

Current ENERGY STAR Manufactured New Homes Policy Record

How to Use This Document

EPA regularly receives partner questions and comments regarding various aspects of the program documents. This document is a record of the issues that have been received since the release of the last revision to the program documents. These issues are either pending resolution by EPA or have been resolved, sometimes resulting in modifications that will be incorporated into the next revision of the program documents. The primary purpose of this document is to allow all partners to have equal access to the latest policy issues and resolutions.

EPA intends to formally incorporate policy modifications into the next revision of the program documents. Those edits will then be enforced for homes produced after a specified transition period, typically 60 days from the release of the revised program requirements. Partners may, at their discretion, use the determinations in this document immediately, in advance of the formal implementation dates. If they do so, they should be sure to document the production dates of the affected homes and to include a copy of the policy record in the files retained by the EPA-recognized Quality Assurance Provider (QAP). Should the need arise, this will allow partners to demonstrate that they acted with the best information available.

Definitions

Each issue listed here is classified as a Change, Clarification, Refinement, Comment, or as an Issue Under Review. These are defined as follows:

- **Change** – The addition, deletion, or modification of a program requirement. A change will typically result from a partner question or feedback indicating that EPA's original intent is not being met or from changes in relevant standards (e.g., ENERGY STAR labeled product requirements, NAECA standards, IECC codes). A change is the most significant type of edit for partners because it is likely to change the way that partners comply with the program.
- **Clarification** – The clarification of a program requirement, typically resulting from a partner question indicating confusion or ambiguity. Clarifications are not intended to significantly change the scope of the program guidelines, but rather to clarify the original intent of the requirement. A clarification is secondary in importance to a change; it should not significantly alter the way that most partners comply with the program.
- **Refinement** – A minor revision, such as an improved choice of words, a grammatical correction, or a correction to a typographical error. A refinement is the least important type of edit; it should have no impact on the way that partners comply with the program.
- **Comment** – A comment provided by EPA in response to a question, which results in no change to the program documents. This may occur, for example, if the question can be answered by referring to already established policy. Aside from the partner asking the question, such comments will typically have no impact on the way that partners comply with the program.
- **Issue Under Review** – An issue that has been submitted and that EPA is still evaluating. Once EPA has evaluated the issue, it will offer a resolution and reclassify the issue using one of the four categories above.

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ID	Log Date	Program Document	Classification	Topic
00006	06/01/2024	Manufactured New Homes National Program Requirements (Version 2, Rev. 01)	Change	<p data-bbox="892 300 2020 370">Implementation Timeline and Eligibility Requirements Sections - Updated implementation timeline, and relocation to Eligibility Requirements Section</p> <p data-bbox="892 397 2020 609">Issue: The Internal Revenue Service (IRS) recently issued Notice 2023-65, which contained guidance for taxpayers on the Section 45L New Energy Efficient Home Credit as amended by the Inflation Reduction Act. Additionally, there have been recent changes to the compliance schedule for the new manufactured housing energy conservation standards. As a result, Partners have asked if there will be changes to the implementation of the ENERGY STAR Manufactured New Homes Program Requirements, Version 3.</p> <p data-bbox="892 641 2020 738">Resolution: In response to the IRS Notice and delayed implementation of the new manufactured housing energy conservation standards, EPA announced via a September 28, 2023, email that it is adjusting the implementation date of its latest program version as follows:</p> <ul data-bbox="934 763 2020 885" style="list-style-type: none"> • Manufactured homes produced on or before December 31, 2025, will be permitted to be certified using either Version 2 or Version 3 of the program requirements. • Manufactured homes produced on or after January 1, 2026, must be certified using Version 3 of the program requirements. <p data-bbox="892 901 2020 1071">In addition, to align with the other sectors, the Implementation Timeline Section will be removed from the program document, and the information will be added to the Eligibility Requirements Section. As part of this update, EPA is establishing implementation dates for Revisions of the MH program requirements. This change will have no immediate impact, as existing revisions include no meaningful changes, but may be more relevant with future Revision releases.</p> <p data-bbox="892 1096 2020 1299">“Only manufactured homes¹ are eligible to be certified through the ENERGY STAR Manufactured New Homes (MH) program. <u>Use the table below to determine the applicable ENERGY STAR Manufactured New Homes program requirements, including the minimum Version and Revision, to which a home is eligible to be certified. For information about the minimum program versions eligible to satisfy the Section 45L New Energy Efficient Home Credit, visit www.energystar.gov/taxcredits.</u></p> <p data-bbox="892 1323 2020 1412"><u>Where EPA has defined a newer Version and / or Revision of the same ENERGY STAR program requirements, homes are eligible to be certified to the new Version / Revision. For example, if a home is eligible to be certified to Version 2 of the MH National Program</u></p>

