

ENERGY STAR[®]

Residential New Construction



July 18, 2025

Dear RESNET staff,

In response to the recent closure of a mid-size Energy Rating Company, this letter clarifies how current program policies apply to homes pursuing ENERGY STAR certification when there is a transfer of the Rater of Record. Please distribute this information to participants as you see fit.

Per the program requirements, the Rater must review all items on the Rater checklists to verify that each inspection checklist item has been met within program-defined tolerances, which, among other things, requires a pre-drywall and final inspection. In the context of a transfer of the Rater of Record, the adopting Rater is required to compile a complete record that satisfies these requirements, using one or both of the following methods:

- **Direct Verification:** The adopting Rater is permitted to verify (or re-verify) any checklist item where it is possible to do so (e.g., re-collect the HVAC design documentation, complete a new National Rater Design Review Checklist, complete a pre-drywall and/or final inspection). Only verification methods defined in ANSI / RESNET / ICC 301 (including appendices) or the "On-Site Inspection Procedures for California HERS Ratings," as applicable, are permitted.
- **Transfer of Documentation:** The adopting Rater is permitted to compile documentation of the original Rater's work to facilitate completion of one or more of the ENERGY STAR mandatory requirements (i.e. checklists). Likely examples of qualifying documentation include an email, photo, inspection report, contract, or scope of work. It will generally not be possible to transfer homes without any documentation, unless drywall is not yet installed.

When drywall is already installed, completing the applicable National Rater Field Checklist (NRFC) requires, at minimum, documentation of the original Rater's pre-drywall inspection, including the address of the home, date of inspection and name of the Rater or Energy Rating Company. The best practice is to collect the completed checklist or equivalent from the original Rater, although other approaches that allow the adopting Rater to accurately complete the NRFC are permitted.

Examples scenarios that would meet the intent of the above guidance include, but are not limited to:

1. A Detailed Inspection Report.

A detailed address-specific report (via email, for example) listing each checklist item verified by the Rater would suffice to establish that the inspection occurred as well as the details of what was inspected.

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2. Abridged Inspection Report with Additional Record of Checklist Details.

An email confirming inspection completion, but without checklist details on the specific items inspected, would generally require supplemental documentation indicating details of what the original Rater inspected. Examples might include:

- An “example” checklist provided by the original Rater, e.g. during a trades training;
- A consistent pattern of completed checklists (or equivalent) from other homes in the development;
- A scope of work or contract indicating the original Rater’s item-by-item expectations.

3. Abridged Inspection Report, Using Worst-Case Assumptions with Rev. 14 / 05.

If no item-by-item inspection details are available, it may be possible to accurately complete SFNH Revision 14 / MFNC Revision 05 of the NRFC using worst-case assumptions. This possibility exists because the Revision made certain previously mandatory features optional.

For example, the adopting Rater could assume no advanced framing details, no slab insulation and, for a home with continuous above-grade wall insulation, Grade II cavity insulation. The omission of these features would need to be reflected in the energy model, which still must satisfy the ENERGY STAR ERI Target and thermal backstop.

These revisions can be applied to any home pursuing certification and, when used, must be applied in their entirety (e.g., including meeting the new SFNH infiltration limit).

Because the above guidance reflects existing program policy, it remains in effect unless and until program policy is updated via standard procedures. HCOs are always welcome to implement requirements over-and-above these minimum program requirements.

The ENERGY STAR team appreciates HCOs’ and partners’ attention to this matter and is available to assist further as it proceeds.