

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



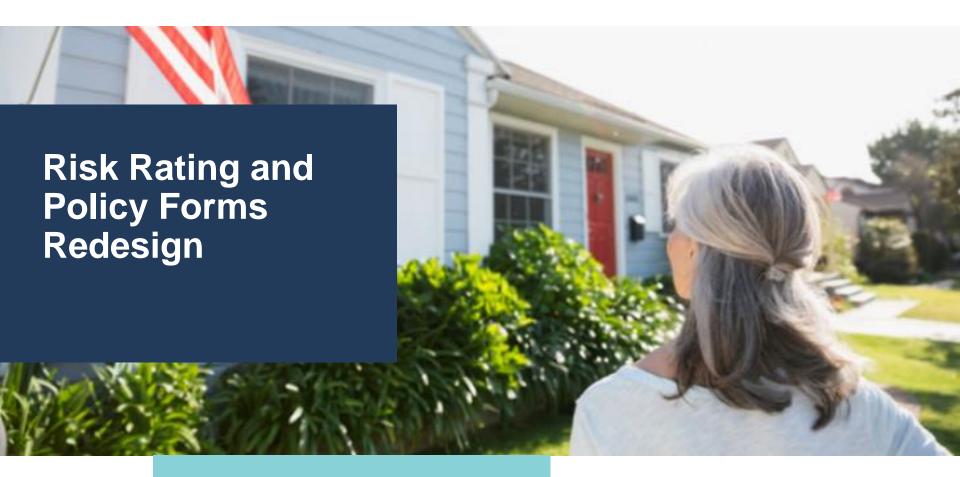
WELCOME & LAST YEAR IN REVIEW



RECENT AND UPCOMING CHANGES IN THE NFIP











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

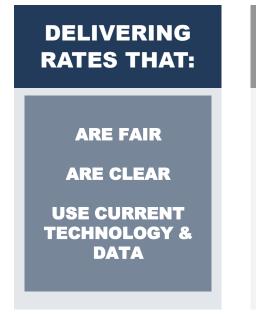
Intuitive rating variables that clearly communicate risk will highlight mitigation opportunities





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...

