



September 15, 2025

Senator Bill Cassidy
455 Dirksen Senate Office Building
Washington, D.C. 20510

Senator Cory Booker
306 Hart Senate Office Building
Washington, D.C. 20510

Dear Senators Cassidy and Booker:

Thank you for the opportunity to provide input to your important work to reauthorize the National Flood Insurance Program (NFIP). This letter responds to your August 15th letter inviting comments on NFIP reauthorization.

The Coastal Flood Resilience Project (CFRP) is a network of nonprofit organizations working for stronger federal, state, and local programs to prepare for coastal storm flooding and rising sea levels along the coast of the United States. More information about the CFRP is available on our website: <https://www.cfrp.info/>.

The CFRP has developed white papers and letters on diverse topics related to coastal storm flooding and rising sea levels. Several of these work products address proposed improvements to the NFIP and are identified below.

- [Needed Reforms](#) to the National Flood Insurance Program Addressing Coastal Flood Resilience and Sea Level Rise

The NFIP is not prepared for the changes to flood risk resulting from a warming planet, including more severe coastal storm surge flooding and permanent inundation of coastal communities by rising sea level. These coastal storm and sea level rise risks have already put the NFIP deeply in debt and are likely to drive future claims that will far exceed insurance premiums and make the entire program unsustainable in the coming decades.

Adapting the NFIP to the coastal flood risks emerging as the climate changes will require a fundamental change in the program's orientation. Today, the program is designed to insure against, and support rebuilding after, conventional flood events. Tomorrow, the program must respond to increasing storm flood risk and permanent inundation due to rising seas by moving people and buildings out of harm's way.

This new focus should include the following key changes:

- **Increasing Public Awareness of Flood Risk:** Congress should revise the NFIP to increase public awareness of evolving risks by updating floodplain maps, providing useful information about sea level rise threats, and requiring mandatory disclosure of flood risks to prospective property buyers, both residential and commercial, before any sale.
- **Discouraging New Construction in Sea Level Rise Risk Areas:** Congress should revise the NFIP to discourage new construction in areas at risk of permanent inundation by rising seas, including not issuing NFIP policies for new construction in these areas.
- **Shifting People and Property to Safer, Higher Ground:** Congress should revise the NFIP to shift program focus from rebuilding damaged properties to relocating homes and communities to higher, safer ground as sea level rises, including investing in planning for timely relocation and significantly increasing funds for buyouts of high-risk properties from willing sellers.
- **Assuring that Flood Insurance is Affordable:** Congress should revise the NFIP to expand premium discounts for adoption of flood reduction measures, giving priority to low-income policyholders, and then further discount premiums to make them affordable. At least 40 percent of expanded investments in buyouts from willing sellers and in home flood mitigation should be available to low-income policyholders.

The additional CFRP work products that address NFIP reauthorization include:

- [National Policy Agenda](#): Preparing for More Severe Coastal Storms and Rising Seas;
- [Response to the Federal Emergency Management Agency Request for Comment on the Local Floodplain Management Standards of the National Flood Insurance Program](#);
- [Reforming the Community Rating System](#) Within the National Flood Insurance Program;
- [Proposed National Policies to Support Relocation](#) of Communities as Sea Level Rises; and
- [A Proposed Strategy to Better Communicate Flood](#) Risk to Coastal Property Owners.

The specific questions posed in your letter of August 15th are addressed in the attachment to this letter. These responses are drawn directly from the existing CFRP *Policy Agenda* and CFRP white papers. New analysis reflecting the views of the organizations participating in CFRP on all the questions was not possible within the comment period. CFRP would be happy to provide input to a draft bill or to provide comments on an introduced bill.

Thank you again for the opportunity to provide input to the important work of reauthorizing and strengthening the NFIP.

Please contact us if you have comments or questions.

Sincerely,

/s/

Jeff Peterson
Shana Udvardy
Co-facilitators
Coastal Flood Resilience Project

cc: "NFIP_RFI@cassidy.senate"

Attachment: CFRP Responses to NFIP Reauthorization Questions
in August 15th Letter

ATTACHMENT

CFRP Responses to NFIP Reauthorization Questions in August 15th Letter

Responses to the questions below are drawn from CFRP white papers identified in the cover letter. In some cases, the white papers do not address the specific questions and these questions are not addressed.

Reauthorization

1. *What is the ideal reauthorization length and why?*

CFRP white papers do not address this question.

