



FEMA

W-09004

January 22, 2009

MEMORANDUM TO: Write Your Own (WYO) Company Principal Coordinators
and the NFIP Servicing Agent

FROM: WYO Clearinghouse
NFIP Bureau and Statistical Agent

SUBJECT: Release of the Standard Flood Hazard Determination Form (SFHDF)

Accompanying for your information is a copy of a December 23 memo explaining FEMA's position on release of the SFHDF, or flood zone information it contains, by lenders to borrowers. Issued by Edward L. Connor, Acting Federal Insurance Administrator, National Flood Insurance Program, the memo was sent to FEMA Regional Administrators to ensure that communications to stakeholders about the SFHDF are consistent throughout FEMA.

Please distribute this document within your organization as appropriate.

Attachment

cc: Vendors, IBHS, FIPNC, Government Technical Representative


Suggested Routing: Marketing, Underwriting



FEMA

December 23, 2008

MEMORANDUM FOR: Regional Administrator
FEMA Regions I – X

FROM: 
Edward L. Connor
Acting Federal Insurance Administrator
National Flood Insurance Program

SUBJECT: Release of the Standard Flood Hazard Determination Form (SFHDF)

I am providing the FEMA position regarding the release of the SFHDF by lenders to borrowers and/or the release of relevant flood zone information it contains. Please ensure your staff considers the following, so communications to various stakeholders about the SFHDF are consistent throughout FEMA.

The SFHDF facilitates the following: 1) accurate rating of the borrower's flood insurance policy premium by the insurance agent; or 2) documentation for a Letter of Determination Review (LODR) request by a borrower who wants to appeal the lender's determination.

It is important for lenders to give a copy of the completed SFHDF to the borrowers, who are ultimately charged for the risk identification information applicable to their property and provided on the SFHDF. Otherwise, the insurance agent is obligated to obtain a flood zone determination in order to write the flood insurance coverage, and differing methodologies or address variations could result in a different flood zone determination. Regulated lenders must, by law, rely upon their in-house or contracted flood zone determinations. A discrepancy between the flood zone determinations made by a lender and an agent could create costly and frustrating situations for the consumer. Additionally, the consumer will be unable to make a LODR request to FEMA without a copy of the completed SFHDF.

To identify the purpose of the SFHDF, FEMA relies upon Section 528 of the National Flood Insurance Reform Act of 1994, an excerpt from the August 2, 1994 Congressional Record (House), and 44 CFR Section 65.17. If you have questions concerning this memorandum, please have your staff contact Tuula Young, Lender Compliance Officer, Industry and Public Relations Branch, by email tuula.young@dhs.gov or telephone (703) 605-4241, or Lora Eskandary, Mapping Program Specialist, Engineer Management Branch, by email lora.eskandary@dhs.gov or telephone (202) 646-2717.