INSURANCE COMMITTEE POLICY DISCUSSION

Insurance Committee Co-Chairs
Steve Samuelson, CFM
Bruce A. Bender, CFM

May 20, 2019
Today’s Agenda

• Welcome – Steve and Bruce
• Flood Insurance & EC Update – Suzan Krowel
• NFIP Transformation/RR2.0 – Tony Hake
• CRS Update – Molly O’Toole
• CBR/OPA Update – Dana Wright (USFWS)
• OFIA Update – David Stearrett (unable to attend – PPT included)
• Ag and PART updates – Steve (PART video included)
• Open Discussion/Questions
Flood Insurance Update
NFIP HIGHLIGHTS and UPDATES

Streamline Underwriting Inquiries

1. WYOS Submit Special Rating through Underwriting, Claims Operation Review Tool (UCORT)

2. Have in place Standardized inquiries/checklists

3. Manage WYO workflows through UCORT and keep Track of rating inquiries.
NFIP HIGHLIGHTS and UPDATES
Enhanced Underwriting Oversight

A. More frequent operation reviews

B. All companies are reviewed (previously company review was rotated 3 year cycle)

C. Timely feedback/corrective action (quarterly reviews as opposed to annual)
NFIP HIGHLIGHTS and UPDATES

Updated Flood Insurance Manual
Released October 2018

1. Reformatted Manual
2. Plain clear/concise language
3. Cancellation due to private insurance (Code 26)
   (Allowed if private policy purchased prior to NFIP)
Manual April 2018 ─ New Manual Oct 2018

PREVIOUSLY 24 SECTIONS now 6 Sections Consisting of:

1. Reference
2. Before you start
3. How to Write
4. How to Endorse
5. How to Renew
6. How to Cancel

With 11 Appendixes A-K
Manual April 2018     New Manual Oct 2018

• EXAMPLE of Where Prior Section was moved to in new Manual

SECTION 2-REFERENCE       is now       1. REFERENCE

SECTION 3-GENERAL RULES

2. Before you start
3. How to Write
4. How to Endorse
5. How to Renew

Appendix H: Flood Maps
Appendix D: Coastal Barrier Resources System
Appendix J: Rate Tables 2.
NFIP HIGHLIGHTS and UPDATES

Program Changes April 2019

1. Rate increases

2. Additional premium for SRL (5% of the premium before ICC)

3. 2-4 Family Primary Residence HFIAA Surcharge Change

4. Clear Communication-For policies effective on or after April 1, FEMA is requiring that the following message appear on the Policy Declarations Page: For more info about flood risk and policy.

Refer to: www.fema.gov/cost-of-flood
NFIP Rate Increases April 2019

• Overall, premiums will increase from an estimated average of $926 per policy to $1,002, for an average increase of 8.2 percent. These amounts do not include the HFIAA surcharge or the Federal Policy Fee (FPF). When the HFIAA surcharge and FPF are included, the total amount billed the policyholder will increase from $1,040 to $1,115, for an average increase of 7.3 percent.

• Premium increases effective April 1, 2019 comply with all the requirements of both the Biggert- Waters Flood Insurance Reform Act of 2012 (BW-12) and the Homeowner Flood Insurance Affordability Act of 2014 (HFIAA).
NFIP Rate Increases April 2019

Here is how increases break down by flood zone:

- Pre-FIRM Subsidized Policies -
- Primary Residences +7.3%
- Non-Primary Residences +24%
- Substantially Improved and SRL+24%
NFIP Rate Increases April 2019

- Non-Residential Business +24%
- V Zones +6%
- Other Subsidized Policies AR & A99 5%
- Post-FIRM V Zones 6%
- Post-FIRM AE and Unnumbered A Zones 4%
- A99 and AR +5%
- A1-30 AE +4%
- AH, AHB, AO, AOB — No change
- Standard Rated X Zone-1%
NFIP Rate Increases April 2019

- ICC premiums — Overall increase 3%
- PRP/Newly Mapped — $8 up to $230,000 on 1-4 Family and up to $480,000 on Other Residential and Non-Residential Bldg
  $6 on 1-4 Family $231,000 to $250,000 and $480,001 to $500,000 on Other Residential and Non-Residential
- Provisional Rating –
  1. $8.00 up to dwelling amount $230,000.
  2. $6.00 $231,000 to $250,000
Currently, the $25 HFIAA fee applies only to those structures that are single family Primary Residence

• Effective on or after 4/1/19, the $25 HFIAA fee will apply to 2-4 family Primary Residence dwellings (in lieu of the $250 fee prior to 4/1/19 Effective date)

• Policyholder must provide Primary Residence documentation that demonstrates building is primary residence
Severe Repetitive Loss (SRL) Increase April 2019

• An additional premium charge for SRLs – will be 5% of the annual subtotal before ICC premium.
Changes October 2019

• There will be a Requirement for insurers to report the Agency National Producer Number (NPN) and the Agent NPN for all new business with a policy effective date on or after October 1, 2019.

