

## **MULTIFAMILY REVIEW ORGANIZATION APPLICATION (Version 1.1)**

### **VERSION 1.1 UPDATE OVERVIEW**

EPA has developed a new, combined multifamily specification that will be applicable to all types of multifamily dwellings (high-rise, mid-rise, and low-rise). The new specification allows for different verification approaches, depending on the needs/preferences of the project Developer. These include a HERS-based path, an ASHRAE-based path, and a Prescriptive path. Projects that will be verified through the ASHRAE or Prescriptive paths must submit their documentation for review to an MRO. Updates in Version 1.1 of this application are mainly to accommodate the new program requirements, and are only applicable to those projects going through the new Multifamily program.

This update also:

- Allows MROs to perform modeling (but not testing or inspections) of multifamily projects pursuing ENERGY STAR certification through other MROs;
- Requires that photo documentation be included as part of the As-Built Submittal (ABS) for all projects in the new Multifamily program that are certified through an MRO;
- Allows MROs to choose to implement alternative Proposed Design Submittal review requirements for Submitters and Modelers that have demonstrated experience with the program.

### **PILOT PROGRAM BACKGROUND**

Through the ENERGY STAR Multifamily program, mid and high rise multifamily buildings can be certified to earn the ENERGY STAR. For projects to be certified through the ASHRAE-based modeling path or Prescriptive path, all applicable ENERGY STAR program requirements in the building must be independently verified by a Rater (certified Home Energy Rater, Rating Field Inspector, or an equivalent designation) or Licensed Professional (i.e., a Registered Architect or Professional Engineer), and specific program documents submitted for review and approval. These submittals demonstrate that the program's requirements have been met, that all mandatory measures are included, and that each energy conservation measure is installed to specification. Historically, the review and approval of submittals has been performed by EPA (or its designated agent).

Beginning in January 2018, EPA began piloting an approach to transition review and approval process to the private marketplace, consistent with how homes/units in other parts of ENERGY STAR's residential sector programs are certified. To accomplish this, EPA is recognizing select organizations (referred to as Multifamily Review Organizations or MROs) to provide independent, third-party review and oversight of Multifamily project submittals to determine whether the project has earned ENERGY STAR certification. At this time, EPA also began phasing out its internal review option (with the exception of certain projects for which EPA's review was already in-process). Today, all new projects that are being certified through an ASHRAE-based or Prescriptive path are

required to be reviewed and approved by a recognized MRO. The person responsible for sending the documentation to the MRO, for the purposes of this document, will be referred to as the Submitter.

The MROs' designated roles and responsibilities were developed based on the requirements of similar oversight models that have been implemented in the ENERGY STAR program for single-family/low-rise multifamily homes (i.e., Verification Oversight Organizations and HVAC Quality Installation Oversight Organizations) and have been adapted for the specific needs of the ENERGY STAR Multifamily program.

The MRO pilot program will allow EPA to evaluate the effectiveness of this review and oversight approach and make modifications, as necessary, before determining if the model should be deployed on a permanent basis. Applicants for recognition should note that EPA may continue to make changes to MRO requirements based on its ongoing evaluation during the pilot. Organizations that have been previously recognized by EPA will be given a period of no less than 180 days to implement any policies or procedures needed to comply with the new requirements.

## **RECOGNITION REQUIREMENTS**

EPA's recognition of an MRO is contingent upon the organization submitting an application that demonstrates that it meets all established eligibility criteria and can satisfactorily fulfill all required roles and responsibilities.<sup>1</sup> Once recognized, the organization must continue to abide by all program requirements to maintain their recognition.

EPA's recognition of MROs relates solely and specifically to the ENERGY STAR Multifamily program and does not authorize the organization to implement or participate in other programs (ENERGY STAR or otherwise). Further, organizations that are recognized by EPA as an MRO should not imply that they are ENERGY STAR partners.

