

Alternative Compliance Paths for 2021 IECC/ASHRAE 90.1-2019

(Updated March 2025)

In HUD's 4/26/2024 final determination ([89 FR 33112](#)), HUD adopted the 2021 International Energy Conservation Code (IECC) and ASHRAE 90.1-2019 as minimum energy standards for new construction projects in certain HUD programs. HUD has determined that the following high performance building standards qualify as alternative compliance paths for the 2021 IECC and/or ASHRAE 90.1-2019.

Additional standards may be added to this preliminary list if they are deemed equally or more efficient than the IECC and ASHRAE standards. Other standards not included in this list may be considered; interested parties are invited to provide documentation of alignment with the 2021 IECC and/or ASHRAE 90.1-2019. Please submit such documentation to EnergyAction@hud.gov.

A. Current consensus energy codes

1. [2024 IECC](#)
2. [ASHRAE 90.1-22](#)

B. Federally supported standards that offer compliance

1. [ENERGY STAR \(EPA\)](#)
 - ENERGY STAR Single Family New Homes (SFNH) National v.3.1, with the following additional requirements:
 - Minimum ANSI/RESNET/ICC 301- 2022 ERI score of 57 (or HERS 57)*
 - Thermal envelope backstop aligned with 2024 IECC performance paths:
 - In Climate Zones (CZ) 1-2, ≤ 108% of the total TC per 2024 IECC Table R402.1.2.
 - In CZ 3-8, ≤ 115% of the total TC per 2024 IECC Table R402.1.2.
 - ENERGY STAR SFNH National v3.2 or v3.3; SFNH California v3.3, v3.4, or v3.5; SFNH Pacific v3.2; or SFNH Caribbean v3
 - ENERGY STAR Multifamily New Construction (MFNC) National v1.1, with the following additional requirements:
 - Minimum ANSI/RESNET/ICC 301- 2022 ERI score of 57 (or HERS 57)*
 - Thermal envelope backstop aligned with 2024 IECC performance paths:
 - In CZ 1-2, ≤ 108% of the total TC per 2024 IECC Table R402.1.2.
 - In CZ 3-8, ≤ 115% of the total TC per 2024 IECC Table R402.1.2.
 - ENERGY STAR MFNC National v1.2 or v1.3; MFNC California Version v1.3, v1.4, or v1.5; or MFNC Caribbean v1
 - ENERGY STAR Next Gen Homes and Apartments 1.0

2. Indoor AirPLUS (EPA)

- Indoor AirPLUS Version 1 with one of the ENERGY STAR certifications listed above
- Indoor AirPLUS Gold Version 2 with one of the ENERGY STAR certifications listed above

3. Zero Energy Ready Homes (DOE)

- Zero Energy Ready Homes Multifamily Version 2
- Zero Energy Ready Homes Single Family Version 2

C. Non-federal programs that embed or reference the above standards

1. Enterprise Green Communities

- Enterprise Green Communities Certification
 - Criterion 5.1a with one of the ENERGY STAR certifications listed in Section B.1.
- Enterprise Green Communities Certification Plus
- Green Communities Certification Plus Zero Emissions

2. LEED

Single Family:

- *LEED v4 BD+C: Homes* with one of the ENERGY STAR certifications listed in Section B.1. (includes LEED v4 2024 Energy Update)
- *LEED v4.1 Residential: Single Family* with one of the ENERGY STAR certifications listed in Section B.1.

Low-Rise Multifamily (< 4 stories):

- *LEED v4 BD+C: Homes* with one of the ENERGY STAR certifications listed in Section B.1.
- *LEED v4.1 Residential: Single Family* with one of the ENERGY STAR certifications listed in Section B.1. (LEED v4.1 Residential: Single Family is available to projects with up to 4 dwelling units)

Multifamily Residential (4+ Stories) options:

- *LEED v4 BD+C: Multifamily Midrise* with 15 points achieved under *EA Credit: Annual Energy Use* prior to Home Size Adjustment
- *LEED v4 Multifamily Midrise (2024 Update)* with 10 points achieved under *EA Credit: Annual Energy Use* prior to Home Size Adjustment
- *LEED v4 BD+C: New Construction or BD+C: Core and Shell* with 8 points achieved under *EA Credit: Optimize Energy Performance*

- *LEED v4 BD+C: New Construction or BD+C: Core and Shell (2024 update)* with 2 points achieved under *EA Credit: Optimize Energy Performance*
- *LEED v5 New Construction or Core and Shell* (note, ASHRAE 90.1-2019 or 90.1-2022 compliance is mandatory for all LEED v5 NC or CS projects per *EA Prerequisite: Minimum Energy Efficiency*)

3. ICC 700 National Green Building Standard (NGBS)

- 2020 NGBS
 - Prescriptive Path
 - Single Family. Climate zones 1-5: Bronze and up; Climate zones 6-8: Silver and up; with minimum points shown in table below.
 - Multifamily. Climate zones 1, 2, 5: Gold and up; Climate zones 3-4: Emerald and up; Climate zones 6-8: Silver and up; with minimum points in table below.