• Specific Rating Guidelines will include rates for above-grade enclosures (hanging floors and mid-level entries) and non-elevated, non-residential structures with below-grade pit areas (e.g., oil pits)

• The Community Rating System (CRS) Eligible List will be updated.
Changes January 1, 2020

- Preferred Risk Policies (PRPs): Premiums will increase 5 percent.
- A99 and AR Zone Policies eligible for the PRP: Premiums will increase 5 percent.
- Newly Mapped policies are initially charged PRP premiums during the first year following the effective date of the map change.
- Annual increases to these policies result from the use of a “multiplier” that varies by the year of the map change. As a result of increases to the multiplier that will be effective January 1, 2020, premiums for Newly Mapped policies will increase 15 percent.
Thank You
NFIP Transformation – Risk Rating 2.0
Risk Rating 2.0

National Association of Realtors
May 14, 2019
FEMA is focused on building a culture of preparedness by closing the insurance gap.

• To meet our goal, we are transforming the NFIP's insurance product.

• A significant part of this transformation is Risk Rating 2.0.
The NFIP’s current rating structure does not reflect advances in technology and our current understanding of flood risk.

The current rating methodology has not changed since the 1970s. Over time, this has resulted in the following issues:

- **Cost disparity**
- **Dramatic changes in pricing at the edges of a flood zone**
- **An incomplete picture of flood risk**
Risk Rating 2.0 aims to deliver rates that are:

- Better reflect a property’s unique flood risk
- Fair
- Easy to Understand
Risk Rating 2.0 aims to deliver several key benefits to policyholders, communities, and the flood insurance industry.

- Create an individualized picture of a property’s risk
- Provide rates that are easier to understand for agents and policyholders
- Reduce complexity for agents to generate a quote
Risk Rating 2.0 aims to deliver several key benefits to policyholders, communities, and the flood insurance industry.

- Reflect more types of flood risk in rates
- Reduce flood risk nationwide through increased coverage and mitigation activity
- Reinforce the financial framework of the NFIP
FEMA is building on years of investment in flood hazard information to incorporate innovative data and modeling.

The new rating structure will determine a customer’s flood risk by incorporating:

- Logical Rating Characteristics
- A broader range of flood frequencies
- Multiple data sources
Rates for all single-family homes will go into affect October 1, 2020.

April 1, 2020
Rates for all single-family homes will be available to industry partners through the new rating engine.

Industry partners will have the opportunity to train their agents before the official rollout of the rating engine.

October 1, 2020
Rates for all single-family homes go into effect nationwide.
Questions

To stay up-to-date with Risk Rating 2.0, and for the latest details, please visit www.fema.gov/nfiptransformation.
Thank You
CRS Update
Community Rating System Update for the ASFPM Insurance Committee

MAY 20, 2019

MOLLY O’TOOLE, P.E., CFM
MANAGING CONSULTANT TO THE CRS
Since the Phoenix Conference:

- More growth
- More training
- Year of Elevation Certificate Central Review
- Next Manual - January 2021
- Supporting the Insurance Moonshot
Community Rating System

- Program Growth
- Insurance Policies
- FEMA Strategic Plan
- Simplify
1,506 CRS Communities as of May 1, 2019
10 Year Growth
Where is the CRS Growth?
Where are the NFIP policies?

Why ask?

- To understand committee motivations.