Activities undertaken by Multifamily Review Organizations are not intended to provide services to the federal government. These organizations are expected to be market-based and may not submit claims for compensation to EPA or any other federal agency for their activities related to fulfilling the required roles and responsibilities of recognized MROs. Recognized MROs may implement participation or certification fee structures, or seek funding from other sources, to support their oversight programs and activities.

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<sup>1</sup> Organizations may team together to submit a joint application and/or an organization's application can specify the use of outside subcontractors to perform some of the roles and responsibilities required of MROs. Collectively, the organizations identified in the application must demonstrate that they can perform all of the MRO roles and responsibilities. In cases where a team or subcontractor-based application is submitted, a lead organization must be identified that, on its own, meets the all of the core Eligibility Criteria and will be responsible for ensuring that the team operates in accordance with MRO requirements.

## **ELIGIBILITY CRITERIA**

### 1) Demonstration of ability to operate impartially

MROs must demonstrate that they are organized and operated to preserve the objectivity of their activities, maintaining a system or process to safeguard impartiality. Organizations seeking recognition must demonstrate to EPA that they:

- Maintain policies to ensure that potential conflicts of interest are identified and avoided;
- Maintain an open participation policy related to Submitter qualifications;
- Maintain impartiality and confidentiality in the project approval process;
- Maintain impartiality in the internal oversight of Reviewers; and
- Establish an impartial conflict resolution process.

An MRO may not review documentation submittals for multifamily projects for which it performed modeling, testing, or inspections. However, MROs are permitted to perform modeling (but not testing or inspections) of multifamily projects pursuing ENERGY STAR certification, provided that the organization will not serve as the MRO for any projects for which they provided modeling services.

### 2) Scope of Operations

In other residential sectors where EPA has established comparable oversight organization constructs to the MRO, maintaining a national scope of operations is required (except in unique geographic or code-based circumstances). However, during the pilot phase of the MRO approach, EPA will consider applications for recognition from organizations that operate at a local, state, regional, or national level. Note that EPA may revisit this policy as the pilot progresses and more information is available.

## **ROLES AND RESPONSIBILITIES**

Organizations seeking recognition must submit an application that satisfactorily demonstrates the ability to fulfill all required roles and responsibilities, including:

- Establish Submitter qualifications
- Perform documentation review
- Develop and maintain project Reviewer qualifications
- Develop and implement a quality assurance process for the review process
- Develop a process for and perform on-site quality assurance of ENERGY STAR Multifamily projects being certified through an ASHRAE-based or Prescriptive path
- Develop and implement a dispute resolution process
- Develop and implement a process to deliver communications to Submitters and Developers
- Maintain project files and records
- Participate in pilot program meetings and communications with ENERGY STAR staff

**TERMINATION**

If, after recognition, EPA determines that a Multifamily Review Organization is not adequately meeting its required roles or responsibilities or is not acting in good faith to maintain consumer and industry confidence in the ENERGY STAR program, EPA will provide the MRO with written notification and allow a period of 30 days to resolve identified issues and provide EPA with a written response summarizing the changes made. If the organization fails to meet this requirement, EPA will suspend or rescind recognition.

**APPLICATION FOR RECOGNITION: Multifamily Review Organization**

Completed applications for recognition should be submitted to EPA at: [mfhr@energystar.gov](mailto:mfhr@energystar.gov)

EPA will confirm receipt of applications received within 5 business days and notify the applicant regarding EPA’s determination on the application within 20 business days. EPA will inform organizations whose applications are not approved of the specific deficiencies identified. Applicants that are not recognized are invited to contact EPA to further discuss their applications and to re-apply based on feedback.

**PART ONE: General Applicant Information**

Organization Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Primary Contact: \_\_\_\_\_

Primary Contact Telephone #: \_\_\_\_\_

Primary Contact E-mail Address: \_\_\_\_\_

Organization Web Site Address: \_\_\_\_\_

Other Team Organizations or Organizations Performing Some of the MRO Responsibilities:<sup>2</sup>

_____	_____
_____	_____

<sup>2</sup> Applicants may submit additional organization named for EPA to review at any time during the pilot.

