



**Statement re:** **Disaster Preparedness-Property Insurance Issues**

**To:** New York State Assembly Standing Committees on  
Local Governments and Government Operations

**By:** Professional Insurance Agents of New York State, Inc.  
Michael Paluba, LUTC, Secretary

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My name is Michael Paluba and I am testifying today as an officer of the Professional Insurance Agents of New York State. PIANY is an association representing about 1,800 agencies employing over 20,000 insurance professionals. I am an agent doing business in Middle Island and today I want to talk about property insurance issues affecting Suffolk County residents, businesses and public entities.

First, let me commend the Committees for promoting public dialogue. Only by exploring and publicizing the challenges we face can we come together and make rational decisions to address the potential for catastrophic events to impact our communities. As professional insurance agents, we will review a number of issues that relate to the preparedness of citizens, governmental entities and the insurance industry to respond.

#### **Federal flood insurance**

Hurricane Katrina recently exposed some shortcomings of the insurance coverage protecting those in affected states. Most notable is the fact that damage from flooding is excluded from homeowners insurance policies and most commercial property policies. Much of the damage from Katrina was caused not by wind, but by the storm surge and the failure of the levee system in New Orleans. Insurers define these events as flooding, so property owners must look to their flood insurance for coverage. Unfortunately, many Katrina victims had not purchased federal flood insurance.

Flood insurance is available in limited amounts from a government-sponsored plan called the National Flood Insurance Program. For homeowners, federal flood insurance limits have been the same since 1968. NFIP only covers up to \$250,000 in damages for the structure and up to \$100,000 for the contents. Businesses can be insured for up to \$500,000 in building coverage and up to \$500,000 in contents coverage.

Admittedly, these limits may not be adequate to replace homes or business properties that are destroyed. Excess limits (above NFIP levels) may be available from certain specialty insurers, but such coverage can be difficult to find and the premiums may be prohibitive. Other potential limitations on NFIP coverage can affect the degree of protection it affords. For example, federal flood insurance does not cover basement improvements, such as finished walls, floors, ceilings or certain personal belongings kept in a basement; also, any area that is below grade level may be considered a 'basement' under the policy. Federal flood insurance does not pay for extra living expenses while residents are forced out of the home due to flood damage, nor for economic losses when a business must close down because of a flood. Even with its limitations, however, having NFIP coverage is better than going without protection if a flood occurs.

One great value of the NFIP, in PIA's opinion, is the fact that it is structured so as to encourage communities to undertake flood preparedness and mitigation activities. NFIP coverage is

available only if the community where the property is located participates in the NFIP. The NFIP requires communities to maintain a minimum level of floodplain management ordinances in order for its residents to be eligible. People can check whether their community participates at <http://www.fema.gov/fema/csb.shtm>.

To encourage communities to exceed its minimum requirements, the NFIP established the Community Rating System (CRS). In exchange for increasing flood preparedness and thereby achieving a better CRS rating, the community's residents are offered discounted federal flood insurance premium rates. Discounts can range up to 45 percent. The CRS is a voluntary incentive program that recognizes and encourages community floodplain management activities that go beyond the minimum NFIP requirements. NFIP rates are discounted to reflect the reduced flood risk resulting from community actions meeting the three goals of the CRS: (1) reducing flood losses; (2) facilitating accurate insurance rating; and (3) promoting the awareness of flood insurance.

Currently, FEMA reports that 43 Suffolk County communities participate in NFIP. However, there are only 26,340 NFIP policies in force in the county, providing aggregate property coverage of about \$6 billion and generating about \$22,000,000 in premium.

Even where federal flood insurance is available, many fail to purchase it, as the FEMA statistics for Suffolk County show. Frankly, the low policy count is a serious problem, indicating that many people in Suffolk County would lack coverage for flooding as a result of a hurricane or major coastal storm. Communities can promote greater awareness of the NFIP policies through public education programs.

PIANY successfully advocated for a required notice from insurers to homeowners policyholders stating that flood insurance must be purchased separately from the NFIP (see Section 3444 of the Insurance Law, enacted in 1994). Despite this warning, many do not take this step unless they are required to do so by the terms of their mortgage. Flood insurance is mandatory for all federal or federally-backed mortgages funding the purchase or construction of buildings in high-risk flood areas.