<i>Climate Zone</i>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
<i>Single Family (min. points)</i>	48 (Silver)	48 (Silver)	56 (Silver)	56 (Silver)	49 (Silver)	43 (Bronze)	42 (Bronze)	42 (Bronze)
<i>Multifamily (min. points)</i>	65 (Gold)	64 (Gold)	71 (Emerald)	71 (Emerald)	65 (Gold)	55 (Silver)	54 (Silver)	54 (Silver)

- Performance Path
 - Silver or above, with a minimum of 48 points for single family or 54 points for multifamily.
 - On-site renewable energy cannot be included when calculating improvements to energy efficiency.
 - Required compliance with the thermal envelope backstop requirements from the 2024 IECC performance path:
 - ❖ In CZ 1 and 2, ≤ 108% of the total TC per 2024 IECC Table 402.1.2.
 - ❖ In CZ 3-8, ≤ 115% of the total TC per 2024 IECC Table 402.1.2.
 - Alternative Compliance Path
 - Meet one of the ENERGY STAR certifications listed in B.1.
- 2025 NGBS (publication pending)
 - Prescriptive and performance paths
 - All levels
 - Alternative Compliance Path
 - All options for Silver, Gold, and Emerald
 - For Bronze:
 - ❖ ENERGY STAR SFNH v3.1 and ENERGY STAR MFNC v1.1 must include the additional requirements listed in B.1.

4. Passive House (Phius)

- Phius 2024 CORE (Single Family and Multifamily)
- Phius 2024 ZERO (Single Family and Multifamily)

5. Earth Advantage

- Earth Advantage Multifamily (Silver, Gold, Platinum)
- Earth Advantage Multifamily Zero Energy Ready
- Earth Advantage Multifamily Zero Energy
- Earth Advantage Multifamily Zero Energy Plus

6. Earthcraft

- Earthcraft House - Performance Badge (Single Family)
- Earthcraft Multifamily - Platinum (Multifamily)

7. Living Building Challenge

- Living Certification 4.1
- Core Certification 4.1
- Petal Certification (Energy) 4.1
- Zero Carbon Certification 1.1

8. Pearl

- Pearl Zero Emissions (Single Family)

9. Green Globes

- Green Globes HUD Multifamily for New Construction
- Green Globes Multifamily for New Construction with Net Zero
- Green Globes Multifamily Performance Plus with Journey to Net zero
 - Green Globes Journey to Net Zero Energy
 - Green Globes Journey to Net Zero Carbon

Note: ASHRAE 90.1 compliance paths only.
- New January 2025: Green Globes Multifamily with Net Zero NC (v.3.0)

10. BREEAM

- BREEAM New Construction Version 7 (pending publication in 2025)

11. Passive House (Passive House Institute)

- Certified Passive House
- PHI Low Energy Building

12. GreenPoint Rated

- GreenPoint Rated New Home Single Family Version 9.2
- GreenPoint Rated New Home Multifamily Version 9.2

Notes:

* ANSI/RESNET/ICC 301-2022 uses a different method of calculating ERI scores than that used for calculating ERI scores in the 2021 IECC. The ANSI option provided here provides an additional compliance option, but it does not replace the 2021 IECC Energy Rating Index (ERI) compliance path, based on DOE analysis of prescriptive requirements of the 2021 IECC for all climate zones. This option is for Single Family only.

Note On Above Compliance Paths. To best understand the programs included in this list, it is important to note that there are two Federally supported standards that are specifically designed to exceed current energy codes by at least 10%. The first, EPA's ENERGY STAR, provides the baseline certification for the second, DOE's Zero Energy Ready Homes. Newer versions of EPA's ENERGY STAR program, and correspondingly DOE's Zero Energy Ready Homes program, are updated on an on-going basis to reflect the publication of newer codes on a three-year cycle. It follows that any non-government program that also embeds requirements for certification of the most current EPA ENERGY STAR or DOE Zero Energy Ready standards will logically exceed the HUD-USDA energy standards as well.

Builders may be incentivized by varying federal, state, and local funding streams; tax credits; or other mechanisms that require these programs and should work closely with owners and developers to best maximize these opportunities.