**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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Unfortunately, this draft does little to address the concerns US-EcoLogic has with RFI certification. As an organization that multifacedly serves the industry, we find this addendum lopsidedly favors the interest of Training Providers. The modification to 207.1.1.4 is appreciated, but is a small concession to a larger concern.

The RFI credentialing and recertification process is it currently exists provides field inspectors with adequate knowledge on how to properly identify and record minimum rated features on site. The HERS Raters under which they operate under already have both the incentive and responsibility to assist in the evaluation of RFI Candidates, which will be reflected onto their QA reviews.

For many, RFI credentialing has been an accessible path into the HERS industry. Those who desire to further their knowledge for either personal or professional desires will pursue HERS Rater or other credentialing. Some minor adjustments should be made in credentialing and recertification processes, but there is no need to gentrify the RFI training process.

Summary of proposed changes on the amendment:

* Eliminate the proposed requirement for RFIs to take a formal building science course.
* Eliminate the proposed requirement for the mentored HVAC grading evaluation for RFIs and HERS Raters.
* Eliminate the proposed requirement for inactive RFIs to complete three Mentored Field Evaluations.
* Provide RFIs the option to pass the Rater Practical Simulations as an option to recerify, if they have not passed them already.
* Provide RFIs the option to obtain HERS Modeler certification as an option to recertify, if they have not certified already.
* Eliminate the proposed requirement for existing RFIs to complete the Rater Practical Simulations.

The amendment brought forth will create significant financial burden on Rating companies of all sizes. Smaller companies may spend double to on their Training Providers to get a certified RFI, and larger companies will experience significant stress on their field teams and associated labor budgets. Keeping the RFI credential financially accessible is integral to what we do as an industry. Putting it financially out of reach may open up a gateway for inspection activity by uncertified personnel.

If there is true desire to develop RFIs, then developing a staged step up towards HERS Rater certification is a more viable option. An RFI Candidate in good standing can complete the HERS Modeler credential and an accredited building science course, which seems to align with the requirements covered under HERS Rater credentialing requirements in a phased manner.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

~~206.2.1.1 Complete a formal Building Science training course conducted by a RESNET Accredited Training Provider. Training shall be based on the Building Science Core Curriculum developed by RESNET.~~

206.2.4.1.2 ~~One mentored HVAC grading evaluation and~~ one RESNET HVAC graded field evaluation. The RESNET HVAC graded field evaluation shall be performed under the observation and to the satisfaction of a Certified Quality Assurance Designee who has completed RESNET Required HVAC Grading training. The RESNET HVAC graded field evaluation shall not be performed remotely.

207.1.1 Rating Field Inspectors

207.1.1.1 Pass the RESNET Graded Field Evaluation overseen by a RESNET certified Candidate Field Assessor or Quality Assurance Designee once in a three-year period, OR

207.1.1.2 Obtain 8 hours of professional development every three years through ~~one or both of the following two options:~~ RESNET approved professional development from a RESNET Accredited Training Provider, OR

~~207.1.1.2.1 Attend a RESNET approved conference once every three years. Complete professional development through live or virtual attendance at a RESNET approved conference.~~

~~207.1.1.2.2 Complete RESNET approved professional development from a RESNET Accredited Training Provider.~~

207.1.1.3 ~~Certified Rating Field Inspectors who have not completed field work on any Confirmed, Sampled, or Threshold ratings within the three-year certification period shall be required to successfully complete three mentored field inspections as outlined in 206.2.1.3 and one RESNET graded-field evaluation overseen by a RESNET certified Candidate Field Assessor or Quality Assurance Designee.~~ Attend a RESNET Conference, RESNET Forum, or a RESNET approved conference once every three years, OR

207.1.1.4 ~~Certified Rating Field Inspectors who have not passed the RESNET Practical Simulation Test may pass the test during their current three-year certification period. Passing the test will be considered equivalent to the certification renewal requirements of 207.1.1.1 or 207.1.1.2.~~ Pass the RESNET Practical Simulations Test.

207.1.1.5 Obtain the HERS Modeler certification.

207.1.1.6 Certified Rating Field Inspectors who have not completed field work on any Confirmed, Sampled, or Threshold ratings within the three-year certification period shall be required to successfully complete one Graded Field Evalaution as outlined in 206.2.1.1.2.1 plus one of the recertification options as outlined in 207.1.1.2 or 207.1.1.3 or 207.1.1.4, or 207.1.1.5.

207.1.1.7 Certified Rating Field Inspectors who have already completed the recertification options as outlined in 207.1.1.4 or 207.1.1.5 must select from the recertification options as outlined in 207.1.1.1 or 207.1.1.2 or 207.1.1.3.