A structure located within a high flood hazard area has a 26 percent chance of suffering flood damage during the term of a 30 year mortgage. Even in high-hazard areas where lenders are supposed to enforce the flood insurance requirement, this may not be happening. First, due to the declining share by Fannie Mae and Freddy Mac in the secondary mortgage market, far fewer mortgages are subject to lender enforcement than in 1994, when mortgage lenders were first enlisted for a mandatory enforcement role. However, even in instances where lenders clearly should be requiring flood insurance, they may not do so due to competitive pressures or inaccurate location reports from property assessors.

When a lender tells one of our clients, "Oh, you don't need flood insurance," it makes the insurance agent's role that much harder. We can point out the evident lack of coverage in traditional policies, but people often remain reluctant to purchase the NFIP coverage. Over 25 percent of NFIP claims come from areas outside of the high flood hazard zones. It is somewhat baffling that more lenders don't encourage flood coverage as an added protection for their loan collateral. These same lenders would never grant a mortgage without fire insurance in place.

PIA National has developed a set of recommendations to improve the NFIP as part of its larger proposal for a comprehensive catastrophe program geared to natural disasters, which would involve a possible federal-state-municipal-private sector approach. Some of these

recommendations, if implemented, would make NFIP protections more robust. They include increasing limits, including contents coverage automatically for homeowners, providing business interruption coverage, clearly differentiating federal flood insurance from federal emergency assistance, running the NFIP on a sound insurance basis regarding rates and reserving practices, ensuring multi-year NFIP authorization, continuing NFIP map modernization, encouraging coordination among federal, state and local authorities on land-use and other development-related rules (which are the exclusive purview of governmental entities), and allowing FEMA to focus on its core mission.

#### PIANY recommendations

- Communities should review their participation level in NFIP and consider whether to undertake activities that would qualify residents for lower costs.
- Public officials should promote public information programs aimed at property owners to educate them about the dangers of flooding in their area and the coverage available through NFIP.
- Community leaders should check whether lenders are enforcing flood insurance purchase, where required; and encourage its purchase even when not required.
- Local officials should petition their federal counterparts to expand NFIP coverage limits to better reflect today's home values and rebuilding costs.
- Local officials should also urge the government to explore adding extra living expense and business interruption options to the NFIP program.

#### **NYPIUA**

Another issue affecting coastal-area property owners is the state's property insurance of last resort, called the New York Property Insurance Underwriting Association. NYPIUA does not provide flood insurance, but it insures other perils that could damage or destroy properties in a widespread emergency, such as fire and windstorm.

NYPIUA is a state-sponsored program that writes property insurance for homes and businesses whose owners are unable to get coverage through normal commercial insurers. In Suffolk County, as of the end of October, NYPIUA had in force 9,508 policies insuring personal residences and 462 policies insuring commercial properties.

Following Hurricane Andrew in the early 1990s, PIANY participated in discussions sponsored by the Insurance Department to explore ways New York's insurers could prepare to pay for hurricane losses. By law, NYPIUA is empowered to buy reinsurance coverage on behalf of its members. However, in practice this would not be feasible because of the "sunset" provision that periodically terminates NYPIUA's authorization.

An unfortunate dynamic has developed in recent years, which has led to several lapses in NYPIUA's authority due to disagreements between the Senate and the Assembly. Other similar state-sponsored markets do not operate with sunsets, including the State Insurance Fund for workers' compensation and the assigned risk programs for auto insurance and medical malpractice coverage.

Even when the Legislature acts promptly to avoid such disruptions, NYPIUA is hampered from entering into long-term projects and contracts by the limited duration of its statutory authority. This effectively prevents NYPIUA from carrying out certain functions it could be called on to perform under current law and presents a barrier to envisioning additional functions that NYPIUA could perform in the future.

NYPIUA's "sunset" causes uncertainty and disruptions for its policyholders and for the insurance agents and brokers who need NYPIUA for their high-risk clients. The disputes over its reauthorization do not relate to NYPIUA's merits. Rather, they reflect the dynamics in Albany, where NYPIUA's periodic sunset is a recurring occasion providing leverage to bring about other, often unrelated, agreements.

#### PIANY recommendation

- Lawmakers should delete the sunset provision in Article 54 of the Insurance Law, making NYPIUA a permanent legal entity like the state's other residual markets.

