

W-21008

June 2, 2021

MEMORANDUM FOR: Write Your Own (WYO) Principal Coordinators and the

National Flood Insurance Program (NFIP) Direct

FROM: NFIP Clearinghouse

SUBJECT: Collection of NFIP Direct Claim Forms

This memorandum announces the release of the NFIP Direct Claims Forms, effective March 1, 2021, through January 1, 2024.

The Federal Emergency Management Agency (FEMA) announces the release of the NFIP Direct Claim forms for use by policyholders approved by the Office of Management and Budget (OMB). FEMA also will publish a second collection for use by adjusters for reporting purposes handling NFIP Direct claims in the October 2021 release of the *NFIP Claims Manual*. The forms are available to download on FEMA.gov:

National Flood Insurance Program Claim Forms for Adjusters | FEMA.gov

National Flood Insurance Program Claim Forms for Policyholders | FEMA.gov

FEMA continues to strive to improve the customer experience for its NFIP policyholders. As part of this effort, FEMA simplified several forms that policyholders use to submit their claim for ease of use. FEMA also enhanced its forms with fillable fields, pre-populated drop-down lists, and popup messages (where applicable) to assist policyholders with proper completion. FEMA designed these enhancements to remove confusion over what information is required and to assist policyholders with submitting a claim without adjuster assistance, should they choose to do so, allowing policyholders to more easily comply with their obligations under the Standard Flood Insurance Policy (SFIP).

In case of a flood loss to insured property, the SFIP expressly places the obligation to submit and prove a claim on the policyholder and requires them to furnish certain information to their flood insurer. Since publishing the previous 2017 collection, FEMA determined that some forms were used by claims adjusters for reporting purposes only. The adjuster has the responsibility to investigate claims on behalf of the insurer and complete certain required forms that assist with investigating, evaluating, documenting, and determining the amount of the claim payment owed to a policyholder when a loss occurs.

Collection of NFIP Direct Claim Forms June 2, 2021 Page 2

Considering this, FEMA removed nine forms from the previous 2017 collection and added four newly created ones: three for policyholders and one for the adjuster. One of the new policyholder forms FEMA created is a Claim Appeal form that policyholders can use to submit a claim appeal. The new Claim Appeal form will help policyholders submit eligible appeals to FEMA without needing to reference separate instructions. The following provides a breakdown of the revisions to the Claim Forms collection:

What's New

	New Form Tile	New Form Number
1	Advance Payment Request-Building & Contents	FF-206-FY-21-113
2	Advance Payment Request - Increased Cost of Compliance (ICC)	FF-206-FY-21-114
3	Proof of Loss - Building & Contents (Adjuster-Prepared)	FF-206-FY-21-112
4	Claim Appeal	FF-206-FY-21-115

NFIP Claim Forms for Policyholders

FEMA now has a collection of nine forms for use by policyholders, which are available for download on FEMA.gov and FloodSmart.gov as follows:

New Form Title		New Form Number	Previous Form Title	Previous Form Number
1	Personal Property	FF-206-FY-21-	Worksheet - Contents -	086-0-06
	(Contents) Worksheet	106	Personal Property	
2	Building Property	FF-206-FY-21-	Worksheet - Building	086-0-07
	Worksheet	107		
3	Proof of Loss –	FF-206-FY-21-	Proof of Loss	086-0-09
	Building and Contents	108		
	(Policyholder-Prepared)			
4	Proof of Loss –	FF-206-FY-21-	Increased Cost of	086-0-10
	Increased Cost of	109	Compliance Proof of	
	Compliance (ICC)		Loss	
5	First Notice of Loss	FF-206-FY-21-	Notice of Loss	
		110		
6	Manufactured (Mobile)	FF-206-FY-21-	Manufactured (Mobile)	086-0-17
	Home/Travel Trailer	111	Home/Travel Trailer	
	Worksheet		Worksheet	
7	Advance Payment Request	FF-206-FY-21-	New Form	N/A
	 Building and Contents 	113		
8	Advance Payment Request	FF-206-FY-21-	New Form	N/A
	– Increased Cost of	114		
	Compliance (ICC)			
9	Claim Appeal	FF-206-FY-21-	NFIP Claims	N/A
		115	Handbook	

