September 20, 2006

MEMORANDUM TO:  Write Your Own (WYO) Principal Coordinators
National Flood Insurance Program Servicing Agent

FROM:  Donald R. Beaton, Jr.
Chief Underwriter
Risk Insurance Branch

SUBJECT:  Underwriting Bulletin – Photograph Requirements on Elevation Rated Risks

The Flood Insurance Manual effective October 1, 2006, includes a requirement in the Special Certifications Section, page CERT 1, that all new business applications, including transfer of business with a policy effective date of January 1, 2007, or later must be submitted with at least two recent photographs that show the front and back of the building and are taken and dated within 90 days of the submission date. If the building is a split-level or has multi-level areas at ground level, at least two additional photographs showing views of both sides of the building must be provided.

In recent meetings with the IBHS Flood Committee and the Flood Insurance Producers National Committee, requests were made to FEMA to clarify whether this new requirement applies when an agent decides to move his/her book of business to another company or when a company acquires a book of business from another company. They pointed out that transfer of business from one company to another is not considered new business application by the NFIP; and therefore, they should be excluded on this new requirement.

This is to clarify that, in cases where the agent is transferring his/her entire book of business to another company or when a company acquired a book of business from another company, the photograph requirements do not apply. FEMA will continue to consider these policies as renewals even though they are reported as new business under the Transaction Record Reporting and Processing Plan. However, in cases where an individual insured decides to change agent and company, that application is considered new business and the photograph requirement applies.

If you should have any questions, please contact your WYO Business Analyst.

cc:  Vendors, IBHS, FIPNC, and Government Technical Monitor

Suggested Routing: Data Processing, Underwriting, Marketing