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RISK RATING 2.0: Equity in Action

For Insurance Professionals

AGENDA

• What is Risk Rating 2.0: Equity in Action?
• What Led to this Transformation of the NFIP?
• The NFIP Today
• What has Changed
• What has Not Changed
• Transition of Current Policies

**This information is subject to change. The information presented here is correct as of the date of this presentation.**
FEMA has updated the NFIP risk rating methodology through the implementation of a new pricing methodology called Risk Rating 2.0. The new methodology brings several benefits to individual property owners and their communities.

WHAT IS RISK RATING 2.0: EQUITY IN ACTION?

- Reflect more types of flood risks in the rates.
- Provide logical rates that use easier-to-understand rating characteristics for agents and policyholders.
- Simplify and standardize the quoting process for properties across the country.
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NFIP BY THE NUMBERS
Currently, the NFIP has:

- 5 million policies
- $1.3 trillion in coverage
- 22,525 communities

SINGLE FAMILY HOMES
PRPs: 1,708,427
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**SINGLE FAMILY HOMES**

- PRPs: 1,708,427
- Pre-FIRM Subsidized: 374,181
- Full Risk: 993,192
- Grandfathered: 165,431

**SINGLE FAMILY HOMES**

- PRPs: 1,708,427
- Pre-FIRM Subsidized: 374,181
- Full Risk: 993,192
- Grandfathered: 165,431
- Newly Mapped: 170,845
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**SINGLE FAMILY HOMES**

- PRPs: 1,708,427
- Grandfathered: 165,431
- Pre-FIRM Subsidized: 374,181
- Newly Mapped: 170,845
- Full Risk: 993,192
- High Risk Coastal Zone: 12,289

**PREMIUMS VS. CLAIMS**

![Chart showing Premiums vs. Claims](chart.png)

- Earned Premium
- Loss Dollars Paid

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[Image links to FEMA website for flood insurance and Risk Rating 2.0 information.]
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**Equity In Action**

**PHASE 1**

- New Business Only
- NFIP Flood Manual
- System Access

**OCTOBER 1, 2021**

Goes into effect for New Business policies!

**NEW PRICING METHODOLOGY**

Transition timeline

**SEPTEMBER 1, 2021**

FEMA released final guidance documents.
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**WHAT HAS CHANGED**

NEW PRICING METHODOLOGY

**LEGACY METHODOLOGY**

FEMA-SOURCED DATA

RATING VARIABLES

- Flood Insurance Rate Map Zone
- Base Flood Elevation
- Foundation Type
- Structural Elevation (Special Flood Hazard Area Only)

1% ANNUAL CHANCE OF FLOODING (FREQUENCY)

FEES AND SURCHARGES
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### ADDITIONAL DATA SOURCES

- Uses new risk considerations to better quantify the real risk to a structure.
- To do this, FEMA has integrated additional datasets into the rating structure. This will be included in the new rating and will be automated.

### COST TO REBUILD

- The building replacement cost will be a new rating element for all properties.
- The replacement cost tool will be used for single-family homes, residential manufactured/mobile homes, residential units, and 2-4 family buildings.
- The replacement cost tool will not be used for Other Residential Buildings, Residential Condo Buildings (RCBAP), Non-residential Buildings, and other Non-Residential types.
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**NEW PRICING METHODOLOGY**

- **FEMA-SOURCED MAPPED DATA**
- **ADDITIONAL DATA SOURCES**
- **COST TO REBUILD**
- **RATING VARIABLES**
  - Distance to Flooding Source & Flood Type
  - Building Occupancy
  - Construction Type
  - Foundation Type
  - Ground Elevation
  - First Floor Height
  - Number of Floors
  - Prior Claims
- **BROADER RANGE OF FLOOD FREQUENCIES**
- **FEES AND SURCHARGES**

*Additional variables are not shown here*

**RATING VARIABLES**

- Rate tables will no longer be used, rates will be calculated using an algorithm.
- The flood zone and Base Flood Elevation (BFE) will no longer be used as a rating variable.
- Elevations will be considered for all properties.

**DISTANCE TO FLOODING SOURCE & TYPE OF FLOODING**

- Legacy methodology versus the new pricing methodology.
- Include Inland, Storm Surge, Tsunami, Coastal Erosion, and Great Lakes – that are likely to impact the structure.
- Both are determined automatically using geospatial information (GIS) data
- Based on the property location entered by the agent.
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### BUILDING OCCUPANCY

- Single Family Home
- Residential Mobile Home/Manufactured Home
- Residential Unit
- 2-4 Family Building
- Other Residential
- Residential Condo Building
- Non-Residential

### Key Takeaways

- Equity in Action
- Legacy vs New Pricing Methodology
- Rating Variables: Flood Source, Flood Type, Building Occupancy
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### RATING VARIABLES

#### FOUNDATION TYPES

There are now 6 simple foundation types.

