

SBRA Modular Program Guide

Compliance Verification Procedures for Certifying Modular Homes for the **ENERGY STAR**[®] Label





Modular Program Guide

Compliance Verification Procedures for Certifying Modular Homes for the ENERGY STAR® Label

The protocols outlined in this guide were developed by the Systems Building Research Alliance in association with the U.S. Environmental Protection Agency.

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1 Program at a Glance

Introduction

This guide is the Systems Building Research Alliance (SBRA) roadmap for designing, producing and installing energy-efficient ENERGY STAR® certified modular homes under the latest versions of the **ENERGY STAR National Program Requirements**¹ developed by the U.S. Environmental Protection Agency (EPA). ENERGY STAR affords the modular housing industry a unique opportunity to extend the advantages of controlled-environment factory production to include exemplary energy performance. An ENERGY STAR certified modular home is a home built in a factory in compliance with state and/or local codes and the ENERGY STAR guidelines, and that has successfully met all technical and quality control requirements established by EPA and the modular program Quality Assurance Provider (QAP).²

EPA designates third-party organizations to serve as Quality Assurance Providers for ENERGY STAR certified homes produced and built under guidelines developed by the QAP and approved by EPA. QAPs develop and administer an EPA-approved process to qualify new homes as ENERGY STAR. As such, QAPs are authorized to provide ENERGY STAR labels to certified homes and are responsible for the oversight and enforcement of all quality assurance requirements related to designing, producing and installing ENERGY STAR certified homes. QAPs also are responsible for reporting to EPA all homes certified for the ENERGY STAR label using the QAP's procedures as well as any issues of non-compliance.

The Systems Building Research Alliance (SBRA) has been approved by EPA as a national Quality Assurance Provider (QAP) for ENERGY STAR certified modular homes. This authorizes SBRA to provide ENERGY STAR labels to certified modular plants and participating builders and to oversee program quality assurance. SBRA developed and now administers an EPA-approved process for modular plants and builders to qualify new homes as ENERGY STAR. This document describes this process. SBRA is responsible for reporting to EPA all modular homes certified for the ENERGY STAR label using the procedures contained in this guide.³



What is ENERGY STAR?

ENERGY STAR was introduced by the U.S. EPA in 1992 as a voluntary, market-based partnership to reduce greenhouse gas emissions through increased energy efficiency. Today, ENERGY STAR offers businesses and consumers energy-efficient solutions to save energy, save money and help protect the environment for future generations. More than 20,000 organizations are ENERGY STAR Partners, committed to improving energy efficiency in homes, products and businesses. EPA is responsible for establishing energy efficiency guidelines for ENERGY STAR certified homes.

¹ ENERGY STAR Certified Homes Program Requirements
www.energystar.gov/newhomes/homes_prog_reqs/national_page

² EPA has established specific qualifications and capabilities that organizations must demonstrate in order to be a designated Quality Assurance Provider (QAP). For more information, visit the ENERGY STAR website:
www.energystar.gov/index.cfm?c=bldrs_lenders_raters.pt_builder_manufactured_qualifications.

³ As an alternative to following the guidelines described in this document, a modular home may earn the ENERGY STAR label through a HERS rating process similar to the process used to qualify site-built homes. For more information, visit the ENERGY STAR website: www.energystar.gov/homes.

What is an ENERGY STAR Certified Home?

A home earning the ENERGY STAR label is significantly more energy efficient than a comparable standard code home. This increased level of energy efficiency can be met using standard technologies and manufacturing practices. ENERGY STAR certified homes are built with a comprehensive building science-based approach that features:

- A detailed package of home envelope air sealing, properly installed insulation and high-performance windows to deliver comfort, durability and lower utility bills.
- A high-efficiency heating, cooling and ventilation system designed and installed for optimal performance.
- A complete water and moisture management package to protect roofs, walls and foundations.
- ENERGY STAR certified lighting and appliances that help reduce monthly utility bills.
- Third-party, independent inspections and testing by a certified Home Energy Rater.

Why Participate in ENERGY STAR?

There are at least four good reasons why a plant or builder should consider making the commitment to build ENERGY STAR certified homes.

1. Recognized brand. The ENERGY STAR label can be a powerful sales tool. ENERGY STAR is a nationally recognized brand, backed and promoted by two federal agencies. Affiliating with ENERGY STAR can differentiate a manufacturer or builder from its peers within the industry and from site-built homes in the same market. Only ENERGY STAR Partners have access to ENERGY STAR logos and labels for certified homes.
2. Lower customer costs. ENERGY STAR certified homes, because they are highly energy efficient, have lower operating costs, thereby reducing a homeowner's monthly out-of-pocket expenses and potentially increasing the resale value of the home.
3. Customer satisfaction. The efficiency measures built into an ENERGY STAR certified home have associated benefits that increase customer satisfaction. These homes are typically more comfortable, durable, quiet and environmentally friendly than non-ENERGY STAR certified homes.
4. Show the benefits of modular construction. ENERGY STAR offers another opportunity for a modular home manufacturer or builder to demonstrate superior energy performance compared with non-ENERGY STAR certified site-built homes.

Key Features of SBRA's Compliance Verification Process for Modular Housing

Modular builders have a distinct advantage in achieving ENERGY STAR levels of performance. The compliance verification protocols outlined in this document are designed by SBRA to take advantage of the resource efficiencies inherent in modular building and the quality control practices that already exist in the factory.

Under the modular compliance verification process, the modular home manufacturing plant (the "plant") completes those portions of the ENERGY STAR requirements that can be accomplished in the factory. The plant then ships the home modules, along with information needed to complete the remaining ENERGY STAR features on site, to the builder/dealer (the "builder"). The builder is responsible for installing the home and completing the remaining ENERGY STAR measures not furnished by the plant, and for obtaining third-party verification that the home qualifies for the ENERGY STAR label. The builder, in effect, purchases a partially completed home that the manufacturer represents as containing specified parts of the overall ENERGY STAR package.

Similarly, quality control is separated into two distinct parts—plant and site—with procedures and protocols appropriate to each. The work of the plant is conducted under the auspices of a plant "Certifier,"

a specialist in factory building with expertise in energy efficient construction, who qualifies the modular plant to build homes that can earn the ENERGY STAR label.

Verifying ENERGY STAR compliance of the completed home, and specifically the work of the builder, is the responsibility of a third-party Home Energy Rater (a HERS Rater, hereafter referred to as the “Rater”). The Rater inspects and qualifies the home. Therefore, while the plant is certified to routinely construct homes ready to earn the ENERGY STAR label, there is no equivalent certification for the builder. Rather, homes are inspected in the field by the Rater for compliance with the ENERGY STAR provisions. Site testing follows a sampling protocol, reflecting the fact that the manufacturer has demonstrated the ability to consistently produce homes that comply with the ENERGY STAR requirements. Table 1 highlights some of the major provisions of the process.