## **PART TWO: Demonstration of Eligibility**

The applicant must attach documentation demonstrating that the organization meets the following criteria for eligibility:

- Maintain policies to ensure that potential conflict of interest issues are identified and avoided;
- Maintain an open participation policy related to Submitter qualifications;
- Maintain impartiality and confidentiality in the project approval process;
- Maintain impartiality in the internal oversight of Reviewers;
- Establish an impartial conflict resolution process;
- Does not perform testing or inspections of multifamily projects pursuing ENERGY STAR certification through the ASHRAE or Prescriptive Paths; and
- Does not perform modeling of multifamily projects pursuing ENERGY STAR certification through the ASHRAE Path, OR has policies or procedures to ensure that it will not serve as the MRO for any projects for which they provided modeling services.

**Does the applicant intend to perform modeling services for multifamily projects to be certified through the ASHRAE-based path? If so, how will the organization ensure that those projects are submitted to a different MRO?**

**Considering the team members identified above in Part One, how will the organizations across the team be utilized and how will any conflict of interests (including business competition issues) be managed?**

## **PART THREE: Demonstrated Satisfaction of Required Roles and Responsibilities**

The applicant must attach documentation that describes the organization’s policies and approach to conducting each of the following:

### **1) Submitter Qualifications<sup>3</sup>**

A Submitter is defined as the individual that is responsible for transmitting ENERGY STAR-related project documentation to the MRO for review. Recognized MROs are required to accept ENERGY STAR Multifamily program documentation from any Submitter that is in good standing<sup>4</sup> who is a certified Home Energy Rater or Rating Field Inspector (or an equivalent designation as determined by the MRO<sup>5</sup>) that has successfully completed an EPA-recognized ENERGY STAR program training

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<sup>3</sup> These Submitter qualifications are applicable to the new ENERGY STAR Multifamily program. Projects being completed through the ENERGY STAR Multifamily High Rise Program must meet the original Submitter qualifications (i.e., a Licensed Professional), as described in Appendix A.

<sup>4</sup> MROs may reserve the right not to accept documentation from Submitters that have been put on probation, suspended, or revoked from participation in the MROs ENERGY STAR Multifamily program.

<sup>5</sup> EPA must approve any MRO-proposed equivalent designation for Submitters in advance of the MRO accepting submittals from these individuals.

class. See [www.energystar.gov/newhomestraining](http://www.energystar.gov/newhomestraining). (NOTE: This training will be updated to include multifamily)

- **Applicant is [ ] or is not [ ] proposing to accept project documentation from individuals other than certified Home Energy Raters or Rating Field Inspectors.**
- **If the applicant is proposing to accept documentation from individuals other than those that meet EPA’s current criteria, in an attachment, please provide any relevant information about the proposed qualification, confirm third party status, and describe the quality assurance and oversight provided.**<sup>6</sup>

## 2) Submittal Documentation<sup>7</sup>

Each Multifamily project seeking to earn ENERGY STAR certification must have the following documentation submitted to an MRO for review:

- a) A Proposed Design Submittal (PDS), including the ENERGY STAR Checklists, Testing and Verification file, Performance Path Calculator, Statement of Energy Design Intent (SEDI), construction documents, and (for ASHRAE path projects only), either the modeling file or the modeling input and output files;<sup>8</sup> and
- b) An As-Built Submittal (ABS), including the Testing and Verification file, Performance Path Calculator, photo documentation,<sup>9</sup> construction documents, and (for ASHRAE path projects only), either the modeling file or the modeling input and outputs files.

