June 28, 2007

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

FROM: Edward L. Connor
Deputy Director for Insurance Mitigation Division

SUBJECT: Continuing Education Credit for Basic Agent Tutorial On-Line Training

As you are aware, FEMA’s On-line Basic Agent Tutorial captures the agent’s license number, as opposed to the Social Security Number, during the registration process, as a unique identifier to ensure that each agent’s continuing education credits will be accurately applied to his or her individual record. It has been our practice not to collect Social Security Numbers because of privacy issues and, more recently, to support the recommendations of President’s Bush’s Identity Theft Task Force to improve government handling of sensitive personal data.

The NFIP Bureau & Statistical Agent just recently learned that the States of Illinois, Maryland, North Carolina, South Carolina and Virginia currently track an agent’s continuing education credit by the Social Security number rather than the agent license number. The Bureau was not originally aware of this reporting situation and, as a result, agents licensed in those states will not be able to obtain continuing education credit for successfully completing the on-line training until the various departments of insurance and/or their vendors upgrade their systems.

The Bureau staff has had numerous conversations with Department of Insurance personnel to try to establish a mutually-agreeable “workaround” to resolve this situation in the interim. However, they have not been able to come up with a workable solution. We welcome your suggestions on how this situation can be resolved. In the meantime, until these states can accept license numbers instead of the Social Security numbers, the states will be removed from the listing of approved states for the on-line training. Classroom style training is still available, and the NFIP Bureau regional office staff members are eager to work with you in helping your agents meet any state-mandated CE requirement for flood insurance training.

We sincerely apologize and hope that this situation will be resolved quickly. Please feel free to contact Helen Harrington, Director of Technical Assistance & Communications, NFIP Bureau & Statistical Agent, at (301) 918-1458 with your suggestions or if you need additional information.

Please share this information with others in your organization, as appropriate.

cc: Vendors, IBHS, FIPNC, Government Technical Representative

Required Routing: Training