Table 1 Major Provisions of SBRA’s Compliance Verification Process for Modular Housing

Provision	Requirement
PLANT COMPLETED	
Certification	<ul style="list-style-type: none"> ▪ Third-party plant Certifier completes one-time plant certification process ▪ Certifier conducts semi-annual inspections/tests to verify on-going compliance
Inspection and testing	<ul style="list-style-type: none"> ▪ QC staff inspects and completes all plant-related checklist items for all homes
Labeling	<ul style="list-style-type: none"> ▪ QC staff applies Quality Assurance (QA) label in the plant
FIELD COMPLETED	
Certification	<ul style="list-style-type: none"> ▪ Third-party Rater conducts field inspection(s) on each home
Inspection and testing	<ul style="list-style-type: none"> ▪ Rater (with builder) completes Rater Design Review Checklist for all homes ▪ Rater (with builder) completes visual inspections and diagnostic testing using Rater Field Checklist ▪ HVAC designer completes HVAC Design Report Checklist for all systems ▪ HVAC contractor completes HVAC Commissioning Checklist for all systems
Labeling	<ul style="list-style-type: none"> ▪ ENERGY STAR Certified New Home label applied to home upon completion on site

Participating in the Program

The following is the sequence of events for qualifying modular homes for the ENERGY STAR label.⁴

1. Certify the plant. To begin building ENERGY STAR modular homes, plants complete a one-time certification conducted by a third-party Certifier. The certification verifies that the plant is familiar with the program requirements. Once completed, the plant can begin producing homes that are ready to be completed on site as ENERGY STAR.
2. Routine plant production of homes that can earn the ENERGY STAR. Once certified, the plant produces modular homes per the ENERGY STAR technical requirements (mandatory measures) and quality assurance procedures approved by the Certifier during the plant certification process.

Each home is accompanied by a set of **Inspection Checklists**, a traveler that identifies the items required to qualify the home under the program. The plant’s quality control staff verifies completion of the items on the checklists required of the plant, signs the checklists and attaches the signed **SBRA Quality Assurance (QA) label** to the home.

⁴ Some state and local programs that provide incentives for ENERGY STAR homes may have additional construction and/or procedural requirements that exceed the National Program Requirements.

3. Install and inspect ENERGY STAR modular homes at the site. The builder is responsible for retaining a third-party Rater. The builder, Rater and the builder's HVAC contractor complete the items on the **Inspection Checklists** that were flagged for field verification.
4. Complete the ENERGY STAR process. When all provisions have been met, the **Inspection Checklists** and a **Modular Home Completion Report** are completed and signed by the Rater and sent to SBRA, the national Quality Assurance Provider for the ENERGY STAR modular home program. SBRA issues the blue **ENERGY STAR® Certified New Home label** to be applied to the home and provides a **Homeowner Certificate**.

Earning the ENERGY STAR Designation

Modular homes designed and produced in the plant to meet the ENERGY STAR guidelines are only “ENERGY STAR certified” after they are inspected and verified on site and receive the blue ENERGY STAR Certified New Home label and certificate. Homes cannot be marketed or promoted as “ENERGY STAR labeled”, “ENERGY STAR certified”, or in any way that implies a home has met ENERGY STAR requirements, until the site verification process has been successfully completed.⁵ Use of the ENERGY STAR brand by a plant or builder to falsely market or promote a home as ENERGY STAR may result in suspension or expiration of the plant's and/or builder's participation in the ENERGY STAR program. Furthermore, it is the builder's responsibility to initiate this site verification process by retaining a certified Rater. The Rater will work with the builder to ensure that the home has been verified by the eligible verifier (the plant, builder, Rater or HVAC contractor, depending on the checklist item) to be in compliance with the mandatory inspection checklists. The Rater will then prepare and submit the documentation to SBRA, who will in turn review the documentation and issue the label and certificate.

Please refer to the **ENERGY STAR Brand Book** (www.energystar.gov/about/energy-star-brand/energy-star-brand-book) and other guidance regarding use of the ENERGY STAR brand by modular plants and builders at www.energystar.gov/index.cfm?c=bldrs_lenders_raters.homes_guidelns_modular.

Partnership, Training and Credentialing Requirements

EPA requires that Builders, HVAC contractors and Raters meet the following requirements prior to certifying homes:

- Builders are required to sign an ENERGY STAR Partnership Agreement and complete the online Version 3 Builder Orientation, which can be found at www.energystar.gov/homesPA.
- HVAC contractors are required to be credentialed by an EPA-recognized HVAC Quality Installation Training and Oversight Organization (H-QUITO), a process that is described at www.energystar.gov/newhomesHVAC.
- Raters and Field Inspectors are required to complete training, which can be found at www.energystar.gov/newhomestraining.

Access to Resources

Additional information about ENERGY STAR New Homes—including marketing materials, the ENERGY STAR Partnership Agreement, copies of forms, ENERGY STAR logos and promotional marks, and the ENERGY STAR label—is available on the Web from the Systems Building Research Alliance (www.research-alliance.org) and ENERGY STAR (www.energystar.gov/homes).

⁵ Terms such as “ENERGY STAR ready,” “ENERGY STAR certified” or “ENERGY STAR compliant” suggest that the home has already earned the ENERGY STAR label and cannot be used in association with homes that have not met all ENERGY STAR requirements.

2 Certifying the Plant

Getting Started: Certifying the Plant

Plants participating in the ENERGY STAR Certified Modular Home Program are required to complete a one-time certification.⁶ Once certified, plants can produce homes that can earn the ENERGY STAR label, monitoring conformance to program guidelines using in-house quality control staff. The certification process assures that the plant has the knowledge, skills and procedures in place to routinely produce homes that comply with the program, and staff committed to maintaining program quality and compliance.

This section provides directions to the Certifier in conducting the plant certification process and discusses the responsibilities of the plant, builder and SBRA. The certification process may be spread out over a number of weeks or months depending on the plant's scheduled production and the builders' scheduled installation and completion of ENERGY STAR modular homes. As shown in Table 2, completion of the certification process involves both the Certifier and various plant staff.

