

November 15, 2013

The Honorable Craig Fugate  
Administrator  
Federal Emergency Management Agency  
500 C Street, SW  
Washington, DC 20472

Dear Administrator Fugate:

The undersigned organizations representing the impacted real estate, development, finance and insurance industries and local governments, urge you to convene a **National Flood Insurance Summit** immediately to bring greater certainty to many of the provisions currently being implemented in the Biggert-Waters Flood Insurance Reform Act of 2012 (Biggert Waters Act).

The housing markets are still recovering in a fragile economy. In the more than 20,000 communities nationwide where flood insurance is required to secure a mortgage, we are responding to several difficult implementation decisions made by the Federal Emergency Management Agency (FEMA) involving the Biggert Waters Act. We understand FEMA has a monumental task, implementing this complex and far-reaching law. However, uncertainty and confusion surrounding these implementation issues are now beginning to stall transactions nationwide. We believe this summit should be separate from legislative efforts, and should focus on the provisions of the reform act that require immediate attention and clarification.

The impacted stakeholders are on the front lines working directly with borrowers, home owners and businesses. Our roles in real estate transactions require us to explain the law and respond to any questions or misconceptions that may arise. It is vital we better understand FEMA's intentions and approach to the law so we can educate the public and convey critical information about the law's implementation. We have many questions about FEMA's plans, timelines and challenges, and we need up-to-date and accurate data.

We propose the following topics to begin the discussion. These are all subjects we believe have administrative flexibility and where the industry can work with you to provide greater certainty in implementation. These include:

- Expediting regulations for the reimbursement of flood mapping appeals, the Technical Mapping Advisory Council, and installment payments to improve the affordability of flood insurance;
- Working to streamline and better publicize the Community Rating System (CRS) so the program is used by more communities to lower premiums;
- Streamlining and better educating consumers about the process for obtaining Elevation Certificates;

- Developing better education and information resources for the real estate, lender, development and insurance industries and local governments, including information about reducing premiums by mitigation actions;
- Enhancing consumer education and materials on the impacts of the Biggert Waters Act and the ongoing flood mapping process, including materials on the scientific resolution panel review process for map appeals; and,
- Designating a FEMA “Ombudsman” or a consumer point-of-contact for implementation and mapping issues and concerns.

The undersigned organizations support a fully authorized, sustainable, and fiscally responsible National Flood Insurance Program (NFIP). We have a vested interest in the most efficient, effective implementation of the new law, and we believe a National Summit with the key stakeholders will begin discussing a way forward. Thank you.

Sincerely,

American Bankers Association  
American Bankers Insurance Association  
Association of State Flood Plain Managers  
Credit Union National Association  
Independent Community Bankers of America  
Independent Insurance Agents & Brokers of America, Inc  
Manufactured Housing Institute  
Mortgage Bankers Association  
National Apartment Association  
National Association of Counties  
National Association of Federal Credit Unions  
National Association of Home Builders  
National Association of Local Housing Finance Agencies  
National Association of Realtors  
National Flood Determination Association  
National Multi Housing Council