

MEMORANDUM FOR:	Multifamily Regional Center Directors Multifamily Satellite Office Directors Multifamily Asset Management Division Directors Multifamily Account Executives Multifamily Owners and Management Agents
FROM:	Jennifer Larson, Director, Office of Asset Management and Portfolio Oversight
SUBJECT:	Temporary Extension of Green Mortgage Insurance Premium Compliance Reporting Deadline for Multifamily Green MIP recipients

The purpose of this memo is to provide additional guidance from the Office of Housing (Office of Multifamily Housing) to lenders/servicers, property owners, and Department of Housing and Urban Development (HUD) staff on the policy pertaining to the annual compliance reporting for Green Mortgage Insurance Premium (MIP) rate recipients (See Federal Register 81 FR 18473 (January 28, 2016)). This Memo will serve to facilitate the effective implementation of the new reporting method outlined in HN 2023-11. HUD has created reduced MIP rate initiatives to encourage owners to adopt higher standards for energy efficiency and sustainability. Note: this guidance does not apply to Green MIP rate recipients administered by Office of Residential Care Facilities.

Where **previously annual reporting was due on March 31** of the subsequent year after the 12month data collection period of January 1 to December 31, **annual reporting shall now be due on May 31.** For example, if a transaction closes on July 5th, 2022, the 12-month Statement of Energy Performance (SEP) cycle would start from Jan 1, 2023, to December 31, 2023. The SEP in the example must now be reported by May 31, 2024. This extension will be **effective for the next five years (through reporting date May 31, 2028)**, after which the reporting deadline will revert to March 31, unless additional guidance is issued.

HUD has received widespread reports of delays in receiving energy and water usage data from utility providers. As demonstrated by the joint agency letter published on January 18, 2024, HUD, along with its federal partners, is committed to supporting the increased availability of whole-building data for the purposes of benchmarking residential buildings. Considering data requests are likely to grow in volume due to the adoption of local and state benchmarking mandates as well as the implementation HUD's own benchmarking initiative, this extension provides utilities, third-party vendors, and other stakeholders more time in to adjust to the increase in data requests and determine how best to appropriately meet capacity in the future.

Applicability

This Notice applies to all FHA-insured Multifamily Housing Green MIP rate recipients with compliance reporting obligations on or after March 31, 2024.