Mapping Changes

Participant Guide
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Training Agenda

This training will cover the following sections:

- Section 1: Evolution of flood maps
- Section 2: Process of flood mapping
- Section 3: Benefits of updating flood maps
- Section 4: Impact of mapping changes
- Section 5: Challenges to flood maps

We will also look at some implementation issues that agents and lenders encounter.

Check the Resources section for some useful supporting information that is available to you.
Section 1: EVOLUTION of flood maps

Let’s start by talking about how flood maps have evolved.
We use maps to reach wherever we want to go. These maps have become more sophisticated over time. For example, road maps have developed from hand drawn maps to GPS devices.

Flood maps have also developed in a similar fashion.
Let’s see how flood maps have progressed:

1) Flood Hazard Boundary Map (FHBM)
   a) Based on approximate flood hazard data
   b) Provided general indications of where the special flood hazard areas were

2) Flood Insurance Rate Maps (FIRM)
   a) Follow a detailed assessment called a Flood Insurance Study
   b) Show Base Flood Elevations and insurance risk zones in addition to floodplain boundaries

3) Digital Flood Insurance Rate Maps (DFIRM)
   a) Contain all the digital data required to create the FIRM
   b) Created on a countywide basis, incorporating all the communities in a given county under one overall map
In 2004, FEMA began updating its flood maps, under the initiative called Flood Map Modernization.

The goal of Flood Map Modernization:
- Update, modernize and digitize flood maps
- Make flood maps more accurate, easier to update and more readable

Goal of the project, FEMA Risk Map:
- Build on the success of map modernization by continuing to work with federal, state and local stakeholders to better identify flood hazards
- Create better public awareness
Section 2: PROCESS of flood mapping

Our next section involves the process that takes place in flood mapping. But before we begin that topic, let’s pause for a quick poll question.
Poll Question #1

How long do you think it takes to update a community’s flood map?

A. 3 months  
B. 6 months  
C. 1 year  
D. More than a year  
E. Maps are updated every 3 years

To understand this, let’s take a look at the process for mapping a community.
Let’s review the mapping process:

1. **Scoping Meeting**: FEMA holds a meeting with local community officials to identify where a new flood insurance study is necessary, as well as what type of study.
2. **Data/Map Development**: FEMA begins the study to identify the flood hazards and to develop Base Flood Elevations.
3. **Preliminary Release**: FEMA gives the community a Preliminary Map to review and may also hold a meeting with the community to get their comments.
4. **Adoption**: FEMA issues a Letter of Final Determination, which establishes the final flood elevations and it provides the new map and flood study to the community.

Communities have to adopt the flood maps within six months of issuance of the letter.
Section 3: RESOURCES for finding flood maps

Now that the new maps are effective, let’s talk about where we go to find maps – both new and old.
Don’t hesitate to be resourceful

The key here is to be resourceful. There are plenty of mapping tools available to the average property owner, insurance agent or lender. It’s just a matter of knowing where to look.
Flood zones are placed into two categories:

1) SFHA: Special Flood Hazard Areas:
   a) Shown on flood maps as zones A or V
   b) Represent the most flood prone zones
   c) Expect that lenders must require the purchase of flood insurance as a condition of their loans

2) Non-SFHA: Non-Special Flood Hazard Areas:
   a) Shown on flood maps as zones B, C or X
   b) Represent moderate to low flood risks
   c) Not mandatory for lenders to require the purchase of flood insurance as a condition of their loans

Some changes in the new maps:
- Zone X replaces zones B and C.
- Shaded X is the same as zone B.
- Unshaded X is the equivalent of zone C.
Special Flood Hazard Areas (SFHA) are also called the 100-year floodplain. It means that:

- there is a 1% chance of flooding in any given year.
- the risk grows to 26% over a 30-year mortgage.

