ASFPFM INSURANCE COMMITTEE CALL

CO-CHAIRS
STEVE SAMUELSON
BRUCE A. BENDER

December 10, 2019
• Welcome
• Ag Structures in the Floodplain Guidance/Policy
• Elevation Certificate Revision
• October 2019/April 2020 NFIP Changes
• Risk Rating 2.0
• NFIP Legislation – Chad Berginnis (ASFPM)
• Pivot/PART – Niki Crewes (FEMA)
• Questions
FEMA’s Draft Ag Policy

Five Recommendations from Studies

✓ Revise the definition and/or floodplain management interpretation of "Agricultural Structures"
✓ Establish a building occupancy specific to "Agricultural Structures" for insurance purposes along with an insurance policy, allowable mitigation techniques, and insurance rating specific to these buildings
✓ Provide detailed guidance of "What is an Insurable Agricultural Structure?"
✓ Collaborate with lending regulators to determine areas of flexibility regarding requiring flood insurance
✓ Provide clarity, guidance, materials, and training on "Agricultural Structures"

FEMA POLICY: Floodplain Management Requirements for Agricultural Structures and Accessory Structures
FEMA Policy #XXX-XX

BACKGROUND
This policy is intended to provide clarification and technical assistance to National Flood Insurance Program (NFIP) state coordinators and local floodplain administrators regarding implementation of the minimum NFIP construction requirements for agricultural structures and accessory structures, as defined in this policy, which are located within flood prone areas. This policy supersedes portions of existing guidance related to agricultural structures and accessory structures found in FEMA Technical Bulletin 1 “Openings in Foundation Walls and Walls of Enclosures” and FEMA Technical Bulletin 7 “Wet Floodproofing Requirements”.

PURPOSE
The purpose of this policy is to acknowledge the unique characteristics and uses of agricultural structures and accessory structures in order to ensure sound development within flood prone areas. It is designed to clarify the definition of agricultural structures and accessory structures found in FEMA’s guidelines and provides increased flexibility within the Special Flood Hazard Area for agricultural structures while ensuring those structures meet minimum flood resistance requirements.

FEMA Policy #104-008-03 and Accompanying FPM Bulletin

New options for communities to allow wet floodproofing in lieu of elevation and dry floodproofing:

- Variance – could be allowed for wet floodproofing agricultural and accessory structures at grade or mixed mitigation with wet floodproofing on a case by case basis – must have established variance mechanism and should have ordinance language
- Community-wide exception – could be allowed for wet floodproofing agricultural and accessory structures approved by FEMA and must be adopted into local ordinance
- Without Variance - if small and low cost, some accessory structures could be allowed to be wet floodproofed without a variance if the proper language is adopted and approved

A pattern of improperly issued variance may cause for probation. Variances must be done in accordance with FEMA P-993.
• OMB has approved the current form for renewal; should be up on FEMA.gov by month’s end
• Suggested revisions are now being submitted to OMB by FEMA
Flood Insurance Changes

• **October 2019**
  - Agent National Producer Number reported on all new business
  - Updated Specific Rating Guidelines for above-grade enclosures (e.g., hanging floors, mid-level entries) and non-elevated, non-residential structures with below-grade pit areas (e.g., oil pits)

• **April 2020**
  - Average cost increase: ~10%
  - Reserve Fund Assessment: increase to 18%
  - Preferred Risk Policy cost increase: 12.5%*
  - New rating process for floodproof buildings
  - Zone V Risk Rating Factor Form discontinued

*Effective January 1, 2021*
Risk Rating 2.0 Release - Deferred

• April 1, 2021
  – Rates released for all building types

• October 1, 2021
  – Rates for all building types go into effect *nationwide*
Risk Rating 2.0 - New Methodology

Current Rating Method
- FIRM Flood Zone
- Base Flood Elevation
- Foundation Type
- Structural Elevation (A & V)
- Fees & Surcharges

Risk Rating 2.0

Geographic Variables
- Distance to coast/river
- Elevation relative to flood source
- Stream order

Structural Variables
- Replacement Cost value
- Foundation type
- First floor height

Other
- Multiple data sources
- More flood frequencies

Fees & Surcharges
Risk Rating 2.0 - Benefits

Easier-to-Understand Rating Characteristics

- Distance to coast or flooding source
- Different types of flood risk
- Cost to rebuild

Creates an individualized picture of a property’s risk

Provides rates that are easier to understand for agents and policyholders

Reflects more types of flood risk in rates

Uses the latest actuarial practices to set risk-based rates

Reduces complexity for agents to generate a quote
Potential New Policy Forms

NFIP Current State
- Dwelling
- General Property
- Residential Condominium Building Association Policy (RCBAP)

VS.

