HUD Survey Requirements: Form 91073M and the *ALTA/NSPS Land Title Survey*

Table A Items, the Surveyor's Report, Timing Windows, and the 2026 Standards Transition

Every HUD-insured multifamily loan closes with two survey documents: an ALTA/NSPS Land Title Survey and Form HUD-91073M. This paper covers what the form requires, how long a survey stays valid, and what each program — 223(f), 221(d)(4), and 223(a)(7) — actually needs.

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If you're mid-deal and just need your program's requirements, jump straight there: 223(f) · 221(d)(4) · 223(a)(7). The rest of this paper covers the HUD 91073M form itself (the required Table A items, the ten Surveyor's Report questions), the timing windows, and the 2026 ALTA/NSPS standards transition HUD addressed in March 2026.

01
THE FRAMEWORK

The Two Documents *HUD Requires*

Every HUD-insured multifamily loan closes with two survey documents: an ALTA/NSPS Land Title Survey, and Form HUD-91073M, which supplements the ALTA Survey. If you've financed apartments with Fannie Mae, Freddie Mac, or a bank, you've ordered an ALTA survey before. The 91073M is the HUD-specific supplemental report. The first part of the HUD report is simply an instruction set to the surveyor on how to complete the ALTA survey per HUD requirements: which edition of the ALTA/NSPS standards to follow, which Table A optional items

HUD requires, and a set of conditions (flood elevations, blanket easements, common elements) where HUD's scope is different than a standard survey. The second part of the HUD report is ten questions about the property that the surveyor answers from fieldwork and title research, followed by a surveyor certification.

Both documents must come from a licensed surveyor — an engineer's signature does not satisfy the requirement — and the report must carry the surveyor's original signature and professional seal. The 91073M report also has to be signed and dated on or after the date of the last revision to the ALTA survey.

HUD mainly requires the supplemental report as a convenient way to instruct the surveyor on exactly what is needed. Every plottable easement, restriction, and exception on the title policy must be depicted on the survey. Blanket easements that can't be plotted get listed with their recording information and a "not plottable" notation next to the title exception. Access roads are labeled public or private.

We reviewed these packages from the HUD side for years. The surveys that clear review are the ones where the surveyor was handed the preliminary title review, the blank 91073M, and any prior surveys early on at engagement.

02

STANDARDS EDITION

Which Standards Apply: *the 2021-to-2026 Transition*

ALTA and NSPS revise the Minimum Standard Detail Requirements on a five-year cycle. The 2026 edition was adopted in October 2025 and took effect on February 23, 2026, superseding the 2021 standards for any survey contracted on or after that date. It should be known, however, that the version of Form 91073M posted on hud.gov still recites the 2021 standards, because HUD wrote the current form when the 2021 edition took effect and hasn't finished revising it.

HUD partially closed that gap on March 20, 2026, when it issued transition guidance stating that until the revised form is published, HUD will accept surveys performed to the 2026 standards on the current form, with the certification language conformed per a redline HUD circulated with the notice. The redline changes five things. Four are simply the year — 2021 becomes 2026 in the standards-of-performance paragraph, in Section A, and in both certification blocks. The fifth is a cross-reference: the wetland-delineation amendment now points to Table A Item 21 instead of Item 20, because the 2026 standards added a new optional Item 20 — a summary table of observed encroachments and access issues — and pushed the client-negotiated slot down one.

The required Table A items are the same list: 1, 2, 3, 4, 6a, 6b, 7a, 8, 9, 10, 11a, 12, 13, 16, 17, and 18. The 180-day and 120-day fieldwork windows are untouched.

Two situations still put the edition in play:

- A survey update contracted after February 23, 2026 must follow the 2026 standards — with one exception. If the original survey was contracted under the 2021 standards and a delayed closing forces an update, the update may stay on 2021 (becoming less and less common each day).

- An as-built survey for Final Endorsement contracted after February 23, 2026 must follow the 2026 standards even if the initial closing survey was performed under 2021. Every 221(d)(4) under construction today closes its final on a 2026 survey.

