effective date is specified as January 1, 2014. In reviewing RESNET'S own policy, it clearly states that in no case shall effective dates be less than 30 days after the approval of an amendment.
 - a. As a Rater, RESNET expects me to follow policy and procedure. RESNET isn't expected to do the same? If my company doesn't follow policy and procedure, the reprimand can be quite severe, which is good for all of us. After all, we only want the best companies to be associated with RESNET. So what are the consequences if RESNET doesn't follow their own bi-laws? Evidently there are none.
2. This amendment requires all certified HERS Raters to take another simulation exam: The RESNET Rater Simulation Practical Exam.
 - . Other than this exam, let's list all the other exams and requirements of this organization:
 - i. Initial classroom training.
 - ii. Initial classroom testing.
 - iii. Initial 3 provisional ratings, one of which is performed in the field.
 - iv. 10% QA.
 - v. 1% QA.
 - vi. Continuing education credits.
 - vii. Soon to be CAZ exams.
 - viii. Soon to be WS exams.
 - ix. Soon to be the exam I've referenced above.
 - a. In adding up all of these requirements, it's obvious that RESNET doesn't understand what happens out in the real world, or better defined, on the front lines. You do realize there is a time and financial expense associated with each these requirements? **What is the point of another exam? Isn't that what items 1 thru 6 above are for?** I'm extremely disappointed with the RESNET Board's leadership and thought process on this topic. With all these extra requirements, the financial health of the Raters will be negatively impacted. I guess we could just pass these costs on to the builders, but the last time I checked, most builders are still not doing HERS Index Ratings, mainly because

of cost. So the last thing we want to do is increase the cost of this service, so I guess the Raters will have to take on another added expense. This extra exam should have only been reserved for the Raters that are having problems with their 1%, 10% QA checks, also for the ones that are not following policies and procedures, and for ones that have any justified formal complaints filed against them. Don't penalize the rest!

3. I'm an envelope and analyst certified BPI auditor. Like RESNET, this organization has positioned itself with other key organizations that carry a lot of weight in the construction industry. Having gone thru their certification process, I can tell you that it's top notch, comprehensive and challenging. I'm sure there are some RESNET Board members that have not gone thru their process. Without doing so, you don't have complete knowledge to make an informed decision about this topic. BPI is widely considered the leader in the standard of CAZ testing. So far with what I've been shown with RESNET, BPI's CAZ testing procedure is much more in-depth. It does not pass the logic test that RESNET would not make an allowance for BPI certification. It's obvious that it boils down to competition between RESNET & BPI. The result is two certifications that do exactly the same thing. The Raters are the ones caught in the middle with investing in more (wasted) time and money.

In closing, the RESNET Board needs to make SMART decisions, ones that don't put extra burden on the Raters that are doing a good job, but at the same time addresses the issue of Raters that are struggling and are not following policies and procedures.

Thank you,

Proposed Change: **None Proposed**

Response:

Accept _____

Reject X _____

Reason:

No specific amending language proposed. No action required

Requirement for CAZ testing in current standard and not being required through this amendment. If the commenter wants to remove the current requirement they should propose a standard amendment for such action.

The ACCA CAZ standard is the only American Consensus Standard approved by ANSI. The BPI standard is not approved by ANSI. As an ANSI accredited Standard Development Organization RESNET is obliged to refer to other ANSI standards.

BPI's standards are different from the ANSI standard. Hence the test needs to cover the ANSI standard.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 19

Commentator: Brian McCormack

Organization: mcremodeling

Clause Number: 28

Paragraph: 12

Comment Type: General

Supportive: No

Comment:

If You continue down this path you will push many of us BPI Analyst and Envelope professionals to offer BPI energy modeling ratings instead of Resnet energy modeling. I have no intention of spending money to prove that I can do CAZ testing as I do over 500 energy audits including CAZ testing per year. Goodbye

Proposed Change: **None Proposed**

Response:

Accept

Reject

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 20

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 1

Paragraph: 102.1.2.2.1

Comment Type: Editorial

Supportive: No

Comment:

Grammatical edit (too many 'and's)

Proposed Change:

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National Core Rater Test, the National Rating Practical Simulation Test ~~and~~, the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test. A maximum of one (1) of the three probationary ratings may be completed as a Projected Rating from plans, with the remaining two (2) being Confirmed Ratings. At least one (1) of the two (2) confirmed ratings shall be field supervised, one-on-one, in person, by the Rating QA Provider's QA Designee or Delegate.

Response:

Accept__xx__

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 21

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 1

Paragraph: 202.1.7

Comment Type: Technical

Supportive: No

Comment:

Updated terminology to be consistent with 202.1.15

Proposed Change:

Maintain certified RESNET Rater Trainers. Only certified **RESNET** Rater Trainers can offer Rater Training under the auspices of an accredited Training Provider.

Response:

Accept_xx___

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 22

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 1

Paragraph: 204.1.3

Comment Type: Technical

Supportive: No

Comment:

- The accredited Training Provider should be allowed to evaluate the Rater candidate with either a field or simulation challenge, at their discretion. RESNET has not established that there is a weakness in the established system of graded field evaluation, and certain Training Providers may wish to continue to use this system to evaluate candidates.
- There is no definition of what is included in the National Rating Practical Simulation Test. This Standard should not be adopted, and should certainly not be considered as a replacement for the graded field evaluation, without a clear definition of what is included in the Simulation Test, how it will be evaluated and how the Simulation Test will be validated as a testing tool.