2. *When authorized in 1968, NFIP was initially administered by the Department of Housing and Urban Development (“HUD”). In 1979, NFIP was moved to FEMA when it was created to centralize the federal government’s emergency preparedness and disaster management. Should a reauthorized NFIP continue to exist within FEMA, or should it belong to another agency, like HUD or the Federal Housing Finance Agency (“FHFA”)?*

CFRP white papers do not address this question.

Affordability

3. *In 2018, FEMA released an affordability framework for the National Flood Insurance Program (NFIP), which explored designs of an affordability program. How should an affordability program be designed? Who should be eligible for premium discounts? Should eligibility be based on the area median income (AMI), federal poverty level (FPL), mitigation efforts, community-level mitigation, other assessments / ratios, or a combination? Should eligibility be based on not only the household’s income, but also the housing costs such as mortgage principal and interest, property taxes, and insurance (including flood insurance and homeowners’ insurance)? What should maximum premium discounts be?*

CFRP recommendations for improving affordability of NFIP premiums are discussed in detail starting on page 10 of this [white paper](#) and include:

- make the discounts available under the Community Rating System (CRS) fully available to disadvantaged communities;
- offer premium discounts for agreements to sell damaged property;
- discount premiums to assure affordability; and

- focus expanded property flood mitigation and buyout investments on disadvantaged communities.

4. *What policy changes would most effectively address affordability concerns for policyholders? Should policy holders be allowed to pay their premiums monthly? If not, why not?*

CFRP recommendations for improving affordability of NFIP premiums are discussed in detail starting on page 10 of this [white paper](#).

5. *What approaches could help balance long-term program fiscal stability, considering the need for premiums to reflect risk while accounting for the investments communities have made to meet flood mitigation standards, and the need to keep premiums affordable for at-risk populations?*

CFRP recommendations for improving affordability of NFIP premiums are discussed in detail starting on page 10 of this [white paper](#).

In addition, on the challenge of meeting long term fiscal stability, the CFRP [Policy Agenda](#) states:

“Stop Issuing Federal Flood Insurance for New Development in Sea Level Rise Risk Areas: The National Flood Insurance Program should stop providing insurance for new development in areas at risk of rising seas in the near term, allowing the private market to meet these needs with appropriate rates.” See page 6.

6. *Given that prior to Risk Rating 2.0 grandfathering allowed property owners to “lock in” the lower risk flood zone or base flood elevation for future ratings, what role should grandfathering of rates play into a reform of the NFIP, taking into account its impact on home values and the downstream impacts on state and local tax bases, as well as the impact on program sustainability? In addition to grandfathered properties, [pre-FIRM](#) properties and [newly-mapped](#) properties have historically also received a discount. What role should these discounted categories have in a reform of the NFIP?*

Recommendations for improving affordability of NFIP premiums are discussed in detail starting on page 10 of this [white paper](#).

Mitigation

7. *How can the NFIP better support and incentivize mitigation efforts at the local or property level? Should FEMA offer non-financial direct technical assistance (DTA)?*

The Community Rating System offers premium discounts in exchange for community scale flood mitigation actions. This [white paper](#) makes recommendations for improving the Community Rating System.

In addition, FEMA could significantly expand community scale flood mitigation efforts by shifting some of the best, proven mitigation actions described in the *Community Rating System Coordinators' Manual* to become mandatory actions as part of the local flood ordinances that communities adopt to enter the NFIP program. This process is discussed in this [white paper](#); see page 9.

8. *How can FEMA ensure that premium rates better reflect mitigation efforts undertaken by property owners? What information would you like FEMA to provide on reductions in premiums due to mitigation actions? To whom should this be provided (e.g. policyholders, communities, builders)?*

CFRP white papers do not address this question.

9. *FEMA states that “mitigation efforts, such as elevating a building, installing proper flood openings in a crawlspace or enclosure, and elevating certain machinery & equipment, will help reduce flood damage and potentially the cost of flood insurance.”¹⁵¹ What other mitigation measures lower flood risk and should be considered in the premium methodology? What mitigation measures lower flood risk in dense urban areas?*

Promotion of mitigation measures in high-risk areas and areas at risk of rising sea level can encourage homeowners to remain in unsafe properties when a better investment would be to relocate to safer, higher ground. Some key actions include:

- expand investment in flood mitigation and relocation planning under the existing Flood Mitigation Assistance program;
- revise the NFIP community participation requirements and CRS to focus on relocation of at-risk property to higher ground; and
- authorize significant new funding to the National Flood Mitigation Fund for acquisition or relocation of high-risk properties.