Put the edition in the surveyor's engagement letter: specify a "2026 ALTA/NSPS Land Title Survey" and attach the current 91073M with HUD's redline. Reused certification templates sometimes still recite the 2016 or 2021 standards; a certification to the wrong edition is a HUD closing comment, so it's worth a quick look at survey delivery rather than at closing.

03
SURVEY SCOPE

The Required Table A Items, *in Plain English*

Table A is the menu of optional survey services at the back of the ALTA/NSPS standards. HUD requires sixteen of them — items 1, 2, 3, 4, 6a, 6b, 7a, 8, 9, 10, 11a, 12, 13, 16, 17, and 18. Here is what each one makes the surveyor do.

- **Item 1 — Monuments.** Physical markers set at every major corner of the boundary, unless corners are already marked. The recorded legal description gets tied to objects in the ground.
- **Item 2 — Address.** The property address as disclosed in the documents or observed in the field, stated on the plat.
- **Item 3 — Flood zone.** The flood zone classification from the FEMA Flood Insurance Rate Map, plotted graphically. The 91073M then goes further than Table A: where any part of the site is in a flood hazard area, the form requires the 100-year flood elevation and zone, and for existing projects the elevations at building entrances, the lowest habitable finished floor, basements, and the parking areas serving each primary building. That elevation data is what HUD's environmental review and the flood insurance requirement use.
- **Item 4 — Gross land area.** Total site area, in acres and square feet. Feeds the plat legend, the appraisal, and the application exhibits.
- **Items 6a and 6b — Zoning.** If the client provides a zoning report or letter, the surveyor lists the classification, setbacks, height and floor-area restrictions, and parking requirements on the plat (6a) and graphically depicts the setback lines (6b), citing the date and source.
- **Item 7a — Building dimensions.** Exterior dimensions of every building at ground level.
- **Item 8 — Substantial features.** Parking lots, signs, billboards, pools, landscaped areas, substantial refuse areas — i.e. the improvements beyond the buildings themselves.

- **Item 9 — Parking.** A count of clearly identifiable spaces by type — regular, disabled, motorcycle, other marked types — plus striping on surface lots. HUD underwriting compares this count to the zoning requirement from 6a and to the parking shown in the appraisal; discrepancies among the three are a standard review comment.
- **Item 10 — Party walls.** Where the client designates, a determination of the location of division or party walls with respect to adjoining properties. In the 2026 standards this is one consolidated item — the old 10(a)/10(b) split from earlier editions is gone.
- **Item 11a — Underground utilities from plans.** Evidence of underground utilities developed from plans and reports the client provides, combined with what the surveyor observes on the surface — manholes, valves, meters, pedestals, overhead lines. HUD requires 11a only. Item 11b, a private utility locate coordinated in the field, is not on HUD's list.
- **Item 12 — Governmental agency requirements.** Checking Item 12 and providing the surveyor the 91073M is what makes HUD's instructions part of the ALTA official scope of work. The relevant requirements come from the client, which means the 91073M is connected to the survey engagement letter.
- **Item 13 — Adjoining owners.** Names of adjoining property owners from current tax records. HUD reads this alongside the encroachment answers — it establishes who is on the other side of every shared line, fence, and drive.
- **Item 16 — Recent earth moving.** Observed evidence of recent earth moving, building construction, or additions. Recent work can mean unrecorded mechanic's lien exposure, which could also be a title policy problem.
- **Item 17 — Street changes.** Proposed changes in street right-of-way lines where the jurisdiction makes that information available, plus observed evidence of recent street or sidewalk construction. A planned widening that takes ten feet of frontage is something HUD wants to see before endorsement.
- **Item 18 — Offsite easements.** Plottable offsite easements that benefit the property — the access drive over the neighboring parcel, the offsite drainage easement — surveyed as part of the work. These appurtenant rights are part of HUD's collateral, so they get surveyed like the fee parcel does.

What HUD does not require — and the conditional add-ons

Four Table A items are not on HUD's list: 14 (distance to the nearest intersecting street), 15 (use of aerial imagery), 19 (surveyor's professional liability insurance), and 20 — the new-for-2026 summary table of potential encroachments and access issues. If a surveyor's proposal prices items HUD doesn't require, that's a scope conversation worth having before signing.