#### **CMAP/ New York Temporary Panel on Homeowners Insurance**

One important program that was developed as a result of the discussions following Hurricane Andrew was the Coastal Market Assistance Program or C-MAP, which is administered by NYPIUA. PIANY was actively involved in drafting this plan, which provides access to homeowners coverage for coastal residents through a voluntary, cooperative effort by insurers and insurance producers. Under the program, insurers agree to suspend their ordinary underwriting requirements in order to insure a specific property. In some cases, the homeowners insurer may agree to provide liability coverage only, while NYPIUA provides the property coverage—another reason NYPIUA is especially important to coastal homeowners.

Each year, the Insurance Department surveys interested parties to determine whether there is a continued need for C-MAP. PIANY supports continuation of this program, even though in recent years agents have not needed to use it as frequently as they did earlier. Should New York suffer a hurricane, we anticipate the need for this program will pick up again. Much thought, work and planning went into the development of C-MAP, and insurers still have not been called on to fulfill their original commitments under the program.

Another step taken by the state was to set up a temporary panel on homeowners insurance, which issued four annual reports to the Legislature during the period 1997-2000. PIANY members were represented on that panel, which although currently inactive has technically never been disbanded. We understand that the department is considering resuming active involvement by the panel.

#### PIANY recommendations

- C-MAP should be continued as an active program.
- The Insurance Department should reactivate the Temporary Homeowners Panel to discuss lessons learned from this summer's hurricane losses.

#### **Hurricane deductibles, mitigation**

Another change introduced following Hurricane Andrew was the use of hurricane deductibles. As homeowners insurers reevaluated their potential exposure on Long Island and other coastal areas of the state, they asked and received the state's permission to add special deductibles that would apply in the event of a hurricane.

As with the flood insurance warning, PIANY was successful in advocating for Section 3445 of the Insurance Law, enacted in 1998. This section and its resulting regulation [Regulation 159; Part 74 of the Insurance Code] require conspicuous annual notices explaining to homeowners the provisions of any hurricane deductibles that may apply to their policies. Still, PIANY members are concerned that some homeowners may not fully recognize their financial exposure, or may not accurately recall the provisions of their hurricane deductibles after the policy has been in force for awhile. Moreover, insurers' deductible requirements vary. The Insurance Department

has approved some 50 different deductible filings ranging from 1 percent to 5 percent of the home's value. A summary of each program is available on the department's Web site.

In some cases, property owners can modify their homes through use of storm shutters or special glass, and thereby improve the terms of their insurance policies. Sections 2346 and 2346-a of the Insurance Law permit property insurance discounts for homeowners, businesses and public entities if they install storm shutters and hurricane-resistant laminated glass windows and doors.

#### PIANY recommendation

- Public officials, in preparing information for residents, should consider including reference to the existence of hurricane deductibles in some policies and possible remedial steps they can take to lessen the damage to their homes in the event of a hurricane.

#### **Funding of catastrophe losses**

The current system of paying for losses to property from hurricanes depends primarily on the private insurance sector, with assistance also available from the government, primarily for public entities that face rebuilding of infrastructure. PIA National has asked Congress to adopt and fund a coordinated natural disaster catastrophe program to reform the current system after its deficiencies were revealed by Hurricane Katrina.

PIA envisions a public-private collaborative effort including prorated participation by states, local governments and all sectors of the financial services industry. The objective would be to create a natural catastrophe financial reserve backstop. The program also should include a provision for the creation of tax-advantaged local or regional enterprise zones in affected areas.

Recently New York's Superintendent of Insurance joined insurance regulators from Florida, California and Illinois in proposing to the National Association of Insurance Commissioners a proposed national catastrophe insurance program. Their proposal involves a partnership among the private sector, the states and the federal government to fund mega-catastrophe losses, plus creation of a new all-perils homeowners policy that could cover the cost of flood losses, earthquake and other disasters. At its recent meeting in Chicago, the NAIC passed a resolution calling for exploration of programs to deal with major catastrophes.

While PIA welcomes the attention of the NAIC to this matter, two issues concern us. First, mandating that homeowners insurers provide flood insurance coverage is a step that could have unintended consequences. PIA believes the NFIP is the correct vehicle to provide such coverage. A strength of the NFIP is that it sets minimum standards communities must meet in order to qualify for the program. Unlimited access to flood insurance would be a bad idea in the absence of any mandatory land-use and mitigation components. Such a step could encourage unchecked development in areas which, objectively speaking, are and should remain uninsurable. PIA advocates a system whereby insurance underwriting judgments can still weigh in the balance, so that (in return for coverage availability) localities are required to enact wise land use rules and meaningful steps to prevent or mitigate flood damage.