These measures are discussed in this [white paper](#); see page 7.

Mapping

10. *What improvements or reforms to FEMA's flood mapping process would be most beneficial to accurately map an area's flood risk and reflect a community's efforts to mitigate that risk?*

Recommendations for improving FEMA's flood mapping are described in this [white paper](#); see page 11.

A recommendation for adding a "sea level rise risk area" to flood maps is provided in this [white paper](#); see page 4 and this [white paper](#); see page 4.

This [white paper](#) includes recommendations for improvements to FEMA flood mapping to improve risk communication; see page 20.

NOTE that upgrades to FEMA flood mapping to identify high risk areas and areas subject to sea level rise are a prerequisite to adopting limitations on issuance of policies for new development in these areas.

11. *Under current policy, FEMA is required to study the need to update its flood maps every five years, but there is no requirement for the maps to actually be updated. Would a requirement for FEMA to update its maps on a consistent basis benefit its ability to better understand flood risks and price its policies accordingly? If so, what would be a good timeline for FEMA to update its maps?*

The CFRP [Policy Agenda](#) includes this recommendation for Congress to provide the funding needed so that flood maps reflect current flood information and projected future conditions.

"Update FEMA Flood Maps and Provide Sea Level Rise Risk Information:

- Congress should provide the funding needed to update flood risk maps prepared for the National Flood Insurance Program to reflect the most current hydrological information.
- NOAA should work with other federal agencies to map areas at risk of future storm flooding and areas expected to be inundated by rising seas in the near and long term."

12. *Are there ways the U.S. government can effectively work with private industry to provide high quality, cost efficient, and regularly updated flood maps?*

CFRP white papers do not address this question.

Risk Rating 2.0

13. *How could the Risk Rating 2.0 methodology be changed or replaced to more accurately reflect a property's true risk rating and past mitigation efforts? What aspects of the legacy flood insurance premium rating system are superior to Risk Rating 2.0?*

A key factor driving premiums up is the NFIP providing a financial safety net for new developments in areas known to be at high risk and subject to rising sea level. As sea level rise accelerates, premiums reflecting “true risk” for these homes would be extremely high and likely politically unsustainable. High loss rates in these high-risk areas drive premiums up overall. A key step toward minimizing overall losses is to avoid insuring more high-risk property by declining to offer insurance for new construction in high-risk areas. This policy is addressed in the CFRP [Policy Agenda](#); see pages 6 and 7. This policy change is also discussed in this [white paper](#); see pages 5, 6, 7.

14. *Should the Risk Rating 2.0 methodology and its data sources receive a third-party review for reasonableness and consistency? If so, how should this review be conducted, and who should be involved in this review? Should FEMA publicize Risk Rating 2.0 data, methodologies, and risk modeling for public access?*

CFRP white papers do not address this question.

15. *How often should FEMA’s rating methodology be updated? Are there new data sources or technologies that should be considered when modifying or replacing Risk Rating 2.0? Should communities or policyholders be allowed to contribute information to FEMA’s rating methodology, and through what process should this occur?*

A key new data source for determining risk premiums is projected future conditions, such as risk of inundation of a property by rising seas; see CFRP [Policy Agenda](#); page 4.

Solvency and Savings

16. *What are the most effective strategies to strengthen the NFIP’s long-term financial solvency?*

A key strategy for improving NFIP solvency is to adopt risk-based premiums for existing properties and to decline to offer coverage to properties newly built in mapped high risk areas and areas subject to rising sea level; see page 5 of this [white paper](#).

Another key strategy to improve solvency is to shift resources from rebuilding flood damaged existing properties in high-risk areas and expand investments in supporting relocation of these properties to safer, higher ground; see pages 7-10 of this [white paper](#).

Another key strategy to improve solvency is to shift the most effective community scale flood mitigation practices from the Community Rating System program to

make them mandatory elements of strengthened rules providing for local NFIP flood ordinances; see pages 9-11 of this [white paper](#).

17. *Are there innovative approaches to building program reserves or savings that Congress should consider?*

CFRP white papers do not address this question.

18. *While FEMA does purchase reinsurance for NFIP policies, would the use of other risk transfer tools such as catastrophe bonds, resilience bonds, or other insurance linked securities be useful in helping NFIP reach program sustainability?*

CFRP white papers do not address this question.