NFIP Claim Forms for Adjusters

FEMA will now offer a collection of six forms for use by adjusters, which have been removed from the original OMB collection. As such, these forms no longer contain an OMB Control Number or FEMA Form number. FEMA will publish the following forms in the *NFIP Claims Manual* (October 2021 updates) and make them available for download on FEMA.gov.

	New Form Title	New Form Number	Previous Form Title	Previous Form Number
1	Adjuster's Preliminary	N/A	Adjuster's Preliminary	086-0-13
	Report		Report	
2	Adjuster's Narrative Report	N/A	National Flood	086-0-15
			Insurance Program	
			Narrative Report	
3	Adjuster's Subrogation	N/A	Cause of Loss and	086-0-16
	Referral		Subrogation Report	
4	Adjuster's Preliminary	N/A	Adjuster's Preliminary	086-0-20
	Flood Damage Assessment		Flood Damage	
			Assessment	
5	Adjuster's Registration	N/A	Adjuster Registration	086-0-21
	Application		Application	
6	Proof of Loss – Building	FF-206-FY-21-112	New Form	N/A
	and Contents (Adjuster-			
	Prepared)			

Forms removed from the previous 2017 collection

FEMA removed four forms due to redundancies:

Former Form Tile		Previous Form Number	
1	Worksheet - Building (Continued)	086-0-08	
2	Adjuster's Final Report	086-0-14	
	Manufactured (Mobile) Home/Travel Trailer Worksheet		
3	(Continued)	086-0-18	
4	Increased Cost of Compliance (ICC) Adjuster's Report	086-0-19	

Questions and Answers

1. Who is required to use the collection of NFIP Forms?

The forms are for policyholders with SFIPs issued by NFIP Direct and adjusters handling claims on their behalf. The forms collect information from policyholders needed by the insurers to adjudicate claims resulting from a flood loss. They allow policyholders to notify, document, and submit claims to the insurer, thereby fulfilling their obligations under

the SFIP. While these forms are designed for NFIP Direct claims, FEMA is aware that WYOs and adjusters handling claims on their behalf use these forms even though there is no requirement for them to do so.

2. Why is there now a separate Building Property Worksheet and a separate Personal Property (Contents) Worksheet for policyholders?

Two versions were created for NFIP Direct policyholders who may want to submit a claim without the help of an adjuster. Each form gives policyholders an opportunity to provide a completed inventory of their flood-damaged property detailing quantities, descriptions, values, and calculating the amount of their loss. NFIP Direct policyholders may use these worksheets to assist them in complying with their obligation under the SFIP to document damages after a loss. Policyholders should take and submit ample photographs and/or video of items listed on these worksheets to support the existence of and verify flood-damaged property they wish to claim.

3. Why were additional columns added to the Personal Property (Contents) Worksheet?

FEMA revised this worksheet at the recommendation of the adjusting community. The added columns provide a place for NFIP Direct policyholders to submit required information relating to model numbers, serial numbers, depreciation, salvage or salvage buyback amounts. To further assist NFIP Direct policyholders with providing a complete inventory, we simplified the form for ease of use by adding interactive and fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable.

4. Do [current] estimating systems conform to the Contents and Building type Worksheet format?

All the revised worksheets give NFIP Direct policyholders an opportunity to provide a proper inventory of their flood-damaged property without the help of an adjuster. The data collected is typically populated into other reporting forms that insurers use to evaluate and adjudicate valid claims. FEMA is aware that estimating software used by adjusters collect this information at various stages in the claim reporting process which may or may not appear on the forms in their current systems. However, FEMA cannot direct private software firms to recalibrate their systems to match the format of these worksheets.