An MRO may require Submitters to provide additional documentation files for a project, at its discretion. Further, MROs have the option to use alternate documentation, templates, or web forms, so long as all of the information that is required in EPA’s program documents is collected for a project.<sup>10</sup>

- **In addition to accepting EPA’s ENERGY STAR Multifamily documentation, the Applicant is [ ] or is not [ ] proposing to accept alternate submittal documentation.**

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<sup>6</sup> Applicants may submit additional qualifications for EPA to review at any time during the pilot.

<sup>7</sup> These submittal document requirements are applicable to the new ENERGY STAR Multifamily program. Projects being completed through the ENERGY STAR Multifamily High Rise Program must meet the original document requirements, as described in Appendix A.

<sup>8</sup> Construction documents and modeling files are included to provide a reference for MRO Reviewers and reduce review times; MROs are not expected to fully review this documentation for consistency with the other elements of the submittal.

<sup>9</sup> Photo documentation is required for all projects. This serves to better align the MRO requirements with the requirements for the Verification Oversight Organizations that oversee HERS Path projects, while not adjusting the MRO on-site inspection criteria Required for all submittals.

<sup>10</sup> MROs are required to review EPA’s ENERGY STAR Multifamily documentation when submitted for a project, regardless of whether they also have their own templates or allow alternative options.

- **If the Applicant is proposing to accept alternate documentation, in an attachment, please identify what type of alternate documentation the MRO plans to allow, and how the MRO will ensure that it covers that same data requirements as the EPA documentation.** <sup>11</sup>

### 3) Documentation Review<sup>12</sup>

An MRO must have a formal and defined process for reviewing all Project Submittals for compliance with ENERGY STAR program requirements that includes, at a minimum, all of the elements specified below. EPA expects that an MRO's review turnaround time typically should be no more than 20 business days. EPA plans to monitor turn-around times throughout the pilot.

- For the first submission for a project, the MRO must review the project information to ensure that it meets program eligibility requirements.
- For the PDS and ABS, the documentation review process may include the use of EPA's [Proposed Design Review](#) and [As-Built Review Templates](#) [Note: these will be updated for the new specification]; or the MRO can use an alternative process that, at a minimum, reviews the same data points specified in the EPA checklists.
  - MROs may choose to implement alternative PDS review requirements for Submitters and Modelers that have demonstrated experience with the program. MROs can consider the optional process described in Appendix C, or create their own guidelines for EPA approval.
  - MROs may also choose to implement alternative ABS review protocols for Submitters and Modelers that have demonstrated the ability to consistently meet program requirements in their submittals. For example, this could include a less in-depth model review. Any changes to the current requirement to review all documentation must be submitted and approved by EPA in advance.
- The MRO must review a SEDI to ensure that it meets EPA's requirements for the Designed to Earn the ENERGY STAR program, when applicable. EPA's SEDI checklist is attached in Appendix B.
- EPA strongly recommends that, whenever possible, MROs have the same person review all submittals for a project to ensure consistency throughout the process.

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<sup>11</sup> Applicants may submit proposals for accepting alternate documentation for EPA to review at any time during the pilot.

<sup>12</sup> These document review requirements are applicable to the new ENERGY STAR Multifamily program. Projects being completed through the ENERGY STAR Multifamily High Rise Program must meet the original document requirements, as described in Appendix A.

- **In an attachment, please specify:**
  - **How projects are assigned Reviewers**
  - **What policies the organization has in place to ensure a consistent review from Proposed Design to As-Built**
  - **What policies the organization has regarding multiple review iterations**
  - **The estimated turn-around time for submittal reviews**
  - **How comments related to the review (e.g., why a submission was not accepted) will be sent to the Submitter**
  
- **The Applicant is [ ] or is not [ ] proposing to utilize an alternative submittal review process or documentation to the EPA checklists.<sup>13</sup>**
  
- **If the Applicant is proposing to use an alternative submittal review process, please describe the process in an attachment.**
  
- **If the Applicant is proposing to use alternative review documentation, in an attachment, please include the documentation and demonstrate how this will ensure the same data points specified in the EPA checklists will be reviewed.**

#### 4) **Project Reviewer Qualifications<sup>14</sup>**

MROs must develop and employ a process to ensure that project Reviewers are trained and qualified to review ENERGY STAR multifamily projects. The MRO is responsible for ensuring that all Reviewers possess the knowledge, skills, and abilities to effectively review an ENERGY STAR multifamily project submission.

