November 28, 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: Clarification of Photograph Requirement Information

The purpose of this memo is to provide additional clarification to the photograph requirements described in the October 2006 Flood Insurance Manual revisions. A previous Underwriting Bulletin on this subject was issued September 20, 2006.

1. For new business effective on or after January 1, 2007, all photographs must be taken within 90 days of the submission date, which is the mailing date, not within 90 days of the Elevation Certificate (EC) certification date. If the EC certification date is older than 90 days, the insured or agent must provide photographs taken within 90 days of the submission date.

2. A building in the course of construction, without the as-built elevations, can obtain a policy based on proposed elevations, even though photographs are not submitted. However, prior to the policy being renewed, a revised EC with as-built elevations must be provided along with photographs.

3. Use of the photograph form is not a requirement for photograph submissions as long as the date the photographs were taken is provided and attested.

4. An EC that is not submitted with photographs is considered an invalid EC unless the building is in the course of construction. Each WYO Company may use its current business practice in handling ECs without photographs, whether this is using tentative or provisional rates, or rejecting the application.

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

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

Suggested Routing: Data Processing, Underwriting, Marketing

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