

The following are comments, questions and answers captured in the Chat box. While there are several without answers, many of those were verbally answered and can be heard on recording of the meeting found on the Insurance Committee webpage.

**Q: Joe, just curious, do you have a breakdown of the specifics of the "insurance" cases**

A: 82% is insurance related, and of that, about 75% is related to rates, with the remaining 25% related to claims.

**Q: If I didn't miss it, what does "HMA" mean as it relates to your work?**

A: HMA = Hazard Mitigation Assistance.

**Q: Re a lapse of policy: what about somebody getting private flood insurance then returning to NFIP?**

A: A policyholder that goes to the private market and comes back to the NFIP is counted as a lapse.

**Q: Are people in X Zones that have flooding allowed to get flood insurance? I've had someone tell me they were denied flood insurance.**

A: People in X zones can get flood insurance, and often qualify for our Preferred Risk Policy. As long as they are in a participating community, we can write the flood insurance policy for a X Zone property whether or not it's been flood. They would not qualify for PRP, rather it would be on the standard dwelling form

**Q: Under Risk 2.0 How will a building's elevation be determined/credited absent an EC?**

**Q: Can you comment on the impacts the RR2.0 will have on elevation certificates?**

A: It will no longer be a requirement for insurance rating.

**Q: If no EC is required, is the default rating slab-on-grade?**

A: That is still being worked out

**Q: Is the EC going away under Risk 2.0?**

A: No.

**Q: What is impact of RR2.0 on coastal communities?**

**Q: I don't even know what C3 means**

A: Customer Centric Communications

**Q: Happy to hear about flood avoidance marketing. Is there any discussion on making that coverage more accessible, maybe giving policyholders the ability to tap into any time of the year and use for other systems and products outside of sandbags and other non-reusable products that are currently listed as eligible?**

**Q: Good point Tom - If more \$\$ were available and it was more easily accessible prior to flood being imminent or declared, folks would actually have time to implement flood protection measures, which ultimately may prevent a lot of damage and payouts**

A: I like that idea. I also like the idea of extending the Increased Cost of Compliance coverage to be prevent. I think that'd make a lot of sense. But I agree with you on Loss Avoidance (thought it's capped at \$1k, I think). Both are fixes that I think require legislation and/or rulemaking. Which are both slow fixes.

**Q: Where might we find the list of languages available?**

A: We mostly have information in English and Spanish, but in some areas, depending on geography, we'll expand into other languages as needed and based on resources available (\$\$)

**Q: Can states get credited under CAP-SSSE or in the new TSF for pushing marketing from NFIP out to their social following?**

A: Good question. And I don't know the answer. I know there are CRS points available. Generally, I'm in charge of creating the stuff, and I'm hoping others push it to their networks. I think you'd have to ask whoever in the Region your CAP-SSE POC is.

**Q: Can you say what the name of that report for official is again?**

A: Flood Insurance Reference - [https://www.fema.gov/sites/default/files/2020-07/fema\\_nfip\\_desk-reference.pdf](https://www.fema.gov/sites/default/files/2020-07/fema_nfip_desk-reference.pdf)

**Q: In the FIM, under Floodproofing requirements, has the annual inspection by local officials been removed?**

**Q: Is there a document that we can share with our clients that will explain the modeled risk that justifies the 14.9% increases for the PRP or other classes?**

A: I will have to get back to you. They usually do an actuary analysis report that I believe is available for stakeholder. Can you provide me with your email so I can get back to you? Thanks Suzan

**Q: Do you envision RR-2.0 to turn into another HFIAA-14 type response from Congress, especially considering the limited information that we have received regarding the changes?**

**Q: Has there been any consideration of a process in which Zone X properties could provide an EC to receive a discount on their PRP based on elevation rating? Many communities are starting to require ECs in the Shaded Zone X floodplain.**

**Q: Any news on aligning RR2.0 with the regulatory side of the house? Or is the plan still to permit building based on risk identified in FIS/ FIRMs while insurance is actually rated based on risk from numerous variables?**

**Q: What kind of changes can we expect with the FIM, due to RR-2.0? Maybe a multiplier built into the policy calculation examples, rate tables, etc.? Similar to the addition of Reserve Fund Assessment and HFIAA Surcharge additions?**