- **In an attachment, please describe how the organization will ensure that project Reviewers are trained and qualified to review ENERGY STAR Multifamily projects.**

#### 5) **Quality Assurance of Review Process<sup>14</sup>**

MROs must develop and employ an internal quality assurance process to ensure proper oversight of the review process.

- **In an attachment, please describe the organization’s internal quality assurance process, including how quality assurance is performed and on what elements of the review process, who is responsible for performing quality assurance, and policies and procedures for addressing deficiencies when they are identified.**

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<sup>13</sup> Applicants may submit alternative processes or documentation for EPA to review at any time during the pilot.

<sup>14</sup> These requirements are applicable to both the new ENERGY STAR Multifamily Program and the ENERGY STAR Multifamily High Rise Program.

## 6) On-site Quality Assurance of ENERGY STAR Multifamily Projects<sup>14</sup>

MROs must develop and employ a system for on-site quality<sup>15</sup> assurance, at either pre-drywall or as-built phase, at a frequency of no less than two projects or 1% of all projects with As-Built Submittals<sup>16</sup> received by the MRO every three years, whichever is greater.

At least one of these On-Site Quality Assurance inspections must occur within one year of the first As-Built Submittal being submitted to the MRO. Furthermore, at least one of the inspections every three years must be an as-built inspection. In addition, MROs must have a formal policy that informs project Submitters that it reserves the right to perform on-site quality assurance for any project, at its discretion.

On-site quality assurance performed by the MRO must include, but is not limited to, the following:

- 1) For Pre-drywall inspections:<sup>17,18</sup>
  - a. Confirm that all ENERGY STAR prerequisites are installed and inspected.
  - b. Confirm that all visible items on the Testing and Verification Worksheets (or equivalent documentation) and Performance Path Calculator are installed as reported.
- 2) For As-Built inspections:<sup>18,19</sup>
  - a. Confirm that all visible ENERGY STAR prerequisites are installed and inspected.
  - b. Confirm that all visible items on the Testing and Verification Worksheets (or equivalent documentation) and Performance Path Calculator are installed as reported.
  - c. Re-test and confirm Submitter's duct leakage test results.
  - d. Re-test and confirm Submitter's compartmentalization test results.
  - e. Re-test and confirm Submitter's ventilation flow rates.

- **In an attachment, please describe the organization's on-site quality assurance process, including how the projects are selected for on-site quality assurance, how quality**

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<sup>15</sup> MROs have the option to use a remote/virtual quality assurance process, so long as all of the verification that is completed in an on-site inspection is able to be completed remotely or through a combination of on-site and remote verification. If the MRO intends to use remote quality assurance, the MRO must describe the process and submit it to EPA for approval.

<sup>16</sup> The rate is based on all projects submitted to the MRO regardless of the specific Submitter.

<sup>17</sup> MRO is responsible for verifying all measures that are installed at the time of inspection. The MRO must document whether a measure is not yet installed, or should have been installed and is therefore out of compliance. While it is understood that some measures may not be installed by the time of this visit, the MRO is responsible for ensuring that the pre-drywall visits are scheduled in a way to provide meaningful quality assurance.

<sup>18</sup> For each selected project, verification must occur in at least 10 units.

<sup>19</sup> The MRO is responsible for verifying all measures that are reasonably visible at the time of inspection. It is understood that measures such as insulation levels may not be verified if they are behind drywall. For the performance tests, the MRO may perform the test, observe the original test, or observe a re-test being performed.