Table 2 Plant Certification Steps and Main Participants

Step	Certifier ⁷	Plant Staff			Builder	HVAC ⁸
		Mgmt	Prod/QC	Eng		
1. Retaining a Certifier		●				
2. Reviewing the ENERGY STAR process	●	●	●	●		
3. Developing Compliant Designs	●		●	●		
4. Documenting the ENERGY STAR Requirements	●		●	●		
5. Building and Inspecting Certification Homes in the Plant	●		●	●		
6. Educating the Builder	●	●			●	
7. Installing Certification Homes	●	●	●		●	
8. Verifying Certification Homes in the Field	●				●	●
9. Labeling Completed and Approved Homes	●	●			●	
10. Issuing the Plant Qualification Form	●					
11. Submitting an ENERGY STAR Partnership Agreement		●			●	

⁶ Plants that are certified to produce ENERGY STAR manufactured homes must be separately certified to produce ENERGY STAR modular homes. Manufactured homes are defined as homes built in a factory meeting the federal Manufactured Home Construction and Safety Standards, commonly referred to as the HUD Code.

⁷ The Certifier may designate a local certified HERS Rater to act as their field representative for the purpose of verifying the three plant certification homes.

⁸ For some permutations of equipment, HVAC contractors must be credentialed by an EPA-recognized HVAC Quality Installation Training and Oversight Organization (H-QUITO). For an explanation of this credentialing process and links to H-QUITOs, which maintain lists of credentialed contractors, visit EPA's website www.energystar.gov/newhomeshvac.

Step 1. Retaining a Certifier

Plants must hire a Certifier, an independent third party who is responsible for reviewing the plant's building procedures and certifying the plant as capable of conforming to the program requirements. Certifiers must meet certain eligibility criteria and are approved and monitored by SBRA. Certifiers must submit a **Modular Certifier Application** to SBRA. A list of approved modular plant Certifiers is provided on the SBRA website: www.research-alliance.org/pages/es_mod.htm. Plants are required to have a **Certifier of Record** at all times.

Step 2. Reviewing the ENERGY STAR process

The Certifier reviews and verifies that plant staff are familiar with the following aspects of building ENERGY STAR modular homes.

1. Overall process and requirements

- Role of the Certifier and SBRA in providing program oversight and maintaining quality.
- Responsibilities of the plant, the builder/dealer and the HVAC contractor.
- Completing the **Inspection Checklists**, hereafter referred to as the “checklists”.
- Field testing requirements and role of the field Rater.
- Labeling process: SBRA Quality Assurance (QA) label applied in the plant and ENERGY STAR Certified New Home label applied in the field.
- Future changes (e.g., new home designs) that would require review by the Certifier.
- Semi-annual in-plant inspections to maintain certification status.
- Resources available on the SBRA website (www.research-alliance.org).
- Registering with EPA by completing an ENERGY STAR Partnership Agreement (www.energystar.gov/homesPA).

2. Product design and specifications and production procedure

- ENERGY STAR National Program Requirements (core efficiency measures and other mandatory measures) and any applicable regional program specifications.
- Proper techniques for ENERGY STAR construction, covering all items on the checklists.
- Quality control, inspection and verification procedures.

3. Quality control (QC) process and documentation

- Changes in the plant's current QC process and third-party inspection procedures.
- Integrating the ENERGY STAR requirements into the plant's QC process, including:
 - Incorporating the ENERGY STAR requirements with the traveler accompanying each module.
 - Procedures for completing the Checklists, such as by verifying and signing off on the requirements at each station by the department supervisor, QC manager or other appropriate staff as per the plant's third-party approved QC practices.

Step 3. Developing Compliant Designs

With guidance from the Certifier, the plant develops compliant designs and specifications based on the applicable version of EPA's **ENERGY STAR Certified Homes Program Requirements** (www.energystar.gov/newhomes/homes_prog_reqs/national_page).

Step 4. Documenting the ENERGY STAR Requirements

The ENERGY STAR requirements are documented in two ways. First, the plant incorporates the ENERGY STAR Program Requirements into the plant's design package and production documents.

Second, all required ENERGY STAR measures and verification items are listed on the **Checklists**, the basic document for dividing the ENERGY STAR responsibilities between the plant, the HVAC designer and contractor, and the builder.

The Certifier works with the plant to develop the plant's customized checklists. The plant may elect to re-order the checklist items (e.g., organize them by workstation or divide them by plant and builder responsibilities) to facilitate the inspection process, and/or incorporate the checklists into the existing plant traveler. All measures prescribed by the ENERGY STAR Program Requirements and the Inspection Checklists that must be verified must be included on the checklists and assigned to either the plant QC staff for items completed in the plant or the builder, Rater or HVAC contractor for items completed in the field. The Certifier reviews and approves the plant's checklists, verifying that all ENERGY STAR measures will be completed at the appropriate stage of construction and have been assigned to the applicable party. The checklists must travel with the home to the field to be completed by the builder, the HVAC contractor and the Rater.

Step 5. Building and Inspecting Certification Homes in the Plant

The plant builds three (3) ENERGY STAR homes using the checklists as a guide and signs off on completed checklist items in the column designated for the plant QC staff. The Certifier visually inspects and verifies all plant-installed items on the checklists. The Certifier should pay close attention to those elements that will not be visible in the completed home and any items identified as potential problem areas during the earlier review of the plant's production practices.

Line inspections may occur over multiple days depending on the plant production rate and schedule. All required items must be inspected at least once and representative modules from all homes must be inspected at least once. However, all items need not be inspected on all modules/homes. In addition to checking construction compliance, Certifiers must observe the implementation of the ENERGY STAR-related QC items and confirm that it is operating in accordance with the approved plan.

If inspections reveal non-compliance with ENERGY STAR requirements, the plant has the option of either correcting the problem or selecting a new home for inspection (in the latter case, the non-compliant home would not qualify as ENERGY STAR or count toward the three initial homes). Any discrepancies must be corrected and discussed with the plant quality control staff. If, in the Certifier's judgment, the plant is not currently able to produce homes that are ENERGY STAR compliant or to properly implement the QC system, then re-training may be required.

The Certifier completes the appropriate sections of each home's checklists using the column designated for the Rater. When a measure is verified, the Certifier checks the corresponding box. Field-installed measures will be verified later. When completing the checklists, indicate "N/A" for items that do not apply to the home. The checklists are shipped with the homes to the site for testing and final inspection.

Step 6. Educating the Builder

The plant staff and Certifier together agree on a process for educating builders on their responsibilities under the program. The following four items should be included in discussions with participating builders.