19. *How can the NFIP effectively manage its debt burden?*

CFRP white papers do not address this question.

20. *The NFIP, on average, pays the U.S. Treasury over \$619 million in interest expenses annually, the third most important NFIP activity when valued by cost. From 2005 until present, the NFIP paid over \$6.2 billion in interest. In the next 10 years, the NFIP is projected to pay \$7.45 billion solely for interest on the debt. Should NFIP receive forbearance on these interest expenses? If so, how long should interest payments be forborne? If so, should NFIP be mandated to use savings for any particular activity or fund? Would NFIP benefit from reorienting its reserves away from losses and toward paying down its interest and debt?*

CFRP white papers do not address this question.

Enhancing Transparency and Accountability

21. *What steps could FEMA and / or Congress take to improve transparency in NFIP rate-setting, claims processing, or program administration?*

CFRP white papers do not address this question.

22. *How can the NFIP better convey community risk and program changes to policyholders and communities?*

This CFRP [white paper](#) (see page 18) recommends adoption of a comprehensive strategy to improve communication of flood risk to coastal communities. Some of the recommended actions would be implemented through the NFIP (e.g., mapping upgrades) while others might be incorporated as NFIP elements.

This CFRP [white paper](#) (see page 3) addressing NFIP reforms generally includes a series of recommendations for improving risk awareness, including improvements to NFIP mapping.

This CFRP [white paper](#) (see pages 7 and 8) recommends that NFIP local ordinance regulations or requirements be upgraded to improve communication of flood risk, including future flood risk and sea level rise, by taking a range of actions such as:

- An annual report to the community;
- disclosure of risk at time of sale; and
- direct notice to homeowners in high-risk areas.

23. *Home buyers and renters often lack awareness about the property and community level flood risk and history of the properties they purchase and rent. Would flood risk and history disclosure requirements between sellers/lessors and buyers/renters of properties before closing transactions help increase transparency and raise risk awareness? If so, what type of information should be disclosed between parties?*

This CFRP [white paper](#) (see page 18) recommends adoption of a comprehensive strategy to improve communication of flood risk to coastal communities, including a series of federal actions to strengthen state laws providing for flood risk disclosure at time of sale (see page 19).

This CFRP [white paper](#) (see page 3) addressing NFIP reforms generally includes a series of recommendations for improving risk awareness, including recommendations for a national standard for flood risk disclosure at time of sale (see page 5). The elements of the proposed national flood risk disclosure standard are described in detail in an attachment (see page 16).

NOTE: The recommendation for a national standard for flood risk disclosure was developed in 2021 and the recommendation for federal actions to promote and strengthen state flood disclosure laws as developed in 2025. The shift toward support of state laws was based on the judgement of white paper authors that strengthening state laws was a better fit for the political climate.

24. *What accountability measures would ensure the program meets its goals and serves stakeholders effectively? Should policyholders be informed of all of the rating factors? Are there any rating factors that should not be disclosed to policyholders? How should this communication occur (i.e., on declaration pages, via an agent, or on an online portal)?*

CFRP white papers do not address this question.

25. How can the Office of the Flood Insurance Advocate (OFIA) better help policyholders and communities?

CFRP white papers do not address this question.

26. FEMA released a direct-to-customer quoting tool and a mitigation discount tool. How can these tools be improved? Are there functions or information that should be added to these tools?

CFRP white papers do not address this question.

27. Currently, NFIP premiums are not appealable. Should NFIP premiums be appealable? If so, what specific rating factors should be appealable? If so, how should this appeals process work?

CFRP white papers do not address this question.

Severe Repetitive Loss Properties

28. What are the main challenges in addressing severe repetitive loss properties, and what solutions could be effective?

This CFRP [white paper](#) (see pages 5-10) describes needed NFIP reforms, including minimizing NFIP exposure to high losses, including repetitive losses, through both:

- prohibiting or discouraging NFIP coverage of newly constructed property in high-risk areas; and
- implementing NFIP policy changes and supporting actions to shift focus away from financing rebuilding in high-risk places where losses will likely be repeated with increasing frequency and toward thoughtful support of investments that relocate structures to lower risk, safer, higher ground.

29. How can the NFIP and its partners better support mitigation efforts for severe repetitive loss properties?

See responses to questions 7, 8, and 9.

30. Should the NFIP expand its practice of buying out severe repetitive loss properties? Under some conditions should buyouts be required?

