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 helps keep the ASFPM membership informed of upcoming changes to the National Flood Insurance Program and the potential impact of these changes. It also provides updated information regarding non-federal flood insurance.

Areas the Committee focused on in 2023-24 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 2023-24. As of this report (April 2024), the NFIP “reauthorization can” was kicked down the road for the 30th time. While some flood-related bills surfaced, none were moved forward.

As of April 1, 2024, the new NFIP rating methodology (Risk Rating 2.0 or RR 2.0) had been through two full renewal cycles. The ASFPM RR 2.0 Workgroup continued to meet with FEMA through bi-monthly calls. The Workgroup provided significant feedback on FEMA’s Flood Insurance Discount Tool when it was released in December 2023. A separate sub-workgroup was created to address the concerns with FEMA being raised around FEMA’s new National Violation Tracker (NVT). The issues around the NVT were more than just its impact on CRS discounts. The sub-workgroup created an FAQ and is targeted to provide recommendations to FEMA by the end of 2024.

We kept 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 and holding committee meetings. We coordinate a presentation by FEMA on the NVT in January 2024.

The Committee continued to liaise with the CRS Task Force through ASFPM’s representative. The Committee also continued to work with the Flood Insurance Producers National Committee (FIPNC – which represents the top 3 insurance agent associations). Meetings are held virtually three times a year.
A Co-Chair (along with Chad Berginnis) did attend the 2024 National Flood Association conference. A Co-Chair attended the 2023 National Flood Conference and plans to attend their 2024 conference in June.

We continue to track issues that may arise around Pivot and the Elevation Certificate. FEMA provided an update on the Elevation Certificate in September. Our Elevation Certificate workgroup reviewed the form and provided FEMA with some suggested edits (which will be carried over to suggestion when the form is up for revision).

Finally, we continued to work with ASFPM Headquarters to help keep members informed about topics that bubbled up (e.g., NFIP litigation, 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 2024-25, the Flood Insurance Committee will continue to monitor:

- Risk Rating 2.0 issues
- New NFIP Homeowners policy form
- FEMA’s NFIP Direct-to-Consumer (D2C) initiative
- Pivot
- Flood Insurance Legislation and Litigation

**Recommended Actions**

The following are key activities for the Flood Insurance Committee for 2024-25:

- Work with FEMA to address issues being created by Risk Rating 2.0 that affect members and policyholders.
- 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 on D2C and the proposed NFIP Homeowners Policy form and other flood insurance-related documents, programs and initiatives released by FEMA.