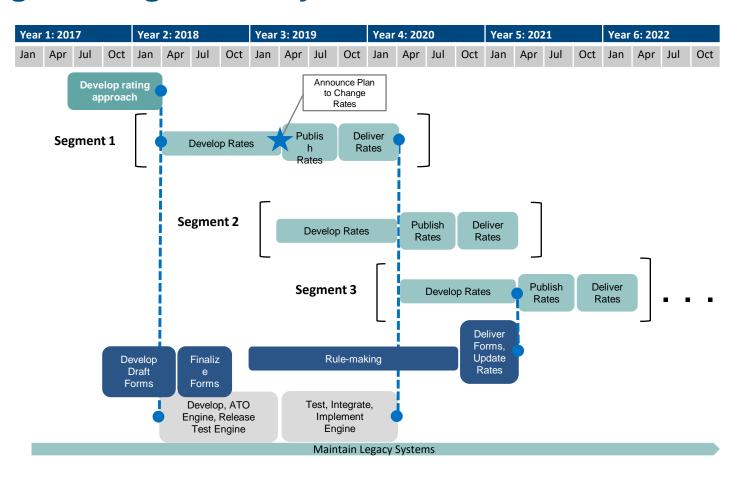








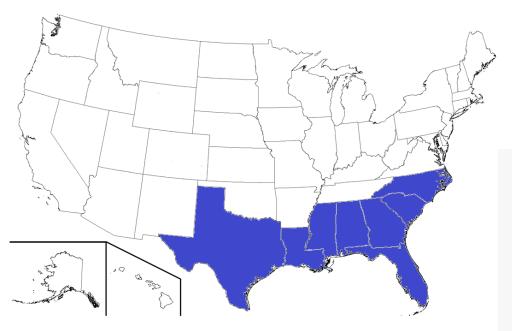
Rating Redesign & Policy Form







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



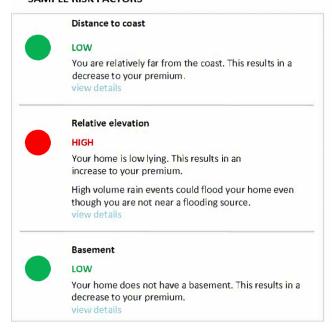
High storm surge and inland flood risk

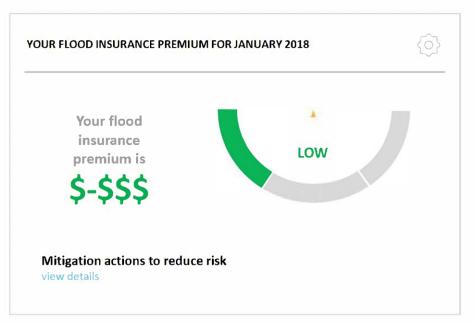




User Experience:Notional Prototype Graphic

SAMPLE RISK FACTORS









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

VS.

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

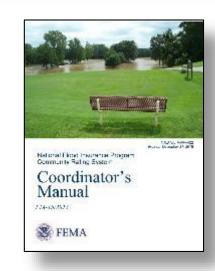
Molly O'Toole, P.E., CFM
Managing Consultant to the CRS





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





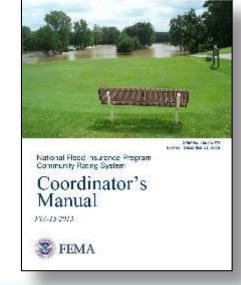
2017 CRS 300 Series Changes

Activity 370 (Flood Insurance Promotion)

A Lender is no longer required on the committee

Coverage improvement plan committee must

still have an insurance agent

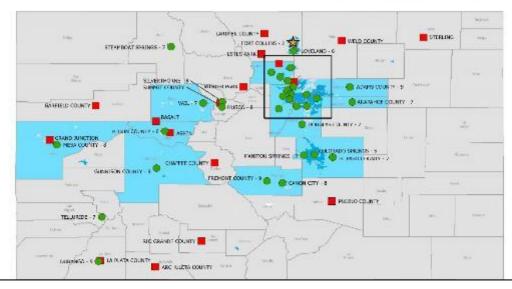


Colorado

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

Rank	CID	Community Name	Policies	Class
1	380024	Boulder	4,253	5
2	080060	Colorado Springs	1,801	5
3	380046	Denver	1,207	7
4	380023	Boulder County	795	5
5	380059	FI Page County	eas	7
5	380101	Larimer County	635	
7	380097	La Plata County	624	360
Ħ	380087	Jefferson County	4/8	6
9	380168	Telkride	478	7
10	385072	Arvada	467	5
11	080027	Longmont	442	8
12	380102	Fort Collins	441	2
13	385075	Lakewood	403	8
14	380002	Aurora	334	8
15	380159	Steamboat Springs	317	7
16	380206	Weld County	296	000
17	385079	Wheat Ridge	258	5
18	380049	Douglas County	256	7
19	380246	Frisco	239	8
20	380193	Estes Park	221	
21	280063	Manitou Springs	194	7
22	380115	Mesa County	191	- 8
23	380064	Vall	187	7
24	380001	Adams County	175	9
25	380078	Gurnveon County	174	8
26	380290	Summit County	173	-
27	080815	Centennial	183	7
28	380011	Arapahoe County	160	7
29	380294	Sterling	157	
30	380103	Loveland	130	8
31	380287	Pitkin Cou		
32	080068	Canon Cit		



CRS resources.org on the 100 General page

35 Grand Jun 380117 38 380143 Aspen 37 3800G7 Fremont County 9 38 118 9 380099 Durango 38 380205 Garlield County 115 106 40 080153 Rio Grande County 41 380008 104 6 Westminster 380052 Basalt 87 43 380147 Pueblo County 87 44 385073 Broomfield 45 380090 86 7 Golden 84 380269 Chaffee County Archuleta County 82 47 380273 02 82 380029 Lyons 48 385076 Louisville 50 380201 Silverthorns





CRS Class Data: October 1, 2017 / Policy Data: May 20, 2017

For a full list of all CRS Communities as of October 1, 2017, visit http://bit.ly/CRS_FIM_Oct_2017.