Two items are conditional. Item 5, vertical relief, applies when the scope includes site grading — and the 91073M then tightens the standard: contours at 1-foot intervals, relaxing to 2-foot and 5-foot only where the mean site gradient exceeds 5 and 10 percent, with top-of-curb and flow-line elevations wherever curbs and gutters exist. On a 223(f), HUD can invoke Item 5 when the repair scope includes grading or site utility work to fix a drainage problem. And the wetlands requirement now lives in slot 21, the negotiated-items slot: where a wetland delineation has been performed, HUD's amended language requires the surveyor to locate any delineation markers observed during fieldwork and to state on the plat if none were observed.

04

FORM 91073M

The Surveyor's Report: *Ten Questions with No Shortcuts*

If the first half of the HUD 91073M are the instructions, the second half is ten questions the surveyor answers from fieldwork and title research. Each question gets a detailed answer or the word "none." "As shown on survey" is expressly not an acceptable response. HUD's closing attorney reads the ALTA Survey and the ten questions side by side to make sure they are aligned.

The ten questions, and what HUD is screening for:

- **1. Rights of way and utility crossings.** Old highways, abandoned roads, lanes, drains, sewer and water pipes over or across the site. Unrecorded physical rights of way are exactly the survey matters title insurance excepts unless someone finds them.
- **2. Water features.** Springs, streams, rivers, ponds, and lakes on, bordering, or running through the property. Water raises boundary questions (a water line that moves could be a title line that moves) and it also flags any floodplain and wetlands issues for the environmental review.
- **3. Cemeteries.** Cemeteries or family burial grounds on the premises. Rare, but a burial ground carries access rights and removal restrictions that survive a deed, which is why the question has stayed on the form.
- **4. Towers and lines.** Electrical and communications towers, antennas, lines, and supports on, overhanging, or crossing the site. Overhanging lines are encroachments, and transmission corridors usually mean recorded easements with building restrictions inside them.

- **5. Disputed boundaries and encroachments.** Boundary lines, setbacks, and easements in dispute; buildings, cornices, signs, or fences crossing lines in either direction. Whatever gets listed here has to be resolved, insured over, or accepted by the HUD Regional Director before closing.
- **6. Recent earth moving.** Earth moving, building construction, or additions within recent months — the report-level cross-check of Table A Item 16, and HUD's screen for unrecorded work that could ripen into mechanic's liens ahead of the insured mortgage.
- **7. Building and possession lines.** For city property, whether walls are independent or party walls, and any easements of support or beam rights. For rural property, how the boundary is evidenced on the ground — fences or otherwise. Where lines of possession differ from lines of title, adverse possession questions are raised.
- **8. Street construction and street line changes.** Recent or proposed street and sidewalk work per the controlling jurisdiction — the report companion to Table A Item 17.
- **9. Flood zone classification.** This answer has to match the flood determination in the environmental review and the flood insurance in the closing package.
- **10. Dump, sump, or landfill use.** Whether the site was ever used as a solid waste dump, sump, or sanitary landfill. A "yes" belongs in the Phase I before it appears in a surveyor's report — this question exists so that nothing surfaces for the first time at closing.

The report closes with the surveyor's certification that the survey was made on the ground per the record description, that except as shown there are no encroachments across property lines, that title lines and lines of actual possession are the same, and whether the premises sit in a 100- or 500-year flood hazard with the FIRM community panel number.

05
EXPIRATION

Timing: *the 180-Day and 120-Day Windows*

The survey and the Surveyor's Report must be signed and sealed by the surveyor no more than 180 days before closing, and the last site inspection or fieldwork can be no more than 180 days before closing. For the as-built survey at the final closing of a construction loan (only HUD 221(d)(4) or 241(a)), both windows tighten to 120 days. The Surveyor's Report must be dated on or after the date of the last revision to the survey, so the report date follows the plat.

The clock runs from fieldwork to closing, not from engagement, and HUD reviews the draft closing package before the closing date. A survey delivered five months before a closing that then slips a quarter is out of the time window.

