Flood Insurance Committee

National Policy Issues

Co-Chairs:
Bruce A. Bender, CFM
Steve Samuelson, CFM
Today’s Agenda

• Welcome & Last Year in Review
• Recent & Upcoming NFIP Changes
• CRS Update
• Elevation Certificate Update
• Base Level Engineering
• OFIA Update
• Ag Structures Early Bird Overview
• Private Flood
• New Business & Next Year’s G & O’s
WELCOME &
LAST YEAR IN REVIEW
RECENT AND
UPCOMING CHANGES IN THE NFIP
Risk Rating and Policy Forms Redesign
NFIP Moonshots

Leveraging technology and data will **streamline** the underwriting and policy issuance process

A more credible view of risk will encourage coverage in all risk-prone areas

Offering more mitigation credits will incentivize risk reduction efforts

**Intuitive rating variables** that clearly communicate risk will highlight mitigation opportunities
Vision

Risk Rating and Policy Forms Redesign is a cross-FIMA initiative established to transform the insurance product and policyholder experience and provide value by...

**DELIVERING RATES THAT:**

- Are Fair
- Are Clear
- Use Current Technology & Data

**USING POLICY FORMS THAT:**

- Are Simple
- Align with Industry
- Provide Choice
Rating Redesign & Policy Form

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Segment 1: Southeast States

- The first Segment of rates will be for *single family homes* in Southeast states (blue).
- Rolling out in segments instead of nationwide helps deliver rates sooner.
- This region was chosen because of the large number of policyholders in or near floodplains and availability of up-to-date data.
- The order of rollout for additional Segments will be determined at a future date.
Pillars of the New Rating Methodology

Overall, the new rating plan will use:

- Replacement cost value
- Intuitive rating variables
- Commercial Catastrophe models + NFIP Map Data
- Easily collected data
Example Rate Calculation

Example of two homes in AE zones with $250,000 limit and value for building:

- **Low storm surge and inland flood risk**
  - Current Premium: $1,169
  - Target Premium: $500

- **High storm surge and inland flood risk**
  - Current Premium: $1,169
  - Target Premium: $2,500
User Experience: Notional Prototype Graphic

SAMPLE RISK FACTORS

Distance to coast
- **LOW**
  - You are relatively far from the coast. This results in a decrease to your premium.
  - view details

Relative elevation
- **HIGH**
  - Your home is low lying. This results in an increase to your premium.
  - High volume rain events could flood your home even though you are not near a flooding source.
  - view details

Basement
- **LOW**
  - Your home does not have a basement. This results in a decrease to your premium.
  - view details

YOUR FLOOD INSURANCE PREMIUM FOR JANUARY 2018

Your flood insurance premium is $-$$$$

Mitigation actions to reduce risk
- view details
New Policy Forms

• NFIP must provide insurance products that customers value and agents can easily sell

• New forms will be understandable to policy holders, agents, and adjusters

• FEMA will test the new forms against the rating plan to determine whether pricing is reasonable

• New forms will utilize industry best practices with an emphasis on plain language.
NFIP Current State vs. Industry

**NFIP Current State**

Three policy forms:
- Dwelling
- General Property
- Residential Condominium Building Association Policy

**Industry policy forms**

- Homeowners policy
- Renters insurance policy
- Condominium policy
- Condo unit policy
- Mobile home policy
- Dwelling fire policy
- Commercial property policy
- Builder’s risk policy
NFIP Insurance Transformation

The new rates and forms will be delivered through the NFIP Insurance Transformation Initiative.

- **Change Management**
  - Develop and implement change management strategy and schedule
  - Conduct stakeholder assessment and ensure successful integration

- **Training**
  - Provide targeted training for underwriters, agents and adjusters
  - Deliver training through online workshops and in-person sessions

- **Communications**
  - Educate stakeholders on the new rating methodology
  - Launch a public awareness campaign

- **Risk Rating Engine**
  - Deliver new rates through an electronic rating engine
  - Provide clear message of flood risk to the customer
NFIP Updates

- **October 2018 Program Changes**
  - New cancellation reason for non NFIP policies
  - Expand eligibility for Newly Mapped rating procedure for lender notifications
  - Policyholder notification prior to cancellation due to map change

