



Sustainability & Green Building  
Jaclyn Toole  
Assistant Vice President  
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November 15, 2018

Johnathan Passe  
Chief, ENERGY STAR Residential Branch  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20004

Re: Request for Information: ISO/IEC 17065 Verification Oversight for the ENERGY STAR Certified Home Program  
Submitted via email to [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov)

Dear Mr. Passe,

On behalf of more than 140,000 members, the National Association of Home Builders (NAHB) submits these comments to the U.S. Environmental Protection Agency (EPA) on the “Request for Information: ISO/IEC 17065 Verification Oversight for the ENERGY STAR Certified Homes Program” published September 2018.

NAHB is a Washington, D.C. based trade association that works to ensure housing is a national priority and that all Americans have access to safe, decent and affordable housing. The federation includes more than 700 affiliated state and local associations in all fifty states, the District of Columbia, and Puerto Rico. NAHB’s membership includes, among others, those who design, construct, and supply single family homes, build and manage multifamily projects, and remodel existing homes. Each year, NAHB’s members construct about 80 percent of the new homes built in the United States.

The EPA is inviting comments from ENERGY STAR program stakeholders on whether organizations that earn and maintain ISO/IEC 17065 “*Conformity Assessment: Requirements for bodies certifying products, processes, and services*” accreditation should be permitted to submit applications to EPA to be recognized as Verification Oversight Organizations (VOO) for the ENERGY STAR Certified Homes program. In addition, the EPA is seeking feedback on whether the Agency should consider incorporating additional or alternative requirements in the VOO ‘Application for Recognition’ to ensure the impartiality and avoidance of conflict-of-interest of VOOs.<sup>1</sup>

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<sup>1</sup> <https://www.energystar.gov/sites/default/files/asset/document/ISO%2017065%20RFI%2008%2009%2018.pdf>

The EPA's goal in soliciting comments on the VOO requirements and application process is to collect stakeholder feedback on the appropriateness of such changes, their potential benefits and negative impacts, and identify a timeline for implementation. NAHB supports providing options for builders, knowing that one size never fits most; therefore, applauds ENERGY STAR for proposing eligibility criteria that are rigorous and allow additional interested parties to apply to be VOOs. It is important that builders have choices when it comes to these types of programs so that they are better able to meet the varying needs of their clients, their projects, and any other certifications they wish to pursue.

By allowing any entity that complies with ISO/IEC17065 to be eligible to be a VOO, the program levels the playing field for the industry. Holding all verifiers to the same standard will provide builders with a clear and consistent set of expectations. In addition, eliminating the non-profit status prerequisite allows interested groups that did not previously meet this requirement to apply. Combined, these new requirements have the potential to allow for more competition in the marketplace, enhance quality control through third-party verification, and further distinguish the role of the builder and the verifier. These improvements will also help to bring additional value and validity to the ENERGY STAR Certified Home Program, knowing that no matter which group conducts the work, the outcomes will be consistent.

In a time where data quality, transparency and consistency are being questioned, it is imperative that changes be made to hold everyone accountable. Once new eligibility criteria is established, all current and future VOOs must be held to the same standard. While NAHB applauds the Agency's initiative to improve quality control and increase the number of VOOs, NAHB does have questions about the cost-effectiveness of the proposed changes and requests that the Agency provide additional information on the costs and fees associated with the proposal.

NAHB supports the availability of voluntary, above-code programs as a means to encourage energy-efficient construction practices. In fact, in a recent survey conducted by NAHB, homebuyers ranked having an ENERGY STAR rating for the whole house as either highly desirable or an essential element for their next home.<sup>2</sup> This information demonstrates that voluntary, above-code programs can penetrate the market place and create a demand, thus increasing their value. NAHB also supports enhancing consumer choices as well as market-based mechanisms to maintain or increase energy efficiency savings. To be effective, however, any program must send the right signals by creating efficient and effective solutions that not only reduce energy usage, but also yield less burdensome regulations in the future. Overall, NAHB believes the ENERGY STAR program, with the proposed changes, is on the right track. It will be enhanced by the new uniform eligibility criteria that increase consistency and improve quality assurance – both of which will facilitate broader use and acceptance in the marketplace.

NAHB appreciates the opportunity to provide comments on the EPA's Request for Information: ISO/IEC 17065 Verification Oversight for the ENERGY STAR Certified Homes Program. Please contact my

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<sup>2</sup> Emrath, Paul. "The Average Builder Uses 10 Different Green Products and Practices," *Eye on Housing* (blog). March 13, 2017 [http://eyeonhousing.org/2017/03/the-average-builder-uses-10-different-green-products-and-practices/?\\_ga=2.172538915.1055520192.1494427816-135545152.1476289408](http://eyeonhousing.org/2017/03/the-average-builder-uses-10-different-green-products-and-practices/?_ga=2.172538915.1055520192.1494427816-135545152.1476289408)

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colleague, Megan Alise Carroll, at (202)266-8325 or [mc Carroll@nahb.org](mailto:mc Carroll@nahb.org) if you have any questions regarding this letter. NAHB looks forward to future opportunities to engage with the EPA and ENERGY STAR Certified Homes Program.

Sincerely,

A handwritten signature in black ink, appearing to read 'JST', with a long horizontal flourish extending to the right.

Jaclyn S. Toole, Assoc. AIA, CGP  
Assistant Vice President, Sustainability & Green Building