That 26% likelihood is more than any other perils property owners routinely insure against.
Resources (3 of 3)

Here are some resources for finding map changes:
- Map Service Center [www.msc.fema.gov](http://www.msc.fema.gov)
- FloodSmart website [www.floodsmart.gov](http://www.floodsmart.gov)
Visit the Map Service Center

Visit FEMA’s Map Service Center online by visiting www.msc.fema.gov
Remember a simple web address: fema.gov
Resources: [www.fema.gov](http://www.fema.gov)

On the website, [www.fema.gov](http://www.fema.gov) you will find links to flood insurance and flood mapping.
To view flood maps online:

- Go to the formatted template on the left hand side of the page.
- Insert an address.
- Click Search by Street Address.
Clicking Search will show you the date of the flood map. It gives you two choices:

1. Buy the map by clicking the dollar sign
2. View the map by clicking the green view button
Clicking the View button will open the flood map on your screen. To make the map readable:

- Use the tools on the left panel to zoom in, zoom out and pan around, or
- Point to the area you want to enlarge and click
Zooming in or enlarging a part of the map will make it readable and you can concentrate on the part you need to refer to.
The overall flood map for a community is called a FIRM or Flood Insurance Rate Map. A part of the overall FIRM is called...
...a FIRMETTE.
Create a Firnette by clicking the ‘Make a Firnette’ button.
When you click the ‘Make a Firmette’ button, you will go back to the entire map, with a pink overlay in the upper left corner.
To create a Firmette:

- Drag the pink overlay to any part of the map
- Click the ‘Create a Firmette’ button
Clicking the ‘Create a Firmette’ button will:
- make a document of the flood map area that was highlighted
- draw the firmette to scale, with the scale shown in the upper right hand corner
- place the cover of that community’s flood map on the firmette

To print the firmette:
- Click the ‘save a Firmette’ button, which will save it to your hard drive
Resources: FEMA Map Service Center (11 of 11)

The saved document can be:

- Printed, as it will appear as a full 8 ½ by 11 document; or
- Emailed, as it is a pdf

References

For further details, refer to the following documents:

- How to Make a FIRMette Using Catalog Search.pdf
- instructions_mapsearch.pdf
Resources: Locating Historic Flood Maps (1 of 4)

To find historic flood maps:

- Go to the Map Service Center
- Click ‘Product Catalog’ in the upper left hand corner
Clicking ‘Product Catalog’ will display all Map Service Center products.

Click the Historic FIRMS option from the list.
To find the required community map, use the drop down menus to:

- Select a state
- Select a county
- Select a community

Click the ‘Get Historic Maps’ button.
Clicking the ‘Get Historic Flood Maps’ button will display a list of historical maps.

Click the view button to open the map and follow the procedure we have already learnt to create a Firmitte.

References
For further details, refer to the following document:

- Historic Maps.pdf
Let’s look at how we can find out about upcoming map changes through the FloodSmart website by simply going to floodsmart.gov.
Bookmark two websites for reference:

- fema.gov
- floodsmart.gov (the official website of the National Flood Insurance Program)

To look for the upcoming map changes in any community:

- Go to floodsmart.gov
- Click the link to ‘Flooding and Flood Risks’
Resources: [www.floodsmart.gov](http://www.floodsmart.gov) (2 of 6)

In the drop down menu, go to ‘Flood Map Update Schedule’.
Type the appropriate zip code of the city you are looking for.

Click ‘Search’.
Clicking ‘Search’ will list all the communities in that zip code’s county.

Scroll down to find the community you are looking for.

For example, the zip code for 60448 is for Mokena, IL. Click ‘Village of Mokena’.
Clicking the name will give a status report for that community about any upcoming flood map activity.
The information shown in this example is:

- Mokena already has had its preliminary map put into place as far back as January 2009
- Its new map is not scheduled to take effect until Sept. 16, 2011
Another resource is FEMA’s Community Status Book, which:

- Lists participating and non-participating communities
- Posts a variety of other information relative to mapping
Resources: [www.fema.gov](http://www.fema.gov)

To search Community Status information:
- Go to fema.gov
- Scroll down the page to links on Flood Info, Insurance and Maps
- Click the link to Flood Info
Resources: Community Status Book (1 of 4)

Clicking ‘Flood Info’ will take you to a section, Flood Maps, Insurance and Information.

Scroll down to the bottom to the Flood Publications section.

Click the link for Community Status Books.
The Community Status Book section lists all the different states.

Scroll down to find the state you are looking for and click on it.