**assurance is performed and on what project elements, who is responsible for performing quality assurance, and policies and procedures for addressing deficiencies when they are identified. If applicable, include a sample form the inspectors would use to document the inspection results.**

#### 7) **Dispute Resolution**<sup>14</sup>

MROs must develop and maintain a Dispute Resolution Process that provides a formal framework for addressing issues or disagreements that may arise between the Submitter’s project team (Modeler, Licensed Professional, Developer, etc.) and the MRO’s Reviewer(s).

- **In an attachment, please provide a detailed description of the organization’s Dispute Resolution Process.**

#### 8) **Communications with Submitters and Builders/Developers**<sup>14</sup>

MROs must develop and maintain a system to deliver submission approval notifications and send a notification to EPA to trigger EPA delivering marketing communications. These communications may include, but are not limited to:

MRO is sending out the following:

- a. Proposed Design Submittal and As-Built Submittal Acceptances<sup>20</sup>
- b. Proposed Design Submittal and As-Built Submittal Rejections and Comments

MRO is notifying EPA of the following:

- a. Proposed Design Approval
- b. As-Built Submittal Approval

- **Applicant acknowledges this requirement. [ ]**

#### 9) **Data Management**<sup>14</sup>

MROs must maintain all submitted project files related to ENERGY STAR Multifamily projects certified by their organization for at least 7 years after final certification. The MRO must agree to provide EPA with any and all project files related to any ENERGY STAR Multifamily project, upon request. The MRO must also track and report to EPA on project review times.

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<sup>20</sup> For MFHR projects, the MRO must also send out Project Application approvals and rejections.

The MRO must also commit to reporting the following information to EPA on a quarterly basis:<sup>21</sup>

- For each submitted project the project name, address, Developer/Builder name, Submitter name, Modeler name, Developer marketing contact, number of buildings and units per building, square footage, path used, code baseline, and status of the project.<sup>22</sup>
- If available, also include: Architect of Record, Portfolio Manager ID number (from SEDI), SEDI score, % energy cost savings, project website, project market sector, and participation in other green building programs.
- When applicable, also include: Designed to Earn the ENERGY STAR status, PDS review turnaround time, number of PDS submittals, ABS review turnaround time, and number of ABS submittals.

EPA intends to review the greater of 10% or 5 projects submitted to each MRO in their first year of recognition.<sup>23</sup> EPA also intends to review all onsite quality assurance related files.

- **Applicant acknowledges this requirement. [ ]**

#### **10) Coordination with ENERGY STAR staff<sup>14</sup>**

At a minimum, MROs must actively participate in periodic conference calls or webinars with ENERGY STAR staff to be informed of program updates, provide EPA with information on their successes and challenges, and to help ensure consistency of review and certification activities across the program. These may be in the form of one-on-one communications between an individual MRO and EPA staff, or may include more than one MRO, depending on the subject and EPA's programmatic needs.

In addition, MROs must commit to ensuring that any questions from project teams regarding the ENERGY STAR Multifamily program are answered accurately and in a timely manner. This may require additional communication with EPA staff beyond the periodic calls and webinars described above.

- **Applicant acknowledges this requirement. [ ]**

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<sup>21</sup> EPA may add or change quarterly reporting requirements during the pilot.

<sup>22</sup> Project status examples include: Project Application approved, Proposed Design Submittal approved/not approved, As-Built Submittal approved/not approved, Withdrawn.

<sup>23</sup> EPA will consider the frequency of QA after the first year based on the results of the initial year. This initial estimate includes projects that may be reviewed but not attain certification.

## Appendix A – Requirements for projects in the ENERGY STAR MFHR Program

The following requirements apply to projects going through the ENERGY STAR MFHR Program and are unchanged from Version 1.0 of the MRO Application.