Goal –

More resiliency.
Support FIMA’s Insurance Moonshot.
Average Policies by CRS Discount

<table>
<thead>
<tr>
<th>CRS Discount</th>
<th>Including</th>
<th>Communities</th>
<th>Total Policies</th>
<th>Average No. of Policies</th>
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<tbody>
<tr>
<td>Top 1%</td>
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<td>997,234</td>
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<tr>
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<td>134</td>
<td>1,602,607</td>
<td>11,960</td>
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<tr>
<td>20%</td>
<td>149</td>
<td>513,444</td>
<td>3,446</td>
<td></td>
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<tr>
<td>30%</td>
<td>148</td>
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<td>40%</td>
<td>149</td>
<td>129916</td>
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<td>60%</td>
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<td>70%</td>
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<td>189</td>
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<td>100%</td>
<td>149</td>
<td>2347</td>
<td>16</td>
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<table>
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<tr>
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<th>Total Policies</th>
<th>Average No. of Policies</th>
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<tr>
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<td>297</td>
<td>3,113,285</td>
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<tr>
<td>Next 30%</td>
<td>446</td>
<td>436,793</td>
<td>979</td>
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<td>Bottom 20%</td>
<td>297</td>
<td>10,772</td>
<td>36</td>
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<table>
<thead>
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<th>CRS Discount</th>
<th>Including</th>
<th>Communities</th>
<th>Total Policies</th>
<th>Average No. of Policies</th>
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<td>Bottom 50%</td>
<td>743</td>
<td>99,362</td>
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</table>

Average PIF for all CRS communities: 2,456
Percent of Contract in Force (CIF)

CRS and NFIP Policy Contracts
December 2 NFIP policies as of December 2017.

<table>
<thead>
<tr>
<th>CRS Communities</th>
<th>Total Number of Policy Contracts (CIF) in Force for Communities</th>
<th>Percent of All Polices</th>
<th>Percent of All CIF in SFHA</th>
<th>Percent of All CIF Standard X</th>
<th>Percent of All CIF PRP &amp; Newly</th>
<th>Other Policies</th>
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</thead>
<tbody>
<tr>
<td>Class 1</td>
<td>1</td>
<td>395</td>
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<td>0.0%</td>
<td>0.01%</td>
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<tr>
<td>Class 2</td>
<td>6</td>
<td>13,690</td>
<td>0.3%</td>
<td>0.2%</td>
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<td>0.4%</td>
</tr>
<tr>
<td>Class 3</td>
<td>3</td>
<td>8,532</td>
<td>0.2%</td>
<td>0.4%</td>
<td>0.2%</td>
<td>0.1%</td>
</tr>
<tr>
<td>Class 4</td>
<td>5</td>
<td>26,759</td>
<td>0.7%</td>
<td>0.9%</td>
<td>0.4%</td>
<td>0.5%</td>
</tr>
<tr>
<td>Class 5</td>
<td>136</td>
<td>909,302</td>
<td>22.3%</td>
<td>26.0%</td>
<td>15.1%</td>
<td>20.0%</td>
</tr>
<tr>
<td>Class 6</td>
<td>230</td>
<td>570,621</td>
<td>14.0%</td>
<td>15.5%</td>
<td>11.6%</td>
<td>13.2%</td>
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<tr>
<td>Class 7</td>
<td>391</td>
<td>714,617</td>
<td>17.6%</td>
<td>15.5%</td>
<td>16.4%</td>
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<tr>
<td>Class 8</td>
<td>472</td>
<td>461,946</td>
<td>11.4%</td>
<td>10.6%</td>
<td>14.3%</td>
<td>11.9%</td>
</tr>
<tr>
<td>Class 9</td>
<td>242</td>
<td>112,552</td>
<td>2.8%</td>
<td>2.9%</td>
<td>2.7%</td>
<td>2.3%</td>
</tr>
<tr>
<td>All CRS</td>
<td>1,486</td>
<td>2,818,398</td>
<td>69%</td>
<td>72%</td>
<td>61%</td>
<td>69%</td>
</tr>
<tr>
<td>Non-CRS</td>
<td>1,250,346</td>
<td>31%</td>
<td>28%</td>
<td>39%</td>
<td>31%</td>
<td>48%</td>
</tr>
<tr>
<td>Total</td>
<td>4,068,742</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>
## CRS and NFIP Policy Contracts - Average by CRS Class

December 2017 NFIP Data and May 2018 CRS Data

<table>
<thead>
<tr>
<th>Number of CRS Communities is Class as of May 2018</th>
<th>Total Policy Contracts in Force (CIF) as of December 2017</th>
<th>Average Number of CIF in the CRS</th>
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<tr>
<td></td>
<td>All</td>
<td>SFHA</td>
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<tr>
<td>Class 1</td>
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<td>395</td>
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<tr>
<td>Total</td>
<td></td>
<td></td>
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</table>