NOTES:

33

34

380017

380305

Littleton

Winter Par

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.





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 at being spent on insurance premiums.



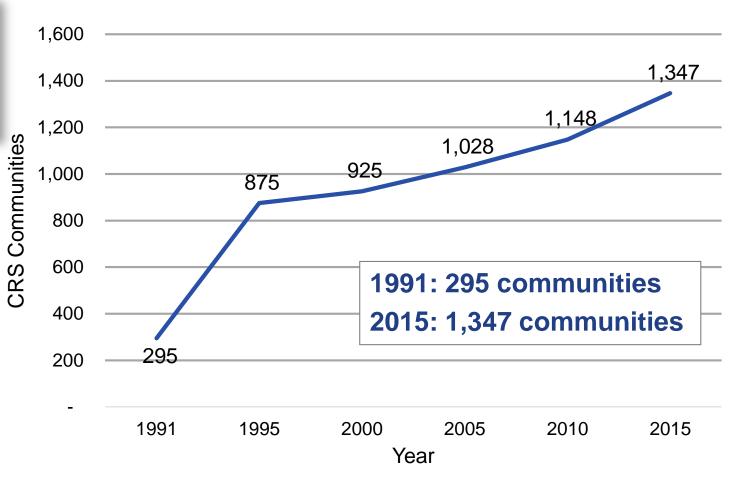


- 1,486 communities in the CRS as of May 2018
- 70 percent of the all NFIP policies within CRS communities