1. Participant roles. Discuss the roles of the plant, Certifier, builder and the builder's third-party Rater and HVAC contractor in the ENERGY STAR modular home program.
2. Division of plant's and builder's responsibilities. Review the measures that were installed in the plant and those that need to be completed in the field by the builder. Introduce the checklists and the builder's responsibility for completing selected items on the checklists.
3. Rater's responsibilities. Review the responsibilities of the Rater. Recommend that the builder identify a Rater prior to receiving the modules for installation and review with the Rater the field verification and testing protocol. The Rater must sign up with SBRA before qualifying homes under the modular compliance procedures outlined in this guide (see page 11 Step 2).

4. HVAC designer's and commissioning contractor's responsibilities. Review the responsibilities of the HVAC designer and commissioning contractor. Recommend that the builder select an HVAC contractor early in the process so that plant design/engineering staff can coordinate with the builder and/or the builder's HVAC contractor regarding the items on the HVAC Design Report and HVAC Commissioning Checklist.

Step 7. Installing Certification Homes

The plant can work with one or more builders in completing the three (3) required certification homes. For evaluation purposes, the homes can be either permanently sited or temporarily installed (i.e., set up outside the factory, at a home show or model center rather than at their final site). For temporarily installed homes, the plant or its agent is acting as the builder of record. Using a temporarily installed home(s) for certification purposes is subject to the following conditions:

- The Certifier must notify SBRA in advance if planning to inspect and test a temporarily installed home for plant certification purposes.
- All ENERGY STAR requirements are completed on the home(s) including all items on the checklists, with the exception that cooling equipment does not need to be installed.⁹
- The Certifier agrees that the home as set is an accurate representation of the ENERGY STAR features as they would be if installed on the final site.

Step 8. Verifying Certification Homes in the Field

The Certifier verifies compliance in the field of a minimum of three (3) assembled and completed ENERGY STAR modular homes. These do not have to be the same three homes that were inspected in the plant. Verification can be accomplished through one or more site visits by the Certifier, through delegation to a HERS Rater¹⁰, or a combination of the two. In addition, the HVAC contractor also inspects each home and completes the checklist items flagged for field verification on the HVAC Commissioning Checklist.

The Certifier or Rater inspects each home and completes the items flagged for field verification on each checklist. The Certifier or Rater also collects the completed HVAC Commissioning Checklist. Once the checklists have been completed, the Certifier fills in a **Modular Home Completion Report** (hereafter referred to as the "Completion Report") for each home.

If any of the inspection results do not meet the program requirements, the Certifier instructs the builder or the plant (as applicable) as to the required corrective measures and re-inspects the home after corrections are made. If the deficiencies are related to plant-constructed items, the Certifier decides on the appropriate course of action and re-inspects the plant process.

Completing the Rater Field Checklist will require the Certifier or Rater to conduct the following pressurization tests on the three homes to verify that the homes meet or exceed the required performance levels.

- An envelope air infiltration test; and,
- For homes with duct systems, tests to determine total duct air leakage and duct air leakage to the outdoors.

If any of the test results do not meet requirements noted on the checklists, the Certifier instructs the builder or the plant (as applicable) as to the required corrective measures. The home is re-tested after repairs have been made. If the deficiencies are related to plant-constructed items, the Certifier determines the appropriate course of action and re-inspects the plant process.

⁹ If cooling equipment is installed it must comply with the ENERGY STAR National Program Requirements.

¹⁰ The Certifier may designate a local certified HERS Rater to act as their field representative for the purpose of conducting on-site inspections and tests on the three plant certification homes. However, all documentation must be reviewed, approved and submitted to SBRA by the Certifier.

To provide feedback to plant management regarding the results of the field inspections and tests, the Certifier provides a brief written report(s) containing the results of field tests and a description of any ENERGY STAR-related installation or construction deficiencies (observed during inspections) and an explanation of remedial actions taken.

Step 9. Labeling Completed and Approved Homes

Upon completion of the field verification process for a plant certification home, the Certifier submits the completed and signed checklists together with a Completion Report and the application fees to SBRA, the national Quality Assurance Provider for the ENERGY STAR modular home program. SBRA reviews the documentation submitted by the Certifier and issues the maroon **SBRA Quality Assurance (QA) label**, the blue **ENERGY STAR® Certified New Home label** and the **Homeowner Certificate** to the Certifier.

NOTE: Once certified, the plant obtains the QA labels from SBRA and applies labels to a module in the plant. The Certifier or Rater obtains the blue ENERGY STAR label and home certificate from SBRA upon completion of the field verification process.

The Certifier signs the QA label and provides both labels to the builder to apply to the home, completing the verification process. The labels should be placed on or near the electrical panel box or other readily visible location. The certificate is provided to the homeowner(s). This may be done for each home as completed and need not wait until all three certification homes are complete.

If a temporarily installed home passes all inspections and tests, SBRA will provide the QA label only for attachment to the home. When the home is installed on its final site, the builder's Rater must file an additional Completion Report noting that it was a re-installed home and remit the field report processing and home certificate fee. SBRA will provide the blue ENERGY STAR Certified New Home label and certificate only when the home has been installed on its final site and re-inspected (and tested if required) by the builder's Rater.



SBRA QA Label

Step 10. Issuing the Plant Qualification Form

Upon successful completion of the inspections and tests of at least three (3) homes, the Certifier qualifies the plant for routine production of ENERGY STAR homes and submits a **Modular Plant Qualification** form to SBRA and provides a copy to the plant.

Step 11. Submitting an ENERGY STAR Partnership Agreement

After certification, the plant registers with the U.S. EPA by completing an ENERGY STAR Partnership Agreement online at: www.energystar.gov/homesPA.¹¹

Maintaining the Plant's Certification Status

Within six months of completion of the plant's certification, and every six months thereafter, the Certifier must inspect the plant and, at the Certifier's discretion, tests homes to ensure continuing compliance with ENERGY STAR specifications and quality control methods.¹² This semi-annual checkup provides plants and Certifiers the opportunity to review any changes in the national or regional program requirements and the plant's construction practices, quality assurance or inspection procedures, as well as address any systemic issues related to the plant's responsibilities that have been encountered by Raters in the field.

¹¹ Partners must complete at least one ENERGY STAR certified home every 12 months to maintain their "active" ENERGY STAR Partner status. Only "active" Partners are listed on the ENERGY STAR Partner Locator on the Web and can use the ENERGY STAR logo to promote ENERGY STAR certified homes.

¹² SBRA may require additional plant inspections by the Certifier based on compliance issues encountered by the Rater or homeowners in the field.

Any changes proposed by the plant that materially affect the ENERGY STAR construction, inspection or verification process must be reviewed and approved by the Certifier in order for the plant to maintain its certification status. This includes substantive changes to ENERGY STAR designs, the plant's quality assurance and inspection procedures, or the plant's checklists.