### Submitter Qualifications

The Submitter is the individual responsible for sending the project paperwork to the MRO and signing off that the information is valid. EPA requires that MROs maintain as part of their Submitter qualifications a policy that permits ENERGY STAR Multifamily High Rise documentation for projects to be submitted by any Licensed Professional that meets EPA’s current criteria (i.e., a Registered Architect or Professional Engineer).

In addition to permitting submissions from Licensed Professionals that meet EPA’s criteria, an MRO may allow individuals with alternative qualifications to submit project documentation, so long as they are a third party and subject to quality assurance and oversight. Note that EPA must approve any alternative qualifications for submitting program documentation in advance of the MRO accepting submittals from individuals with the specified qualifications.

- **Applicant is [ ] or is not [ ] proposing to accept project documentation from individuals other than those that meet EPA’s current criteria.**
- **If the applicant is proposing to accept documentation from individuals other than those that meet EPA’s current criteria, in an attachment, please provide any relevant information about the proposed qualification, confirm third party status, and describe the quality assurance and oversight provided.<sup>24</sup>**

### Submittal Documentation

EPA currently requires that each Multifamily High Rise project seeking to earn ENERGY STAR certification submit the following documentation for review:

- a Project Application;
- a Proposed Design Submittal (PDS) (including the Submittal Validation Form, Testing and Verification file, Performance Path Calculator, and Statement of Energy Design Intent); and
- an As-Built Submittal (ABS) (including the Submittal Validation Form, Testing and Verification file, Performance Path Calculator, and Photo Template<sup>25</sup>)

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<sup>24</sup> Applicants may submit additional qualifications for EPA to review at any time during the pilot.

<sup>25</sup> Note that after EPA or an MRO has certified three projects submitted by a Developer or Licensed Professional, EPA does not require submission of a Photo Template for additional projects by that Developer or Licensed Professional. However, the photos must still be collected by the project team and, if requested, submitted to the MRO or EPA. The MRO must honor this waiver for Developers and Licensed Professionals who have previously submitted projects to EPA and met the three project threshold.

An MRO may require Submitters to provide additional documentation files for a project, at its discretion. Further, MROs have the option to use alternate documentation, templates, or web forms, so long as all of the information that is required in EPA’s program documents is collected for a project.<sup>26</sup> If the MRO intends to use alternate documentation, it must demonstrate that it satisfies this requirement in its application.

- **In addition to accepting EPA’s ENERGY STAR Multifamily High Rise documentation, the Applicant is [ ] or is not [ ] proposing to accept alternate submittal documentation.**
- **If the Applicant is proposing to accept alternate documentation, in an attachment, please include the documentation and demonstrate how this documentation will collect the same information currently collected.**<sup>27</sup>

### Documentation Review

EPA requires that for each project, the MRO must have a formal process in place to review all Project Applications, Proposed Design Submittals (including the Submittal Validation Form, Testing and Verification file, Performance Path Calculator, and Statement of Energy Design Intent), and As-Built Submittals (including the Submittal Validation Form, Testing and Verification file, Performance Path Calculator, and Photo Template) for compliance with the ENERGY STAR program requirements.<sup>28</sup> Under normal circumstances, EPA expects that an MRO’s review turnaround time should be no more than 20 business days. EPA plans to monitor turn-around times throughout the pilot.

For the Project Application, EPA requires that the MRO review the application to ensure the project meets the eligibility requirements.

For the PDS and ABS reviews, this process may include the use of EPA’s [Proposed Design Review](#) and [As-Built Review Templates](#) or the MRO can use an alternative process that, at a minimum, reviews the same data points specified in the EPA checklists. In addition, the MRO must review the SEDI to ensure that it meets the EPA requirements for Designed to Earn the ENERGY STAR when applicable. EPA’s SEDI checklist is attached in Appendix A. EPA recommends where possible having the same person review all submittals for a project to ensure consistency throughout the review.