This [white paper](#) describes recommended improvements to programs related to federal buyouts of high risk property (see pages 9-10).

This [white paper](#) describes a comprehensive strategy to support relocation of communities in high flood risk areas, including recommendations for federal

buyouts where such buyouts are in the federal government's long-term financial interest (see pages 10-12).

31. What policy changes could reduce the incidence and impact of severe repetitive loss claims?

As noted above, many NFIP losses will be associated with a small number of risky properties and policies that shift requirements and financial incentives away from rebuilding in unsafe places and toward relocation to safer, higher ground will significantly reduce repetitive losses. This [white paper](#) provides a comprehensive set of recommendations for adopting a relocation focused strategy for communities in high flood risk areas, including changes to the NFIP (see pages 7-8).

Mandatory Purchase Requirement

32. The mandatory purchase requirement (MPR) applies to properties with federally-backed mortgages within the Special Flood Hazard Area (SFHA). The SFHA is defined by FEMA as an area with a 1% or greater risk of flooding every year. What are the strengths and weaknesses of the current mandatory purchase requirement? Should changes to MPR standards be explored, and if so, how should MPR standards change?

CFRP white papers do not address this question.

33. How could compliance with the mandatory purchase requirement be improved?

CFRP white papers do not address this question.

34. What impact, if any, does the mandatory purchase requirement have on your community or industry, and what changes would you recommend?

CFRP white papers do not address this question.

Participation in the Program

35. What incentives or requirements could encourage more consistent participation in the program?

CFRP white papers do not address this question.

36. What changes in the program have led to a decrease in participation in the program?

CFRP white papers do not address this question.

37. Should an affordability program be open to new as well as existing NFIP policyholders?

This CFRP [white paper](#) describes recommendations for improving affordability of the NFIP generally (see pages 10-14).

Continuous Coverage Requirement

38. *FEMA imposes a continuous coverage requirement which may penalize homeowners who experience a lapse in their policy. Additionally, FEMA may refuse to recognize private flood policies as satisfying the continuous coverage provision, resulting in homeowners who comparison-shop losing subsidies when they return to the NFIP. What statutory or regulatory changes could end these penalties without exposing NFIP to adverse selection?*

CFRP white papers do not address this question.

Disproportionate Impact on Communities

39. *How does the NFIP currently impact different communities, particularly those that are low-income, minority, or rural?*

CFRP white papers do not address this question.

40. *What steps can Congress and FEMA take to ensure more equal access to flood insurance and mitigation resources?*

This CFRP [white paper](#) (see pages 10-14) provides detailed recommendations to make the NFIP more affordable for low-income communities and people, including:

- make the discounts available under the Community Rating System (CRS) fully available to disadvantaged communities;
- offer premium discounts for agreements to sell damaged property;
- discount premiums to assure affordability; and
- focus expanded property flood mitigation and buyout investments on disadvantaged communities.

41. *How can Congress and FEMA better address the unique needs of vulnerable or disproportionately affected populations?*

See response to question 40 above.

42. *The Community Assistance Program – State Support Services Element (CAP-SSSE) program provides funding to states to help communities participating in the NFIP proactively identify, prevent, and resolve flood management issues.*

Should CAP-SSSE be permanently authorized and preserved? Should any changes be made to this program?

CFRP white papers do not address this question.

43. *In a future affordability program, how should NFIP ensure that communities most in need receive benefits? For example, areas with high area median income (AMI) may have a larger percentage of homeowners eligible to receive a premium discount.*

This [white paper](#) includes recommendations to improve NFIP affordability at the community level, including improving support to low income communities for use of the Community Rating System and focusing buyouts on low income communities (see pages 11 and 14).

NFIP Coverage Limits

44. *The current maximum NFIP coverage limits are \$250,000 for building coverage and \$100,000 for contents for single-family to four-family residential properties and \$500,000 for nonresidential building coverage and \$500,000 for contents coverage. How do these limits align with the actual replacement costs and recovery needs in today's housing and commercial markets?*

CFRP white papers do not address this question.

45. *How might adjustments to these statutory coverage caps affect program participation, affordability, and the relationship between the NFIP and private flood insurance offerings, particularly in high-value or high-risk areas?*

CFRP white papers do not address this question.

46. *Are there alternative models, such as supplemental or layered insurance approaches, that could better address coverage gaps for properties exceeding current NFIP maximums, and what would be the operations and access considerations of such models?*

CFRP white papers do not address this question.