Step 1. Review Documentation and Proposed Changes

Prior to visiting the plant, the Certifier coordinates with the plant and SBRA and reviews the following:

- Completed checklists and Completion Reports to identify any systemic compliance discrepancies that may require changes to be implemented in the plant's production or quality control procedures. Certifiers may request copies of documentation for completed and certified homes from SBRA.
- Any proposed changes to the plant's product designs and specifications, checklists, or production and quality control procedures.
- The plant's process for educating builders on their responsibilities under the program.

Step 2. Conduct In-Plant Inspection

The Certifier observes the plant's production practices and quality control procedures at various stages of the home production process, including completion of the checklists by plant staff.

For a minimum of one (1) ENERGY STAR home on the production line, the Certifier visually inspects and verifies all plant-installed items on the checklists, paying particular attention to any items identified as problem areas during the documentation review for completed homes. Inspections must take place in the plant and should cover all requirements prescribed by the ENERGY STAR Program Requirements and the inspection checklists (other mandatory measures).

If areas of non-compliance are discovered during the in-plant inspection, the Certifier will recommend corrective actions to the plant and inspect an additional ENERGY STAR home on the production line, ensuring compliance with all ENERGY STAR requirements. If non-compliance is found in the second home, the plant must cease all production of homes that can earn the ENERGY STAR label and the Certifier must notify SBRA. SBRA will provide recommended corrective actions, which may include requiring re-certification of the plant, and notify EPA.

Step 3. Report Findings to SBRA

Following the inspection, the Certifier provides a brief report to the plant and to SBRA summarizing the inspection results. At a minimum, the following items must be included in the report:

- Certifier company and inspector name
- Plant company name, city and state
- Summary of inspection process and results, including a brief description of any required modifications to the plant's current practices
- Date of in-plant inspection and signature of Certifier

The Certifier signs and dates the completed checklists for the home observed on the production line and submits copies to SBRA along with the semi-annual inspection report.

3 Routine Production

Routine Production of ENERGY STAR Modular Homes

Routine compliance is a continuation of the process started with plant certification, with one important change: compliance in the field is checked by a Rater hired by the builder. The steps for routinely building ENERGY STAR homes, including the responsibilities of the plant, builder, HVAC contractor, Rater and SBRA, are described below.

Step 1. Obtaining QA Labels

Once certified, the plant orders **Quality Assurance (QA)** labels from SBRA. SBRA will confirm that the plant is certified and process the label order. The label order form is available on the SBRA website: www.research-alliance.org/pages/es_mod.htm.

NOTE: The **QA label** verifies that the home was constructed in a certified modular home plant in accordance with ENERGY STAR program and SBRA oversight requirements. The label indicates that the plant's part of the ENERGY STAR home qualification process is complete. The home only becomes ENERGY STAR certified when the blue EPA **ENERGY STAR Certified New Home label**, obtained by the Rater upon home completion, is applied to the home in the field.

Step 2. Retaining a Rater

Builders must hire a Rater,¹³ an independent third party who is responsible for checking that the home conforms to the program requirements. A national list of certified Raters can be found on the Web at: www.resnet.us/directory/search. Raters are eligible to qualify ENERGY STAR modular homes once they review the requirements and procedures in this guide and complete a **Modular Rater Application**. A list of Raters certified to inspect and test modular homes is provided on the SBRA website: www.research-alliance.org/pages/es_mod.htm.

Step 3. Ordering Homes that can Earn the ENERGY STAR Label

The builder initiates the process of constructing an ENERGY STAR modular home by ordering a modular home from a certified plant. The home must have a QA label to earn the ENERGY STAR label. A list of plants that have been certified to produce ENERGY STAR modular homes is provided on the SBRA website: www.research-alliance.org/pages/es_mod.htm.

Step 4. Producing and Labeling Homes in the Plant

The plant builds homes per the ENERGY STAR requirements and procedures and applies the QA label inside the home, typically on or near the electrical panel or other readily visible location. The plant representative verifies that the applicable portions of the checklists are completed and signs the checklists and the QA label. When completing the checklists, indicate "N/A" for items that do not apply to the home or that conflict with local requirements.

Step 5. Delivering Homes with Checklists

The plant ships the home to the builder and provides the builder with a copy of the partially completed checklists. The checklists should be signed by the plant and ready to be completed by the builder, the HVAC contractor and the Rater. The plant should retain a copy of the checklists.¹⁴

¹³ The term "Rater" refers to the person completing the third-party on-site inspections required for certification. This person shall: a) be a certified Home Energy Rater, Rating Field Inspector, or an equivalent designation as determined by a Verification Oversight Organization such as RESNET or SBRA; and, b) have attended and successfully completed an EPA-recognized training class. See www.energystar.gov/newhomestraining.

¹⁴ For a home that is to be a display model or stock unit, the builder should file the partially completed checklists until such time as the home has been sold and delivered to the final home site. Display models/stock units that were partially completed in the plant to meet the ENERGY STAR requirements cannot be certified for ENERGY STAR and receive the blue field label until the home is installed on the final site and the necessary inspections/tests have been conducted by the Rater and documentation has been submitted to SBRA.

Step 6. Completing Homes and Notifying the Rater

Prior to delivery of the home to the site, the builder informs the Rater of the pending project, providing the home address, construction documents, the checklists and expected delivery date and construction schedule. The builder and Rater establish a schedule for visiting the site to inspect and verify all applicable checklist items. The Rater is required to visually inspect every home at least once during construction.

Step 7. Verifying Homes

For the first two (2) homes built by the builder, and for a representative sample of one (1) in every seven (7) homes thereafter, the Rater inspects each home and completes the checklist items flagged for field verification. For homes with duct systems, completing the **Rater Field Checklist** will require conducting testing to determine total duct leakage and duct air leakage to the outdoors. At the discretion of the Rater, the builder may verify up to eight items in Sections 1 through 4 of the **Rater Field Checklist**.

The HVAC contractor inspects each home and completes the **HVAC Commissioning Checklist** for each commissioned system present in the home.

Step 8. Reporting Homes to SBRA

The Rater finalizes and signs the **Modular Home Completion Report**. If the home complies with the program requirements, the Rater submits the checklists and Completion Report along with the builder's report processing fee to SBRA. The Rater also provides a copy of the completed checklists and Completion Report to the builder. Processing fees are provided on the SBRA website:

www.research-alliance.org/pages/es_mod.htm.

NOTE: Some state or local programs that provide incentives for ENERGY STAR construction may have additional construction and/or procedural requirements that exceed the National Program Requirements. If required for an incentive, Raters inspecting modular homes for the ENERGY STAR label under a state-sponsored program should report homes to their rating Provider as usual. All other modular homes produced and verified via the protocols outlined in this guide should be reported to SBRA only and not to the rating Provider.