Let's take the example of West Virginia.
Clicking the state name will bring an alphabetical listing of participating communities. It will also display:

- The CID (Community ID) Number
- The date of the Flood Hazard Boundary Map – the first flood study done of the community
- The date of the initial FIRM (effective when the community first joined the NFIP): This is the INITIAL map that determines whether a building is pre or post-FIRM.
Defining Pre-FIRM and Post-FIRM

FIRM stands for Flood Insurance Rate Map.

Pre-FIRM refers to a building that was built before the adoption of a community’s first flood insurance rate map. Pre-FIRM structures are rated using a set of subsidized rates.

Post-FIRM refers to a building that was built after the adoption of a community’s first flood insurance rate map, that is, after the floodplain has been defined. Post-FIRM structures are rated using an actuarial rating approach.

Remember, the initial FIRM Date is the dividing line between Pre-FIRM and Post-FIRM.
The last column shows the Current Effective FIRM Map. It is the date of the current flood map.

All this information is importance when deciding how to write and rate a flood insurance policy.
Poll Question #2

Where can you find out if a community is scheduled for a map update?

A. Community Status List  
B. FEMA Map Service Center  
C. FloodSmart.gov  
D. FEMA.gov
Section 4: BENEFITS of updated flood maps

Let's take a few moments to talk about the benefits of new/updated flood maps.
Benefits

Some of the benefits of updated flood maps are:

- Better risk identity
- More accuracy in flood maps

This can allow property owners to make more informed decisions.
There is a need for new flood maps due to:

- Growth
- Development
- Urbanization

Better delineation and documentation of Base Flood Elevations if possible because of:

- Advances in technology
- Updated flood studies

Base Flood Elevation is a prediction of how high the flood waters will get when there is a 100-year base flood event.

Updated and accurate mapping allows property owners to make their flood insurance purchase decision based on variables that truly depict their flood risk.
Take a look at an old paper map. It shows:

- The darkly shaded area as the SFHA
- Lightly shaded as well as unshaded areas that represent non-SFHA (zones B, C and X)
Take a look at the new digital FIRM. This is more readable compared to the old paper map. Some of its features include:

- Easy identification of streets and rooftops of houses
- Presentation of SFHA by aqua-dotted
- Location of base flood elevations in the aqua-dotted area as black numbers on a white background
Section 5: IMPACTS of mapping changes

Let’s review how all these map changes impact all of us – insurance agents, property owners, lenders, etc.
Impacts (1 of 4)

Remember, every flood makes a big impact... on somebody and so does every map change.
Some property owners are moved into special flood hazard areas and that may require them to purchase flood insurance.
Some other property owners are removed from the floodplain.
Properties that are moved into the floodplain:

- The risk of flooding is increased.
- More buildings and properties are moved into the floodplain area since the flood hazard area has expanded.
- Property owners need to purchase flood insurance (first time for many of them).

Properties that are removed from the floodplain:

- Property owners need to remember that flood risk has been reduced not eliminated.
- Property owners have a lower-cost flood insurance alternative called the Preferred Risk Policy that will allow them to retain their flood insurance coverage at a significantly lower premium.
Impacts: What is a Preferred Risk Policy (PRP)?

Preferred Risk Policy (PRP):

- Is a low-cost policy that’s available to buildings in B, C and X zones that meet certain loss eligibility requirements
- Includes both building and contents options for insureds to choose from
- Is a great way for an insured to keep their same protection at a much reduced cost

Premium comparison:

<table>
<thead>
<tr>
<th>Premium Comparisons</th>
<th>$150,000 building $60,000 contents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-FIRM AE Zone</td>
<td>$1721</td>
</tr>
<tr>
<td>Post-FIRM +1 AE Zone</td>
<td>$745</td>
</tr>
<tr>
<td>Standard Zone</td>
<td>$1242</td>
</tr>
<tr>
<td>PRP Premium</td>
<td>$312</td>
</tr>
</tbody>
</table>
Section 6 discusses the implementation issues that both agents and lenders confront when new maps become effective.
Implementation: Making it all work together

How can we all work together to make it all work together?
Poll Question #3

Who is responsible for making certain that the flood zone is correct on flood insurance policies?