- **Slab on Grade (Non-Elevated)**
  - Includes EC Diagram numbers 1A, 1B, and 3
- **Basement (Non-Elevated)**
  - Includes EC Diagram numbers 2A, 2B, and 4
- **Crawlspace (Elevated, including non-elevated sub-grade crawlspace)**
  - Includes EC Diagram number 8 and 9

#### CONSTRUCTION TYPE

**FRAME:**
- The first floor above ground level is constructed with wood or metal frame walls.

**MASONRY:**
- The first floor above ground level is constructed with masonry including brick, or concrete walls for the full story.

**OTHER:**
- The first floor above ground level is constructed with materials other than wood or metal frame or masonry walls for the full story.
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**RATING VARIABLES**

**FOUNDATION TYPES**

There are now 6 simple foundation types.

- Elevated without Enclosure on Post, Pile, or Pier
  - Includes EC Diagram number 5

- Elevated with Enclosure on Post, Pile, or Pier
  - Includes EC Diagram number 6

- Elevated with Enclosure Not Post, Pile, or Pier
  - Includes EC Diagram number 7

**FIRST FLOOR HEIGHT**

- Elevations are used in determining rates for all policies.

- The elevation of the first floor of the structure replaces the elevation difference in the legacy methodology.

- There are 2 ways to determine first floor height for a property.
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**FIRST FLOOR HEIGHT EXAMPLES**

Definition: height of the building’s first lowest floor above the adjacent grade

![Examples of First Floor Height](image)

**RATING VARIABLES**

- This is part of the new pricing methodology rating engine.
- FEMA will determine a First Floor Height value using application information, and various datasets.

**Method 1:** System Generated

**DETERMINING ELEVATIONS:**
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**FIRST FLOOR HEIGHT EXAMPLES**

Method 2: Difference between the reported First Flood Height and the Adjacent Grade.

**RATING VARIABLES**

- Under the new pricing methodology, an EC will **no longer be required** for rating (optional).
- ECs can be used to determine the structure’s elevations, including the first-floor elevation above ground level.
- ECs may still be required to comply with local floodplain management regulations.

**Method 2: Elevation Certificate (EC) (Optional)**
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**RATING VARIABLES**

Note: If Section E is completed for zones other than unnumbered A and AO, the information should be used for underwriting purposes only.

**EQUITY IN ACTION REMINDER**

- Elevation Certificates
  - Optional for rating purposes
  - Used for Floodplain Management compliance
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RATING VARIABLES

NUMBER OF FLOORS

Will no longer include:
- Basements
- Enclosures
- Crawlspace
- Attics (if used for storage)

A unit’s floor will now be determined by the actual floor on which it is located.

This is an important change for condominiums and apartment renters.
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RATING VARIABLES

PRIOR CLAIMS

- FEMA will not include prior claims history in the initial rate calculation
- The prior claims variable will be applied at renewal of the policy, after first loss under the new pricing methodology
- A rolling 20-year period
- Severe Repetitive Loss (SRL) surcharge included in their premium until they have their first loss under the new pricing methodology

WHAT IS AN EXCLUDED LOSS?

- Increased Cost of Compliance claim payments; or
- Claims closed without payment.

DEFINITION:

“Excluded Losses”
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RATING VARIABLES

2004 – 2024
20-Year Rolling Window

2003 Policy Purchased

2007 Claim #1

2011 Claim #2

2022 RR 2.0 goes into effect

2024 Claim #3

2024 – 2026 Prior Claims Variable: 2

36
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**BROADER RANGE OF FLOOD FREQUENCIES**

Flooding sources other than what is listed on the FIRM.

Examples:

- Catastrophe modeling
- Urban Flooding

**NEW PRICING METHODOLOGY**

<table>
<thead>
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</tr>
</tbody>
</table>

*Additional variables are not shown here

**FEES AND SURCHARGES**

The following fees and surcharges will apply to all policies:

- Reserve Fund Assessment
- HFIAA Surcharge
- Federal Policy Fee
- Probation Surcharge (if applicable)

**NEW PRICING METHODOLOGY**

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</tbody>
</table>

*Additional variables are not shown here
Key Takeaways

- Construction and Foundation type
- First floor height: System vs EC
- Claims Rating Variable

5 MINUTE BREAK

Coming Up Next:
- Statutory Discounts
- Retired Policy Types
- What has NOT Changed
- Transition of Current Policies
- And more...
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WHAT HAS CHANGED

STATUTORY DISCOUNTS & MITIGATION CREDITS

STATUTORY DISCOUNTS

- Pre-FIRM
- Newly Mapped
- Other (Emergency Program)
- The discount will *gradually* phase out
- A policyholder may lose their discount if they allow the policy to lapse
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COMMUNITY RATING SYSTEM DISCOUNTS

• The new pricing methodology applies the CRS discount uniformly in qualifying communities - regardless of whether the structure is inside or outside the Special Flood Hazard Area (SFHA).

• The discount is a flat percentage based on the CRS class, with no difference for flood zone.

MACHINERY & EQUIPMENT (M&E)

• The rating engine will apply a discount for policyholders with M&E Elevated to at least the elevation of the floor above the building’s first floor.

• Agents will self-certify the position of the M&E by answering a “Yes/No” question on the application.