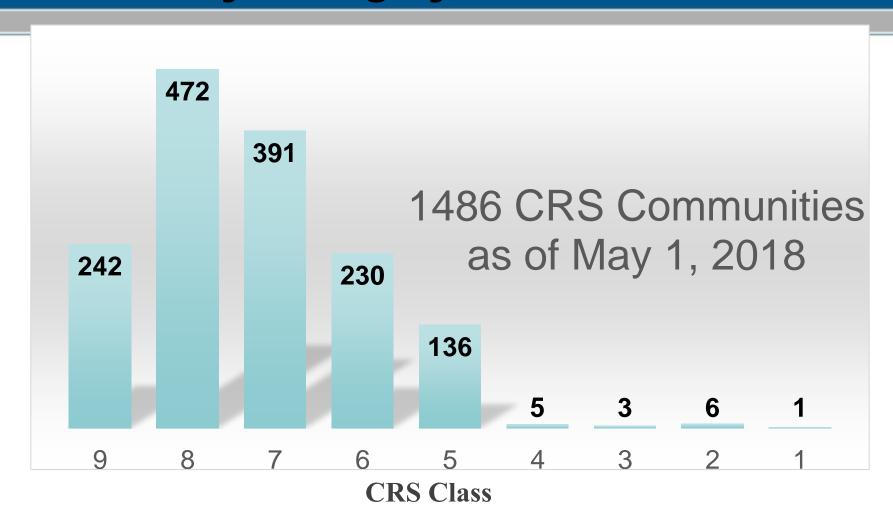
Growth of the CRS





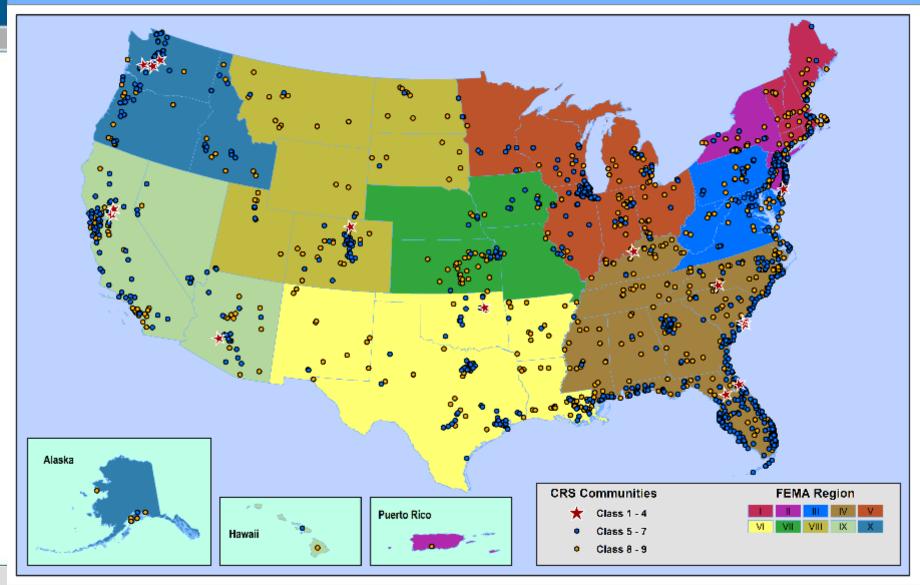








May 2018







Currently:

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



Fact Sheet

Federal Insurance and Mitigation Administration

June 2018

National Flood Insurance Program / Community Rating System

Small Communities in the CRS

The Content dynaming System is used of the Company viscod automates Program should. These was included in 1999, use included in 1999, use including the subject of the latest force including and including management and including content and including management and including content and including content and including the ISE year forest should be first that it as the activities your contenting to an activities and including content and

Small Communities face Different Challenges

The CD's recognized that many time Learnmani iss.

Super oper do not, yield as analied, and look of unel, part time staff, and look of

per part date supporting of a positive like engineering of a positive like (183). But morning are are mark in leady file and one in the opport cross in the social text after perputition, that in requirements of the CoS might be compared for your and need to one to be significant expense.

Inhalp you eschare some endlar and sulp you going you open disperie in the CSS, but the original of the year through the sulp of the sulp

The idea that joining the Community Rading Bestern is not confrontivelle or workshie—for a small or lowpolicy sount community simply is

Of the 1 488 command as in the CR3 as of May 2010, Nije 185 have populations of 5,000 or feat. Of these, 18 have constructed Classic as high 2 25% discount for the policytolides in the recomminates Special Flood Heater Areas.

Those bind commonities have touch that need no make ment of the history arrows had underway, plan a few that wore life touche to add, provided with doct broch points to per are stay in the CRS.

They have related the send to of enemy executive on anticytesters amount flood flow trace perchamaentancing the communities rest lence in the tree of flooding, and settly designated in the form of a calibraticating. In their others.

eggio (1.15), alther sono Chare-geordeman enchendra o collaptative exculpateman pueblic hundre, and Las prepare (6), process population regions no relative photo, and relative by a rend formula.



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!







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



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

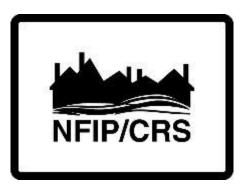


ASFPM Involvement in the CRS

- 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



NFIP's Community Rating System

Questions?









Elevation Certificate Review

Updates for November 2018



Background

- 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

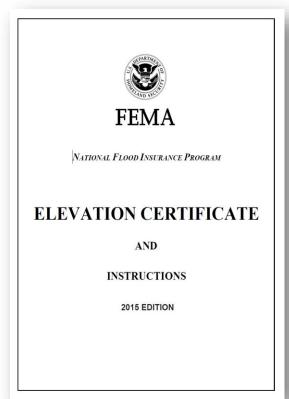


Elevation Certificate Expiration

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:





Getting it down to Five

- 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, <u>Transect, or</u> <u>Floodway Data</u> Table, or FIRM panel
 - Indicate Source of BFE; Clarify "Other" documentation
 - Specify any Reports Used
 - Specify LOMC if used



Top Five Hits

- 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



Top 5 Hits

- C2.e Requirements (Machinery and Equipment Elevations)
 - Language Clarifications
 - Enter the lowest platform, floor, or ground elevation supporting of at least 1 of the lowest following machinery and equipment servicing the building. items: 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