A. Lender
B. Insurance agent
C. Property owner
D. Insurance carrier
E. FEMA/NFIP
F. All of the above
Let’s take a look at some challenges insurance agents face in implementation:

- They need to be aware that maps have changed in and around their marketing territory.
- They have to identify the properties that have been affected by those map changes, specially the existing insureds.
- They need to properly communicate that change to the clients.
- They need to understand the available rating options.

The primary rating options that may apply to properties being moved into special flood hazard areas by map changes are:

- Grandfather Rating Rules
- Two-Year Preferred Risk Policy Eligibility Extension
Grandfathering is used in conjunction with flood map changes to allow certain premium benefits when flood zones are changed from non-special flood hazard areas to special flood hazard areas on new maps.
The Grandfather Rule allows property owners to lock in flood zone and base flood elevation information from the previous flood map – for rating purposes only – when it works to the advantage of the insured.
Implementation: Grandfathering – Continuous Coverage

There are two types of grandfathering:
- Continuous Coverage
- Built-in-Compliance

If a policy is put in place before a map changes, the grandfather rules allow it to keep its prior flood zone and/or BFE according to the ‘Continuous Coverage’ portion of the grandfather rules just so long as it keeps that coverage continuously in force.

It is also possible to assign such a grandfathered policy to a new owner in order to maintain that continuous coverage.
In early 2009, Del Euge’s farm house sat well outside the SFHA according to the March 1981 flood map for Hendricks County. Property along County Road 471 East was clearly out of the floodplain.
Hendrix County was about to acquire new flood maps in 2009 that would dramatically change the floodplain along County Road 471, so Del opted to purchase a flood insurance policy before the new map became effective.
Del purchased a policy effective 9/15/09. Under the grandfather rating rules, Del’s policy would be:

- Rated in zone X
- Rating continues in zone X
- Even after map change which moves him into zone AE
- Must keep coverage continuously in force (Pre-FIRM)
If a building was constructed in compliance with a specific map, then it can be grandfathered for rating purposes back to that map’s zone and BFE.

Continuous coverage is not required – so buildings built in compliance can take advantage of grandfathering if they buy a flood insurance policy either before or after the map has changed. This part of the rule typically applies to just Post-FIRM buildings.
Let’s go back to that old Hendricks County flood map where we find Del’s house clearly out of the special flood hazard area in zone X. Note that his house was built in 1984, making his house Post-FIRM since the initial FIRM for Hendrix County was effective in March 1981. Since he was built in compliance with that map, he is grandfathered into zone X for rating purposes and continuous coverage is not required.
Pre-FIRM structures have grandfathering limitations. They can only benefit from the Grandfather Rules if flood insurance is purchased prior to the map change.
Let’s take an example to put the Grandfather Rule into perspective.

This coverage is for a single family dwelling with one floor – no basement and no prior flood losses. We are quoting $200,000 building coverage along with $80,000 contents.

Here’s a comparison chart:

<table>
<thead>
<tr>
<th>Premium Comparisons</th>
<th>$200,000 building</th>
<th>$80,000 contents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-FIRM AE Zone (No Grandfather)</td>
<td></td>
<td>$2235</td>
</tr>
<tr>
<td>Post-FIRM +1 AE Zone (No Grandfather)</td>
<td></td>
<td>$819</td>
</tr>
<tr>
<td>Post-FIRM -1 AE Zone (No Grandfather)</td>
<td></td>
<td>$5623</td>
</tr>
<tr>
<td>Standard X Zone (Grandfathered)</td>
<td></td>
<td>$1439</td>
</tr>
<tr>
<td>PRP Premium (PRP Extension)</td>
<td></td>
<td>$343</td>
</tr>
</tbody>
</table>
Implementation: Preferred Risk? – No Grandfathering

Remember, in Del’s case, he initially bought a policy while he was still in zone X. So not only was he eligible to be rated in zone X when he first wrote the policy, he was also eligible for the low-cost Preferred Risk Policy provided he met the PRP’s loss eligibility requirements.

But you must be in a B, C or X zone not only at the time of original application, but also at each subsequent renewal. So, if the map changes and the building get put into a SFHA like Del’s did, you have to convert it to a standard X zone policy under the current grandfather rules.
The new rule, Two-Year PRP Eligibility Extension, has taken effect on January 1, 2011. It allows certain buildings to receive up to two years of the low-cost PRP premiums if they have been affected by a recent map change.