Total: 4,068,746
Insurance Moonshot

<table>
<thead>
<tr>
<th>CRS and NHP Policy Contracts</th>
<th>Total Number of Policy Contracts</th>
<th>Percent of All Policies</th>
<th>Percent of All CRS Policies</th>
<th>Percent of All CRP Policies</th>
<th>Percent of All NCR Policies</th>
<th>Other Policies</th>
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</thead>
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<td>CRS Communities in Class on May 2019</td>
<td>CRS</td>
<td>NHP</td>
<td>Total</td>
<td>CRS</td>
<td>NHP</td>
<td>Total</td>
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<td>1</td>
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<td>100%</td>
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</tbody>
</table>
NFIP/CRS UPDATE

February / March 2019

More on FEMA’s Moonshot —

Think Again about Flood Insurance

With early, drastic flooding capturing everyone’s attention this spring, communities have an opportunity to emphasize the importance of flood insurance. One message communities can send to their residents is “Think again about flood insurance.” This can encourage people to take another look at what they have that needs protection, get fresh information about their risk and about the coverage available, and/or re-examine their past decisions about flood insurance.

The spring 2019 outlook from the National Oceanic and Atmospheric Administration is for an elevated flood risk for two-thirds of the contiguous United States at least until the end of May. The map shows that there is potential for moderate to major flooding in parts of 25 states. There is no better time to emphasize the fact that people need flood insurance now.

Flood Insurance Myths

Often those who do not have flood insurance have failed to purchase a policy because they are laboring under one or more misimpressions about the availability or expense of a policy. One way to turn this around is to confront those “myths”
State Participation Maps

Every October
100 Series Page of CRSresources.org
https://crsresources.org/100-2/
CRS Resources Home

This is the temporary location of the CRS Resources website. This site is provided for Community Rating System (CRS) coordinators, webinar participants, and users groups to obtain reference materials related to the CRS. Here you will find CRS documents, worksheets, and tools relevant to the activities credited under the CRS Coordinator’s Manual. Other information regarding the National Flood Insurance Program’s CRS program can be found on the CRS page at the FEMA.gov website.

Use the menu above to find resources organized by CRS Activity.

- Download the 2017 CRS Coordinator’s Manual

New communities can click here to find the CRS application and Quick Check.
Supporting the FEMA Strategic Plan

➢ Incentivize
➢ Moonshots
➢ Simplify
➢ RR 2.0
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

- Simplify
- Current Manual (2017) to be used throughout all of 2020
- 2021 CRS Coordinator’s Manual
  - Class 8 Freeboard Prerequisite
  - Substantial Damage
  - Flood risk outside the SFHA
- Next, next Manual expected for 2026
Monday: Committee Meetings

Exhibit Hall:

- CRS Booth in Exhibits Hall
- CRS On-on-One Room

Tuesday: Concurrent Sessions A2, B2, C2

Wednesday: “Lunch with CRS” (12:20 pm)

Thursday: Concurrent Session G2
NFIP’s Community Rating System

Questions?

Thank you

Double Coverage by 2022
CBRS/OPA Update
The Coastal Barrier Resources Act “simply adopts the sensible approach that risk associated with new private development in these sensitive areas should be borne by the private sector, not underwritten by the American taxpayer.”

President Reagan 1982 signing statement
Coastal Barrier Resources Act (CBRA)

- Congress enacted CBRA and created the Coastal Barrier Resources System (CBRS) in 1982.

- Designated relatively undeveloped coastal barriers as part of the CBRS.

- Prohibits most Federal funding and financial assistance, including flood insurance within designated areas. Examples include (but are not limited to):
  - Beach renourishment
  - Construction of seawalls
  - Disaster assistance
  - New road construction

- Market-based approach to conservation.

- Does not restrict private, local, or state funded development.

“*The CBRA meets a national problem with less Federal involvement, not more.*”
~ President Reagan, 1982
In 2007, GAO found that about 97% of all units remained undeveloped or experienced minimal development. About 3% of units experienced significant development.

