

**FEMA Risk Insurance Division Response to Comments, Docket ID FEMA-2014-0034**  
**FEMA Form 036-0-32 (the Standard Flood Hazard Determination Form)**

**CoreLogic Comments**

Written comments were received on Docket ID FEMA-2014-0034, renewal of the Standard Flood Hazard Determination Form (SFHDF) collection. Comments were submitted by Ms. Cheryl Small, CoreLogic Flood Services.

Ms. Small recommends that FEMA:

- 1) Return to the previous one-page form with additional instructions pages;
- 2) Remove the yes/no choice for the LOMC response;
- 3) Offers suggested language to describe "multiple buildings" in the instructions portion of the form.
- 4) Requests that FEMA include a statement that preparers have latitude in their formatting of the form.

**FEMA Response to Comments by CoreLogic**

In response to the concerns raised by CoreLogic, the Agency will 1) return the form to a single page with the instructions preceding the form. This format (Instructions first, followed by the form) will allow the various Paperwork Burden and Privacy Act Statements to be updated as required by OMB and DHS while keeping the form at one-page.

In order to address Core Logic and other commenters concerns regarding the 2) LOMC entry, while still addressing the need to use the most up-to-date flood risk data available, the new form will continue to include a box for the LOMC (yes/no) and if there is one, requesting the date and number of the LOMC.

FEMA does not have statutory responsibility for enforcing the mandate to purchase flood insurance; nor do we have the authority to regulate lenders. It would be inappropriate to offer guidance regarding what the user's regulatory requirements are, including to state how they define "multiple buildings" (comment 3). FEMA will, however, add a statement clarifying that

FEMA does not have the authority to regulate lenders and that users need to use the form as their regulator requires and FEMA does not set those requirements.

For further information please contact: Susan Bernstein, Program Analyst, FEMA, Federal Insurance and Mitigation Administration (FIMA), 202-212-2113.

Dated:

*Bonnie Shepard for Jordan Fried 2/18/15*

**Jordan Fried, Esq.,**

Acting Deputy Division Director, Risk Insurance Division,

Federal Insurance and Mitigation Administration,

Federal Emergency Management Agency,

Department of Homeland Security.





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Docket Manager  
Office of Chief Counsel  
DHS/FEMA  
500 C Street SW., Room 8NE  
Washington, DC 20472-3100

Re: Federal Emergency Management Agency, Docket ID FEMA-2014-0034; OMB No. 1660-0040; Proposed Collection; Comment Request; Standard Flood Hazard Determination Form

Dear Madam or Sir:

With over twenty years providing flood determinations to mortgage lenders and servicers pursuant to the Flood Disaster Protection Act of 1973, as amended (the "Act"), CoreLogic appreciates the opportunity to share our comments on the proposed renewal and revision of the Standard Flood Hazard Determination Form (the "Form", FEMA Form 086-0-32).

Regarding first the overall length, CoreLogic recommends that the Form remain as a single page with the "Comments" section returned to its previous position within the Form. In almost twenty years since its first implementation the Form has been a one-page document with accompanying instructions. We are not aware of any issues arising from use of the Form in this format. The Form as a two- or three-page document would unnecessarily impose a significant burden on federally regulated lenders and mortgage servicers which use the Form to comply with the provisions of the Act. Specifically, an expanded form multiplies the burden of meeting the documentation and production requirements of the Act without any compliance benefit. We further recommend that to help retain the current length of the document, the Paperwork Burden Disclosure Notice remain with the instruction pages of the Form.

Furthermore, we understand that the National Flood Determination Association (NFDA) has submitted a sample of the Form which we encourage FEMA to consider. One specific formatting change which the NFDA recommends, and we support, is the change to Section II. B., Box 3 (the "LOMC field"). The LOMC field does not require a Yes/No response because, as indicated in the proposed instructions for this section, this "field can remain blank if no Letter of Map Change ... applies to the subject property." Thus, we recommend that FEMA remove the Yes/No question for the LOMC field.

Regarding the instructions to the Form, we recommend that FEMA amend the section regarding multiple buildings to read as follows in acknowledgement of recent changes brought about by Section 13 of the Homeowner Flood Insurance Affordability Act of 2014:

**"MULTIPLE BUILDINGS:** If the loan collateral includes more than one building located in different flood zones, a listing of the buildings may be included in the comment section or as an attached schedule, or separate forms may be completed. Any attachments should be noted in the comment section. A separate flood insurance policy is required for each building or mobile home subject to the mandatory purchase of flood insurance requirement. Federal law exempts non-residential buildings detached from the primary residential building on residential property from the mandatory purchase of flood insurance requirement."

Finally, preparers of the Form have historically had latitude with the formatting of the Form, allowing for more efficient and pragmatic use of space, so long as content is preserved. As such, FEMA should reiterate in its final notice that preparers have this latitude with formatting.

We encourage FEMA to consider our comments in preparing the official version of the Form. It is critical that the final version of the Form that is adopted by FEMA, approved by the OMB, and released to the public and made available on FEMA's website is one that best and most efficiently serves to help lending institutions comply with the Act.

Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cheryl Small".

Cheryl Small  
Vice President Operations  
CoreLogic Flood Services