Let’s see how it works.
The first group of eligible buildings is buildings that were newly designated within an SFHA due to a map revision on or after October 1, 2008, and before January 1, 2011.

They become eligible for two years of low-cost PRP premiums on their first renewal following January 1 of this year.
Implementation: Two-Year PRP Eligibility Extension: 2\textsuperscript{nd} Window of Opportunity

Buildings that are newly mapped into SFHAs after January 1, 2011 will be eligible for a PRP for two years from the effective date of the map revision whenever it happens in the future.

It’s important to note here that this rule only applies to map revisions that were effective on or after October 1, 2008 – not before.
Let’s go back to Del’s case study.

Remember, Del took out a flood policy on 9/15/09 because he knew that the flood map was going to change later that month. So, he wrote a PRP policy while he was still in zone X and it cost him only $343.

Then the map changed on 9/25/09 putting Del in a special flood hazard area. When his policy came up for renewal in September 2010 he was no longer eligible for the PRP under the current grandfather rules. And the PRP extension rule was not in effect then – it didn’t take effect until January 1, 2011.

So, he was not eligible for the new PRP extension on this past September’s renewal. He instead had to renew his policy under the grandfather rules using standard X zones rates that will give him a premium of 1,439 for this next year.

When he comes up for his renewal in September 2011 he’ll be eligible to transition back to the PRP policy and that $343 premium for two full policy years now that the PRP eligibility extension rule is in effect.

At the end of the two years his extension will end and he will transition back to the standard X zone rates again – under the normal grandfathering rules.
Poll Question #4

How many of your insureds or borrowers have taken advantage of or will be eligible for the Two-Year PRP Eligibility Extension?

A. None – so far
B. Less than 10
C. Between 10 and 50
D. More than 50
Let’s move on to lender implementation issues.

How do lenders know there are map changes that might affect their clients?

Most lenders hire third-party vendors to determine all their flood zones and most purchase additional “life of loan” tracking, which monitors all future flood map activity.

If a flood map changes and any loans are affected:

1. The flood zone vendor notifies the lender of that map change.
2. The federal regulations require lenders to notify borrowers of the requirement for flood insurance.
3. That notification requires the borrower to purchase flood insurance within 45 days.
4. If the borrower doesn’t respond in that period, then the lender must force place flood insurance.

The borrower has the opportunity to work with his insurance agent during that 45-day period to produce a standard flood insurance policy – that most times will be significantly less expensive than a force placed flood insurance policy.
Implementation: Lender Implementation Issues (2 of 4)

Once the policy is written, the lender has to ensure if:

- The flood insurance exist on the correct building(s)
- The correct amount of flood insurance written
- The flood zones are compatible between the policy and its determination

Federal lending regulators require that lenders resolve discrepancies between special flood hazard areas (A or V zones) and non-special flood hazard areas (B, C or X zones).
As of October 1, 2009, all carriers began putting a grandfathering indicator on the declarations pages of policies.
Implementation: Lender Implementation Issues (3 of 4)

Let’s see how the new PRP extension affects lenders.

All six federal lending regulators have put out guidance saying that insurance carriers, not lenders, are responsible for determining whether the extension applies or not.

What lenders will begin seeing now (after 10/1/10) are two flood zones on declaration pages:

- Current Flood Zone
- Flood Risk/Rated Zone
Current Flood Zone: the flood zone on the property on the current or revised flood map

Flood Risk/Rated Zone: the flood zone used from the previous flood map to actually rate the flood insurance policy

Lenders aren’t required to review or resolve differences between the Current Flood Zone and the Flood Risk/Rated Zone.
Implementation: Current Zone/Rated Zone

Here’s an illustration of a declarations page that shows the two flood zones.

Rated Zone: B
Current Zone: AE

Since the ‘Grandfather’ indicator shows ‘Yes’, it is a clear reason for the difference between rated and current zone. So there’s no discrepancy to resolve.
Now that we’ve dealt with most of the implementation issues, let’s move on to discuss challenges to the flood maps.
Challenges

What happens when we can’t all agree?
There are different types of challenges that can be made regarding flood maps, which fall under the heading of Letters of Map Change.