1. Keep people out of harm’s way
2. Save taxpayer dollars
   - More than $9.5 billion estimated savings as of 2013
3. Protect valuable habitat for fish and wildlife
   - Habitat for threatened and endangered species and commercial and sportfish species

In 2007, GAO found that about 97% of all units remained undeveloped or experienced minimal development. About 3% of units experienced significant development.
Location of CBRS Units

870 CBRS Units (approx. 3.5 million acres) located in 23 states and territories

Atlantic, Gulf of Mexico, Great Lakes, U.S. Virgin Islands, and Puerto Rico coasts
Official CBRS Maps and Digital Boundary Data

- CBRS boundaries are depicted on a set of official maps referenced in the law

- The U.S. Fish and Wildlife Service (Service) maintains the official maps

- Maps were originally hand drawn on USGS quads

- Completed a digital conversion for most of the CBRS maps in 2016

- CBRS boundaries are now accessible in a variety of digital formats in addition to the hard copy maps
Digital CBRS Data Availability

1. **CBRS Mapper**

2. **Web Map Services (WMS, REST) which can be consumed by:**
   - GIS professionals
   - Federal, state and local GIS applications
   - FEMA products such as NFHL Viewer and Map Service Center

3. **Shapefile Download**
   - Recommend subscribing to listserv for updates

Link to more information about CBRS digital data:
https://www.fws.gov/cbra/maps/Boundaries.html
CBRS Map Revisions

• With a few minor exceptions, only Congress can approve CBRS boundary revisions to add or remove land.

• The 2000 and 2006 CBRA reauthorizations directed the Service to digitally remap the CBRS and recommend additions to Congress.

• In December 2018, Congress adopted changes to about 7% of CBRS units resulting from mapping projects completed by the Service in 2016. These changes affected over 50 communities.

• The Service is currently remapping an additional 43% of the existing CBRS units, largely through a Hurricane Sandy related project affecting over 200 communities.

For more information about CBRS map modernization, visit: https://www.fws.gov/cbrea/maps/Map-Modernization.html
The U.S. Fish and Wildlife Service is the authoritative data provider for CBRS Boundaries

- Historically, CBRS boundaries were shown on FEMA’s FIRM panels.
- Approximately 1,400 of 2,500 FIRM panels (more than 56%) would become outdated soon due to CBRS remapping efforts.
- CBRS maps and FIRM panels have different lifecycles:
  - Changes made effective through legislation enacted by Congress; FWS does not control the timing.
  - FIRM panels cannot be updated immediately after a CBRS map change.
- FEMA and the Service have worked collaboratively to update the delivery of CBRS data to the public.
Removal of CBRS boundaries from FIRM Panels

* In February 2019, FEMA officially removed the CBRS boundaries from FIRM panels via Letter of Map Revision

* FEMA now displays the Service’s dynamic CBRS data service in:
  * National Flood Hazard Layer (NFHL) Viewer
  * NFHL based FIRM and FIRMette exports.
To access the CBRS Validation Tool, visit [www.fws.gov/cbra](http://www.fws.gov/cbra). Click on the “CBRS Mapper” graphic on the right side of the page.
Select the “CBRS Mapper” to view the existing CBRS units.
Use the “Find Location” tool in the upper right corner of the CBRS Mapper to zoom to an area.
Type an address or location in the search window and select it when it appears in the drop down window. If the address does not appear, you may need to search for the city and state or zip code and use the zoom tools to locate the property.
If producing CBRS documentation for a structure, verify that you have identified the correct structure. Because the Service cannot guarantee the placement of a marker by an automated address locator, the CBRS Mapper **does not** automatically put a marker on the property.

It is the user’s responsibility to ensure that the pin location corresponds with the actual location of the subject property.

Click the “CBRS Validation Tool” button in the upper right corner of the mapper.
Follow the directions in the tool. First, click the pin icon to select your point of interest on the map (i.e., the structure or property for which you require CBRS information).
Click the point on the map where you would like to place your point. In this case, the structure that corresponds to the address that we searched for at 257 Minorca Beach Way, New Smyrna Beach, FL 32169 is located here (see pin).