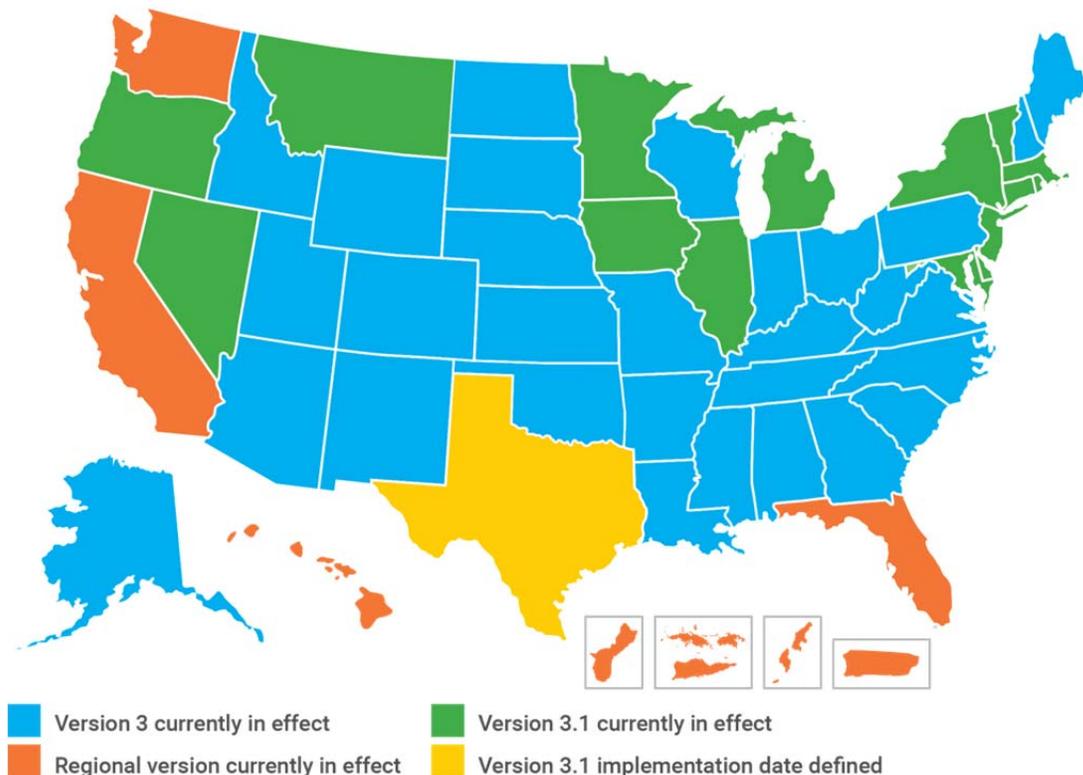
Step 9. Applying Labels to Homes and Providing Certificate to Homeowners

SBRA reviews and approves the Completion Report and issues an **ENERGY STAR Certified New Home label** and **Homeowner Certificate** to the builder or the Rater. The Rater provides the label and certificate to the builder. The builder applies the label to the home adjacent to the SBRA QA label and provides the certificate to the homeowner(s). This completes the home verification process.

NOTE: Partners must complete at least one ENERGY STAR certified home every 12 months to maintain their "active" ENERGY STAR Partner status. Only "active" Partners are listed on the ENERGY STAR Partner Locator on the Web and can use the ENERGY STAR logo to promote ENERGY STAR certified homes and their ENERGY STAR partnership.

4 Design, Construction and Verification Requirements

To earn the ENERGY STAR, a home must comply with the version of the Program Requirements that are in effect where the home will be sited. ENERGY STAR periodically makes clarifications and revisions to its requirements based on partner feedback and posts these to the ENERGY STAR website at www.energystar.gov/newhomes/homes_prog_reqs/national_page. For the most current requirements, please check the website.



Select Core Energy Efficiency Measures

Working with their third party, plants and builders configure a custom combination of energy measures for their homes that is equivalent in performance to the minimum requirements of the **ENERGY STAR Reference Design Home** (National Program Requirements Exhibit 1), as assessed through energy modeling, and verify that the resulting HERS Index meets or exceeds the **ENERGY STAR HERS Index Target**. More information about how the target is defined is available on the ENERGY STAR website at www.energystar.gov/newhomes/homes_prog_reqs/national_page.

Complete Mandatory Measures

Regardless of the measures selected to achieve the HERS Index Target, certification of a home also requires completion of the **Mandatory Requirements for All Certified Homes** (National Program Requirements Exhibit 2), which impose certain constraints on the efficiency measures selected (e.g., insulation levels, insulation installation quality, window performance and duct leakage). The mandatory requirements include the following:

- **Rater Design Review Checklist and Rater Field Checklist**
- **HVAC Design Report**
- **HVAC Commissioning Checklist**
- **Water Management System Builder Requirements**

Verify Compliance

Meeting the provisions of ENERGY STAR for modular homes is the joint responsibility of the plant and the builder. While many of the required features or components can be completed in the plant, several features of every home will be completed in the field by the builder and verified by a HERS Rater. Therefore, the plant and builder work together in demonstrating that the home complies with all the requirements to earn the ENERGY STAR label. The plant should take the lead in developing the documents that will be used for demonstrating compliance and then assist the builder in understanding the steps to complete the home.

The primary documents used for inspection and verification of ENERGY STAR modular homes under the modular compliance verification protocols are the checklists and reports listed in the Mandatory Requirements for All Certified Homes, and the **Modular Home Completion Report**. The Completion Report is a field verification form unique to the modular program that is completed by the Rater (or the Certifier for plant certification homes). It serves as a coversheet to the Inspection Checklists and is submitted to SBRA to report certified homes and to request the ENERGY STAR label and home certificate.

The **Inspection Checklists** are the primary documents for dividing ENERGY STAR responsibilities between the plant, the builder and the HVAC contractor. The plant is responsible for verifying all items completed in the plant. The Checklists serve several functions, including the following:

- Provide an itemization of the energy measures incorporated into the home;
- Provide a place for the plant’s quality control staff to document compliance with the design and construction specifications and mandatory measures; and,
- Provide the builder and the Rater with a record of the items inspected in the plant and a list of the items that are to be completed and verified in the field to meet the ENERGY STAR requirements and qualify the home for the ENERGY STAR label.

