

Proposed Amendments on Quality Assurance of Multifamily Buildings and Petitions of Stay of Action on Provider Discipline Comments

Comment #: 1

Commentator: Sharla Riead

Organization: Accurate Rater Network by Hathmore Technologies

Clause Number: 1

Paragraph: 904.4.2.6.1

Comment Intent: Not an Objection

Comment Type: Editorial

Comment:

The wording as proposed is confusing. The current wording makes it seem that all units that are possible to be inspected at the time of the field QA must be inspected. I believe the intent is that all minimum rated features that are possible to be inspected should be inspected.

Proposed Change:

904.4.2.6.1 For multifamily projects, field review shall include an comprehensive inspection of all minimum rated features ~~of the units within that building~~ that are possible to be inspected within the selected units and within the building during the time of the field QA . This means that the QAD shall inspect attic insulation via a common attic access where present, mechanical rooms that house common mechanical systems that serve multiple units, common ventilation systems, etc.

Response:

Accept X

Reject

Reason:

Changes accepted as submitted.

Proposed Amendments on Quality Assurance of Multifamily Buildings and Petitions of Stay of Action on Provider Discipline Comments

Comment #: 2

Commentator: Sharla Riead

Organization: Accurate Rater Network by Hathmore Technologies

Clause Number: 1

Paragraph: 904.2.6.2

Comment Intent: Not an Objection

Comment Type: Editorial

Comment:

Some grammatical and clarifying changes are needed. The terms QA and field QA are used interchangeably and could cause confusion. These changes are also suggested to maintain consistency with 904.2.6.1, since the field QA may encompass more than a unit - it could include other areas of the building. Finally, the exception from 904.4.2.6.2.2 should not be based on an assumption but a requirement.

Proposed Change:

904.4.2.6.2 If the annual rating volume of a Rater is such that more than one QA is required for that annual period's field QA quota (i.e. the Rater ~~did~~ completed more than 100 ratings during the annual period), no more than one field QA of units within a particular multifamily development shall count toward meeting the total field QA quota.

904.4.2.6.2.1 An exception would be allowed if a particular multifamily development contained more than 100 units. In such an instance, one field QA per every 100 units of that development shall count towards the annual field QA quota.

904.4.2.6.2.2 Another exception would be allowed if the Rater had one or more Rating Field Inspectors (RFI) who worked on a particular multifamily development throughout the annual period, in which case the QAD may select multiple units with a particular multifamily development to count towards the annual field QA quotas for each RFI ~~assuming that~~ as long as those additional field QAs represent work performed by each individual ~~the~~ RFIs during the annual period.

Response:

Accept X___

Reject _____

Reason:

Changes accepted as submitted.

Proposed Amendments on Quality Assurance of Multifamily Buildings and Petitions of Stay of Action on Provider Discipline Comments

Comment #: 3

Commentator: Conor Sosebee

Organization: Southface

Clause Number: 1

Paragraph: 904.4.2.6.1

Comment Intent: Objection

Comment Type: General

Comment:

The current wording suggests that field QA is performed on all possible units (including minimum rated features) in the building during the time of the field QA visit. The below edits clarify (what we believe) to be the intent of these changes.

Proposed Change:

904.4.2.6.1 For multifamily projects, field ~~review~~ QA shall include an inspection of all minimum rated features ~~of the units within that building~~ that are possible to be inspected for the selected unit during the time of the field QA. This means that the QAD shall inspect attic insulation via a common attic access where present, mechanical rooms that house common mechanical systems that serve multiple units, common ventilation systems, etc.

Response:

Accept X

With following modifications:

904.4.2.6.1 For multifamily projects, field ~~review~~ QA shall include an comprehensive inspection of all minimum rated features ~~of the units within that building~~ that are possible to be inspected within the selected units and within the building during the time of the field QA . This means that the QAD shall inspect attic insulation via a common attic access where present, mechanical rooms that house common mechanical systems that serve multiple units, common ventilation systems, etc.

Reject

Reason:

Changes accepted as submitted.

Proposed Amendments on Quality Assurance of Multifamily Buildings and Petitions of Stay of Action on Provider Discipline Comments

Comment #: 4

Commentator: Conor Sosebee

Organization: Southface

Clause Number: 2

Paragraph: Rational Section 904

Comment Intent: Objection

Comment Type: General

Comment:

It seems like the intent is to gather information regarding minimum rated features of all unit types within the buildings and their various orientations. The rationale given for Section 904 is confusing and we believe the proposed change meets the intent.

Proposed Change:

The proposed language helps clarify and specify the true role of performing QA on a multifamily building. If during the QA visit you include top floor and bottom floor units you are including the various envelope conditions within the building – slab connection, attic connection, connection to another unit via a floor assembly – which all present their own unique challenges in terms of defining the unit envelope. Including corner units allows you to QA units with the most exterior (ambient to conditioned) shell area and adiabatic wall conditions, which both again have unique challenges in terms of defining the unit envelope. The minimum rated features should be very similar if not identical across all the unit types so including top floor, bottom floor and end units will not impact your ability to verify the minimum rated features of the project.

Response:

Accept

Reject

Reason:

Recommended change has been noted by the Committee, but did not include any recommended changes to the proposed language.