Proposed Change:

Rewrote 204.1.3

Mentored Field or Simulated Practical Examinations

Graded field evaluations or simulated practical examinations allow a candidate to demonstrate their ability to perform certain tasks appropriate to their desired certification. Rater practical examinations will be administered through either a mentored field evaluation or the RESNET Rater Simulation Practical Examination. Graded field evaluations are performed under the observation of a certified RESNET Rater Trainer, Quality Assurance Designee, or QAD Delegate who verifies the candidate's competency at performing certain tasks as defined by RESNET.

Response:

Accept _____

Reject __xx__

Reason: _The RESNET Training and Education committee and the Board of Directors adopted a policy that a simulation based test should be used instead of a test based on a single home due to concerns of inconsistency.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 23

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 2

Paragraph: 204.1.6.1

Comment Type: Technical

Supportive: No

Comment:

Will need to specify what a “passing score” is. Also, specify that the passing score must be achieved on each exam. Will a different passing score be on any of the exams be required for RESNET Rater Trainers? If so, what scores on which exams?

Proposed Change:

204.1.6.1 Pass the national HERS Rater test, the RESNET Combustion Appliance Simulation Test and the RESNET Rater Simulation Practical Test **with a score of at least 80% on each exam.**

Response:

Accept_xx___

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 24

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 2

Paragraph: 204.1.6.2

Comment Type: Technical

Supportive: No

Comment:

A RESNET approved Training Facility should be allowed to serve as one of the two training ratings if the facility accurately represents real-world conditions.

Proposed Change:

Demonstrate competency at certain tasks mentored by a Certified Trainer by completing two training ratings. These ratings shall not contain any errors identified by RESNET approved rating software. Both ratings shall have a reasonably acceptable level of accuracy when compared to the trainer's independent ratings of the same houses or building plans. The Trainer may choose these tasks to be performed in a hands-on environment, from house plans, or through RESNET approved computer simulations. However at least one of the two training ratings shall be a confirmed rating conducted in-person with a certified trainer on a real house **or** a RESNET approved training facility, ~~or using RESNET approved computer simulations.~~ The candidate shall perform the following procedures during the confirmed training rating.

Response:

Accept____

Reject__xx__

Reason: _For training purposes a rater must go through a real live rating exercise with a real home or using RESNET approved computer simulations.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 25

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 2

Paragraph: 204.1.6.2.10

Comment Type: Technical

Supportive: No

Comment:

- This effective date appears to not comply with RESNET Policy 024, mandating a minimum of 30 days from the time of standard adoption to effective date.
- This excludes rater candidates who took training prior to Jan. 1 2014 from having to satisfy this requirement before they expire (one year after they passed RESNET exam). They will have until Jan. 1 2015 to satisfy this requirement similar to Raters certified prior to Jan. 1 2014.

Proposed Change:

The effective date for item 204.1.6.2.9 is Jan 1, 2014. Raters who were certified prior to Jan 1, 2014 shall pass the RESNET Combustion Appliance Simulation Test and The Work Scope Development Tests before Jan 1, 2015. Similarly, Rater Candidates who completed training prior to Jan 1, 2014 shall pass the RESNET Combustion Appliance Simulation Test and The Work Scope Development Test before Jan 1, 2015.

Response:

Accept_XX___ with below modification

~~The effective date for item 204.1.6.2.9 is Jan 1, 2014.~~ Raters who were certified prior to Jan 1, 2014 shall pass the RESNET Combustion Appliance Simulation Test and The Work Scope Development Tests before Jan 1, 2015.

Reject_____

Reason:

Cannot have regulation effective dates prior to adoption of the standard.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 26

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 2

Paragraph: 204.1.6.4

Comment Type: Technical

Supportive: No

Comment:

This excludes current raters and rater candidates from having to pass this simulation. Raters certified prior to the effective date will have already demonstrated competency through the graded field evaluation, provisional ratings, and at least one field rating with Providership oversight. Forcing the Rater to take this exam would be an unnecessary and onerous requirement.

Proposed Change:

~~The effective date for RESNET Rater Simulation Practical Examination is Jan 1, 2016. All Rater candidates who take RESNET Rater training following the effective date of Jan 1, 2016 must pass either the graded field evaluation or RESNET Rater Simulation Practice Examination prior to certification. Raters who were certified prior to Jan 1, 2016 shall pass the RESNET Rater Simulation Practical Examination before Jan 1, 2017.~~

Response:

Accept____

Reject__xx__

Reason:

The RESNET Training and Education Committee and the Board of Directors adopted a policy of simulation based practical test over field based test on a single home over concerns of consistency.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 27

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 41641

Paragraph:

Comment Type: General

Supportive: No

Comment:

There do not appear to be updated requirements for QAD's. We suggest that Chapter 9 be updated to require QAD's to be current Raters, so that all training and certification requirements for Raters will apply automatically. This should not prevent RESNET from imposing additional or more stringent requirements on QAD's. Note that there will also need to be updated language regarding new requirements for RFI's as well.

Proposed Change: **None Proposed**

Response:

Accept_____

Reject_X_____

Reason:

No specific amending language proposed. No action required

If the commenter wants to remove the current requirement they should propose a standard amendment for such action.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 28

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 41641

Paragraph:

Comment Type: General

Supportive: No

Comment:

•Where will the work scope requirements be set out in the RESNET standards? Does ACCA/ANSI have a standard for work scope recommendations?