2018 ASFPM Conference Insurance Work Group

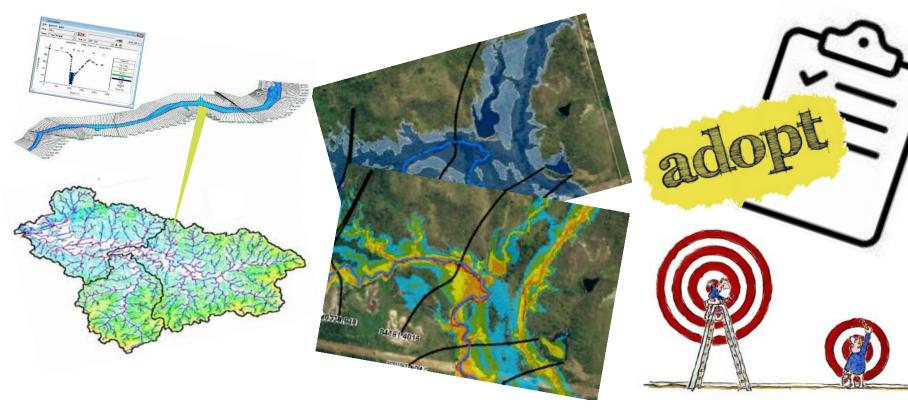




OVERVIEW

Base Level Engineering

Programmatic evolutionary step



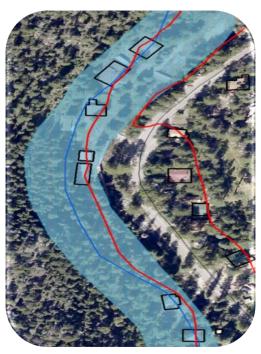
Credible and expandable engineering analysis and modeling for FEMA,
State, communities and developers.

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.

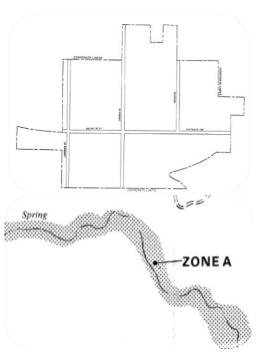
Base Level Engineering - Focus Areas







Unmodernized Communities



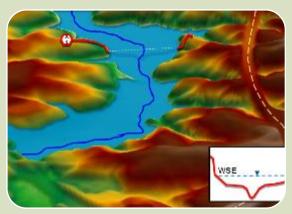


Unmapped Miles



Flood Risk Studies







Hydrolo gy

Volume of water?

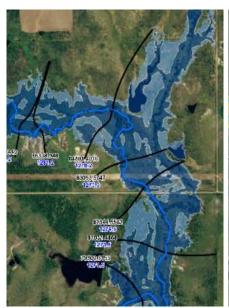
Hydrauli cs

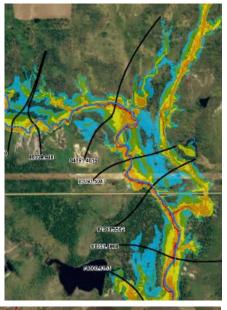
Will the stream in

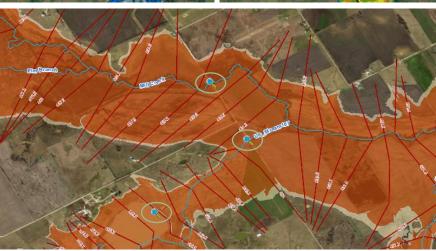
Floodpl ain Mappin g

What

Base Level Engineering



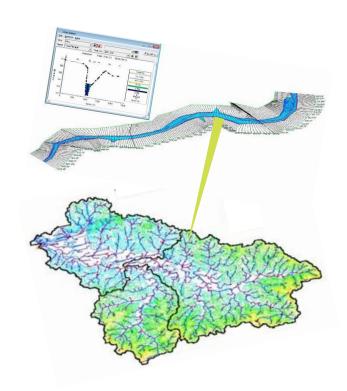




R6 Minimum Purchase

- 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 lowa
 - State of Indiana
 - USACE Omaha, NE
 - Many, many more

