



Setting the Standards for Home Energy Efficiency

**Interpretation:** Third Party Photo Documentation

**Designation:** IR 301-2019-041, IR 301-2022-029 and IR 301-2025-004

**Approved:** June 23, 2026, by RESNET® SDC 300

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**Reference:** This request for interpretation refers to the requirements in:  
Standard: ANSI / RESNET / ICC Standard 301-2019  
ANSI / RESNET / ICC Standard 301-2022  
ANSI / RESNET / ICC Standard 301-2025

Section(s): Appendix B

Table(s): Inspection Procedures for Minimum Rated Features

Relating to: The alternative “comprehensive photograph” procedure for verifying foundation, slab-on-grade, continuous exterior, and roof deck insulation

**Excerpt of text:** See excerpts of the referenced sections at the end of this interpretation. Note that the text is the same in the three editions.

**Background:** Appendix B generally requires Raters to visually verify installed features, including insulation location, R-value, and Grade. However, for certain insulation locations, Appendix B allows Raters to verify features using comprehensive photographs when immediate post-installation visual verification is not possible. These locations are foundations, slabs-on-grade, exterior continuous wall insulation, and roof decks, which are assemblies that are frequently covered soon after installation and inaccessible by the time of a typical pre-drywall inspection.

This raises a question about whether these photographs may be taken by someone other than the Rater, such as the builder or insulation contractor. The alternative presumes the Rater lacks access for a visual inspection, which, by extension, precludes the Rater from capturing photographs. If the Rater could capture comprehensive photos, they could verify the features directly, making the alternative unnecessary. It follows that the intent is for the photographs to be provided by a third party who can document the work during the potentially brief period after installation when these locations are accessible. We request confirmation that accepting such third-party photographs is consistent with the standard's intent.

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**Interpretation:** *Proposed by the Petitioner*

When the “comprehensive photographs” alternative is used to verify foundation, slab, exterior continuous wall, and/or roof deck insulation, the photos may originate from a third party, such as the builder or insulation contractor.

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**Question:** Is this Interpretation correct?

**SDC Answer:** Yes.

**SDC Comments:** Prior to the referenced statement in Appendix B, the previous sentence states that the Rater must “collect photos to confirm installation at several site locations and in sufficient detail to confirm thickness, type and grade of the insulation installation”. The word “collect” was intended to allow the Rater to use a third party, such as the builder or insulation contractor, for those photos. It is still the Rater’s responsibility to ensure that the photos collected adequately represent the installation and can be used to determine the type of insulation installed, the R-value, and the grade of the installation.

Note: This interpretation applies to ANSI/RESNET/ICC 301-2019, ANSI/RESNET/ICC 301-2022, AND ANSI/RESNET/ICC 301-2025

**Excerpt of Text:**

**Building Element: Floor/Foundation Assembly**

**Rated Features**

- Foundation insulation
- Slab-on-grade insulation
- Wall insulation installation
- Roof deck insulation

**Task**

Determine type, grade, location, and thickness of \_\_\_\_\_ insulation and resultant R-Value

**On-Site Inspection Protocol**

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Collect photos to confirm installation at several site locations and in sufficient detail to confirm thickness, type, and grade of the insulation installation.

If foundation insulation cannot be visually verified immediately after installation, it may be verified through **comprehensive** photographs that comply with the requirements given above.