Proposed Change: **None Submitted**

Response:

Accept___

Reject__X__

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 29

Commentator: Jenna Grygier

Organization: Southface

Clause Number: 2

Paragraph: 805.3

Comment Type: Technical

Supportive: No

Comment:

- 805.3: The Interplay ResCAZ simulator works well as one of many training tools but is not a substitute for experiential learning with actual test equipment, work flow on a job site, or problem solving in a real combustion appliance zone.
- 805#a: RESNET should work with BPI and industry partners to identify nationally-recognized certifications which include verification of field proficiency in combustion safety testing. RESNET Standards will need to state clearly which certifications fall under the hands-on training exemption, in addition to BPI Analyst.
- 805#b: RESNET must be clear as to exactly when a Rater, Rater Field Inspector or other professional is required to follow this standard. This must be linked to required QA procedures in Chapter 9. Also, RESNET should clearly articulate the value proposition to stakeholders of performing these tests as part of a scope of work for all levels of building assessment, from Code Verification to confirmed HERS Ratings.

Proposed Change:

Rewrote 805.3 RESNET-accredited Training Providers shall train Auditors on these Standards through field exercise, classroom and through simulated conditions. This training must include a minimum of two hours of field training using test equipment meeting this Standard on in a combustion appliance zone with at least one atmospherically vented combustion appliance. This training should also include at least four hours of classroom and verified simulation training. A passing score of 80% or higher on the RESNET Combustion Appliance Simulation Test and the Work Scope Development written exam administered by a RESNET-accredited Trainer is also required, provided by RESNET. The test shall cover the content of these guidelines with a minimum of 25 questions. A minimum score of 80% is required to pass.

INSERT 805.#a Auditors and Auditor candidates shall be exempt from the training mandated by Section 805.3, if the Auditor has been previously certified, and is in good standing with the Building Performance Institute (BPI) in a designation that includes field testing of competency in combustion appliance zone testing (e.g., Building Analyst Professional, Envelope Professional, Heating Professional). Auditors are allowed to “challenge” the simulation and work scope development written exam administered by a RESNET-accredited Trainer. All Auditors certified by RESNET prior to January 1, 2014 must achieve passing scores on both of these exams prior to January 1, 2015. All current Auditor candidates must achieve passing scores on both of these exams in order to become RESNET Auditors.

INSERT 805.#b The protocol in section 805.1 shall be followed by Auditors whenever inspecting a home for the purpose of performing a confirmed HERS Rating, Home Energy Survey, Home Energy Audit or other service as required by the Program having jurisdiction and a vented combustion appliance that uses indoor air to vent combustion gases exists in the home.

Response:

Accept_____

Reject_xx_____

Reason:

This revision is simply to require candidate training in both field and simulation. Meaning the simulation can't be a replacement for field, and vice versa. RESNET's role is a standards and certifying body, and that means we designate our certification requirements. In this case that is to pass the simulation test and the online exam.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 30

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 1

Paragraph: 102.1.2.2.1

Comment Type: General

Supportive: No

Comment:

This section states that a rater candidate must get certified "within twelve (12) months of successfully passing the National Core Rater Test, the National Rating Practical Simulation Test and the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test." Although it seems clear from that statement that the clock starts upon passing the third of those three tests, what if it takes 3 years from the time of training for the person to pass that third test? Shouldn't there be some limit for the amount of time between when they pass the first and when they pass the third?

Proposed Change:

...within twelve (12) months of successfully passing the National Core Rater Test, the National Rating Practical Simulation Test and the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test. The clock will begin when the student passes the third of the three tests. All three tests must be passed within 180 days of each other.

Response:

Accept__xx__ with below modification

...within twelve (12) months of successfully passing the National Core Rater Test, **practical testing described in Section 204.1.6.2 of this standard and RESNET CAZ and Workscope tests**

Reject_____

Reason:

This is addressed in Addendum 1, Section 204 which states, "Prior to issuing a candidate's certification, a RESNET Accredited Rating Provider shall confirm that the candidate has completed at a minimum, all of the following tasks appropriate to their desired certification within a 12-month period."

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 31

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 1

Paragraph: 102.1.2.2.1

Comment Type: General

Supportive: No

Comment:

"At least one (1) of the two (2) confirmed ratings shall be field supervised, one-on-one, in person, by the Rating QA Provider's QA Designee or Delegate." This requirement will increase the cost of certification significantly without increasing the skills of raters significantly. I agree that some kind of interaction in the field with new raters is good but do not think "one-on-one, in person" is the only way to do that. With Facetime, Skype, and similar services, remote monitoring is possible and much more affordable than requiring a personal meeting between the rater candidate and a QAD or QADD.

Also, we currently require field tests of all our new raters, and we do that at the end of their probationary process. Trainers who are also QA Providers could get around the intent of this requirement by scheduling an extra day to get their newly trained rater candidates through all the probationary work in one day and could arrange it in a way to meet the "one-on-one" requirement, at least nominally. This is just another way that those who cut corners will get a cost advantage over those of us who do things right.

Proposed Change:

At least one (1) of the two (2) confirmed ratings shall be field supervised, one-on-one, in person **or remotely through live-stream video**, by the Rating QA Provider's QA Designee or Delegate.

Response:

Accept

Reject xx

Reason:

This is an interesting concept but needs to be developed more fully in defining what would be acceptable documentation from a live-stream video. The commenter is encouraged to develop the idea more and submit as a proposed standard amendment on the RESNET standard amendment online form - http://www.resnet.us/professional/standards/submitted_amendments. If not clearly defined remote live stream video could be subject to abuse.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 32

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 1

Paragraph: 202.1.7

Comment Type: General

Supportive: No

Comment:

"Only certified Rater Trainers can offer Rater Training under the auspices of an accredited Training Provider." RESNET is going down the wrong path here. The BPI model of separating training from testing and certification is a much better way to ensure that the end product, HERS raters, is good. Actually, anyone interested in HERS training can get their basic training anywhere and from anyone. They really only need a certified HERS trainer to get them through the two training ratings and, after this clean-up amendment is approved, the three tests. Why not acknowledge reality?