When the timeline is delayed

If the survey items go stale, HUD provides one path: the HUD Regional Director, in consultation with the HUD Closing Attorney, may extend the 180-day timeframe at reasonable discretion, and if fieldwork is allowed to be older than 180 days, the lender submits a Survey Affidavit of No Change signed by the borrower, in a format similar to the sample at MAP Guide Section 19.10. The borrower is affirming that nothing on the ground has changed since the fieldwork date — no construction, no new easements in use, no changes to improvements or boundaries. With an organized application timeline — we walk through the full sequence in our 223(f) timeline and 221(d)(4) timeline papers — most surveys don't go stale. But we still often recommend that the Borrower order the survey as one of the first third-party reports on every deal and watch the certification date against the projected closing. We are not hoping for the survey items to go stale. However, our experience is that the survey is one of the last due diligence items to be received, and we want to get the package in as quickly as possible, that way we don't push the closing out any further than necessary.

06

223(F) · 221(D)(4) · 223(A)(7)

Survey Requirements *by Program*

The form and the timing rules above apply to every program. What differs is how many surveys a deal needs and when each one is due.

223(f) — one survey, one closing

A 223(f) acquisition or refinance has a single endorsement, so it needs one ALTA/NSPS survey and one 91073M, submitted with the Firm Commitment application and current within 180 days of closing. If the repair scope includes site grading or site utility work (correcting a drainage problem is the common case) HUD can require Table A Item 5 topographic contours at the intervals described in Section 3. For a purchase, the seller's existing ALTA survey is a head start: hand it to the surveyor with the title commitment and the update is usually a lighter scope than an original survey.

221(d)(4) — three survey touchpoints

A construction deal needs the survey three times.

- **At Firm application.** The application drawings include an ALTA survey with Table A Items 5, 6a, and 6b — topography and zoning — at a scale of 1″ = 40′, dated no more than six months before the Firm Commitment application.
- **At initial endorsement.** The same survey, updated and re-certified so that fieldwork and signature both fall within 180 days of initial closing with the 91073M Surveyor's Report (if needed).
- **At final endorsement.** A full as-built survey with a new 91073M, dated within 120 days of final closing, showing everything as constructed — buildings, paving, utilities, easements as they were actually placed.

Between initial and final endorsement the surveyor is generally out of the picture since there is no survey deliverable during the construction period itself. The scheduling risk is at final endorsement: construction schedules move, and an as-built ordered late compresses against the 120-day window. We want the as-built on the surveyor's calendar when construction is reaching completion.

223(a)(7) — usually no new survey

A 223(a)(7) refinances an existing HUD-insured loan, and HUD already holds the as-built survey from that loan's closing. A new survey is not required if three conditions are met (MAP Guide Section 19.6.2): the title company will issue its policy with no new survey exceptions; a copy of the HUD-approved as-built survey from the original loan file is available; and there have been no changes to the land or buildings, or only minor changes the HUD Regional Director finds acceptable. When the conditions hold, lender's counsel submits a Survey Affidavit of No Change with a copy of the original survey, and the survey line item on the deal budget is zero.

The condition that fails is usually the first or third: the title company takes a new exception, or something has been built — a new carport, a storage building, an addition — since the original closing. At that point the deal needs a survey meeting the full requirements above. This is worth knowing before application: if you've added improvements since your last HUD closing, tell your lender early, because it changes the third-party budget and the timeline.

07

TITLE INTERPLAY

When the Survey and the Title Policy *Disagree*

HUD's closing review reads the survey against the pro forma title policy. An encroachment or unrecorded use the surveyor reports has a short list of resolutions: the title company insures over it with an endorsement, the parties cure it with a recorded easement or license, the condition is removed, or the HUD Regional Director accepts it as minor. Each of those takes time in inverse proportion to how early the survey was ordered.

If the project shares a drive, parking, drainage, or amenities with an adjacent parcel, HUD wants a recorded agreement that runs with the land and the agreement has to exist in the record early enough for the surveyor to plot it and the title company to schedule it. Papering a shared-use agreement during the closing window means revising the survey, the title commitment, and the 91073M at the same time.

08

PRACTICAL NOTES

Cost, Timing, and *What to Hand the Surveyor*

For a typical multifamily site, an ALTA/NSPS survey with the 91073M scope runs around $10,000 or more, moving with acreage, the number of improvements, the count of title exceptions to plot, and the region. Plan on five to six weeks from engagement to a reviewable draft. This means that we recommend Borrowers order the survey in the first wave of third-party reports, alongside the appraisal and environmental, not when you are trying to wrap up the rest of the checklist before the Firm Application is going in.

