

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

Written comments were received on Docket ID FEMA-2014-0034, renewal of the Standard Flood Hazard Determination Form collection. Comments were submitted by Mr. Daniel D. Wilkening, CB Chief Administrative Officer, JPMorgan Chase Bank.

**JPMorgan Chase Bank Comments**

- Form Length - JPMC requests that the SFHDF be no longer than one page with Instructions on the reverse side. We are concerned that essential information will be lost if the SFHDF is lengthened to two pages with an additional page of instructions.
- Lender Name - We suggest that this field and its instruction state that to the extent the determination is requested by a servicer after loan origination, the servicer's name may be listed.
- Paperwork Burden Disclosure Notice - JPMC feels that this information is not essential to SFHDF users and could be moved to the instructions, thus permitting inclusion of the Comments Section on the first page of the SFHDF,
- Comments Section - Our flood determination vendors use the Comments Section of the SFHDF to communicate important information to us, particularly with respect to properties that contain multiple structures. It is critical to have this information easily visible on the first page of the SFHDF.
- Lender ID Number- We appreciate FEMA's willingness to make this field optional as we have had challenges getting this information when JPMC is not the Agent on syndicated transactions, particularly with foreign banks or non-bank affiliates of domestic banks that do not have lender identification numbers.
- Preparer's Information: Multiple Buildings - The instructions on multiple buildings should be revised to indicate that it is not necessary to attach a schedule if the Comment Section contains language indicating that "Section II B.4 (Flood Zone) applies to any buildings on the property" in the following cases: (i) all structures are in a single flood zone, but outside of a special flood hazard area. ("SFHA"), or (ii) all structures are in a single SFHA. We would additionally request striking the following statement in these instructions: "A separate flood insurance policy is required for each building or mobile home." It is true that most NFIP policies only cover one structure, but we have seen NFIP policies that cover multiple buildings and this would certainly not be true of a private policy. In addition, as you know, the Homeowners Flood Insurance Affordability Act of 2014 removed certain detached structures from the mandatory flood insurance purchase requirement, and a blanket statement such as the one in proposed instructions is no longer accurate.
- Technical Correction - We suggest inserting a word missing from Section 2 C. ("Federal Flood Insurance Availability") of the instructions: "Federal flood insurance is prohibited in areas designated by the Coastal Barrier Resources Act. .."

FEMA Response to Comments by the JPMorgan Chase

- Form Length – The Form is being re-formatted to be one page. FEMA will not be able to make the two page instructions one-page as requested, this conflicts with several other requests to add data/space.
- Lender Name – the term “lender” has been replaced with “lender/servicer” on the form and on the instructions page.
- Paperwork Burden Disclosure Notice – this Notice is required by DHS/FEMA and will not be removed.
- Comments Section – There is no room to accommodate a comment section and keep the form at one page as has also been requested. A note will be added to the instructions sheet that “Preparer may add additional pages/data as needed.”
- Lender ID Number- this section has become optional.
- Preparer’s Information: Multiple Buildings – This section has been updated to state: “For guidance regarding multiple buildings, please contact your regulator, servicer, lender or other entity as applicable.” It is not appropriate for FEMA to be offering this regulatory guidance to lenders.
- Technical Correction - We are fixing inserting a word missing from Section 2 C. (“Federal Flood Insurance Availability”) of the instructions: “Federal flood insurance is prohibited in areas designated by the Coastal Barrier Resources Act. .. “

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

Dated: *2/26/15*

*Bonnie Shepard for Jordan Fried*

**Jordan Fried, Esq.,**

Acting Deputy Division Director, Risk Insurance Division,

Federal Insurance and Mitigation Administration,

Federal Emergency Management Agency,

Department of Homeland Security.

# J.P.Morgan

## Fax cover sheet

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Legal entity/department: JPMorgan Chase Bank, N.A.

Address/location:

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Message:

Re: Docket ID FEMA-2014-0034

Please find attached JPMorgan Chase Bank, N.A.'s comment letter in response to FEMA's request for comment on its proposed amendments to the Standard Flood Hazard Determination Form.

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February 9, 2015

Via U.S. Mail:  
Federal Emergency Management Agency  
Docket Manager, Office of Chief Counsel  
DHS/FEMA, 500 C Street S.W., Room 8NE  
Washington, DC 20472-3100

Via Email:  
[www.regulations.gov](http://www.regulations.gov)

Re: Standard Flood Hazard Determination Form;  
Docket ID FEMA-2014-0034  
Renewal of Paperwork Reduction Act Clearance  
OMB Control Number 1660-0040

Ladies and Gentlemen:

Pursuant to a notice published December 11, 2014 (the "Notice"), the Federal Emergency Management Agency (FEMA) announced the upcoming renewal of the Standard Flood Hazard Determination Form (SFHDF) and made available a draft of a new version of the SFHDF ("Proposed Form") and its instructions. The Notice solicits comments from the users of the SFHDF as to whether or not the Proposed Form would create additional burden or hardship. JPMorgan Chase Bank, N.A. ("JPMC") appreciates the opportunity to provide the following comments on FEMA's Proposed Form:

- Form Length – JPMC requests that the SFHDF be no longer than one page with instructions on the reverse side. We are concerned that essential information will be lost if the SFHDF is lengthened to two pages with an additional page of instructions.
- Lender Name – We suggest that this field and its instruction state that to the extent the determination is requested by a servicer after loan origination, the servicer's name may be listed.

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- Technical Correction – We suggest inserting a word missing from Section 2 C. ("Federal Flood Insurance Availability") of the instructions: "Federal flood insurance is prohibited in areas designated by the Coastal Barrier Resources Act..."

We appreciate FEMA's efforts to evaluate the burden of completing and using the form and hope that the SFHDF will remain at one page with the improvements suggested. We would be pleased to meet with you to discuss any of these items further.

Very truly yours,