Proposed Change:

"Only certified Rater Trainers can ~~offer Rater Training~~ **proctor RESNET exams and HERS rater training ratings and must do so** under the auspices of an accredited Training Provider."

Response:

Accept____

Reject__xx__

Reason:

Certified RESNET Rater Trainers should be teaching rater candidates. Independent third parties as defined by RESNET, should be allowed to proctor tests. Section 208 already defines the use of proctors for exams

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 33

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 2

Paragraph: 202.1.15

Comment Type: General

Supportive: No

Comment:

"Only RESNET accredited Training Providers can offer Rater Training using certified RESNET Rater Trainers."

See my previous comment on this topic.

Proposed Change:

Only RESNET accredited Training Providers can ~~offer Rater Training~~ **proctor RESNET exams and HERS rater training ratings** using certified RESNET Rater Trainers.

Response:

Accept_____

Reject_XX_____

Reason:

Repeat of comment 32.

Certified RESNET Rater Trainers should be teaching rater candidates. Independent third parties as defined by RESNET, should be allowed to proctor tests. Section 208 already defines the use of proctors for exams

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 34

Commentator: Jeffrey Sauls

Organization: Energy Vanguard

Clause Number: 41642

Paragraph:

Comment Type: General

Supportive: No

Comment:

While I originally thought it was impossible, RESNET has proven me wrong. Apparently it IS possible to make combustion safety standards/policies more awkward (WAY more awkward) and confusing than BPI.

Proposed Change:

Not sure where to begin. While I appreciate the time (and I assume effort) put forth to this point, please assign people with the experience, time capacity, and knowledge to develop these standards/requirements.

Response: **None Proposed**

Accept____

Reject__X__

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 35

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 2

Paragraph: 203

Comment Type: General

Supportive: No

Comment:

"Only certified trainers can conduct Rater Training under the auspices of a RESNET accredited Training Provider."

See my first comment on this topic.

Proposed Change:

Only certified trainers can ~~conduct Rater Training~~ **proctor RESNET exams or HERS rater training ratings** under the auspices of a RESNET accredited Training Provider.

Response:

Accept____

Reject__XX__

Reason:

Repeat of comment 32

Certified RESNET Rater Trainers should be teaching rater candidates. Independent third parties as defined by RESNET, should be allowed to proctor tests. Section 208 already defines the use of proctors for exams

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 36

Commentator: Jeffrey Sauls

Organization: Energy Vanguard

Clause Number: 3

Paragraph: 805.2

Comment Type: Technical

Supportive: No

Comment:

Recognize the BPI Standards and the numerous RESNET HERS raters who are also BPI certified professionals and know this topic well.

Proposed Change:

Please unstrike Section 805.2.

OR

Excuse BPI certified professionals (Building Analyst or Enevelope) from these new training/testing requirements.

Response:

Accept_____

Reject_XX_____

Reason:

BPI standards are different than RESNET standards. This requires RESNET training and testing.

RESNET has adoted, however a policy that exempts the field CAZ testing training to raters who are currently certified as BPI Building Analysts.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 37

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 2

Paragraph: 204.1.1

Comment Type: General

Supportive: No

Comment:

204.1.1 Training

~~Though not required training is strongly encouraged. Training provides certification candidates with the knowledge and skill sets appropriate to their desired certification.~~

I don't understand why this section was deleted. The first statement makes it clear that potential HERS raters do not have to take a training class. The second statement is unnecessary justification and should be stricken. Instead, it should say that rater candidates must pass the required exams and complete the required probationary ratings.

Proposed Change:

204.1.1 Training

~~Though~~ **Training** is not required. ~~training is strongly encouraged. Training provides~~

~~certification candidates with the knowledge and skill sets appropriate to their~~

~~desired certification.~~ **Rater candidates who do not attend HERS rater training still must pass all required exams and complete all required probationary ratings.**

Response:

Accept_XX__

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 38

Commentator: Jeffrey Sauls

Organization: Energy Vanguard

Clause Number: 3

Paragraph: 805.3

Comment Type: Editorial

Supportive: No

Comment:

In the RESNET world, I've never referred to myself as an "Auditor". "Rater" is the most common term used and is heavily reinforced through the RESNET standard. The word "Auditor" is heavily associated with the HESP program and EnergySmart Contractor programs. Also, see the Glossary for proof.

Proposed Change:

Insert the word "Rater" wherever the word "Auditor" exists.

805.3 RESNET-accredited Training Providers shall train HERS **Raters**/Auditors on these protocols...

Response:

Accept_XXX___

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 39

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 2

Paragraph: 204.1.3

Comment Type: General

Supportive: No

Comment:

204.1.3 ~~Mentored Field Simulated Practical Evaluations Examinations~~

~~Graded field evaluations~~ Simulated practical examinations allow a candidate to demonstrate their ability to perform certain tasks appropriate to their desired certification. Rater practical examinations will be administered through the RESNET Rater Simulation Practical Examination ~~Graded field evaluations are performed under the observation of a certified trainer, Quality Assurance Designee, or QAD Delegate who verifies the candidate's competency at performing certain tasks as defined by RESNET.~~

What the heck is a Simulated Practical Examination? We have this new term that's not in the glossary and there's no protocol to guide trainers who are supposed to start doing this in 2015. Is it the confirmed training rating as described in 204.1.6.2? Is it a separate exam to be defined before its 2016 start date?