Current ENERGY STAR Manufactured New Homes Policy Record

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00001	06/01/2024	<p>Manufactured New Homes National Program Requirements (Version 2, Rev. 01)</p>	<p>Clarification</p>	<p style="background-color: #cccccc;">ENERGY STAR Certification Process Section – Quality Assurance Providers are to verify that items have been met within program-defined tolerances; not use discretion to discern intent of items</p> <p>Issue: The Certification Process Section contains a footnote with a statement regarding the verification of items that conflict with code requirements or installation instructions. This statement may incorrectly imply that Quality Assurance Providers have the authority to interpret program intent, potentially leading to inconsistent implementation of the program requirements. Instead, it is the responsibility of the EPA to ensure that each program requirement is sufficiently clear that all Quality Assurance Providers can implement that policy consistently.</p> <p>Resolution: To better convey that Quality Assurance Providers are to verify that requirements have been met within program-defined tolerances rather than discern the intent of the requirements, the following minor edit will be made to Footnote 3 for consistency: “ENERGY STAR requirements shall not be met if they conflict with code requirements or installation instructions. In such cases, the homes may not be certified unless the EPA-</p>															

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				recognized Quality Assurance Provider has determined that no equivalent option is available that could meet the intent of the conflicting requirement.”																
00003	06/01/2024	Manufactured New Homes National Program Requirements (Version 2, Rev. 01)	Change	Exhibit 1 – Equivalent requirements for products rated using SEER2 and HSPF2																
				Issue: As of January 1, 2023, air conditioners and heat pumps must be rated with new efficiency metrics (e.g., SEER2, EER2, and HSPF2) according to new test procedures from the U.S. DOE. Several of the energy efficiency measures that may be used to meet the program requirements are only defined using the older metrics. Therefore, it is necessary to add equivalent efficiency levels for products certified using the new metrics.																
				Resolution: Due to the new efficiency metrics from DOE, equivalent efficiency levels will be added for air conditioners and heat pumps using the new metrics. The new values were determined using conversion factors for a ducted split system from Draft PDS-02, BSR/RESNET/ICC 301-2022 Addendum C-202x. While this addendum is not finalized, the EPA will monitor progress and update the conversions if needed. A new row will be added to the Electric Heat Pump Package in Exhibit 1 as follows:																
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00007	06/01/2024	Manufactured New Homes National Program Requirements (Version 3, Rev. 01)	Change	Eligibility Requirements and Implementation Timeline Sections - Updated implementation timeline, and removal of Implementation Timeline Section																
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Current ENERGY STAR Manufactured New Homes Policy Record

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00005	06/01/2024	Manufactured New Homes National Program Requirements (Version 3, Rev. 01)	Refinement	<p>ENERGY STAR Certification Process Section – Removal of references to “Electric Heat Pump Package”</p> <p>Issue: Unlike the previous versions of the Manufactured New Homes Program Requirements, Version 3 does not contain an “Electric Heat Pump Package”. Despite this, such a package is referenced in the Certification Process Section. Instead, a heat pump is one potential measure that can be selected from Exhibit 2 to achieve the total required points.</p>												

Current ENERGY STAR Manufactured New Homes Policy Record

				<p>Resolution: The terminology in the Certification Process Section will be updated by removing the reference to an “Electric Heat Pump Package” and instead referencing the heat pump measure that can be selected from Exhibit 2.</p> <p>Specifically, Step 4 will be revised as follows:</p> <p>“Additionally, for homes designed to meet the Electric Heat Pump Package <u>use a heat pump measure from Exhibit 2</u>, installation of the heat pump equipment must be verified. Refer to each QAP for details on approved verification protocols.”</p> <p>Step 6 will be revised as follows:</p> <p>“QAPs shall audit documentation of the heat pump equipment installations for no less than ten percent (10%) of certified homes that use the Electric Heat Pump Package <u>a heat pump measure from Exhibit 2</u>.”</p>
00004	06/01/2024	Manufactured New Homes National Program Requirements (Version 3, Rev. 01)	Refinement	Exhibit 1 – Addition of “Mandatory” to Exhibit Title
				<p>Issue: Exhibit 1 displays the Mandatory Energy Efficiency Measures and Mandatory Setup Requirements for all Manufactured Homes being certified under this version of the program.</p> <p>However, the title of Exhibit 1 is “Requirements for All Certified Manufactured Homes” and does not contain, “Mandatory,” in the title.</p>
				<p>Resolution: To avoid potential confusion, the Exhibit 1 title will be revised as follows:</p> <p>“Exhibit 1: <u>Mandatory</u> Requirements for All Certified Manufactured Homes”.</p>