Proposed Future State
- Homeowners
- Tenants
- Group Flood
- Mobile Homes
- Landlord
- Condo Unit
- RCBAP
- Small Commercial
- Large Commercial

www.FEMA.gov/NFIPTransformation
NFIP Reauth – Expires December 20th

OR

Chad Berginnis
ASFPM Executive Santa
Niki Crewes
Branch Chief (Acting)
Insurance Analytics and Policy Branch
Federal Insurance and Mitigation Administration
Federal Emergency Management Agency
ACCESSING NFIP DATA
Agenda

• Pivot update
• Ad hoc data requests
• Privacy Act
• ISAA
PIVOT UPDATES
Overview

• Pivot Business Benefits
• Report Updates
• Current Report Availability Status
• Timeline
• PART Reports
  ▪ Web Reports
  ▪ Tableau Reports
  ▪ Downloadable Data Types
• Coming Soon
• Ad-hoc Data Requests
Pivot Business Benefits

**Near real-time data validation/feedback and improved awareness**

- Near real-time validation of flood insurance data business rules; instead of waiting almost 60 days with the legacy solution
- Since 3/1/19, 6.5M+ transactions have been submitted, with 500k+ claims and policies validated
- Via data APIs, industry partners receive instant notification of data submission success/failure
- Same day information submitted by companies provides the NFIP and stakeholders w/more awareness
Current Report Availability Status
<table>
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<tr>
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<th>Report Category</th>
<th>Status As of 12/09</th>
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<tr>
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<td>Repetitive Loss Data State and Community Drilldown</td>
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<td>Address Lookup by State, City and Zip Code Drilldown</td>
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<td>Rolling 12 Months History: PIF, CIF, PRP</td>
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<td>CBRS Ineligible Addresses</td>
<td>Policy</td>
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Timeline

• Timeline for Outstanding Community & Policy Reports:
  ▪ Report1: Community Details - State & Community Drilldown – In UAT (Targeting for 12/20)
  ▪ Report2: Preferred Risk Policies Totals By Region/State/County/Community - In UAT (Targeting for 12/20)
PART Reports

PART Reports

NFIP Files System of Records Notice (SORN) Routine Uses

As a State Hazard Mitigation Officer (SHMO)/NFIP Coordinator having a current signed Information Sharing Access Agreement (ISAA) with DHS/FEMA/FIA/FID, each time you access PIVOT you must select one of the NFIP Files SORN Routine Uses shown below.

Note: If you do not need personally identifiable information (PII) and wish to access aggregate/summary level data reports only, enter a reason for access below and click the submit button without choosing any of the routine uses.

* Indicates field is required.

- [ ] G. Routine Use (G) is for floodplain management enforcement only. Any other routine use (G) that involves investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order requires an ISAA that must be reviewed and cleared by the FEMA Privacy Office.

- [ ] H. Determine or verify eligibility for benefits/verify non-duplication of benefits/determine unmet needs.

- [ ] I. Ascertain the degree of financial burdens

- [ ] J. Further NFIP outreach and education activities

- [ ] K. For acquiring and relocating their flood prone properties

- [ ] L. Assist in hazard mitigation and floodplain management activities

- [ ] M. Conduct research, analysis, and feasibility studies

- [ ] N. Provide repetitive loss records of properties

Please state specifically how the data will be used (do not repeat the routine use). *

Provide reason for access...
PART Web Reports

When accessing any web report, the page will appear like the one shown below (Company/Policy Claims Lookup used as an example)

To generate a report:
1. Enter any known parameters.
2. Click Run Report to display the results.

