



August 7, 2023

Susan Bernstein
Insurance Specialist
Federal Emergency Management Agency
Via electronic submission at www.regulations.gov

Re: Docket ID FEMA-2023-0015, OMB No. 1660-0040 (Standard Flood Hazard Determination Form)

Dear Ms. Bernstein:

The National Flood Association (NFA) appreciates FEMA's efforts to release the new version of the Standard Flood Hazard Determination Form (FEMA Form FF-206-FY-21-116, the "Form"). As you are aware, each mortgage loan transaction (e.g., the making, increasing, renewing, or extending of a mortgage loan for which one or more buildings serve as collateral) requires the completion of the Form to determine flood insurance requirements and for compliance with the Flood Disaster Protection Act of 1973 (42 U.S.C. § 4104b(c)). NFA members are the largest collective user of the Form, completing and providing it to these lending institutions for their regulatory compliance purposes more than 20 million times annually, per NFA's annual member survey. Thus, NFA has extensive experience with and a vested interest in the continued availability and usability of the Form.

Given the Form's criticality and ubiquity, **the NFA encourages FEMA to promptly finalize the release of the Form without change by the impending expiration date of September 30, 2023.**

We emphasize a timely renewal of the Form without change, but want to take this opportunity to make two suggestions regarding the Form that will improve the user experience:

1. **Improve the functionality on FEMA's underwriting forms webpage to make the Form easily accessible.** Currently, when a user goes to FEMA's webpage (<https://www.fema.gov/flood-insurance/find-form/underwriting>) and clicks on "Download File", the user receives a "Please Wait" message that does not resolve itself (see attached "Exhibit A: User Experience"). The user must take additional, non-intuitive steps in order to access the Form. The same access issue applies to FEMA's new Elevation Certificate and we have been told that this is due to the fillable nature of the forms; however, on this same webpage the Residential Basement Floodproofing Certificate (also a fillable form) opens immediately upon clicking "Download File". Improving this functionality will better support accessibility to the Form.
2. **Verify and update the various URL hyperlinks within the Form's instruction pages (FEMA Instruction FI-206-FY-22-102, pages 1-2).** Many of the hyperlinks currently return a "page not found" message so we encourage FEMA to verify and update these URLs, as applicable, as a convenience for those reviewing the instruction pages.

The NFA appreciates FEMA's efforts to promptly release the renewed Form without changes as well as consideration of the aforementioned improvements to the Form's accessibility and instructions. If either or both of the suggested improvements would present a delay to the release of the renewed Form, the NFA supports these being addressed after its release. This will allow stakeholders to implement the renewed Form into their systems and procedures in a timely manner. If you would like to discuss any of these comments in further detail with the NFA, please contact me at cheryl.small@nfa flood.com or our team at info@nfa flood.com.

Sincerely,

A handwritten signature in black ink that reads 'Cheryl A. Small'.

Cheryl Small, Executive Director
National Flood Association


Exhibit A: User Experience

Clicking this link--[National Flood Insurance Program Underwriting Forms | FEMA.gov](#)

Goes to this page--

National Flood Insurance Program Underwriting Forms


Scrolling down to the Form and clicking “Download File”



Standard Flood Hazard Determination Form (MUST DOWNLOAD)

This form can be filled out online.

The Standard Flood Hazard Determination Form is required for all federally backed loans and is used by lenders to determine the flood risk for their building loans. The form is authorized by the National Flood Insurance Reform Act of 1994 and is imposed on lenders by their regulatory entities, not by FEMA. FEMA oversees the National Flood Insurance Program which makes federally administered flood insurance available throughout the United States and is responsible for development, updates and making the form available to users. Implementation of the mandatory flood insurance purchase requirements of the Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 94, as amended, is the responsibility of the various federal agencies that regulate lenders. Please contact your regulator or lender to determine their requirements. This form may be locally reproduced. This form needs to be downloaded and opened directly in Adobe Reader because it may not open in Edge or other browser-based readers. If you have questions about this form, please contact FloodSmart@fema.dhs.gov. For questions about when the use of this new version of this form is required, please contact your regulator.

Nov 1, 2022  [Download File](#)

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