Second, PIANY has grave concerns about the establishment of state-specific catastrophe funds. This possibility was discussed for New York following Hurricane Andrew. PIANY seriously considered supporting such a move at that time, but ultimately decided it would be a risky step. We doubt any state can adequately fund such exposure alone. Moreover, we have similar concerns about the existence of a guaranteed financial backup undermining the industry's sound underwriting practices and marginalizing the role of private sector reinsurance. Underwriting judgments at both the primary and reinsurance level do tend to reward responsible

behavior by property owners and public officials—conversely, a government guarantee if wrongly structured could foster and subsidize irresponsibility.

Finally, PIA advocates changes in federal tax policy to enable individual insurers to reserve more adequately for low-frequency, high-severity events. The current method of taxing insurers prevents them from setting aside a portion of their premiums to keep as a “rainy day” reserve for the inevitable large catastrophe. In some countries, such reserving can be compulsory.

#### PIANY recommendations

- New York lawmakers should actively explore the proposals being advanced by PIA, the NAIC and other groups to determine which approaches could benefit New York residents.
- However, any approach should incorporate and strengthen the land-use and mitigation components of the NFIP and related federal initiatives.
- Further, any approach should set retention levels by insurers at a reasonable, feasible level and regard any schemes for a state-level catastrophe fund with extreme caution.
- Public officials from New York should advocate for changes in federal tax policy that could help insurers reserve more appropriately for paying large catastrophe losses.

#### **TRIA**

Unlike natural disasters, the federal government does currently provide a commercial lines coverage mandate and a corresponding financial backstop for the insurance industry in the case of losses from certain terrorist attacks. This program was created by the federal Terrorism Risk Insurance Act of 2002. Originally set to expire at the end of this year, the program could be extended if Congress reaches agreement and the President signs the legislation. Currently the House and Senate have passed separate bills (H.R.4314 and S.467 respectively) which contain a number of substantive differences. These need to be reconciled by House-Senate conference, an agreed-on bill developed and passed by each, and the approval of the White House secured. Time is tight, but PIA is hoping that these steps will fall into place before it expires at year-end.

While many commercial insureds declined the original offer of terrorism coverage, all New York policies still insure fire damage following a loss caused by terrorism. Further, the state has so far not approved exclusions that would permit licensed carriers to exclude terrorism once TRIA expires. In effect, insurers of New York properties would find themselves on a financial tightrope without a net if TRIA is not extended. Moreover, in view of the current resistance by Congress to extend TRIA beyond 2007, any extender should include provisions for a transition to a permanent plan to fund this exposure, as referenced in the House version.

#### PIA recommendations

- Public officials should urge New York’s Congressional delegation to speed an acceptable TRIA extender to the President for his signature.
- The bill should provide a transition to a permanent public-private funding mechanism.

#### **Public entity coverage**

One item in the list of questions posed for this hearing involves self-insurance by governmental entities. Some degree of self-insurance can be an acceptable approach for municipalities. Often, however, self-insurance is based on certain revenue assumptions that may not remain accurate in the wake of a devastating loss to residents and businesses that pay taxes in the community. It would be prudent for local entities to examine the impact of Hurricane Katrina on their counterparts in the Gulf area and then review their insurance programs with their agent or broker to determine if adjustments are needed.

### **Review of insurance coverage adequacy**

Public entities are not the only insureds whose programs should be reviewed to determine their current adequacy. A hearing by the Assembly Insurance Committee in Long Beach last year probed a host of issues affecting homeowners insurance valuations for insurance purposes. These include escalating construction costs, recent limitations on replacement-cost coverage, inflated costs of building materials and labor during the rebuilding period that follows a major event, limits on extra living expenses, the cost of rebuilding to comply with new construction codes and other factors.

Commercial property owners face similar issues in correctly valuing their property. In addition, they face the challenge of insuring against the loss of revenue due to the interruption of their business operations, either due to direct loss at their property, losses at suppliers or other business partners, or closure due to the actions of civil authorities which may render the business inaccessible or unable to open.

