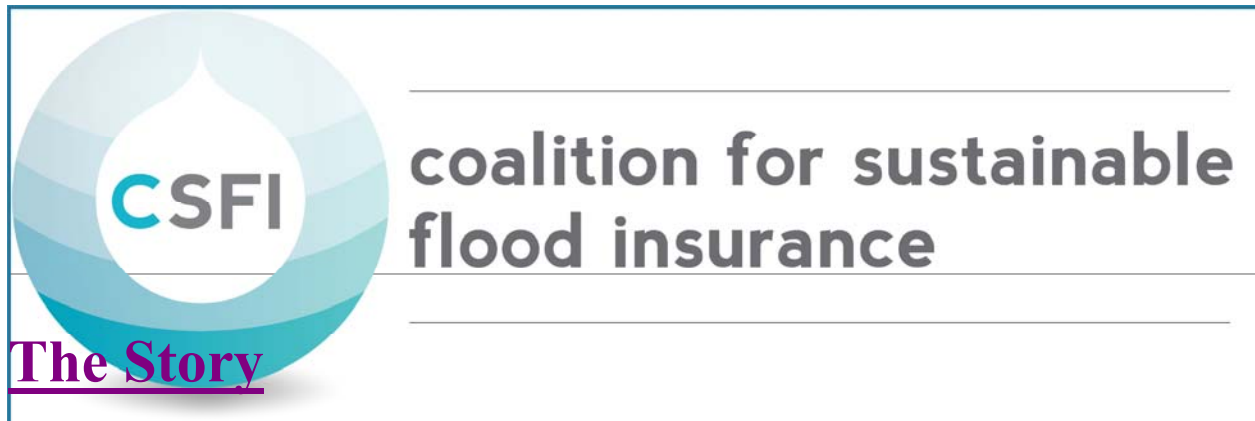


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The coalition was created in support of a sustainable, fiscally responsible National Flood Insurance Program that protects the businesses and homeowners who built according to code and have followed all applicable laws. However, changes made to the NFIP in the Biggert-Waters Act of 2012 threaten to harm the very citizens the program was designed to protect.

Action Items:

- **Submit Letters to the Editor** – Attached you will find a [SAMPLE Letter to the Editor](#) that coalition members are encouraged to submit to their local papers.
- **Sign on to Letter to President Obama** – We are finalizing the [Letter to President Obama](#) requesting that he administratively delay problematic portions of the law. The updated text of the letter is attached. Please let me know by **COB Monday 10/28/2013** if your organization would like to sign on.



Current Challenges

Two major issues affecting the price of flood insurance are causing grave concern to coastal and riverine areas across the country:

1) Phase-Out of Grandfathering – The Biggert-Waters Act of 2012, which reauthorized and made substantive changes to the National Flood Insurance Program (NFIP), phases out grandfathering. That is, properties that were built in accordance with all FEMA required elevations and applicable codes at that time may now be considered out of compliance, through no fault of their own, due to new flood mapping.

2) “All or Nothing” Protection – New FEMA maps, which outline base flood elevation changes, do not currently recognize protection offered by unaccredited (less than 100 year protection) levees, or other elements (e.g., pumps) at all. For example, if a levee only offers 50-year protection, the property protected by this levee is considered as having no protection.

Potential Impacts

- Home values go to zero; homeowners lose everything
- Property assessments go to zero; parishes lose tax revenue
- Bank mortgages go into default; banks are left with worthless assets
- The NFIP program, itself, goes into a “death spiral” as people leave the program
- The communities and economies of southeast Louisiana – and all of coastal and riverine America – will be made unviable



Possible Solutions

1) Congress can amend the Biggert-Waters Act:

- To reinstate grandfathering of properties (not policies) that were built to code, have maintained insurance, have not repeatedly flooded, etc.
- To reflect an economically reasonable and slower increase in rates to actuarial rates

2) FEMA can work with local stakeholders to continue to develop and refine maps to accurately reflect flood risk in each affected community by taking into account nonaccredited levees and other features that afford flood protection

Key Questions of Financial Structure and Management

On August 8, 2013, GNO, Inc. hosted a roundtable with David Miller, FEMA Administrator for Flood Insurance and Mitigation, the Louisiana Congressional delegation and multiple Parish Presidents and officials. During the meeting, several questions were raised regarding the financial structure and management of NFIP that went unanswered. These issues, along with a lack of publicly available data, have raised serious questions about whether NFIP reforms were implemented based on complete information and analysis. With this in mind, GNO, Inc. was charged with producing a briefing to find answers to key questions of financial structure and management.

The following paper identifies the questions posed to FEMA, their responses, resulting analyses, and remaining issues: [NFIP Report](#).

For more information about the Coalition for Sustainable Flood Insurance, please contact Caitlin Berni at cberni@gnoinc.org or 504.527.6980.

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