5. Why are there now *two* Proof of Loss forms for claims involving building property and/or personal property?

a. For NFIP Direct policyholders who may want to submit a claim without the help of an adjuster, FEMA created the Proof of Loss - Building & Contents, *Policyholder-Prepared* form exclusively to assist them with submitting a Proof of Loss to the insurer to meet their obligations under the SFIP. For ease of use, this form is interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, designed to assist them with completing, where applicable.

b. For NFIP Direct policyholders who may want to submit a claim with the help of an adjuster, FEMA created the Proof of Loss - Building & Contents *Adjuster-Prepared*. This form is used when an adjuster prepares the Proof of Loss as a courtesy to the policyholder, who then reviews and verifies the accuracy of the information. By signing and dating this Proof, the policyholder validates and agrees with the information prepared by the adjuster. This form includes more detailed information than the Policyholder-Prepared Proof and includes a Statement of Loss that the insurers can use as a basis for issuing payment.

6. What new forms were created to further support a policyholder meeting their obligations after a flood loss?

- a. Advance Payment Request Building & Contents.
- b. Advance Payment Request Increased Cost of Compliance (ICC).
- c. Claim Appeal, new form replaces the information in NFIP Claims Handbook instructing a policyholder on how to file an Appeal.

7. Why is FEMA introducing a new Claim Appeal form? Is the NFIP Claims Handbook discontinued?

FEMA determined that some policyholder appeal submissions were ineligible for various reasons (e.g., untimely submissions or are unnecessarily delayed when missing information must be requested). By providing an appeal specific form that calculates timeframes and prompts the policyholder to include the necessary information, it will generally make it easier for policyholders to submit the appeal. The new form may also reduce the number of ineligible submissions and gain additional efficiencies in the appeals process. This form complements the information found in the *NFIP Claims Handbook*, which will continue to serve as a valuable resource to all NFIP policyholders.

8. Why was the Adjuster's Final Report removed/discontinued?

This form was removed at the request of the adjusting community. While the Final Report originally served as an important reporting tool, it collected duplicative information which has now been incorporated into other forms or data that is no longer required to be collected.

9. What do I do if the fields on the form are not functioning properly?

All new and revised forms were designed to be interactive with fully functioning fillable fields, including numerous drop-down lists and pop-up messages, where applicable. The intent was to make it easier for NFIP Direct policyholders to submit a claim without the help of an adjuster. During the form development and submission process, FEMA made every effort to ensure all fields functioned as intended. If any errors are found, FEMA requests end users to make the necessary corrections/calibrations in their estimating software to work around these issues.

10. Can expired forms that adjusters use for reporting information to the flood insurers continue to be used?

Expired adjuster reporting forms can continue to be used by the adjusting community until further notice. However, FEMA requests end users remove "OMB Control Number 1660-0005" and its corresponding expiration date (top right corner of each page); and the "FEMA Form Number 086-0-xx" and its corresponding date (bottom left corner of each page) as these forms have been removed from the OMB collection. In the interim, FEMA is working on a new collection of updated adjuster forms for the October 2021 NFIP Claims Manual update.

FEMA reiterates the new Claim Appeal Form **is not** an adjuster-facing form. Software companies **should not** incorporate it for usage by flood insurance adjusters. If an NFIP policyholder chooses to file an appeal, the NFIP policyholder can obtain the form directly from the NFIP insurer or from FEMA.gov, and only after a denial. This aligns with federal regulations governing the NFIP. An offer of the form by adjusters could directly or indirectly harm the policyholder and the insurer and may violate the SFIP at Section VII.J.8.

Direct any questions about the new NFIP claim forms to the FEMA-FID Claims Mailbox and indicate in the subject line "NFIP Forms Question."

cc: Vendors, IBHS, Government Technical Representative

Required Routing: Claims, Underwriting