Flood Insurance Committee Annual Status Report

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Introduction

The ASFPM Flood Insurance Committee supports the ASFPM’s floodplain management efforts through information, education, and outreach activities on flood insurance issues. The Committee provides input on flood insurance legislation and flood insurance rules and guidelines propagated by FEMA. The Committee also helps keep the ASFPM membership informed of upcoming changes to the National Flood Insurance Program and the potential impact of these changes.

Areas the Committee focused on in 2021-22 included:

- Monitor modifications and effects of implementation to the insurance aspects of the NFIP, both from FEMA and Congress (including Risk Rating 2.0),
- Liaise with insurance stakeholder groups,
- Work with FEMA on issues affecting flood insurance (e.g., Pivot, Elevation Certificates, CRS, ICC), and
- Keep ASFPM Headquarters and members informed and updated.

Key Accomplishments

While we continued to hope for flood reform legislation from Congress, it did not happen (yet again) in 2021-22. While several bills surfaced, none were moved forward, and the reauthorization can was kicked down the road again.

FEMA did roll out the new risk rating methodology, Risk Rating 2.0 (RR 2.0). We attempted to keep members informed via different means including our bi-monthly Insurance Corner in ASFPM’s Insider, providing material for ASFPM to socialize updates (e.g., LinkedIn, Facebook), keeping our webpage updated – including our committee creating two new RR 2.0 fact sheets). We also coordinated with FEMA’s Floodplain Management Directorate to hold three 2+ hour workshops targeted for floodplain managers. Before and after those workshops, we started receiving a lot of questions from members on how the rating worked, impacts of mitigation, the use of Elevation Certificates, and more. As a result, we collaborated with the Floodplain Regulations Committee to form a small RR 2.0 workgroup to collect concerns and examples of issues. A 4-page summary of these was then provided to FEMA in February 2022. In response to this summary, a call was held with FEMA March 2022 which has led to the planned formation of an ASFPM-FEMA workgroup which will be a conduit to share these and future concerns and examples.

The Committee continued to liaise with the Flood Insurance Producers National Network (FIPNC – which represents the top 3 insurance agent associations) and attend FEMA’s Industry Day; however, because we did not meet in person with FIPNC, we did not get to directly meet that same day with the Institute of Business and Home Safety (IBHS) Flood Committee (which represents Write Your Own Companies). We did, though, receive copies of their minutes.

A Co-Chair (along with Chad Berginnis) did attend the 2022 National Flood Association conference. We virtually attended the 2021 National Flood Conference and plan to attend their 2022 conference in person.
Two other issues the Committee tracked and worked on were:

- **Pivot** – this continues to be a pain point for many communities and states. Receipt of requested Pivot data or forms (e.g., RUL, ISAA) for most of the past year has been slow to none. FEMA states they are working on digging through the backlog, but members are not reporting great results. This, of course, then impacts the work community officials can do to make their community more resilient, let alone address FEMA’s CRS requirements.

- **Elevation Certificate (EC)** – in early September, the Committee reached out to FEMA and requested to be engaged in the updating of the EC, which they welcomed. The small EC workgroup from 3 years ago was re-established and quickly provided recommendations. Over the course of the next month, FEMA worked closely with our workgroup and walked through all our recommended changes and updates. The final draft is now posted on the Federal Register for review with comments due by May 9, 2022; the EC workgroup will be reviewing and providing a response.

Finally, we continued to work with ASFPM Headquarters to help keep members informed about topics that bubbled up (e.g., private flood insurance, bi-annual changes in the NFIP program, new flood insurance marketing material), answer flood insurance related questions received from members (including RR 2.0), and write the bi-monthly *Insurance Corner* in ASFPM’s *Insider.*

**Priorities**

In 2022-23, the Flood Insurance Committee will continue to monitor:

- Risk Rating 2.0 and new policy forms
- Pivot
- Flood Insurance Legislation
- Elevation Certificate

**Recommended Activities in 2022-23**

The following are key activities for the Flood Insurance Committee for 2022-23:

- Work with FEMA to include floodplain managers and local officials in their RR 2.0 education and outreach efforts, including providing the ability to determine the insurance cost benefits of mitigative actions.
- Continue to engage with FEMA to identify ways to provide floodplain managers with the data they require in Pivot more easily and speedily.
- Continue to monitor legislation and research around private and federal flood insurance.
- Provide feedback to the Elevation Certificate and other documents FEMA may release.