During the certification process, the Certifier and plant together review the Mandatory Requirements for All Certified Homes to ensure they are incorporated into the plant’s Inspection Checklists. The plant may elect to re-order the checklist items (e.g., organize them by workstation or divide them by plant and builder responsibilities) to facilitate the inspection process, and/or incorporate the checklists into the existing plant traveler.

EPA Form 1500-108 ENERGY STAR® Certified Homes, Version 3 Modular Home Completion Report OMB Control No. 2080-0086

INSTRUCTIONS
To receive the home label(s) and certificate, the Rater must send this **Modular Home Completion Report**, a copy of all completed and signed **Inspection Checklists** and a check for the applicable processing fee to:
Systems Building Research Alliance
1778 Broadway, Suite 1050
New York, NY 10019

Please allow 7-7 business days for USPS delivery. For FedEx 2 Day delivery, enclose an additional \$200 SBRA fee.
Check one box below used to the entity that will receive the label(s) and fill it to the home.

PROCESSING FEES
 \$50 builder's fee for home certificate and site label OR
 \$150 plant certification home (QA label + builder's fee) OR
 \$100 temporarily installed plant certification home (plant QA label only)*
*Home must be re-inspected by a Rater who installed on the final home site and a new Construction Report submitted along with the \$50 processing fee for the certificate and site label.

CONTACT INFORMATION
 Homeowner(s)
New York Address: _____
New York Address: _____
City: _____ State: _____ Zip: _____
 Manufacturer Builder
Corporate Name (if applicable): _____ Company: _____ Contact Name: _____
Plant Name: _____ SQ-Contact Name: _____ Address: _____
Plant Name: _____ State: _____ City: _____ State: _____ Zip: _____
Phone: _____ Email: _____
 Certifier / Rater has verified that the Manufacturer and Builder are ENERGY STAR Partners

CERTIFIER / RATER PRIMARY CONTACT FIELD INSPECTOR / TESTER (if allowed from Primary Contact)
Company: _____ Contact Name: _____ Company: _____ Contact Name: _____
Address: _____ Address: _____
City: _____ State: _____ Zip: _____ City: _____ State: _____ Zip: _____
Phone: _____ Email: _____ Phone: _____ Email: _____
HVAC Contractor / Technician: _____ HVAC System Designer (if different from Contractor/Technician): _____
Company: _____ Contact Name: _____ Company: _____ Contact Name: _____
Address: _____ Address: _____
City: _____ State: _____ Zip: _____ City: _____ State: _____ Zip: _____
Phone: _____ Email: _____ Phone: _____ Email: _____

CREDENTIALING ORGANIZATION: ACCA AIA Other _____

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EPA Form 1500-108 ENERGY STAR® Certified Homes, Version 3 Modular Home Completion Report OMB Control No. 2080-0086

INSPECTION / TEST RESULTS HOME ID: _____

1. WAS THIS HOME TESTED? Yes No (No. skip to question 4)

2. DEVELOPMENT/INSTALLATION
a) Infiltration rate is 6.8 in CDA 1, 2; 6.8 in CDA 3, 4; 6.8 in CDA 5, 6, 7; 6.8 in CDA 8. Measured: _____ ACH50
b) Total duct leakage is 6 CFM50 / 100 sq ft of conditioned floor area (CFA). Measured: _____ CFM50/100 sq ft
c) Duct leakage to outdoors is 4 CFM50 / 100 sq ft (CFA=1,200 sq ft) is 6 CFM50 / 100 sq ft. Measured: _____ CFM50/100 sq ft
d) All A/C units and air handling equipment are located within the home's air and thermal barriers AND envelope leakage has been tested to be 6.8 in ACH50 in CDA 1, 2; 6.8 in ACH50 in CDA 3, 4; 6.8 in ACH50 in CDA 5, 6, 7; 6.8 in ACH50 in CDA 8.

4. QUALITY ASSURANCE (QA) LABEL (must check ONE to pass)
a) An SBRA quality assurance (QA) modular home label is affixed to home interior and signed and dated by a factory representative. YES NO
b) This is one of the factory's initial three certification homes. This plant QA label will be signed and affixed with the label ENERGY STAR™ Certified New Home site label. YES NO

5. CERTIFIER / RATER EVALUATION (check ONE and sign below)
a) PASSED: No discrepancies were identified. YES NO
b) PASSED: Minor discrepancies were identified and repaired, as described below, and the home was re-inspected. YES NO
c) FAILED: Discrepancies are described below: _____

Checklist: _____
Item No. _____
Remediation: _____

Checklist: _____
Item No. _____
Remediation: _____

Checklist: _____
Item No. _____
Remediation: _____

Signature of Certifier / Rater: _____ Date: _____

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5 Resources for Certifiers and Raters

Plant Certifier

Responsibilities

The plant Certifier is responsible for reviewing the procedures and methods that the plant plans to employ in building ENERGY STAR modular homes, educating plant personnel on the program, and certifying the plant as conforming to the requirements of the national ENERGY STAR program and SBRA's compliance verification process for modular homes. Although plant certification is a one-time process, the Certifier is responsible for periodically re-inspecting plant procedures and resolving production-related problems if and as they arise. Therefore, the plant is required to have a **Certifier of Record** at all times. Major responsibilities of the Certifier include the following:

1. **Plant certification.** During plant certification, the Certifier assists the plant in developing compliant designs and construction practices;¹⁵ verifies that an acceptable quality assurance system is in place in the plant; verifies that workers are properly trained in ENERGY STAR requirements; reviews and approves the plant's **Inspection Checklists**; and, inspects and tests certification homes to establish the plant's ability to routinely build compliant homes under the program. The plant certification process is discussed in 'Section 2: Certifying the Plant'.
2. **Periodic re-inspections of the plant.** At no greater than six month intervals, the Certifier inspects the plant and, at the Certifier's discretion, tests homes to ensure continuing compliance with ENERGY STAR requirements.
3. **Problem resolution.** When issues are identified by Raters in the field that may have originated in the plant, the Certifier works with the Rater and the plant to resolve the problem and take corrective actions if necessary.

Qualifications and Eligibility Criteria

Certifiers must have proven experience with plant building methods and expertise in energy efficient building, be familiar with the requirements and procedures contained in this guide and be qualified to conduct testing and diagnostics related to ENERGY STAR compliance. SBRA reviews and approves Certifier credentials. SBRA reserves the right to revoke Certifier credentials at any time and for any reason.

Credentials for Certifiers include all of the following:

- Certified Home Energy Rating System (HERS) Rater or Provider -or- Licensed Engineer or Architect,
- Working knowledge of residential building codes, of the plant production processes, and of the modular home design approval and inspection process,
- Knowledge of modular home design, construction, installation, material use and fabrication,
- Hands-on experience conducting duct and whole-house air leakage measurements,
- Experience and training in the principles of building science and in energy efficiency construction practices,
- Capability to maintain computer records and communicate via email.