• The list of eligible M&E will be listed in the Flood Insurance Manual.
MACHINERY & EQUIPMENT (M&E)

- The rating engine will apply a discount for policyholders with M&E Elevated to at least the elevation of the floor above the building’s first floor.
- Agents will self-certify the position of the M&E by answering a "Yes/No" question on the application.
- The list of eligible M&E will be listed in the Flood Insurance Manual.

FLOOD VENTS

- The rating engine will apply a discount to the policy for buildings in any flood zone with proper openings in the enclosure.
- The flood insurance application will need to reflect the proper information in order to receive the discount.
FLOOD VENTS

- A minimum of 2 openings on at least 2 exterior walls
- Total net area of not less than 1 square inch for every square foot of enclosure
- Bottoms of openings no higher than 1 foot above the higher of the exterior or interior grade

FLOODPROOFING

- An alternative to elevating a building at or above the Base Flood Elevation
- The insurer must submit proper documentation
- Meet eligibility requirements
WHAT HAS CHANGED

WHAT'S GOING AWAY

GRANDFATHERING

- BFEs and Flood Zones will no longer be used for rating
- Transition to true risk premium
- Subject to statutory caps (if applicable)
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**RETIRED POLICY TYPES/RATING METHODS**

- Preferred Risk Policies (PRPs)
- Mortgage Portfolio Protection Program (MPPP)
- Submit-for-Rates (SFRs)
Key Takeaways

- Discounts and Credits
- Legacy Rating and New Pricing Paths
- Retired Policies and Rating Methods

WHAT HAS NOT CHANGED
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**WHAT HAS NOT CHANGED**

- The Mandatory Purchase requirement
- Floodplain Management
- Statutory caps on annual individual rate increases
- Building/Contents Eligibility and Increased Cost of Compliance (ICC)
- Underwriting Forms
- Assignment of a policy to a new building owner

---

**WHAT HAS NOT CHANGED**

**The Mandatory Purchase requirement**

- Still be required for properties in Special Flood Hazard Areas (SFHAs).
  - Flood Insurance Rate Maps
  - 30-day waiting period waived (loan exception)
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**Floodplain Management**
- Community compliance
- LOMAs and LOMRs will still exist.
  - Flood Insurance Rate Maps

**WHAT HAS NOT CHANGED**

**Statutory caps on annual individual rate increases**
- Most premium rates may not increase by more than 18% per year.
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**Building/Contents Limits and Increased Cost of Compliance (ICC)**

- Coverage limits.
- ICC coverage/%

**Underwriting Forms**

- The application, general change endorsement, and cancellation forms will still be used the same way as current.
- The forms will be updated under Risk Rating 2.0.
- Policy forms: Dwelling, General Property, RCBAP are not changing.
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### Assignment of a policy to a new building owner

- Policies can still be assigned to a new building owner.
- This is important under Risk Rating 2.0 specifically, because it allows the glidepath to transfer to the new building owner.

### WHAT HAS NOT CHANGED

### TRANSITION OF CURRENT POLICIES
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**Equity in Action for Renewals**

**PHASE 2**

**APRIL 1, 2022**

Existing policies will be subject to the new pricing methodology.

**TRANSITION OF CURRENT POLICIES**

**Reminder: Phase 1**

- October 1, 2021 – March 31, 2022

- Existing policyholders will be able to renew under the new pricing methodology if beneficial
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**TRANSITION OF CURRENT POLICIES**

- With the implementation of the new pricing methodology, any premium changes will go into effect at renewal.

- At renewal, PRP and Newly Mapped policyholders will be able to:
  - Change their coverage amounts
  - Increase their deductible

- Lapse in Coverage

**Summary**

- Legacy Methodology
- Risk Rating 2.0: Equity in Action
- What has Changed and Not Changed
- Transition of Policies
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RESOURCES

- Risk Rating 2.0: Equity in Action Website
  - [Risk Rating 2.0](#)

- WYO Bulletin
  - W-21003 - New Pricing Methodology
  - W-21007 - New Pricing Methodology Update

- Equity in Action Fact Sheet
  - [Equity In Action](#)

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TO FLOODPLAIN MANAGERS

National Flood Insurance Program Home Page

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Find an Insurance Form
https://www.fema.gov/flood-insurance/find-form

Standard flood Insurance Policy Forms
• Dwelling Policy Form
• General Property Policy Form
• Residential Condominium Building Association Policy (RCBAP) Form

FloodSmart.gov
https://www.floodsmart.gov
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Office of the Flood Insurance Advocate
https://www.fema.gov/flood-insurance/advocate

Flood Insurance Advocate

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 National Flood Insurance Program (NFIP)
- Identifying trends affecting the public
- Making recommendations for NFIP improvements to FEMA leadership

What Information Can OFIA Help Me Find?

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Evaluations

- All attendees will be receiving an email link to a survey and feedback form.
- Please take time to complete and help us improve our training effort!
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To stay up to date with Risk Rating 2.0: Equity in Action, and for the latest details, please visit:

Risk Rating 2.0: Equity in Action

THANK YOU!