- **Updated Policy Guidance**
  - August 2018 – Claims Manual
  - October 2018 – Flood Insurance Manual
Thank You
CRS Update for the ASFPM Insurance Committee

June 18, 2018

Molly O’Toole, P.E., CFM
Managing Consultant to the CRS
Since the Kansas City Conference:

- 2017 CRS Coordinator’s Manual (April 2017 to March 2020)
- 3 year verification cycle visit for top 10% of CRS discount communities
- Centralized annual recertification process – different communities each quarter
- Includes a centralized review of Elevation Certificates
Activity 370 (Flood Insurance Promotion)

- A Lender is no longer required on the committee
- Coverage improvement plan committee must still have an insurance agent
CRSresources.org on the 100 General page

**Colorado**

Top 50 National Flood Insurance Program (NFIP) Policy Count Communities* and Community Rating System (CRS) Participation

*Ranked by the total number of NFIP insurance policies in-force.

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**Benefits of Joining the CRS**

* Activities credited by the CRS provide direct benefits to the community, including enhanced public safety, reduction in flood damage and environmental protection.
* Residents are reminded that the community is working to protect them from flood losses.
* Public information activities will build a knowledgeable constituency interested in supporting and improving flood protection measures.
* Money stays in the community instead of being spent on insurance premiums.

NOTES:

As of October 2017, 251 communities in Colorado participate in the National Flood Insurance Program (NFIP). Of these communities, 47 (or 19%) participate in the Community Rating System (CRS).

Of the top 50 Colorado communities (in terms of flood insurance policies-in-force), 33 participate in the CRS. The remaining 17 communities present an outreach opportunity for encouraging participation in the CRS.
Community Rating System

- 1,486 communities in the CRS as of May 2018
- 70 percent of the all NFIP policies within CRS communities
Growth of the CRS

1991: 295 communities
2015: 1,347 communities

25 Years
Community Rating System

1486 CRS Communities as of May 1, 2018

CRS Class

9: 242
8: 472
7: 391
6: 230
5: 136
4: 5
3: 3
2: 6
1: 1
Currently:

- Considerations for the 2020 Manual
- Small Communities Guide
  - Focus on what the community is already implementing
- FEMA’s Insurance Moonshot
Community Rating System

Next:

- CRS will be back on FloodSmart (next phase)
- More attention to the Moonshots
  - Committee input and any tools are welcome!
- Development of the 2020 CRS Coordinator’s Manual
  - Committee input welcome!
Community Rating System

CRS Goals:
1. Reduce and avoid flood damage to insurable property
2. Strengthen and support the insurance aspects of the NFIP
3. Foster comprehensive floodplain management

Other considerations:
- CRS is a voluntary program
- CRS is a rating program (actuarial)
- A community CRS rating results in a direct insurance premium discount
Community Rating System

2020 CRS Coordinator’s Manual

- Insurance Promotion (Activity 370)
- Freeboard Prerequisite
- Substantial Damage
- Flood risk outside the SFHA

2023 CRS Coordinator’s Manual

- What can’t be done, or get done, with 2020 Manual
ASFPM Involvement in the CRS

- CRS Task Force
- ASFPM CRS Green Guide
- Assistance with Moonshot effort
CRS at ASFPM in Phoenix

- Committee Meetings
- CRS Booth in Exhibits Hall
- CRS On-on-One Room
- “Lunch with CRS”
- Tuesday, Wednesday and Thursday Concurrent Sessions
Questions?
Elevation Certificate Review

Updates for November 2018
• E.C. Expires every Three Years
• 2015 Form had Several Errors, Inconsistencies and Outdated Issues
• Original 2015 Electronic Form released with Major Problems
• ASFPM Flood Insurance Committee is Non-Voting Member of Flood Insurance Producers National Committee (FIPNC)
• FEMA meets with FIPNC and Executive Flood Committee of Inst for Business and Home Safety (IBHS) 3x / Yr
• 2017 Meetings: ASFPM urged FEMA to form Industry Committee re Needed Changes to EC
Schedule and Process