Certifiers must complete and submit to SBRA a **Modular Certifier Application**.

¹⁵ Analysis must be conducted by a certified HERS Rater or Provider and a copy of the documentation submitted to SBRA.

Home Energy Rater (HERS Rater)

Responsibilities

The Rater is hired by the builder to inspect, test and certify individual factory built ENERGY STAR homes installed and completed by the builder on site. Major responsibilities of the Rater include the following:

1. Visual inspections. The Rater coordinates with the builder on the inspection schedule, visits the site to inspect every home at least once during construction and completes the **Inspection Checklists**. The builder, the HVAC contractor and the Rater all sign the checklists.
2. Performance testing. The Rater conducts performance testing on 1 in every 7 homes completed by a builder within each 12-month period, and for a minimum of one (1) home in each 12-month period in which the builder completes an ENERGY STAR certified modular home, to ensure that the home meets or exceeds the target performance level indicated on the checklists. If any test results do not meet the enforceable requirements on the checklists or **Modular Home Completion Report**, the Rater follows the non-compliance procedures described below.

Additionally, the Rater tests the first two (2) homes constructed by a builder under these modular protocols. These two homes are not counted as part of the routine testing of ‘1 in 7 homes’ per builder, but may include those homes that were part of the plant’s qualification process. If a builder completes an ENERGY STAR certified home after their partnership status has become “inactive” (i.e., the builder does not complete at least one ENERGY STAR certified home in a 12-month period), the Rater must conduct the pressurization tests on the builder’s next home to reinstate the builder’s “active” status. This home may be counted toward the ‘1 in 7 homes tested’ requirement.

3. Coordinating with HVAC contractor. The HVAC contractor is responsible for completing the items flagged for field verification on the **HVAC Commissioning Checklist**.
4. Reporting qualified homes.¹⁶ The Rater submits the completed and signed checklists and Completion Report to SBRA along with the builder’s report processing and home certificate fee. SBRA reviews the documentation and issues the blue ENERGY STAR New Home label and the homeowner’s certificate to the Rater or to the builder. The builder applies the label to the home and presents the certificate to the homeowner.

Qualifications and Eligibility Criteria

Raters must be familiar with the requirements and procedures contained in this guide and have proven skills in reviewing energy efficient building practices, building diagnostics and conducting testing associated with ENERGY STAR compliance. SBRA reviews and approves Rater credentials. SBRA reserves the right to revoke Rater credentials at any time and for any reason.

Credentials for Raters include all of the following:

- Working knowledge of the residential building codes,
- Knowledge of modular home design, construction, installation, material use and fabrication,
- Certified Home Energy Rating System (HERS) Rater.

Raters must complete and submit to SBRA a **Modular Rater Application**.

¹⁶ Some state or local programs that provide incentives for ENERGY STAR homes may have additional construction and/or procedural requirements that exceed the National Program Requirements. If required for an incentive, Raters inspecting modular homes for the ENERGY STAR label under a state-sponsored program should report homes to their rating Provider as usual. All other modular homes produced and verified via the protocols outlined in this guide should be reported to SBRA only and not to the rating Provider.

Protocol for Addressing Non-Compliance at the Site

If and when a Rater identifies an item of non-compliance during a site inspection or test, and if the item of non-compliance is deemed by the Rater to be systemic (relating to routine methods in either site construction or plant production), the Rater is required to take the following actions:

1. After documenting one or more such non-compliance items, the Rater files a Completion Report with SBRA describing the non-compliance and informs the builder as to any corrective actions required. The home is then repaired and re-tested.
2. The Rater inspects and tests the next two homes built by the same builder. These homes shall not count toward the '1 in 7 homes' test rate. At the discretion of the Rater, the inspection and testing may be limited to the item(s) found deficient on the failed home, but must include the deficient items. If both homes pass, the standard quality control testing regimen resumes.
3. If one of the additional homes fails, the Rater ceases testing and notifies SBRA immediately for instructions on how to proceed.
4. If, in the Rater's judgment, continued non-conformance is the result of work by the builder and is not related to measures implemented by the plant, ENERGY STAR verification can only resume after repeating the two (2) home initial evaluation successfully and the Rater is fully satisfied that all systemic problems have been addressed and the builder is ready to consistently meet ENERGY STAR requirements.
5. If continued non-conformance is the responsibility of the plant, construction of ENERGY STAR homes can only resume after the plant certification process, including inspection and testing of all relevant items on three (3) homes, has been successfully repeated and demonstrated to the plant Certifier's full satisfaction that all systemic problems have been addressed and the plant is ready to consistently meet ENERGY STAR requirements.

If non-compliance by either the builder or the plant continues after attempts to address the problems have been made, the builder must stop building ENERGY STAR modular homes and the plant must cease production of homes that can earn the ENERGY STAR under the requirements contained in this guide and SBRA must be notified for further corrective action. SBRA will notify EPA.

If an item of non-compliance is identified by a homeowner, the non-compliance must be verified by a Rater who must then follow the actions described above.

In addition, if a home is marketed or sold as an ENERGY STAR certified home, by either the plant or builder, and that home did not earn the ENERGY STAR label or was labeled without having met all ENERGY STAR requirements, SBRA and EPA will investigate the matter and determine what, if any, action is necessary by the plant and/or builder, including making corrections to marketing materials and/or taking action so the home meets all ENERGY STAR requirements and earns the ENERGY STAR label. Plants and builders participating in promoting and building ENERGY STAR modular homes under SBRA's compliance program must make a good faith effort in taking any actions necessary, as determined by SBRA and EPA, to address and resolve problems with any ENERGY STAR-related requirements and to address and resolve any issues related to the plant's or builder's use of the ENERGY STAR brand. Failure to do so may result in suspension or expiration of the plant's and/or builder's participation in the ENERGY STAR program.

Please note that, according to the **ENERGY STAR Brand Book** (www.energystar.gov/about/energy-star-brand/energy-star-brand-book), no home may be promoted or sold as an ENERGY STAR certified home unless it has earned the ENERGY STAR label. Also, no entity may promote themselves as directly building, constructing or otherwise providing an ENERGY STAR certified home to consumers unless they are directly responsible for final construction of the home. Information regarding use of the ENERGY STAR brand by plants and builders is available at www.energystar.gov/index.cfm?c=bldrs_lenders_raters.homes_guidelns_modular.

Questions about use of the ENERGY STAR brand can be sent to energystarhomes@energystar.gov.