Also, when you include statements meant to justify parts of the standard, it gets confusing. Thus the following statement is unnecessary" "Simulated practical examinations allow a candidate to demonstrate their ability to perform certain tasks appropriate to their desired certification." We don't need to know why. If it's important enough to be in the standard, you don't need to add this kind of fluff.

Proposed Change:

Good question. How about starting with a definition?

Response: **None Proposed**

Accept____

Reject__X_

—

Reason:

No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 40

Commentator: Allison Bailes III

Organization: Energy Vanguard

Clause Number: 2

Paragraph: 102.1.2.2.1

Comment Type: General

Supportive: No

Comment:

This section doesn't say anything about the 25 question multiple choice test on combustion safety. You can't force raters to take something that's not in the standard. Also, this whole section is confusing about what tests are required and makes no distinction between existing raters and new rater candidates.

According to this clean-up amendment, in addition to the national HERS rater test, raters now have to pass "the National Rating Practical Simulation Test and the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test." I've already commented on the lack of definition for the practical, but a few other things need to be said here:

1. Why does the name of the practical simulation test have different names in different parts of the standard?
2. Aren't the Combustion Appliance Simulation Test and the Work Scope Development Test the same test? If so, don't use the word 'test' twice.
3. The 25 question multiple choice test is not included here.
4. Why not just tell people the number of tests they actually have to take, number them, give their names, and use the same names everywhere.
5. Sometimes the word 'test' is used, sometimes 'examination.' Choose one and stick with it.

Proposed Change:

Good luck! This "Clean-up Amendment" is a complete mess.

Response:

Accept_____

Reject__X__

Reason:

_No specific amending language proposed. No action required

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 41

Commentator: Jeffrey Sauls

Organization: Energy Vanguard

Clause Number: 41641

Paragraph: 102.1.2.2.1, 204.1.6.1

Comment Type: Editorial

Supportive: No

Comment:

Please clarify the names of the tests. The same tests are given different names in different sections. Also please clarify how many tests there actually are. Section 102.1.2.2.1 lists 4 different tests. Section 204.1.6.1 lists only 3.

Is it the National HERS Rater test or National Core Rater test? Seriously? Can't someone work on consistency before you publish?

Proposed Change:

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National ~~Core~~ HERS Rater Test, the National Rating Practical Simulation Test and the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test. A maximum of one (1) of the three probationary ratings may be completed as a Projected Rating from plans, with the remaining two (2) being Confirmed Ratings. At least one (1) of the two (2) confirmed ratings shall be field supervised, one-on-one, in person, by the Rating QA Provider's QA Designee or Delegate.

204.1.6.1 Pass the national HERS Rater test, the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test, and the RESNET Rater Simulation Practical Test.

Response:

Accept_XXX___

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 42

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 1

Paragraph:

Comment Type: General

Supportive: No

Comment:

Here is the crux of the problem with this amendment. The justification is false. There is no justification for this amendment, therefore a very poorly written one is used to make a very poor attempt to justify a very poorly written and ill advised amendment to force HERS Raters to spend unnecessary time, energy, money and resources on something they don't really need and that will benefit no one.

"Based upon the recommendations from the RESNET Training and Education Committee, RESNET Board of Directors adopted a policy for a simulation based practical test for Raters."

All this means is that the BOD thinks something might be a good idea. It doesn't make it a reality. In order for it to become a reality, it must go to committee to have language drafted, then through public comment and review process, where all comments and ideas must be carefully weighed and considered, then back to committee for final review, possibly back out for another round of comments, and to the BOD for approval. Just a policy is adopted to put something in motion does not make it a foregone conclusion that what they want or think they want will necessarily happen. This statement is not a justification, it is an excuse.

"Clean up language is needed to have the Standards reflect the Board policy."

Really? This is not clean up language. Clean up language is when you make editorial changes. This is the proposed language that makes training and testing requirements for CAZ, workscope and even rating simulation exams a reality for all HERS raters and candidates.

"The amendment of Chapter Two of the Standards required the training and testing of Home Energy Raters on CAZ testing."

Really? Where? If it did, you wouldn't have proposed this amendment. This statement is misleading and untrue.

"There is language in the Standard that needs to be made clearer to be consistent with the requirement."

Really? Where is this language? Its in this amendment, that's where! Again, this statement is misleading and untrue.

Proposed Change:

CORRECT FALSE AND MISLEADING JUSTIFICATION AS FOLLOWS:

~~Based upon the recommendations from the RESNET Training and Education Committee, RESNET Board of Directors adopted a policy for a simulation based practical test for Raters. Clean up language is needed to have the Standards reflect the Board policy.~~

~~The amendment of Chapter Two of the Standards required the training and testing of Home Energy Raters on CAZ testing. There is language in the Standard that needs to be made clearer to be consistent with the requirement.~~

~~The standard language requiring that training take place by a certified Rater Trainer under a RESNET accredited Rater Trainer also needs to be clarified.~~

This committee does not really believe it will be of any value to force certified Raters who are also BPI certified take CAZ exams, or HERS rating simulation exams. However, we are still proposing it because that is what we were told to do, even though we are not in favor of it. Please accept our apologies. We are just following orders, and that's the truth.

Response:

Accept ___

Reject __XXX__

Reason:

Does not propose amendment to standard amendment language.