- **The Applicant is [ ] or is not [ ] proposing to utilize an alternative submittal review process or documentation to the EPA checklists.**<sup>29</sup>

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<sup>26</sup> Note that an MRO is required to review EPA’s ENERGY STAR Multifamily High Rise documentation when submitted for a project, regardless of whether they also have their own templates.

<sup>27</sup> Applicants may submit alternate documentation for EPA to review at any time during the pilot.

<sup>28</sup> MROs have discretion for allowing alternate submittal review protocols for Submitters that have demonstrated the ability to consistently meet program requirements in their submittals. Any changes to the current requirement to review all documentation must be submitted and approved by EPA in advance.

<sup>29</sup> Applicants may submit alternative processes or documentation for EPA to review at any time during the pilot.

- **If the Applicant is proposing to use an alternative submittal review process or documentation, in an attachment, please include the documentation or process description and demonstrate how this will ensure the same data points specified in the EPA checklists will be reviewed.**
  
- **In an attachment, please also specify:**
  - **The Project Application review process**
  - **How projects are assigned Reviewers**
  - **What policies the organization has in place to ensure a consistent review from Proposed Design to As-Built**
  - **What policies the organization has regarding multiple review iterations**
  - **The estimated turn-around time for submittal reviews**
  - **How comments related to the review (e.g., why a submission was not accepted) will be sent to the Submitter**

**Appendix B – Sample SEDI Review Process**

<b>Verify SEDI Submission – Data Entry and Key Details</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>PPC/T&amp;V Entry</b>
The project information entered into the SEDI matches the Project Application information. Review the following information				
1. Project Name				
2. Building Address				
The project information is generated by the SEDI. Verify these details match the submission				
1. Gross Square Footage (note: does NOT include parking)				
2. Residential Square Footage				
3. Commercial Square Footage (if applicable)				
4. Parking Square Footage (note: including this in the SEDI is optional)				
a. Parking Type (Open / Partially Enclosed Garage / Enclosed Garage)				
5. Number of Units				
6. Number of Units in mid-rise, high-rise (all units should be in one category per building)				
7. Number of Bedrooms				
8. Electric Usage				
9. Gas Usage				
10. Other Fuel Usage				
DEES review				
11. Do 1-10 all match and energy use is included?				
12. Is commercial space included in the model? (Note: If the project contains commercial space, this space must be modelled in order to earn DEES)				
13. Is commercial space more than 25% of the GFA?				
a. If yes, is the commercial space separated out into a separate category?				
14. Is ENERGY STAR Design score 75 or higher?				
15. DEES earned? (Are 11,12,13a all yes or N/A?)				

### **Appendix C - Optional Process for Reduced Design Reviews:**

This framework presents an optional process for reducing the 100% PDS review requirement.<sup>30</sup> MROs may use this framework for their process or develop an alternative approach. In either case, MROs must get EPA approval before implementing any alternative Design Review process.

- 1) Raters may be permitted not to have a design review on their Prescriptive Path projects, after their first Prescriptive Path design approval.
- 2) Model reviews:
  - a) All model reviews (Design and As-Built) will be graded on a scale determined by the MRO. The MRO will determine what grade is necessary to consider the model to “pass.” The general intent of this is to document that the model was properly completed and met the Simulation Guidelines and the Submittal is able to be approved or there were only minor issues or issues unrelated to the model.
  - b) After an individual Modeler has passed model reviews for three projects with the same MRO, any projects with models by that individual do not need to have a model review at design.
  - c) If the individual Modeler subsequently fails two model reviews, they must submit design models again and pass three again.
  - d) With approval from EPA, an MRO can also reduce the number of design reviews from 3 to 1 for Modelers who have past experience with the MFHR program, have attended relevant training, or have modeling certifications.
- 3) An ASHRAE path project can eliminate design reviews once the individual Rater has one approved design submittal and the Modeler has met the criteria for eliminating model reviews.

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<sup>30</sup> To earn Designed to Earn the ENERGY STAR, projects must have a design review.