**Q: Do the number of claims by an individual structure result in increased rates for that individual?**

**Q: Has there ever been discussion to increase the \$1,000 threshold in the Rep Loss definition?**

**Q: What is the max?**

**Q: Will you engage with local communities during the testing and implementation phase? If we are partners in the NFIP we need to know how this impacts our communities and how to explain the changes to our residences. Also we need to develop some confidence that your methods are providing reasonable results, and we know the situations in our communities the best.**

**Q: Will the RR2 still have max dwelling coverage of homes of \$250,000 or will that be more in line with Replacement cost coverage**

**Q: If the CRS isn't changing but there are no more PFP policies, will all policies be eligible for the CRS community discount?**

**Q: what is the logic of phasing out EC but rating a building more accurately? How is LF and mechanicals will get rated?**

**Q: How will the transition from the PRP take place ? optional deductibles?**

**Q: (assuming no one in the X zone will receive the discount)**

**Q: Did you say that the max premium will be \$12,000?**

**Q: IF EC are lessing, are LOMC needed any longer?**

**Q:Will a Surveyor be need to determine the height above the ground? Or is this something the policyholder can do?**

**Q: Clean slate: does that mean SRL in X zones are seeing the premiums drop?**

**Q: Where will all the data for rating 2.0 come from?**

**Q: How are you working with mortgage companies to get away from in/out mentality?**

**A: We are planning on meeting with the folks at Treasury and the lenders in the coming months to explain the logic behind RR 2.0 and how risk and premiums will be determined at the individual property level**

**Q: Please be sure to define the acronyms you are using.**

**A: ISAA = information sharing access agreement**

**Q: Can community floodplain administrators access this data?**

**Q: Our attorneys won't let us sign the unlimited indemnity FEMA is requesting; they don't do that for anyone. Typically, communities sign sovereign immunity agreements. Any changes planned for this requirement? I didn't hear an answer to the type of immunity question**

**Q: What is the FMNI rule?**

**A: FM&I = Floodplain Management, Mitigation and Insurance....It's common in FIMA headquarters. And the Regions**

**Q: Do we have to register for account in PIVOT if we are getting an ISAA? Or will that access be granted as part of the ISAA process?**

**Q: Can we get in just to get summary data such as policies in force by occupancy without an ISAA?**

**Q: Can we easily obtain summary data by zip code, congressional district, census tract & block, without needing the ISAA?**

**Q: How can a structure or property have an identity that is "protectable" by the privacy act of 1974? Aren't flood policies tied to properties and not people?**

**Q: Is the term PII defined in the Privacy Act?**

**Q: Is a RU letter form available online?**

**Q: I'm being told I need an ISAA for annual Rep Loss data... Having same issues with administrative challenges, indemnification, etc...**

**Q: Is the data released through Routine Use Letters able to be shared with a communities contractor?**

A: The community contractor would also need an RU so we could document where the data goes

**Q: Would we need RU letter every year?**

A: A RU letter cannot grant you privileged access to Pivot due to the recurring nature of access to PII

**Q: Can RU letter be used to get privileged access to PIVOT?**

A: You would need a RU letter for every year a requestor required updated data. As a note we are working with Mitigation and Privacy to streamline our program processes

**Q: So, an "RU" letter is used to only request and receive specific data without any PIVOT access? Essentially, how we were already doing it?**

**Q: By State Law we cannot indemnify another government agency. Are we stuck with RU as the only option?**

A: That is correct RU Letter is a faster administrative process for providing data to communities

**Q: How do we obtain and "RU" letter/form and to whom do we submit it?**

A: For RU Letter templates please work with regional staff

**Q: What is the process for a FP Admin to get a login to download data from PIVOT?**

**Q: What is the future of LOMA and LOMR-F exemptions?**

**Q: Thank you Chad. Engage! is a great tool - accessibility to our Congressionals is critical to advance floodplain management policy. Nice!**

**Q: Geocoding has been a problem for flood insurance underwriters as it is not always accurate and affects inaccurate location determination. I use Google earth with the NFHL with lower elevation aerials that have photos that are show dead of winter removal of a tree canopy to aid in determinations. I use community gis mapping to confirm my determination. How do I dispute without a hassle from an underwriter saying we have to accept the MSC mapping FIRMette?**