**U.S. Department of Homeland Security**
Washington, D.C. 20472

FEMA

W-16079

October 14, 2016

MEMORANDUM FOR: Write Your Own (WYO) Company Principal Coordinators and the Direct Servicing Agent (DSA)

FROM: Greta Richardson
Director of Claims
Federal Insurance and Mitigation Administration

SUBJECT: Reminder on Existing Guidance Regarding Multi-Peril Losses



Hurricane Matthew caused widespread damage caused by flood, wind, and other perils. As seen in previous similar disaster events, properties subject to multiple hazards can present particularly challenging claims for flood claim adjusters to process. Accordingly, FEMA would like to remind adjusters and other claim handlers about existing guidance provided on the subject.

Overall, flood claim adjusters should take special care when adjusting claims caused by both flood and other perils. In addition to thoroughly examining all flood damage, adjusters should also photograph and note evidence of damage caused by non-flood perils. General notations of damage caused by non-flood perils do not rise to the level of providing a professional opinion regarding causation, damages, or repair methods. Such notations can help resolve disagreements later in the claims process.

The NFIP provides adjuster specific guidance in the form of wind or water investigative tips as a tool to help determine the damage caused by wind or water or a combination of both. The adjuster should use the proven methods to document windstorm damage to buildings or contents. Please refer to the 2013 Adjusters Claims Manual, page (IX-1) for guidance on Wind vs. Flood Issues and FEMA Bulletin W-08008, dated February 25, 2008, for a discussion of Wind/Water Investigative Tips. These tips are also included as an appendix to this bulletin.

Please direct any questions, comments, or concerns regarding the handling of multi-peril claims to FIMA Claims at FEMA-FIDClaimsMailbox@fema.dhs.gov.

cc: Vendors, IBHS, and Government Technical Representative

Required Routing: Reporting and Independent Adjusting Firms

**Wind vs. Flood Investigative Tips**

**Important Things to Do When Investigating a Claim**

- Research local newspapers and/or check with the National Weather Service, or other agencies to determine the specific data relative to the storm in the location of the claim. Specific information to look for includes wind speed data, storm surge data, flood height data, and other relevant information.

- When damage is caused by a hurricane, tropical storm, nor'easter, or other event that may cause both wind and flood damage, determine and record the following (*check and record the timing and duration for each)*:

| Data Element | Measurement | Timing | Duration |
|---|---|---|---|
| Highest Wind Speed | _____ | _____ | _____ |
| Barometric Pressure | _____ | _____ | _____ |
| Amount of Rainfall | _____ | _____ | _____ |
| Tidal Heights | _____ | _____ | _____ |
| Storm Surge | _____ | _____ | _____ |
| Wave Heights | _____ | _____ | _____ |

- Record the distance and direction of the insured risk relative to the eye of the storm. Remember that the waves are higher to the right of the storm's path.

- Research and record site conditions:
    - Original ground elevation
    - Distance from body of water
    - After-storm ground elevation or other indications of scour
    - Amount and type of storm debris

- Canvas the neighborhood for eyewitnesses and take their recorded or signed statements. Be certain to identify where each witness was at the time of the storm, the amounts or descriptions of wind and flood each witness saw, and the time of day that each saw it. Record in the claims files only what each witness actually says—not hearsay or your opinion.

- Check for and photograph the debris line. Measure and record how many feet the debris line is from the shoreline and from the insured risk. Be sure to describe the topography in detail.

- Check for and photograph houses and objects adjacent to the insured risk. If damage appears to be different from that of the insured risk, determine why and record the reason in the claim files. Usually, the damage is different for one of two reasons:
    - Different cause of damage (e.g., a tornado can cut a relatively narrow path, leaving neighboring buildings relatively undamaged).
    - Different building construction and anchoring. Look for connectors or tie-down straps for elevated buildings and enclosures beneath elevated buildings. Check the pilings for evidence of scouring. Photograph the remaining pilings, showing patterns of the leaning pilings. Determine how deep the pilings were installed and measure the distance between pilings.

- Determine and record in the claim file a complete description of the damaged or demolished building, including the type of construction; whether elevated (if elevated with an enclosure, be sure to indicate the type of enclosure – breakaway walls, open lattice work, vents, etc.); number of floors (including basement); roof covering and pitch; windows, carports, etc.; and the building's relative position to the wind. It is also important to include a description of the foundation type (slab, piles, piers, etc.) and damage.

- Photograph (close-up) the remains of connectors or tie-downs. Be sure to describe the size, type, brand, method of installation, and if possible the brand name.

- Make a notation in the initial report where evidence suggests the insured risk was not built as securely as neighboring buildings. The flood insurer or coastal plan, for example, may want to check the local building codes to determine if a building construction violation has occurred and document the claim files, both with copies of the code and the evidence of a violation. The age of the building and the effective dates of the building codes need to be documented.

- Check for and photograph any wind-caused openings in the building and/or missing roof shingles.

- Check for and photograph all possible wind-related water marks or stains visible on both the exterior and interior walls and ceilings of the building.

- Check for and photograph all possible flood-related water marks or stains visible on both the exterior and interior of the building.

- Check for and photograph any water marks visible on nearby trees or fence posts, or other buildings.