NOTE: All 4 Policy Search and Claims Search web reports do NOT have download functionality. These are:

- Company/Policy Claims Lookup
- Policy Search By Street Level
- Company/Policy Lookup-Policy Data
- Insured Name Search
PART Tableau Reports

To view and download PART Tableau Reports first select the PART Reports Card

Welcome to PIVOT

Quick Filter

What are you looking for?

Reports

PART Reports
PART Tableau Reports

- Search for the report you would like to download and click on the report tile.

**NOTE:** All Tableau reports have download functionality, but they may be disabled based on user permissions (i.e. some reports only allow certain users to download data as a PDF, Crosstab, or Full Data.)

**Tableau Workbooks are not currently available for download**
PART Tableau Reports

The “Download” button will be visible once you initially click into the report but this will not allow you to download any data – only screenshots. You must click on the report tab and filter data before downloading.
PART Tableau Reports

Click on Report Tab to view and filter the data
PART Tableau Reports

**CBRS Ineligible Addresses**

Data as of: 3/31/2019

For the most current CBRS information, please visit the CBRS Validation Tool at [https://www.fcc.gov/cbrel/documentation.html](https://www.fcc.gov/cbrel/documentation.html) and check the latest guidance in the NFI... Field Manual at [https://www.fcc.gov/spectrum-licence-reference-manual](https://www.fcc.gov/spectrum-licence-reference-manual).

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Filter your data accordingly

NOTE: Order matters, start with the largest geographic parameter (usually "State")
PART Tableau Reports

Make sure to click somewhere on the report. Not doing so will cause certain Download file formats to be disabled and grayed out. Select the drop-down fields based on the requirement and highlight the field value, then go to download file formats. Then you will see the file formats that are enabled or disabled based on user permission.

*Tableau Workbooks are not currently available for download*
Downloadable Data Types

**Image (.png)**

This will only download a screenshot of the data on the screen.

Click on **Image** from the “Download” pop-up and another “Download Image” pop-up will appear. Click **Download**.
Downloadable Data Types

Image (.png)

Photos will open
Downloadable Data Types

Data (.csv)

The Data option downloads the data in a separate browser window

2 tabs: Summary and Full Data

i. Click on Data from the “Download” pop-up and a separate browser window “View Data” will open with a Summary and Full Data tab. View the data in the new browser window or click on the “Download all rows as a text file” hyperlink to download as a spreadsheet (.csv).
# Downloadable Data Types

## Data (.csv)

Excel will open

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Downloadable Data Types

Crosstab (.csv)

The Crosstab option downloads all the data as a spreadsheet.

i. Click on Crosstab from the “Download” pop-up and another “Download Crosstab” pop-up will appear. Click Download.
Downloadable Data Types

Crosstab (.csv)

Microsoft Excel will open
Downloadable Data Types

**PDF(.pdf)**

This will only download a screenshot of the data on the screen.

1. Click on **PDF** from the “Download” pop-up and a “Download PDF” pop-up will appear. Select your Layout, Content, and Sheets to Download. Next click **Generate**.
Downloadable Data Types

PDF (.pdf)

Adobe Acrobat will open
Coming Soon

• Future releases will include consolidated reports and an updated user interface. If you have questions, comments, or suggestions regarding PART reporting, please contact:
  
• fema-nfippivotsupport@fema.dhs.gov
Ad-hoc data requests

• JIRA access for those in FEMA (Need PIV)
  ▪ Work with your RIFL to generate a request ticket

• With every ad-hoc request:
  ▪ Routine use
  ▪ Need-to-know
  ▪ additional information

• Our concern is protecting the information of our stakeholders
QUESTIONS
PRIVACY ACT

PRIVACY ACT OF 1974 (5 U.S.C. 552A)
Privacy Act

- The Privacy Act of 1974, 5 U.S.C. § 552a, establishes a code of fair information practices that governs the collection, maintenance, use, and dissemination of information about individuals that is maintained in systems of records by federal agencies. A system of records is a group of records under the control of an agency from which information is retrieved by the name of the individual or by some identifier assigned to the individual.
Privacy Act


- This system of records allows DHS/FEMA to collect and maintain records and information regarding applicants, policyholders, prospective policyholders, insurance agents, and other individuals associated with NFIP.