NOTE: A structure bisected by the CBRS boundary (i.e., both partially in and partially out) is within the CBRS. A pin placed on a bisected structure must be placed on the portion of the structure furthest within the unit (including any attached features such as a deck or stairs).
Once you have selected your point, enter the address or description of the point location in the window under “Step 2.”
Once you have entered the address, read the “Point Placement Certification Statement” and click “Certify and Create PDF.”
Once you have clicked the “Certify and Create PDF” button, a link will appear at the bottom of the window. Click this link to open your PDF.
The CBRS Mapper Documentation produced by the CBRS Validation Tool includes:

- A map depicting the pin location with respect to the CBRS unit(s) in the area
- The user supplied address
- A statement indicating whether the pin location is within or outside of the CBRS (or in the “CBRS Buffer Zone”)
- The flood insurance prohibition date (where applicable)
- The System Unit establishment date (where applicable)
- Information regarding the official CBRS map for the area
- Notes regarding any applicable restrictions on Federal funding and financial assistance
- Links for more information
What happens when your point is within the “CBRS Buffer Zone”?

The CBRS Validation Tool will not provide in/out CBRS documentation for locations that are within the “CBRS Buffer Zone” (i.e., areas within about 20 feet of a CBRS boundary). Such locations require a “CBRS Property Determination.”

A CBRS Property Determination is an official letter from the Service that indicates whether or not a specific property or project site is located within the CBRS.

See the Service’s website for additional information about determinations: https://www.fws.gov/cbra/documentation.html
FEMA Flood Insurance Manual Changes

* FEMA’s Flood Insurance Manual was updated in April 2019. For communities containing CBRS units, the manual now requires the following documentation:

1) the output from the CBRS Validation Tool

    or

2) a letter from the U.S. Fish and Wildlife Service (for structures within the CBRS Buffer Zone)

See Appendix D of the manual for additional information:

https://www.fema.gov/media-library/assets/documents/178743
Subscribe to the CBRA Listserv

The CBRA listserv electronic mailing list will provide subscribers with updates when there are changes to the CBRS boundaries or other news items related to CBRA.

To subscribe via email, send a blank message to: CBRA-join@lists.fws.gov.

You will receive an email indicating that your request has been received. To confirm you want to be added to the mailing list, simply reply to that message, keeping the Subject: header intact. If you do not receive a confirmation email, please check your spam filter.

For more information, visit: https://www.fws.gov/cbra/Listserv.html
Questions?

Email cbra@fws.gov
What is the difference between an Otherwise Protected Area (OPA) and a System Unit?

The CBRS includes two types of units, **System Units** and **Otherwise Protected Areas (OPAs)**.

**System Units** are predominately comprised of privately owned areas, though they may also contain areas that are held for conservation and/or recreation. System Units are depicted in pink in the CBRS Mapper. Most new Federal expenditures and financial assistance, including Federal flood insurance, are prohibited within System Units.

**OPAs** are predominantly comprised of conservation and/or recreation areas, though they may also contain private areas that are not held for conservation and/or recreation. OPAs are denoted with a “P” at the end of the unit number and are depicted in green in the CBRS Mapper. The only Federal spending prohibition within OPAs is the prohibition related to Federal flood insurance.
What is the “Flood Insurance Prohibition Date”?

The date on which the prohibition on Federal flood insurance first took effect for a given area. The NFIP uses this date to determine whether a structure located within the CBRS is eligible for Federal flood insurance.

Federal flood insurance is available within the CBRS for structures that were constructed (or permitted and under construction) before the area’s flood insurance prohibition date (which is generally tied to the date that the area was first established as either a System Unit or OPA, but may differ in some cases).

If an existing insured structure within the CBRS is substantially improved or damaged (i.e., over 50 percent of the structure’s market value), its Federal flood insurance policy cannot be renewed.

The date on which prohibitions on Federal expenditures besides flood insurance (e.g., dredging and disaster assistance) went into effect.

This is the date that FEMA uses to determine whether a road, structure, or facility is an “existing facility” as defined by its regulations implementing CBRA and the Stafford Act (44 CFR Part 206.342(c)).

Additionally, this is the date used to determine whether Federal navigation channels and related structures were authorized prior to the date on which the area was included in a System Unit (16 U.S.C. 3505(b)).

In most cases, the System Unit establishment date is the same as the flood insurance prohibition date. However, these dates differ in areas that were first designated in 1982 and also in areas that have been reclassified from OPA to System Unit.
Office of the Federal Insurance Advocate (OFIA) Update
Office of the Flood Insurance Advocate

Reducing complexity with compassion and fairness

David Stearrett, CFM
Director, Office of the Flood Insurance Advocate
ASFPM Insurance Committee Meeting
OFIA 2018 Annual Report and Progress Report
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 Office of the Flood Insurance Advocate

The OFIA advocates for the fair treatment of policyholders and property owners by providing education and guidance on all aspects of the NFIP. The OFIA assists frustrated and confused policyholders and property owners affected by the NFIP.

