

Current Zero Energy Ready Home (ZERH) Manufactured Homes V1 Policy Record

Last Updated: September 11, 2023

How to Use this Document

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

DOE intends to formally incorporate policy modifications into the next revision or version of the program requirements documents. Those edits will then be enforced for homes manufactured 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 manufactured dates of the affected homes and to include a copy of the policy record in the files retained by the Certifier. 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 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 DOE's original intent is not being met or from changes in relevant standards. 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 DOE in response to a question, which results in no change to the program requirements documents. This may occur, for example, if the question can be 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 DOE is still evaluating. Once DOE has evaluated the issue, it will offer a resolution and reclassify the issue using one of the four categories above.

ID	Log Date	Program Requirements Document(s) Affected	Classification
MHV1.001	6/1/2023	Certification, Enforcement, and Reporting Guide	Clarification
Topic	Plant Certification Process		
Issue	<p>Program partners requested clarification regarding the process by which plants are certified. The language in Section II. Plant Certification could be interpreted to mean that the plant could not be certified until 3 qualification units are field inspected. The intent of the certification process is that the plant is certified based on installation of features that are installed in the plant. While the DOE ZERH program does want to know that a manufacturer can deliver a fully certified unit installed on final site, these units will have to wait until sale to be installed. Because the program does not want plant certification to be delayed while waiting for sale and installation, it is important to clarify the order in which certification and later field verification will happen.</p>		
Resolution	<p>Plant certification may be finalized upon completion of plant verification of all required plant-installed items on the three qualification units. Following plant certification, the Certifier shall inspect 3 of the first 30 homes (10%) installed in the field (initial sample). The sample shall be inspected within 60 days of the installation of the 30th Certified ZERH MH. Following the initial sample, the Certifier shall conduct field evaluations as described in section IV. Maintaining Plant Certification and as described in U.S. DOE Zero Energy Ready Home Manufactured Homes National Program Requirements, Version 1. This resolution is being implemented and evaluated during the Version 1 Pilot phase. DOE reserves the right to revise this policy based on those evaluations.</p>		
MHV1.002	6/1/2023	Certification, Enforcement, and Reporting Guide	Clarification
Topic	Plant Certification Responsibilities		
Issue	<p>Program partners requested clarification regarding the party responsible for plant certification.</p>		
Resolution	<p>The Certifier (under the oversight of the Quality Assurance Provider) is responsible for plant certification. This includes inspection and verification in the plant, final approval of plant certification, and any required follow-up field evaluations. This resolution is being implemented and evaluated during the Version 1 Pilot phase. DOE reserves the right to revise this policy based on those evaluations.</p>		

MHV1.003	9-11/2023	U.S. DOE Zero Energy Ready Home Manufactured Homes National Program Requirements, Version 1	Clarification
Topic	Sealed Crawl Spaces		
Issue	Requirement 3.10 of the Field Installed Measures checklist in Exhibit 3 requires that crawlspaces be sealed and conditioned. However, 24 CFR part 3285.505 requires that a crawl space with skirting be provided with ventilation openings. 3.10 was written with block crawl spaces in mind, not pier foundations with skirting. However, there is concern that a block crawl space would be interpreted as “skirting” under 3285.		
Resolution	IF the US Department of Housing and Urban Development interpret a block crawl space as “skirting,” or if they provide any other interpretation that requires ventilation of such a crawl space, THEN DOE ZERH program will waive requirement 3.10 for sealing and conditioning the block crawl space. However, If no such interpretation or requirement exists in the HUD code, block crawl spaces (not meaning pier foundations with skirting) would be required to be sealed and conditioned.		
MHV1.004	9-11/2023	U.S. DOE Zero Energy Ready Home Manufactured Homes National Program Requirements, Version 1	Clarification
Topic	PV-Ready Features		
Issue	Requirement 16.2 of the Factory Installed Measures checklist in Exhibit 3 requires conduit to be run between the designated location for the future inverter and the designated location of the future PV array. The value of this measure for site-built homes is that it provides an easy means for installing wiring for a PV system without needing to open building cavities internally or run conduit externally. Typically, the conduit runs into the attic. However, most Manufactured Homes are built without any access or space in the attic. Likewise, most designated future inverter locations will be on the exterior of the unit. For this reason, running a conduit to the attic either interior or exterior would not save any time or money on a future PV installation, defeating the purpose and intent of the requirement		
Resolution	If the designated inverter location is on the interior, run a 1 in. electrical conduit from the designated photovoltaic array location to the designated inverter location. If the designated inverter location is on the exterior of the home, then a conduit from the designated photovoltaic array location to the designated inverter location is not required.		
MHV1.005	9-11/2023	U.S. DOE Zero Energy Ready Home Manufactured Homes National Program Requirements, Version 1	Clarification
Topic	Measured Duct Leakage Sampling Frequency		
Issue	Requirement 4.3 of the Factory Installed Measures Checklist in Exhibit requires duct testing at a rate of 10%, but the sampling basis was not provided.		
Resolution	The 10% sampling should be based on number of “homes”, and not number of “floors” to avoid inconsistency of sampling method across different manufactured plants.		