The surveyor will typically ask for the title commitment with the exception documents, the blank 91073M with HUD's 2026 redline, any prior surveys, the recorded legal description, and the zoning report, if available. A surveyor working from that package prices the job accurately and plots the exceptions the first time.

If the closing slips and the survey goes stale, the update or recertification is materially cheaper than starting over. The expensive version of a survey problem is the one discovered in HUD's closing review; the inexpensive version is the one your lender catches at survey delivery. We read every survey and Surveyor's Report on our deals against the title commitment before either goes to HUD.

09

QUICK ANSWERS

Frequently Asked *Questions*

What is HUD Form 91073M?

Form HUD-91073M, the "HUD Survey Instructions and Surveyor's Report", is the HUD-specific supplement to the ALTA/NSPS Land Title Survey required on every HUD-insured multifamily loan. The first part instructs the surveyor on how to complete the ALTA survey: which edition of the ALTA/NSPS standards to follow, which Table A optional items HUD requires, and conditions such as flood elevations, blanket easements, and common elements where HUD's scope is more thorough than a standard survey. The second part is ten questions about the property that the surveyor answers from fieldwork and title research, followed by a certification. Both documents must come from a licensed surveyor — an engineer's signature does not satisfy the requirement.

What ALTA/NSPS Table A items does HUD require?

Form HUD-91073M requires sixteen Table A items on every survey: 1 (monuments), 2 (address), 3 (flood zone), 4 (gross land area), 6a and 6b (zoning from a provided zoning report), 7a (exterior building dimensions), 8 (substantial features), 9 (parking count and striping), 10 (party walls), 11a (underground utilities from plans), 12 (governmental agency requirements — the item that incorporates HUD's instructions), 13 (adjoining owners), 16 (recent earth moving), 17 (street right-of-way changes), and 18 (plottable offsite easements). Item 5 (vertical relief) applies conditionally when the scope includes site grading, and HUD's amended wetland-delineation language rides in the negotiated slot, Item 21 under the 2026 standards.

How long is a survey good for on a HUD loan?

Under MAP Guide Section 19.4.7.6, the survey and the Surveyor's Report must be signed and sealed no more than 180 days before closing, and the last fieldwork must be no more than 180 days before closing. For the as-built survey at the final closing of a HUD construction loan — a 221(d)(4) or 241(a) — both windows tighten to 120 days. The HUD Regional Director, in consultation with the HUD Closing Attorney, may extend the 180-day timeframe at reasonable discretion; if fieldwork is allowed to be older than 180 days, the lender submits a Survey Affidavit of No Change signed by the borrower.

Does a HUD 223(a)(7) refinance require a new survey?

Usually not. A 223(a)(7) refinances an existing HUD-insured loan, and HUD already holds the as-built survey from that loan's closing. A new survey is not required if three conditions are met under MAP Guide Section 19.6.2: the title company will issue its policy with no new survey exceptions; a copy of the HUD-approved as-built survey from the original loan file is available; and there have been no changes to the land or buildings, or only minor changes the HUD Regional Director finds acceptable. When the conditions are there, lender's counsel submits a Survey Affidavit of No Change with a copy of the original survey. If a condition fails — most often because the title company takes a new exception or improvements have been added — the deal needs a survey meeting the full HUD requirements.

Do HUD surveys follow the 2021 or the 2026 ALTA/NSPS standards?

The 2026 ALTA/NSPS Minimum Standard Detail Requirements took effect on February 23, 2026, superseding the 2021 standards for any survey contracted on or after that date. HUD issued transition guidance in March 2026: until a revised Form 91073M is published, HUD accepts surveys performed to the 2026 standards on the

current form, with the certification language conformed per a redline HUD circulated. The required Table A items are unchanged. Surveys contracted before February 23, 2026 may be completed under the 2021 standards, but an as-built survey for Final Endorsement contracted after that date must follow the 2026 standards even if the initial closing survey used 2021.

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HUD/FHA Multifamily Origination

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