• November 2018 Expiration
• FEMA agreed to form Industry Committee
• Insurance Committee and FP Regulations Committee formed an EC working group in November 2018 to identify issues
• ASFPM invited ASFPM and Surveyor rep (Wendy Lathrop) to a working group including numerous FEMA branches, incl. Ins. Advocate
• ASFPM working group developed detailed comments and recommendations, presented as color coded submittal
Schedule and Process

- FEMA weekly calls in December; had January deadline
- Deadline extended to May so calls became monthly
- Lots of discussion on wording changes; Hard to get through call agendas
- FEMA informed working group that they could only push a couple of Form changes, but more flexibility on instructions
  - Most of ASFPM comments were on instructions
- FEMA later informed ASFPM that instructions changes were also limited in number – Asked for 5 top recommendations
Elevation Certificate Expiration

Recommended changes:

- **A5** – Lat/Long is 5 decimals; so should decimal degrees
- **A6** - Photos should always be provided, not just for ins.
- **A8/A9** – Crawlspace/ Enclosure; Attached Garage - wording changes; document total rated area of flood opening
- **B7,9,10** – wording clarification; include link to MSC
- **C2** – Elevations; accuracy should be to 0.1’ not 0.01’; revise wording to accommodate 2 floors below BFE; revise C2e to provide examples not be prescriptive
- **D** – add clarifications and email address
- **Corrections**: Other Source not fillable in B10, B11, C2

Draft Recommendations:
• Recognized that Can’t Lose All Rec’s
• Grouped Similar Recommendations
  – E.g., Engineered Openings in Two Sections
• Separate Sent Correction of Errors, Contradictions and Outdated Info
• Kept Lower Priority Recommendations for Future Discussion
Top Five Hits

- Engineered Openings – A8 –A
  - Add Total Rated Area
  - Add Rated Area of Engineered Openings to Net Openings of Standard Openings
- Documentation of BFE Data
  - Lots of Discussion
  - Need to Clarify Use of FIS
  - Always use Nearest Tenth of Foot
  - Using the appropriate Flood Insurance Study (FIS) Profile, Transect, or Floodway Data Table, or FIRM panel
  - Indicate Source of BFE; Clarify “Other” documentation
  - Specify any Reports Used
  - Specify LOMC if used
C2.a-d Requirements – Bldgs with Multiple Levels or Multi-Level Enclosures

- For buildings requiring more than 2 floors or levels to be surveyed, such as those with multiple floors or multi-level enclosures, enter the additional surveyed elevations and floor descriptions in the Section D comments, and clarify which floors are entered as C2.a and C2.b.

- Further Clarifications – C2.c (Lowest Horizontal Structural Member) may be filled out if not in V zone

- Some Language Clarifications
• C2.e Requirements (Machinery and Equipment Elevations)
  – Language Clarifications
  • Enter the lowest platform, floor, or ground elevation supporting at least 1 of the lowest following machinery and equipment servicing the building. Items such as elevators and their associated equipment, furnaces, hot water heaters, heat pumps, and air conditioners, etc., may be located in an attached garage or enclosure or on an open utility platform that provides utility services for the building.
Top 5 Hits

• Section D Documentation Requirements
  – Comments and Requirements often Omitted or Incomplete
  – Instructions to Insert Info in “Place Seal Here” box
  – Instructions on Using Comments Area
Parking Lot Issues

- Perception that Expiration Date means filled out EC expires
- Round Hundredths Elevations to Tenths of a foot
- **Require Building Photographs**
- Clarify Community Name and CID to account for Newly Incorporated communities, annexations and dissolutions.
- Clarify Zone AO instructions re natural grade or finished construction
Comments and Perspective

• Hard to do Needed Revisions on FEMA’s Schedule
• FEMA is Limited re Developing more Comprehensive Revisions
• Need Working Group to Continue Between Revision Deadlines
• Thanks: Insurance and FPRegs Committee Members
• Thanks: Bruce and Del
Base Level engineering
Credible and expandable engineering analysis and modeling for FEMA, State, communities and developers.

Data assisting the estimation of flood extents, water surface elevations and flood depths

May be adopted as Best Available Information (BAI) by communities & inform development decisions.
Base Level Engineering – Focus Areas

1. Unknown & Unverified Miles

2. Unmodernized Communities

3. Unmapped Miles
Flood Risk Studies

Hydrology
Volume of water?

Hydraulics
Will the stream in question flood?

