




**FEMA**

W-18028

October 19, 2018

MEMORANDUM FOR: Write Your Own (WYO) Company Principal Coordinators,  
WYO Vendors, and National Flood Insurance Program (NFIP)  
Direct

FROM:   
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Federal Insurance and Mitigation Administration

SUBJECT: Pivot Testing and Operational Considerations

FEMA is modernizing the IT systems supporting the NFIP and is approaching the replacement of the Transaction Record Reporting and Processing (TRRP) system. On July 31, 2019, Pivot is scheduled to become the NFIP's System of Record (SOR), which will significantly change how FEMA records and validates policy and claim information. The directions below, written in conjunction with our Pivot beta testing community, highlight the key milestones, upload requirements, and operational considerations for WYOs, Vendors, and NFIP Direct (referred to as "industry users" below) to facilitate a smooth transition and ensure user acceptance of Pivot. FEMA has provided initial drafts of an operational considerations document and will continue to publish monthly updates to industry users via email from the Industry Management Branch. Once available, this document will be posted on the Pivot portal to allow user access.

## **I. Daily Submissions**

Daily submission requirements for UCORT remain in place and are unchanged. As detailed below, by January 22, 2019, industry users are required to submit policy and claim transactional information to Pivot at least daily. The new system relies upon an Application Programming Interface (API) that allows industry users to enter information on demand. The API documentation is available from [fema-nfippivotsupport@fema.dhs.gov](mailto:fema-nfippivotsupport@fema.dhs.gov).

As industry users develop their systems to enable API communication with Pivot, FEMA has provided an aid to ease transition concerns. A TRRP "parser" will enable industry users to submit TRRP data to Pivot in the same format that the legacy system uses today. Pivot will translate the file into the new data schema to allow for testing and validation. The TRRP parser is only a short-term aid, and industry users will be required to be fully capable to use the API by October 1, 2019. The TRRP parser will not be maintained past that date.

Some monthly submissions will remain. For example, the reconciliation and financial statements will remain monthly deliverables. While this information will be uploaded, stored, and transmitted via Pivot, the frequency of submissions is not changing.

## **II. Shadow Operations and Testing**

To promote a smooth transition, FEMA is conducting extensive testing, shadow operations, and parallel processing efforts. Beta testing is underway, and industry users can create sample policy and claim information to begin testing functionality. FEMA encourages industry users to start testing now to understand how the system works and provide feedback to improve usability. FEMA is adding additional functionality at least monthly. Contact [fema-nfipivotsupport@fema.dhs.gov](mailto:fema-nfipivotsupport@fema.dhs.gov) with questions or to obtain access. The timelines for shadow operations and testing are described below.

### **A. Shadow Operations**

FEMA will require industry users to upload transactional information to Pivot on a daily basis beginning on January 22, 2019. Data migration from the legacy system will be complete and industry users will be able to begin the full testing and validation processes for Pivot for all active term policies, enabling FEMA and industry users to identify and resolve issues prior to parallel processing. Industry users can access and upload Pivot at any time, allowing for real time or multiple uploads throughout the day. During shadow operations, in addition to daily uploads, FEMA requires industry users to provide test results at least once every two weeks. Industry users will help perform root cause analysis for any issues that arise during shadow operations.

### **B. Parallel Processing**

Parallel processing will begin on April 1, 2019. The parallel processing period is when FEMA and industry users will fully use both the legacy system and Pivot simultaneously. Results from each system, inclusive of monthly deliverables, will be compared to ensure that Pivot is operating as expected and is ready to become the NFIP's SOR. Pivot will incorporate the April 1, 2019 program changes in the test environments by April 1, allowing for significant daily testing and validation prior to the April TRRP cycle being conducted via NFIP ITS in May 2019. As the NFIP ITS will still be the SOR at that time, the April 1, 2019 changes will also be implemented in that system.

Upon the successful completion of parallel processing, FEMA will officially designate Pivot as the System of Record and will formally notify industry. FEMA estimates this cutover will occur on July 31, 2019.

## **III. Replacement of BureauNet and Data Exchange**

The Pivot Analytics and Report Tool (PART) has been improving FEMA's data analysis capabilities since 2017. For example, PART ingests and cleans UCORT daily claims submissions and has already replaced the need for quick claims and polling. Industry users will be given access to the PART application to enable data analysis and provide insight into their book of business.

PART already contains all legacy information and will become the sole analysis and reporting tool by **January 22, 2019**. Prior to this cutover, legacy reports will be phased out starting in November 2018. An information banner on BureauNet and Data Exchange will highlight upcoming migrations and provide information on where to access data. FEMA will continue to enhance PART throughout FY19 and beyond, based on industry feedback. PART will also provide FEMA and industry users with performance and predictive analysis capabilities in 2019.

#### **IV. Future Program Changes and Pivot Impacts**

FEMA will communicate future enhancements via email and web postings. Before a change or enhancement is formally scheduled via bulletin, FEMA will communicate potential changes and collect user feedback on priority, requirements, considerations, etc.

For future system changes that impact the Financial Arrangement, Financial Control Plan, WYO Accounting Procedures, or the replacement of the TRRP and Edit Specifications, FEMA will publish the changes via bulletin with an effective date similar to the current process, though implementation timeframes may be shorter. The bulletin will contain testing and oversight information as well.

FEMA acknowledges program changes, with or without IT considerations, can be challenging. Further, changes with little time to test and adapt bring risk to all parties. FEMA will increase the amount of dialogue and testing of changes prior to implementation in the future to mitigate risk. Leveraging the same mechanisms listed above, WYOs will have the ability to provide feedback on challenges and successes of implementing the program changes. FEMA will share the feedback with our system development teams to assess for additional changes. FEMA will continue to conduct monthly WYO calls and provide other mechanisms for dialogue and communications. FEMA seeks industry input on how to best share information regarding changes to minimize risks to all parties.

**Please direct all questions or comments about this bulletin to the Insurance Systems team at [fema-nfippivotsupport@fema.dhs.gov](mailto:fema-nfippivotsupport@fema.dhs.gov).**

**Summary of Key Dates**

<b>Key Milestone</b>	<b>Date</b>
Industry beta testing of Pivot	Underway
PART replaces BureauNet and Data Exchange	January 22, 2019
Start of Shadow Operations	January 22, 2019
Start of Parallel Processing	April 1, 2019
Cutover to Pivot as the SOR and decommission of legacy system	July 31, 2019
Decommission of TRRP Parser	October 1, 2019

cc: Vendors, IBHS, FIPNC, Government Technical Representative

Required Routing: Claims, Training, Underwriting, Adjusting Firms, Independent Flood Adjusters