Base Level Engineering Uses

- 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)





LOCAL PERMITTING

Base Level Engineering Uses



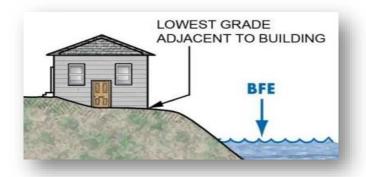


INSURANCE RATING

- 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





Elevation Certificate

SECTION B - FLOOD INSURANCE RATE MAP (FIRM) INFORMATION							
B1. NFIP Community Name & Community Number				B2. County Name			B3. State
							•
B4. Map/Panel Number	B5. Suffix	B6. FIRM Index Date	B7. FIRM Panel Effective/ Revised Date		B8. Flood Zone(s)	B9. Base Flood Elevation(s) (Zone AO, use Base Flood Depth)	
B10. Indicate the source of the Base Flood Elevation (BFE) data or base flood depth entered in Item R9: FIS Profile FIRM Community Determine Other/Source: Base Level Engineering (Estimated BFE report attached) B11. Indicate elevation datum used for BFE in Item B9: NGVD 1929 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							

FEMA Form 086-0-33 (7/15)

Replaces all previous editions.

Form Page 1 of 6

Questions?

Diane Howe diane.howe@fema.dhs.gov FEMA R6 Risk MAP Lead 940.898.5171

Elizabeth Savage <u>esavage@h2opartnersusa.com</u> Regional Program Management Lead assisting FEMA R6 214.918.8523





OFFICE OF THE FLOOD INSURANCE ADVOCATE UPDATE

Office of the Flood Insurance Advocate



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

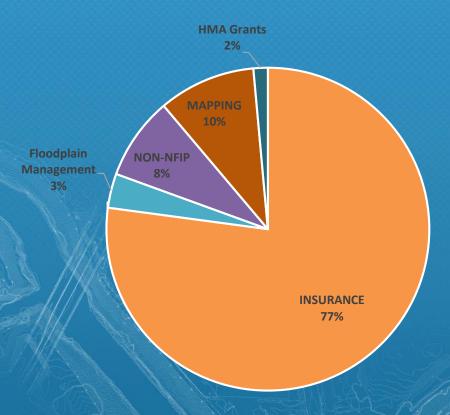
The Office of the Flood Insurance Advocate (OFIA) advocates for the fair treatment of policyholders and property owners by providing education and guidance on all aspects of the NFIP, identifying trends affecting the public, and making recommendations for program improvements to FEMA leadership.

- 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



Inquiry Traffic Breakdown

Inquiry Breakdown



- 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



Outcomes Achieved by the OFIA

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"

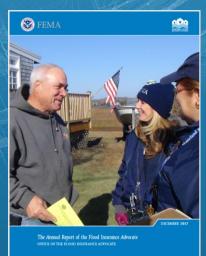




The OFIA's Annual Report

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





Challenges with Customer Communication During the Claims Process



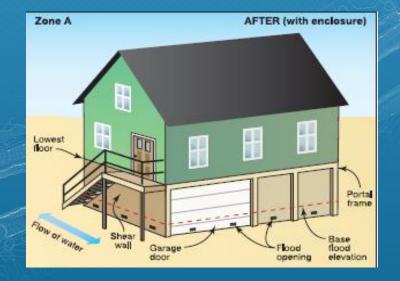
- Available resources on how to navigate the process can be hard to understand
- The OFIA recommends refreshing these materials and posting claims process resources to an online easy-to-find central location



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

400 C Street, SW Washington, DC 20024 David Stearrett@fema.dhs.gov











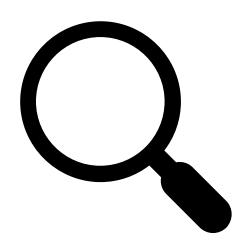
Proposed NFIP Changes for Agricultural Structures

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