Please see 204.1.5.2.8 Use combustion gas sensing equipment and recommend methods of fixing leaks. Perform CAZ, spillage, and CO testing in accordance with Worst-Case Depressurization and Combustion Appliance Testing protocols contained in Chapter 8. Also: 204.1.6.2.9 Perform CAZ, spillage, and CO testing in accordance with Worst-Case Depressurization and Combustion Appliance Testing protocols contained in Chapter 8.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 43

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 1

Paragraph:

Comment Type: Technical

Supportive: No

Comment:

The words practical and simulation mean different things. In order for it to be a "practical" exam, it would need to be real world, hands on, in a real house, under real conditions, using real tools and real people who actually exist in the real world. If it is a simulation, then it is make believe, not real, and therefore not practical. Call it what it is: "simulation."

Proposed Change:

Delete the word "Practical" when used in any reference to a simulation exam, as follows:

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National Core Rater Test, the National Rating Practical Simulation Test and the RESNET Combustion Appliance Simulation Test and the Work Scope Development Test. A maximum of one (1) of the three probationary ratings may be completed as a Projected Rating from plans, with the remaining two (2) being Confirmed Ratings. At least one (1) of the two (2) confirmed ratings shall be field supervised, one-on-one, in person, by the Rating QA Provider's QA Designee or Delegate.

Response:

Accept_XXX___ with below modification

102.1.2.2.1 In order for a Rater Candidate to be certified as a Home Energy Rater, they must satisfactorily complete two (2) supervised ratings as part of Rater training and a minimum of three (3) probationary ratings within twelve (12) months of successfully passing the National Core Rater Test, **practical testing described in Section 204.1.6.2 of this standard and RESNET CAZ and Workscope tests**. A maximum of one (1) of the three probationary ratings may be completed as a Projected Rating from plans, with the remaining two (2) being Confirmed Ratings. At least one (1) of the two (2) confirmed ratings shall be field supervised, one-on-one, in person, by the Rating QA Provider's QA Designee or Delegate.

Reject___

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 44

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 1

Paragraph:

Comment Type: Editorial

Supportive: No

Comment:

"202.1.7 Maintain certified rater trainers. Only certified Rater Trainers can offer Rater Training under the auspices of an accredited Training Provider."

The phrase "under the auspices" is used awkwardly here. This sentence does not need this phrase. Delete it.

Proposed Change:

Delete "the auspices of".

202.1.7 Maintain certified rater trainers. Only certified Rater Trainers can offer Rater Training under the auspices of an accredited Training Provider.

Response:

Accept_XXX___ with below modification:

202.1.7 Maintain certified rater trainers. Only certified Rater Trainers can offer Rater Training through an accredited Training Provider.

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 45

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 2

Paragraph: 204.1.3.

Comment Type: Technical

Supportive: No

Comment:

Mentored field evaluations (supervised training ratings and probationary ratings) are not being removed from the training and certification requirements. Therefore, mentored field evaluations should not be deleted from this section. Mentored field evaluations and virtual simulations should be broken out into two sections.

Proposed Change:

204.1.3 Mentored Field ~~Simulated-Practical Evaluations Examinations~~
Graded field evaluations ~~Simulated-practical examinations~~ allow a candidate to demonstrate their ability to perform certain tasks appropriate to their desired certification, in a real world, hands-on setting. Rater practical examinations ~~will be administered through the RESNET Rater Simulation Practical Examination~~ Graded field evaluations are performed under the observation of a certified trainer, Quality Assurance Designee, or QAD Delegate who verifies the candidate's competency at performing certain tasks as defined by RESNET.

204.1.3.1 Simulated Practical Examinations

Simulated practical examinations allow a candidate to demonstrate knowledge appropriate to their desired certification, via an online virtual simulation. RESNET Rater Simulation examinations will be administered through the RESNET Rater Simulation Examination.

Response:

Accept_____

Reject_XXX_____

Reason:

The RESNET Training and Education Committee and the RESNET Board of Directors have adopted a policy of simulation based practical tests over tests based upon a single home.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 46

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: ALL

Paragraph:

Comment Type: General

Supportive: No

Comment:

Many of the comments submitted during the public comment and review process for the Proposed Revisions to RESNET CO and CAZ Depressurization Testing Standard are more directly related and relevant to this amendment. Nearly half of the comments submitted to the technical amendment are relevant to the training/testing amendment. It is likely that many commenters unknowingly commented to that amendment thinking they were commenting to both, or that they believed, as they rightly should, that their comments would be included and taken into consideration in both discussions. Many people took the time to respond to these changes, which are not very well communicated, and are very confusing and difficult to follow. I expect that you have already decided to include all of those comments, but just in case, I must make this request. Please migrate all of the comments from that amendment over to this one, so that all voices, opinions and concerns may be properly included in the deliberations. These comments can be found here:

<http://www1.resnet.us/comments/amendments/comments.aspx?SeriesID=39>

The following comments submitted to the concurrent above referenced amendment should be included and considered as part of the comment review process: #6, #8, #11, #12, #13, #14, #15, #18, #20, #22, #23, #24, #25, #26, #27, #29, #31, #34, #35, #38, #39, #47, #49, #50, #54, #55, #56, #57, #69, #72, #75, #76, #82, #84, #85,

Proposed Change: **None Proposed**

Response:

Accept

Reject

Reason:

No specific amending language proposed. No action required. The comments cited were submitted for a different amendment.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 47

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 2

Paragraph: 204.1.6.2

Comment Type: General

Supportive: No

Comment:

Thank you for making this long overdue correction to this section.