- Provide assistance to individual policyholders and property owners, especially in the most complex of cases.
- Identify trends and issues that appear to be impacting a broad range of FIMA’s customers.
- Make recommendations to FIMA and FEMA leadership intended to address the issues faced by customers and support programmatic improvements.
Each year, OFIA delivers an Annual Report to the FEMA Administrator with recommendations for NFIP program improvements to ensure fair treatment of policyholders and property owners.

In 2018, the OFIA received a variety of cases from policyholders requiring assistance navigating the claims process,

From this 2018 casework, OFIA identified four customer frustrations warranting more systemic solutions to reach fair outcomes for policyholders:

- Confusion Regarding Premium Increases
- Confusion Regarding Condominium Coverage
- Claims Impacts When Assuming a Non-Primary Residence
- Lack of Refunds for Prior Policy Terms After a LOMA Is Issued
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<tr>
<th>Frustration</th>
<th>Recommendation</th>
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<td>1. Confusion Regarding Premium Increases</td>
<td>• <em>Modify the description of a misrating</em> contained in the NFIP Flood Insurance Manual to exclude losses incurred after the initial flood insurance application.</td>
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<td>• Develop a mechanism to transition a property from one rate class to another while remaining within the maximum amount of premium chargeable under the law.</td>
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| **2. Confusion Regarding Condominium Coverage** | • Update or create **new educational material** that includes information about how the Residential Condominium Building Association Policy (RCBAP) and Dwelling Form policy interacts at the time of loss.  
  • Develop a **procedure to identify condominium unit-owners** with Dwelling Form policies within a building **covered by an RCBAP** and ensure they receive new or updated materials.  
  • Develop a **disclosure form** to be signed by the owners of condominium units at the time of application for flood coverage and make it available to insurance agents.  
  • **Price Dwelling Policies** that are covering a unit that is already **covered by an RCBAP differently** than a unit that is in a building not covered by RCBAP. |
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| 3. Claims Impacts When Assuming a Non-Primary Residence| • Instruct the NFIP insurers, that at the time of Application, residency status must be correct and not assumed either primary or non-primary.  
• Instruct NFIP insurers to identify and review policies initially quoted and paid for by policyholders as if they were for a primary residence, but issued as if they were for a non-primary residence on or after April 1, 2015, particularly PRPs.  
• Instruct NFIP insurers to validate the residency status of each dwelling at the time of loss. If the status is incorrect, the claim should be adjusted based on the amount of coverage originally requested before the coverage limits were reduced by the policyholder’s underpayment of premium. The claim should not be delayed while the policy is being corrected. |
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<td>4. Lack of Prior Term Refunds After a LOMA Is Issued</td>
<td>• FID should <em>allow rating endorsements for Letter of Map Amendment (LOMA) removals back to the date of the effective flood map or up to five years.</em></td>
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<td>• FID should <em>revise the NFIP Flood Insurance Manual to reflect the updated procedure.</em></td>
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<td>• The Risk Management Directorate (RMD) should update all LOMA outreach materials to educate policyholders on the allowance of premium refunds for policy terms.*</td>
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In 2019, **OFIA published the first Progress Report** to track progress made on implementing OFIA recommendations from the Annual Reports.

Key findings include:

- **Program progress on all** 2015-2016 recommendations.
- **45%** of all 2015-2016 recommendations are **fully implemented**.
- **Positive outcomes** for completed issues
  
  *For example customers who were denied prior-term refunds in 2015 can now receive up to five years of refunds.*

- **75 to 85% reduction in related casework.**

**OFIA’s next Progress Report** tracking progress implementing the **2016-2017 recommendations** will be issued in **2020**.
Other Updates – Steve Samuelson

-Ag: ASFPM, via subcommittee, provided comments on Ag properties int; waiting to hear from FEMA

-PART: Pivot Analytics Reporting Tool. ASFPM, via subcommittee, provided recommendations to consider when creating new reports for new system. FEMA has walked through recommendations one-by-one with ASFPM and is open to further recommendations; here is a brief description what their goal is with PART:
https://www.youtube.com/watch?v=mT8uBiGwjw0
General Discussion