#### PIANY recommendations

- PIANY would be glad to help local officials plan outreach efforts to alert residents and businesses to these coverage issues and urge them to consult their own agent or broker for a complete review of their current coverage and to explore additional coverage options.

### **New York's Property-Casualty Insurance Security Fund**

To the extent that any local public entity, business or homeowner secures insurance from New York-licensed insurers, they are provided with certain protections under New York law from the Property-Casualty Insurance Security Fund in the event the insurer becomes insolvent. New York in fact has a number of funds, with separate insolvency funds for workers' compensation and public motor vehicles such as taxis. These separate funds have come under enormous pressure lately and their problems as well as other factors may well stress the "big" property-casualty fund. One suggestion would be to lower the amount of protection available from this fund and deny protection altogether to entities above a certain net worth. The Insurance Department has proposed doing this.

Currently, legislation passed earlier this year mandates an audit of New York's entire system for handling insurer insolvencies, including the problems at these funds and the Insurance Department's Liquidation Bureau activities. A report, originally due on Oct. 31, now is expected early next year.

In the event of a catastrophe of major proportions, insurer insolvency is one of the definite possibilities. PIANY opposes any decrease in the current levels of protection for policyholders.

#### PIANY recommendations

- The forthcoming report should be closely watched by local public officials to determine the impact of its recommendations on their current level of protection.
- New York should look to adequately fund its current level of protection, not cut back on the protection it currently provides.

**Conclusion**

In conclusion, PIANY thanks the Committees for the opportunity to air these important issues involving property insurance protections. Preparing for a disaster, in whatever form, is everyone's responsibility. However, legislators and local public officials enjoy a special role in the decision-making process.

We offer our assistance and insurance expertise to you and to the public officials of Suffolk County as you address these challenging issues.



## National Association of Professional Insurance Agents

The National Association of Professional Insurance Agents (PIA National) proposes the following issues be addressed in the federal flood insurance program. While many of these issues will also need to be considered in light of policy interests toward a possible federal-state-municipal-private sector approach to the larger issue of a Comprehensive Catastrophe Natural Disaster Program, successful improvements to the NFIP will provide guidance for the broader natural catastrophe approach in the future.

### *PIA Proposals for National Flood Insurance Reform:*

- (1) Increase building property insurance limit maximums for all classes of property able to be insured under the NFIP.** Current limits are increasingly inadequate and with today's values and adjusting for inflation since 1968, provide less real dollar coverage. This must be increased above the current \$250,000 level.
- (2) Include automatic coverage for contents at a percentage of the building amount insured for flood for non-commercial properties.** Currently, building/residence contents are not covered in an NFIP policy unless the insured specifically decides to include that coverage and cost in their NFIP policy. Most all in the NFIP program have building coverage, but fewer than should have contents coverage, electing instead to "save their money." However when a loss ensues, people forget and confuse the manner in which private sector homeowners insurance responds to a loss (building value covered automatically sets 50% of that for contents, 10% for outer structures and 20% for additional living expenses) with how NFIP insurance really works. Consumers' claims settlement expectation is that contents will be covered as a percentage of the building value covered. When that does not happen, issues may arise from their disappointment. This is particularly important with primary residences, and the increasing number of secondary residence that are planned as the insureds' retirement residence.
- (3) Add or coordinate flood coverage for commercial policies in the area of business interruption insurance.** BII coverage is now only available in the private sector property market on a covered peril basis. Flood is not (and never has been) a covered peril in the private sector, and thus in Katrina/Rita businesses, especially small-to-mid-size owners who purchased this coverage as a part of their Business Owner Policy in the private sector were not able to have the coverage apply to their ongoing business cost needs in the flooding aftermath.
- (4) Separate Insurance from Government Assistance.** PIA National never forgets that NFIP is a federal program, and as such may be subject to and need to consider federal government assistance for specific limited areas with buildings and property owners that require NFIP coverage, but may have mitigation and/or true needs-affordability issues. Congress will, as always, decide who, what, where and when. However, when those are identified and Congress decides to make these rare accommodations that should be understood clearly as government welfare exceptions. As such these social policy treatment exceptions should not drive changes in the overall NFIP program/operations, but be dealt and managed as NFIP matters would regularly - and then have the government assistance applied to those exceptions cases - noting their uniqueness.

