

Narrative of Changes

The purpose of the Narrative of Changes is to clearly indicate changes to a collection since the previous approval.

Collection Title:
OMB Control No.: 1660-0010
Current Expiration Date: July 31, 2014
Collection Instruments: No Forms

The following are the changes to the collection:

Supporting Statement:

Question 2 Deleted - The information collection is used by FEMA, through its NFIP Bureau & Statistical Agent, to assist the insurance companies - Write Your Owns (WYO), and the contractor for the NFIP Direct – in underwriting new business and renewal applications for flood insurance. This is to verify whether a building, which is located on a designated coastal barrier, is neither new construction nor a substantial improvement, and is, therefore, eligible for NFIP coverage. If the information is not collected, then invalid NFIP Flood Insurance Policies may be inadvertently written.

Added -

When an application for flood insurance is submitted for buildings located in CBRS and/or Otherwise Protected Area (OPA) communities, the following types of documentation must be submitted as evidence of eligibility by the applicant's insurance agent writing through the NFIP Direct Servicing Agent (DSA):

- 1) **FEMA Flood Insurance Rate Map (FIRM)** - For buildings built on or after the date the insurance prohibition became effective, a legible copy of the current FEMA Flood Insurance Rate Map (FIRM) panel showing that the building is not located in a CBRS area or OPA.
- 2) **Legally Valid Building Permit** - For buildings in CBRS areas and OPAs, a permit is needed, or, if the building permit was lost or destroyed, a written statement to this effect signed by the community official responsible for the building permits will be accepted in lieu of the building permit; and
- 3) **Written and Signed Statement from a Community Official** - A statement by a responsible community official that is written and signed and states that:
 1. The walls and roof of the building were in place (1982 Act) or the start of construction took place (1990 Act), before the date the insurance prohibition became effective, and
 2. The building was not substantially improved or substantially damaged on or after the date the insurance prohibition became effective.
 3. For structures in OPAs only this also involves written certification from the governmental body overseeing the area indicating that a building in an OPA is used in a manner consistent with the purpose for which the area is protected may be submitted in lieu of the above documentation.

Moved from Question 3 up to Question 2:
All of these

Question 3: Deleted - Although documents in this collection can be scanned and uploaded through an agent, no document used in this process can be processed without first being used as a paper print out that often needs to then be signed such as in the case of letters from officials and signed statements. The documents needed to show that a structure is eligible to receive flood insurance include building permits, written statements, and signed statements by local officials and they can be submitted by postal mail to show that a structure is eligible to receive flood insurance as well. The general processing procedure is as follows.

Added - No documents used in this process can be processed without first being obtained in printed (hard copy) format. These paper documents (such as letters/statements from officials) often need to be signed.

Revised: The insurance agent writing business through the ~~Direct Servicing Agent (NFIP DSA)~~ will submit-submits the documents in conjunction with the application for flood insurance either in hard copy through the mail, ~~or will send it~~ electronically by scanning and uploading the documents through the DSA's web based system. The URL for the insurance agent's portal is <https://www.nfipservices.com/>. The agent will use this portal to sign in and submit insurance applications and related documents – such as the scanned copies of coastal barrier legislation documents – electronically

Deleted - At this site paper documents that were scanned are submitted. Upon receipt of an application for a property that is identified as being in a Coastal Barrier Resources System community, the DSA requires that the agent or underwriter review the Flood Insurance Rate Map comparing the location of the property to the CBRS boundary. If the property is clearly outside of the CBRS area, then the risk is eligible for coverage, and the policy is allowed to process. If the location of the property compared to the CBRS boundary is questionable, the agent or underwriter must then review the Date of Construction (DOC) of the building comparing it to the CBRS designation date. If the DOC is before the CBRS designation date, then the risk is eligible for coverage, and the policy is allowed to process. If the DOC is on or after the CBRS designation date, then the agent or underwriter must gather certain documents, such as, the FIRM with the location of the property marked on it, a copy of a plat survey or tax map, a copy of a community or municipal street map showing the location of the property, or some other official document that will show the location of the risk or certify that it is outside of the CRBS area. These

Moved to Question 2 - These documents are submitted to the NFIP Bureau for tracking and transmittal purposes. The Bureau sends the packet to the appropriate US Fish & Wildlife Field Office (F&WS) for an official determination. Issuance of the policy (eligibility for coverage) is based on the US F&WS determination.

Question 8 b. Deleted - There has been no recent consultation outside the agency specifically on this information collection; however

Question 8 c. - Revised - No consultation has been conducted **directly** with respondents (**applicants for flood insurance**). The building permits, written statements, and signed statements required by this information collection are submitted along with, and as part of, an application for flood insurance. Most, if not all, of the information required by the Implementation of the Coastal Barrier Resources Act, which is submitted in conjunction with the NFIP application, is a matter of public record. **A respondent needing information regarding CBRA/OPA documentation consults his insurance agent.**

Question 9 Deleted - There have not been any decisions to provide any payments or gifts to respondents in exchange for the property location/date of construction information pertaining to a particular building, with relation to CBRS boundaries. This information is required to determine eligibility for NFIP coverage only. Therefore, if a property owner wishes to purchase NFIP insurance and if the subject property is in close proximity to the CBRS boundary, then they must provide the information so that the NFIP may determine eligibility for coverage.

Added - FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

Question 12 – Number of forms respondents **increased or decreased**. See Question 15 for explanation.

Question 13 – annual cost burden to respondents or record keepers updated.

Question 14 - costs to the Federal Government updated.

Question 15 – Burden hour decrease explained.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
- FEMA Flood Insurance Rate Map, - Legally Valid Building Permit, - Written and Signed Statement from a Community Official				672.5	400	-272.5
Total(s)				672.5	400	-272.5

Explain: FEMA Flood Insurance Rate Map, Legally Valid Building Permit, and Written and Signed Statement from a Community Official - The burden hour figures represents all applicants for flood insurance in CBRS communities that submitted CBRA-related documentation either along with their original flood insurance application or in response to a

request from the NFIP DSA for additional information. The decrease in the burden hours is the result of fewer applications for flood insurance requiring CBRA/OPA documentation being received in the past 12 months reported. There was no change in the program or the documentation requirements.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
- FEMA Flood Insurance Rate Map, - Legally Valid Building Permit, - Written and Signed Statement from a Community Official				\$18,951.13	\$13,178.20	-\$5,772.93
Total(s)				\$18,951.13	\$13,178.20	-\$5,772.93

Explain: FEMA Flood Insurance Rate Map, Legally Valid Building Permit, and Written and Signed Statement from a Community Official - the previously approved cost burden was \$18,951.13. The current estimated annual cost burden is \$13,178.20, resulting in a decrease of \$5,772.93. The change in cost burden results from a decrease in the number of annual responses, i.e., the number of property owners in CBRA/OPA communities applying for flood insurance who were required to submit CBRA/OPA documentation.