Floodplain Mapping
What areas are at risk?
Base Level Engineering

R6 Minimum Purchase

- Hydraulic Engineering Models
  10%, 4%, 2%, 1%, 1%+, 1%- , 0.2%
- Estimated Flood Extents
  10%, 1% and 0.2%
- Estimated Water Surface Grids
  1% and 0.2%
- Estimated Flood Depth Grids
  1% and 0.2%
- Additional Purchased (R6)
  - HAZUS – Level 2 Analysis
  - Point file (Choke Points, Survey Support and Update Areas)
  - Base Level Engineering Report
  - Other datasets can be produced, modeling is prepared/available
Base Level Engineering is Best Available Data

- Base Level Engineering is **Best Available Information**, is useable by communities when released under the same guidance.
- The approach should be reviewed for application prior to use, not universally applicable without some alteration (modernized maps, model backed miles or significant detailed mapping areas)
- Base Level Engineering **must be prepared on high quality ground elevation and must meet the minimum modeling/mapping standards** identified in FEMA’s Standards for Flood Risk Projects (FIMA 204-078-1, February 2018)
- Numerous efforts are producing expansive model backed information for local use, for instance:
  - State of West Virginia, most of Region 3
  - State of Iowa
  - State of Indiana
  - USACE – Omaha, NE
  - Many, many more
• Base Level Engineering is **Best Available Information**, is useable by communities when released under the same guidance.
  • Use where no data exists
  • Use where data is more conservative or similar to existing (Zone A)
• In all cases, any modeling/mapping results should be reviewed prior to broad adoption. Communities with no information to work from have been ecstatic with the availability and coverage.
• Intended to allow community “test drive”
• May be used to determine lowest floor
• Skeleton models allow developers to prepare existing/proposed modeling.
• Communities are provided all modeling and datasets through our Estimated BFE Viewer ([www.inFRM.us/estBFE](http://www.inFRM.us/estBFE))
Base Level Engineering Uses

- Information produced by our methodology can be used to assist insurance rating.
- The estimated BFEs identified by our results and by our Estimated BFE Viewer (www.inFRM.us/estBFE) may be used to identify insurance premiums in Zone A areas.

- QUESTION – Does policy indicate that local adoption of an estimated BFE is required to allow insurance rating to use this information?
- OR is this an indication that education with locals and insurance industry is needed?
- WHAT do we need to relay to them?
- WHAT tools or information is needed?
Base Level Engineering Uses

- Information produced by our methodology can be used to assist Letter of Map Amendment (LOMA) submittals.

- The estimated BFEs identified by our results and by our Estimated BFE Viewer (www.inFRM.us/estBFE) may be used to identify estimated BFEs in Zone A areas. Communities can:
  - Use where no data exists
  - Use where data is more conservative or similar to existing (Zone A)

- Elevation Certificate should be used:
  - Section B10 - Check “OTHER”
  - Indicate “Base Level Engineering”
  - Submit Estimated BFE Viewer Report with LOMA submittal

- MT1 group and FMIX staff are available for additional submitter questions
### SECTION B – FLOOD INSURANCE RATE MAP (FIRM) INFORMATION

<table>
<thead>
<tr>
<th>B1. NFIP Community Name &amp; Community Number</th>
<th>B2. County Name</th>
<th>B3. State</th>
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<tbody>
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<table>
<thead>
<tr>
<th>B4. Map/Panel Number</th>
<th>B5. Suffix</th>
<th>B6. FIRM Index Date</th>
<th>B7. FIRM Panel Effective/Revised Date</th>
<th>B8. Flood Zone(s)</th>
<th>B9. Base Flood Elevation(s) (Zone AO, use Base Flood Depth)</th>
</tr>
</thead>
<tbody>
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</table>

B10. Indicate the source of the Base Flood Elevation (BFE) data or base flood depth entered in Item B9:

- [ ] FIS Profile
- [ ] FIRM
- [ ] Community Determined
- [x] Other/Source: **Base Level Engineering (Estimated BFE report attached)**

B11. Indicate elevation datum used for BFE in Item B9: [ ] NGVD 1929 [x] NAVD 1988 [ ] Other/Source: ________________________

B12. Is the building located in a Coastal Barrier Resources System (CBRS) area or Otherwise Protected Area (OPA)? [ ] Yes [ ] No

Designation Date: ________________________

- [ ] CBRS
- [ ] OPA

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FEMA Form 086-0-33 (7/15) Replaces all previous editions.
Questions?

