

August 24, 2026

Sarah Ice, Director (A) Customer Service Division  
Federal Insurance Directorate, Federal Emergency Management Agency  
Via email to [sarah.ice@fema.dhs.gov](mailto:sarah.ice@fema.dhs.gov)

**Re: Industry Inquiries Regarding the NFIP's Direct-to-Consumer Tool**

Dear Sarah,

The National Flood Association (NFA), a national non-profit trade organization that serves to advance the common interests of the flood risk management community, is committed to promoting a strong and sustainable flood insurance framework that protects industry, taxpayers, and communities. As such, the NFA supports improvements to the availability and accessibility of flood insurance from the National Flood Insurance Program (NFIP) and commends the NFIP's efforts in this regard, which include the Direct to Consumer ("D2C") portal that is accessible via FloodSmart.gov. As D2C presents a new structure by which consumers may directly purchase flood insurance policies from the NFIP without engaging a licensed insurance agent, NFA's members have raised the following questions:

- How many NFIP policies have been purchased through D2C, without the assistance of an insurance agent? Of these, how many of them are for properties with mortgages?
- How are the addition of mortgagees, additional interests and mortgagee clauses handled? Is a copy of the policy sent to the named mortgagee and any other additional interests?
- How is the amount of coverage selected for the policy confirmed to meet the amount of coverage required when there is a mortgage?
- Who should mortgage servicers work with when the servicing of a mortgage transitions between financial institutions and/or when loan servicers require changes to the mortgagee clauses?
- How does FEMA ensure that the property information input by the consumer is correct for the subject property if underwriting factors are not reviewed by a licensed agent?
- In the event of a lapse in the NFIP or shutdown of government operations, how are processes for non-premium bearing endorsements and other policy transactions that are currently allowable during such a shutdown to be managed for policies purchased via D2C?

The NFA appreciates your consideration of these questions and the opportunity to engage in constructive dialogue to obtain further clarity on these D2C processes. We look forward to your response and to scheduling a call with the appropriate FEMA staff at their earliest opportunity.

Sincerely,



Leila A. Taha, Executive Director  
National Flood Association  
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