204.1.6.2 Demonstrate competency at certain tasks mentored by a Certified Trainer by completing two training ratings. These ratings shall not contain any errors identified by RESNET approved rating software. Both ratings shall have a reasonably acceptable level of accuracy when compared to the trainer's independent ratings of the same houses or building plans. The Trainer may choose these tasks to be performed in a hands-on environment, from house plans, or through RESNET approved computer simulations. However at least one of the two training ratings shall be a confirmed rating conducted in-person with a certified trainer on a real house, ~~a RESNET approved training facility, or using RESNET approved computer simulations.~~ The candidate shall perform the following procedures during the confirmed training rating.

Proposed Change: None

Response:

Accept

Reject XX

Reason:

No specific amending language proposed.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 48

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 2

Paragraph: 204.1.6.2.10

Comment Type: Technical

Supportive: No

Comment:

There are several significant issues with this small, but significant section.

1. Although the proposed (not-yet-approved) amendment was released for public comment and review on February 21st, 2014, the effective date is January 1st, 2014, two months in the past. This is unprecedented in my experience with RESNET and in fact, RESNET has a policy regarding effective dates of amendments that state quite clearly that in no case shall the effective date be less than thirty days after the approval of the amendment. Therefore, per RESNET Policy, this amendment shall not be made retroactively effective. To do so would be in direct conflict with RESNET Policy, as adopted by the RESNET BOD. You may read this policy here: http://www.resnet.us/standards/RESNET_Policy_024.pdf

2. We are not wholly opposed to RESNET referencing the ANSI/ACCA standard. What we are opposed to is the removal of the reference to the BPI Standards and ignoring the fact that the BPI standards are the most widely accepted and recognized CAZ testing standard in the rating, home performance, and weatherization industry. We believe there is room for both standards to be referenced by RESNET, and that the BPI standard should be able to be followed if the rater is trained and certified under that standard.

We are also not wholly opposed to the addition of CAZ training and testing for HERS raters. In fact, we believe that it will enhance the professionalism of the industry and result in safer, healthier homes. Many raters do not have BPI or equivalent training. However, many raters do not perform ratings on homes that contain combustion safety equipment. Therefore, we believe this should be offered as an add-on training and certification for raters working in areas that require combustion safety training. We also recognize and appreciate the fact that being certified by RESNET to perform CAZ testing will solve a problem for many raters who must hold both certifications, when their primary scope of work is performing HERS ratings, not home energy audits. So, for these reasons, we support the addition of a RESNET CAZ certification for raters. What we are absolutely opposed to is not recognizing HERS raters that are already trained, tested and certified as BPI BA professionals. There is nothing significantly different about the RESNET CAZ standard, and the laws of physics do not change in homes having HERS ratings performed in them. Most HERS raters have the BPI certification, and BPI certification is similar to the VISA card, accepted everywhere. BPI certified professionals perform a much more rigorous and challenging multiple choice and grueling field exam to prove they have the requisite knowledge. BPI's

field examination is, in our opinion, much more defensible than the RESCAZ simulation, and is actually a practical exam, according to the definition of “practical”, which refers to the actual act of doing something, hands on, in the real world. Also, the only reason RESNET has not already adopted the BPI standard is because the two organizations could not come to terms with one another. This does not mean that RESNET cannot and should not reference the BPI standard and that it is no longer a good and pragmatic decision to make. Therefore, we believe that all current BPI certified HERS raters should be exempted from having to take an online simulation exam to prove that they can know how to perform the required tests that they have already dedicated significant time, resources and money to earning a certification for.

If you have done the math, you will find that this onerous and unnecessary requirement will waste well over 100,000 man hours in training, preparing for, and taking these exams. Plus, millions of dollars in lost time and exam fees will have been wasted. I think we need to be sensitive to the fact that this time and money could be spent on something of actual value, whether it be learning something new and valuable, or simply spending time with friends, family and children. There are a finite amount of hours in one's lifetime, and we need to take this into consideration. I think most people who have already spent the time, effort and money would greatly appreciate it if their hard earned certification and investment was recognized, rather than being forced to do something that not only wastes their valuable time, but makes their blood boil. Imagine how happy people will be when RESNET does the right thing and accepts their certification as meeting the training and testing requirement. The alternative is thousands of angry people. Ask yourself, is it really worth it?

Proposed Change:

204.1.6.2.10 The effective date for item 204.1.6.2.9 is Jan 1, 2014 will be 30 days from the date of adoption of this amendment, per RESNET Policy. Raters who were certified prior to Jan 1, 2014 shall pass the RESNET Combustion Appliance Test and The Work Scope Development Tests before Jan-July 1, 2015, with the following exception. Raters who hold an active BPI Building Analyst certification at the time of adoption of this amendment shall be exempt from this testing requirement.

Response:

Accept__XXX__ with below modification:

204.1.6.2.10 ~~The effective date for item 204.1.6.2.9 is Jan 1, 2014.~~ Raters who were certified prior to January 1, 2014 shall pass the RESNET Combustion Appliance Test, and The Work Scope Development Tests before January 1, 2015.

Reject_____

Reason:

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 49

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 3

Paragraph: 204.1.6.4

Comment Type: Technical

Supportive: No

Comment:

We are completely, utterly and without reserve, opposed to any HERS rating simulation examination requirements for certified HERS raters. If RESNET wants to continue to drink the simulation koolaid and continue down this path, they should not punish raters who have already jumped through all the hoops, paid for and earned their right to perform HERS ratings as certified professionals. Ensuring that Raters have the practical knowledge to perform a HERS rating is adequately addressed during the training and probationary rating process, which now requires one-on-one field mentoring to ensure that a QAD has actually gone into the field and personally witnessed a Rater's competency at performing all required tests and inspections. It is again addressed through the quality assurance process, year after year. Therefore, given all of this additional mentoring and oversight, there is no real value to requiring a simulation exam for certified HERS Raters. To mention that it would be a waste of valuable time, money and resources would be a absurd understatement. Therefore, we believe that all certified raters should be grandfathered in and exempted from any such examination requirement, which should be reserved for newly trained rater candidates only.