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Regional Program Management Lead assisting FEMA R6  214.918.8523
OFFICE OF THE FLOOD INSURANCE ADVOCATE UPDATE
Reducing NFIP complexity with compassion and fairness.

https://www.fema.gov/national-flood-insurance-program-flood-insurance-advocate

https://www.fema.gov/webform/flood-insurance-advocate-ask-question
Adding Value alongside of Regional Efforts

The Office of the Flood Insurance Advocate (OFIA) advocates for the fair treatment of policyholders and property owners by providing education and guidance on all aspects of the NFIP, identifying trends affecting the public, and making recommendations for program improvements to FEMA leadership.

- The OFIA is but one of the inputs helping the organization learn to be more customer centric
- The OFIA handles very complex cases, involving multiple legs of the stool
- The OFIA has close proximity to program decision makers, able to elevate to program Leadership
- The OFIA helps bring a customer perspective
- The OFIA works collaboratively with the program offices
Approximately 77% of inquiries received by the Advocate’s office focus on Insurance related topics including underwriting and claims.

While they may lead with insurance, most inquiries are complex and cross multiple program areas.

Findings continue to indicate an overall need for:

- Increased agent education and training requirements
- Clear, consistent communication with policyholders and property owners

The number of more general inquiries are expected to drop as the programs strengthen materials and resources.
Through our casework, the OFIA has worked to achieve beneficial outcomes for NFIP customers such as:

- Helping to stop home foreclosures
- Correctly applying BW-12 provisions to restore grandfathering
- Correctly applying PRP, and Newly Mapped
- Assisting customers in obtaining premium and cancellation refunds
- Reduction in premium payments
- Assisting customers with receiving accurate claims payments
  - Named their child after an Advocate Representative, “Baby Claire”
The OFIA’s Annual Report

- Annual Reports are the primary form of reporting for the OFIA
  - Concerns are identified from the inquiries submitted to the OFIA over the year
- OFIA leadership briefed the content to SBC and HFSC on the findings and recommendations
- This is one of the ways the OFIA helps the organization learn to become more customer centric
- Reports focus on issues that appear to impact a broad set of policyholders and property owners or have significant financial impact on a subset of the policyholder population
- The Annual Report is published on a calendar year basis and made public through a multi-step process
Challenges with Customer Communication During the Claims Process

• Available resources on how to navigate the process can be hard to understand

• The OFIA recommends refreshing these materials and posting claims process resources to an online easy-to-find central location
Lack of Premium Reduction Following the Lower-Level Abandonment of a Building

- Policy holders accept HMA assistance for a lower level abandonment and continue to be charged high insurance rates.

- The OFIA recommends guidance be provided to community officials regarding best techniques to reduce flood risk and lower flood insurance costs.
Lack of Refund for Duplicate Coverage with Private Insurance

• Policy holders find a private flood insurance alternative but are not allowed to cancel their NFIP policy.

• The OFIA recommends that the program allow a refund for the cancellation of an NFIP policy when a policy holder secures a privately written policy.
Severe Repetitive Loss Mitigation

• Cost-benefit analysis of eligibility for HMA funding disqualifies some pre-FIRM structures

• The OFIA recommends a review of the eligibility requirements for HMA funding
Office of the Flood Insurance Advocate

David Stearrett, CFM

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David Stearrett@fema.dhs.gov
Proposed NFIP Changes for Agricultural Structures

ASFPM National Policy Committee
June 19, 2018

Erin Cobb
Floodplain Management Division, FEMA
ASFPM Insurance Committee Early Bird Session
Wednesday (June 20) at 7am
PRIVATE FLOOD INSURANCE

STORIES FROM THE FIELD
NEW BUSINESS/NEXT YEAR’S GOALS

- Invite John Hintermister (FEMA Underwriting Branch Chief) to insurance committee calls
- Invite NFA to speak at Insurance Committee Call
- Bring ICC back up as area for committee to focus on
- Include private flood in objective planning
- Explore how to work more with realtors