- (5) **Rate and Form Need to Reflect Proportional Exposure to Risk:** PIA appreciates that as the FEMA/NFIP program offers additional options for coverage, all policies need to reflect a far more accurate and reasonable cost of the risk borne. As FEMA/NFIP build these ratings, as well as the transition program needed to move current policyholders into these changes, Congress must also create a far more secure and exclusive policyholder reserve of these premiums to assure that they - and the interest earned from the investing of these monies - be exclusively available to pay the claims of the program. Congress must learn that flooding events run in long-term cycles, approximately 20-30 years. Increased earnings during the lesser-flooding years must not be viewed as "extra-dollars" for other government uses even when those uses are within the FEMA framework.
- (6) **Ensure Multi-Year NFIP Authorization.** PIA National firmly believes that the NFIP must continue to have multi-year authorization by Congress for its various authorities in order to operate a balanced, orderly program with continuity. A five-year authorization is attainable and desirable for the program's sake and fully responsive to Congress' evaluation obligations.
- (7) **Continue Commitment to Map Modernization.** FEMA is now in the middle of the five-year process of updating all flood maps in the United States. It is imperative that FEMA be provided the time and resources needed to effectively complete this process, maintain regular updating, as well as archive retired maps for necessary reference. Many people, businesses and lenders in the wake of Hurricanes Katrina, Rita and Wilma said that they did not buy/require flood insurance because the maps indicated they were outside of high-risk areas, and therefore not made a condition of their loan. By using updated maps, property owners will have a better idea of their risk and can react accordingly. Further, more education about the mapped NFIP flood zones corresponding to what those zones means in terms of potential hazard to loss is needed. Using a 20-year mortgage as comparison can help more people, business and lenders see that in a number of flood zones their potential exposure to a flood is greater than their potential hazard from a total fire loss to their property.
- (8) **Federal-State-Local Authorities Coordination on:**
- Set-backs
  - Land-use and development guidelines
  - Infrastructure projects including levy upgrades and maintenance
  - Construction codes development, implementation and enforcement
  - Uniform approach to elevation and flood zone determinations
  - Improved Flood Plain Management
  - Building Materials use & individual property maintenance

These areas are the exclusive authority of these governmental entities and each one must work with the others to both respect and coordinate their actions to achieve the type of mitigation program that was intended by the FEMA/NFIP program at its inception. The above listed items are critical components of the program and issues that neither individual property owners nor any one of the government entities noted can achieve on their own.

**(9) Allow FEMA to Develop:** PIA National has raised this issue before - it is important for Congress to appreciate what a critical role change has played in FEMA's ability to accomplish its mandates. Since 2000, the NFIP operations and then the FEMA Agency have been subjected to an extra-ordinary level of change in the strategic direction, purpose, operation and leadership. Effective government operation requires clear direction and purpose of, for and by government agencies. PIA believes that given that opportunity, the FEMA/NFIP will once again regain its consistency of focus and practice, providing the type of agency response unit for the direction and end-goals set out by Congress and needed by the people and areas covered by the NFIP.

### ***Coordination with Related Programs***

PIA National believes that the NFIP is the appropriate structure for insuring flood losses. Going forward, Congress may consider a comprehensive, coordinated natural disaster catastrophe program. The widespread devastation caused by Hurricane Katrina serves as an awesome reminder that neither one state nor a regional grouping of states can fund or support a catastrophe reserve fund. In September 2005 PIA National again outlined the elements of such a proposal and urged Congress to enact it. We point out here that such a catastrophe funding mechanism should neither encompass nor subsume the NFIP. Additionally, PIA National strongly supports the extension of the Terrorism Risk Insurance Act (TRIA). We believe TRIA must be extended, but that it must be treated as it is now - a specific, distinct program that cannot be paired with a natural disaster catastrophe program or the NFIP.

### ***Conclusion***

PIA hopes that by working together with Congress our suggestions for NFIP's improvements will continue to support and improve this vital, needed federal program.

Certainly, the outline developed for the internal review/study of the NFIP provides all of us with a starting point for these ongoing discussions. Our comments here connect PIA's knowledge to the related areas in the suggested NFIP study outline that Congress has requested.

PIA looks forward to working with Members of Congress and legislative staff to find the best possible outcomes for the National Flood Insurance Program.