- In addition to those disclosures permitted under 5 U.S.C. 552a(b) of the Privacy Act, all or a portion of the records of information contained in this system may be disclosed outside DHS as a routine use pursuant to 5 U.S.C. 552a(b)(3).
Privacy Act

Personally Identifiable Information

- Personally Identifiable Information (PII) is any information that permits the identity of an individual to be directly or indirectly inferred, including other information that is linked or linkable to an individual.
INFORMATION SHARING ACCESS AGREEMENT (ISAA)
ISAA

- As we transitioned from the NFIP legacy system to Pivot, we shut down broad access to NFIP data through the NFIP system in favor of instituting “least privileged role based access” principles. This enables us to put the policyholder first while balancing the needs of NFIP staff and partners to fulfill their duties.
  - Least privileged role based accessed is sharing only the data needed, at a particular point in time, for a specific purpose with only those who need to see it based on their function.
Over the last few years, we have coordinated with DHS Privacy, FEMA Privacy, and FEMA OCC to develop standard data sharing agreements called “Information Sharing Access Agreements” (ISAAs) that can be used for most NFIP data sharing needs at the state and local level.

The Federal Insurance Directorate (FID) requires a signed data sharing agreement before distributing NFIP PII to all external parties. The FID Assistant Administrator signs all NFIP data sharing agreements.

Currently we have a process for the state NFIP Coordinators and State Hazard Mitigation Officers (SHMOs) to access PII specific reports in Pivot.
Regular ISAA:

- Sample of paragraph 1 purpose...
  ...to receive NFIP policy and claims information to be used internally for preparation of outreach materials and other activities required for CRS, repetitive loss information, floodplain management compliance, and hazard mitigation.

- In paragraphs 3.e., 5.b.i., and 5.b.iv., state the routine use(s) that are consistent with the purpose stated in paragraph 1.
  ...routine uses O, R, T.
ISAA for Pivot access:

• At this time, only the state NFIP Coordinator and the SHMO may sign the ISAA and have access to Pivot.

• FID intends to open access in the near future after the Insurance Analytics and Policy Branch (IAPB) is able to complete a further analysis on reporting by the current users. IAPB is currently finding that many times the routine uses do not align with the stated reason for access to the reports or the user is simply selecting all of the routine uses available. Additionally, the stated reasons are vague.

• Our Pivot team will create a user guide to include better detail on what is necessary for reporting.
Example Challenges with PART

- FEMA requires information be included in HMA grant applications that SHMOs used to have access to as part of BureauNet. Since we cannot access this information in the new system, FEMA is effectively preventing communities from applying for Federal grant funds.

- Grant applications for acquisition of a property at pre-flood market value require access to data in order to determine there has not been a duplication of benefits.

- Mitigation grants require specific RL and SRL property information.

- State of Ohio has grants open with FEMA that the scope of work cannot be completed for without access to data that is currently unavailable.

- Cannot see premium information for a policy. Previously paid premiums are eligible for reimbursement under Hazard Mitigation Grant Program.

- Unable to check Rep Loss and Severe Rep Loss properties easily for a Community Assistance Visit.

- Unable to access data on minus rated policies when conducting a CAV in a community.

- During a CAV field tour it has been a practice to look at policy information related to structures found during a field check for additional information.

- Concentrating on Rep Loss properties for a community after a flood is important for mitigation purposes.

- Communities need RL-SRL data for hazard mitigation plans and Community Rating System purposes. Annual outreach and Rep Loss Area Analysis are needed for CRS communities.

- Flood loss data has been incorporated into various planning tools they work on such as floodplain management plans or emergency management plans and flood risk studies. Unable to do the planning without the data.

- Citizens call State offices to ask for elevation certificates. Used to be able to look at policy information to see if policy had been rated with an EC. Can’t do that now.

- When compiling reports for FEMA on federally-funded mitigated properties, we used to be able to check to see if the owner has maintained their required policy.

- Unable to use PART; some State Coordinator’s have been asking FEMA regions for assistance. Information received has not been what was asked for, incomplete or out of date.
Questions?