Challenge 1: Letter of Determination Review (LODR):
- Has to be jointly requested in writing by the lender and borrower
- Is time-sensitive – must be requested within 45 days of when the lender first notifies the borrower that they have to purchase flood insurance
The LODR is used when there is a dispute between the lender and borrower over which flood zone a building is in.

Take a look at buildings A and C on this map.

The blue area running down the middle of the slide represents the special flood hazard area. Notice how part of the lot that Building A sits on is in the SFHA but the building itself appears to be out.

Notice that a small portion of building C is in the SFHA. If any portion of the building is in, then the building is considered to be in the floodplain and flood insurance would be required.

A dispute might occur if the lender’s determination shows a building to look more like Building C but the borrower thinks it looks like Building A.

This dispute could be settled through the Letter of Determination Review process.

Lender and borrower must approach FEMA within 45 days of that notification and then FEMA has 45 days to respond once supplied all the necessary technical information. FEMA’s response will indicate what flood zone the building is in based on the information submitted.
References

For further information, refer the following:

- FEMA’s Mandatory Purchase of Flood Insurance Guidelines booklet
- [www.fema.gov](http://www.fema.gov)
Challenge 2: Letter of Map Amendment (LOMA):
This involves a dispute with the map.

References
For further information, refer to the following documents:
- FEMA’s Mandatory Purchase of Flood Insurance Guidelines booklet
- Flood Map section of the NFIP Flood Insurance Manual
Take a look at Building B.

Building B is clearly in a SFHA. But there’s a little note under Building B that says it is substantially elevated on a natural knoll too small to be shown on the map. So, although the map includes it in the SFHA, the property owner is convinced that it sits on ground so high that it should not be included in the floodplain.

The LOMA process is designed to have FEMA take a look at technical elevation data submitted by the property owner to determine whether the map should be amended and the building removed from the SFHA.

LOMA is not time-sensitive. It can be done at any time. Also, the lender does not have to be involved.
Challenge 3: Letter of Map Revision (LOMR):
It involves an official revision to the flood map and generally applies to multiple structures and/or a specific geographic area. All LOMR requests come to FEMA through the community since the community would have to adopt the official revisions to its map.
Challenge 4: Letter of Map Amendment “Out as Shown”:
This procedure is in some ways similar to the LODR but it is not time-sensitive and it does not require the lending institution to be involved. It also requires less technical data because once again, it involves a dispute over how the map is being read.
The LOMA “Out as Shown” involves a dispute over whether a building is just in or just out of the SFHA.

The “Out as Shown” determination does not require elevation data be submitted. It simply requires a sufficient amount of property location information to be submitted to FEMA so it can determine where it is on the map.

If a FEMA mapping specialist finds that the property and/or building is not in the SFHA, a letter will be issued stating that the property or building is “Out as Shown” rather than as “Removed” as it would with a normal Letter of Map Amendment.

References
For more information, refer to the following:
- Flood Map section of the NFIP Flood Insurance Manual
Or contact:
- A mapping specialist at the FEMA Map Information Exchange
Challenges: Letters of Map Change (8 of 10)

One more item to discuss here is a Summary of Map Action or a SOMA.
When a revised map is issued all the previous map actions (LOMAs, LOMRs, etc.) are all superseded by the new map. So, the new map has to be updated to include all the information from those changes.

FEMA and its mapping contractor do that through the process called Summary of Map Action (SOMA). A SOMA provides a process for automatically revalidating letters of map change when a new map is issued.
Challenges: Letters of Map Change (10 of 10)

For more information on any of the processes or challenges that we’ve just talked about, contact FEMA Mapping Specialist at 877-336-2627.
Overview of Resources

Some of the resources we have discussed in this training are:

- [www.fema.gov](http://www.fema.gov)
- [www.msc.fema.gov](http://www.msc.fema.gov)
- [www.floodsmart.gov](http://www.floodsmart.gov)
- Your WYO Company

You can also access the following PDF documents:

- 2010 NFIP Reference Sheet.pdf
- Agent_Fact_Sheet.pdf
- FMIX Fact Sheet.pdf
- Grandfathering Fact Sheet for Agents-2010.pdf
- Historic Maps.pdf
- How to Make a FIRMedee Using Catalog Search.pdf
- instructions_mapsearch.pdf
- MSC Fact Sheet.pdf