As I read through the comments posted, it is plain to see that there is obvious overwhelming opposition to this requirement. It is also clear that many people simply view this as a "money grab". Based on these observations, I am sure that the vast majority of those out there who are unaware of this language will "freak out" when they learn that it was even considered, much less adopted. Please do the right thing and exempt certified HERS Raters from a simulation test to prove they understand how to perform a rating.

Proposed Change:

204.1.6.4 The effective date for RESNET Rater Simulation Practical Examination is Jan 1, 2016. Raters who were certified prior to Jan 1, 2016 are exempt from this requirement. shall pass the RESNET Rater Simulation Practical Examination before Jan 1, 2017.

Response:

| Accept___

Reject_XXX____ With change

Reason:

The RESNET Training and Education Committee and RESNET Board of Directors have adopted a policy of simulation based practical tests over concerns of consistency of tests based on a single home.

The National Consistency of HERS Index Score recommended and the RESNET Board approved a policy that all raters must pass a practical simulation test.

For more clarity the proposed language has been amended to:

206.1.6.3 The effective date for RESNET Rater Simulation Practical Test is January 1, 2016. Raters who were certified prior to January 1, 2016 shall pass the RESNET Rater Simulation Practical Test on January 1, 2017.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 50

Commentator: scott Suddreth

Organization: Building Performance Engineering

Clause Number: 1

Paragraph:

Comment Type: Editorial

Supportive: No

Comment:

BPI Building Analyst Certifications should be recognized in lieu of the new RESNET CAZ tests.

I have been a HERS Rater for over a decade and BPI certified for 6 years. Live CAZ testing is the only way to really put a candidate in the real world situation where you if they understand the test. I support the simulation but it think they should have to demonstrate it in front of a QA or someone.

Proposed Change:

Allow existing BA certification to stand in lieu of resnet caz testing.

Require field demonstration of CAZ testing in addition to the simulation.

Response:

Accept

Reject

Reason:

No specific amending language proposed. No action required

Requirement for CAZ testing in current standard and not being required through this amendment. If the commenter wants to remove the current requirement they should propose a standard amendment for such action.

The ACCA CAZ standard is the only American Consensus Standard approved by ANSI. The BPI standard is not approved by ANSI. As a ANSI accredited Standard Development Organization RESNET is obliged to refer to other ANSI standards.

BPI's standards are different from the ANSI standard. Hence the test needs to cover the ANSI standard.

RESNET, however, exempts the field training requirement for raters who are current BPI Building Analysts.

PROPOSED AMENDMENT TO UPDATE RATER & QAD TRAINING AND TESTING STANDARDS

Comment #: 51

Commentator: Eurihea Speciale

Organization: The BER

Clause Number: 3

Paragraph:

Comment Type: Technical

Supportive: No

Comment:

We agree with the overwhelming opposition to remove the language in section 805.2. I will reiterate my comment from the concurrent technical amendment:

RESNET standards should recognize the BPI Technical Standards as equivalent and allow for BPI BA certification to serve as an equivalent certification. It is the most pragmatic and easy path to take, and will result in the least (as in close to zero) resistance from the HERS Rater community. In fact, the community may erect a monument and throw a huge parade in your honor if you will simply do the right thing and keep the BPI reference in the standard, and recognize BPI certified professionals as having met the requirements for certification under the RESNET Standard. To strike the BPI Standard and require all BPI certified HERS raters to be trained and tested is a huge and unnecessary financial burden that many cannot bear in a slumping marketplace, not to mention unfair and indefensible. There are better uses for our time, resources and money than requiring people to go through this unjustifiable process for no practical benefit whatsoever. When you look at this on a macro scale, you are talking about tens of thousands of wasted man hours and resources; time that could be spent improving homes, learning something new and valuable, earning money or connecting with friends, family and children. It just doesn't make any sense at all.

Proposed Change:

Proposed Change:

805.1 These protocols contained in the Building Performance Institute (BPI) Technical Standards for Building Analysts or ANSI/ACCA 12 QH, Appendix A Sections A4 (CarbonMonoxide Test) and A5 (Depressurization Test for the Combustion Appliance Zone (CAZ)) shall be followed by RESNET-accredited Raters and Auditors (hereinafter referred to collectively as "Auditors") performing combustion appliance testing ~~or writing worksopes for repairs.~~

OR

REINSTATE:

805.2 If the Auditor has been trained and certified in accordance with a RESNET approved "equivalent home performance certification program" or the Building Performance Institute (BPI) Standards, the Auditor may follow protocols in accordance with those equivalent standards.

Response:

Accept_____

Reject__XXX__

Reason:

Requirement for CAZ testing in current standard and not being required through this amendment. If the commenter wants to remove the current requirement they should propose a standard amendment for such action.

The ACCA CAZ standard is the only American Consensus Standard approved by ANSI. The BPI standard is not approved by ANSI. As a ANSI accredited Standard Development Organization RESNET is obliged to refer to other ANSI standards.

BPI's standards are different from the ANSI standard. Hence the test needs to cover the ANSI standard.

RESNET, however, exempts the field training requirement for raters who are current BPI Building Analysts