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**Addressing Affordability in the  
National Flood Insurance Program**

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Resources for the Future

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# Addressing Affordability in the National Flood Insurance Program

Carolyn Kousky and Howard Kunreuther<sup>1</sup>

## Abstract

With respect to the pricing of insurance, there is often tension between setting premiums that reflect risk and dealing with equity/affordability issues. The National Flood Insurance Program in the United States has recently shifted toward elimination of certain premium discounts which has raised concerns of affordability of coverage for homeowners. We examine these concerns through a case study of Ocean County, New Jersey, an area heavily damaged by Hurricane Sandy. We argue that the NFIP must address affordability, but that this should not be done through discounted premiums. Instead, we propose a means-tested insurance voucher program, coupled with a loan program for investments in hazard mitigation.

## 1. Introduction

Disaster events are costly to insure. The possibility of severe disasters in combination with the spatial correlation in losses often requires private insurers to set high premiums to cover the potential claim payments and administrative/marketing costs. For the case of homeowners with properties in hazard-prone areas, this has led to an ongoing tension between their requests for affordable insurance and the need for the private insurance sector to price catastrophic lines of coverage at premiums that reflect risk. In responding to this tension, many governments have subsidized the cost of insurance policies for property in hazard-prone areas (OECD 2008).

This challenge in offering insurance at premiums reflecting risk and its impact on the affordability of coverage is now a topic of discussion and debate with respect to the United States' National Flood Insurance Program (NFIP). The NFIP, housed within the Federal Emergency Management Agency (FEMA), offers flood insurance to residents and businesses in participating communities. Since Hurricane Katrina in 2005, the NFIP has been in debt billions of dollars to the US Treasury. In July 2012, the President signed the Biggert–Waters Flood Insurance Reform Act with overwhelming bipartisan support from Congress. This bill

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included provisions designed to improve the program's financial basis by eliminating several types of premium discounts.

The legislation takes the program a step closer toward premiums reflecting risk, so as to put the NFIP on a more financially sound footing. As higher premiums begin to be phased in around the country, however, many legislators are now wavering on their commitment to risk-based pricing for flood insurance over concerns that many of their constituents will not be able to afford coverage or are being treated unfairly.

This paper examines the current tension in the NFIP over risk-based premiums and issues of equity/affordability. The policies that are unfolding around this issue, while specific to U.S. flood insurance, offer lessons for other countries and other lines of disaster insurance that face similar challenges. We use Ocean County, New Jersey as a detailed case example to analyze the recent changes to the NFIP and its impact on affordability of insurance coverage for homeowners. We make the case that the NFIP must address affordability, but that this should not be done through discounted premiums. In their recent report, New York City has recognized the importance of insurance premiums that reflect risk, stating "the City will avoid falling into a common post-disaster trap: namely, calling for subsidized coverage, which may provide short-term benefits to the insured, but contributes to other adverse long-term consequences, including encouraging high-risk behavior," (City of New York 2013, 94). For low- and middle-income residents who cannot afford flood insurance coverage at risk-based premiums, we propose an explicitly means-tested voucher program, building on a proposal by Kunreuther (2008), and expanded upon by Kunreuther and Michel-Kerjan (2011) and Kunreuther, Pauly, and McMorro (2013). We propose coupling this voucher program with a loan program for investments in loss reduction measures, which would be tied to the property and made affordable through reductions in the NFIP risk-based premium.

The next section of this paper provides background on the NFIP and the Biggert–Waters reform bill. Section 3 discusses the role insurance can play in providing information to individuals on the risk that they face and encouraging them to adopt loss reduction measures. It also highlights ways of dealing with issues of equity and affordability in redesigning the NFIP by examining the types of programs currently in place for providing vouchers for other types of goods to low-income households. Coupling a voucher program with a mitigation loan program is likely to significantly reduce costs to homeowners and the federal government as illustrated in Section 4 through an analysis of homes in Ocean County, NJ subject to storm surge flooding from hurricanes. Section 5 presents our proposal of coupled voucher and loan program. The final section offers concluding thoughts and suggestions for future research.

## **2. Background on the NFIP**

The NFIP was created in 1968, partially in response to the perception that flood insurance was not widely available in the private market. The principal objectives of the NFIP are to support floodplain management in communities, encourage households to insure against flood losses, while achieving financial soundness in the long-run (Hayes and Neal 2011). The program was designed as a partnership between the federal government and local communities. Communities can voluntarily join the program by adopting a floodplain ordinance based on the most up-to-date flood hazard maps provided by FEMA. At a minimum, communities must require that new development and substantially improved or damaged properties in high hazard areas be built at or above the level of the 100-year flood. Only then is flood insurance made available

to residents in the community. As of September 2013, more than 5.54 million policies were in-force nationwide, representing just under \$1.29 trillion in coverage.

Currently, single-family residences can purchase up to \$250,000 of building coverage and up to \$100,000 of contents coverage. Businesses can purchase up to \$500,000 each of building and contents coverage. Prices for these policies vary by flood risk zone based on Flood Insurance Rate Maps (FIRMs) issued by FEMA. Special Flood Hazard Areas (SFHAs), where the annual risk of a flood is 1 in 100 or greater, are divided into two broad groups: A zones and V zones. V zones are subject to wave action, or storm surge, and have higher risk-based rates reflecting the higher expected damage and claims payments.

A household residing in an SFHA with a mortgage from a federally backed or regulated lender is required to purchase flood insurance for the life of the loan, but several data sources suggest that compliance with this requirement is not universally enforced and that compliance varies around the country (e.g., Kriesel and Landry 2004; Dixon et al. 2006; Kousky 2011). Rates in SFHAs vary with the characteristics of the structure, such as whether the home has a basement, the number of floors, and, importantly, the height of the lowest floor relative to base flood elevation (BFE)—the estimated height of floodwaters during a 100-year flood.

Premium discounts are given to any structure that was built before FEMA had mapped the flood risk in an area (referred to as pre-FIRM structures). The discounted premiums were designed to encourage greater participation in the program by both communities and individuals, and to not penalize homeowners who would otherwise see a sudden drop in property values. These discounts were never means-tested and not targeted at lower-income households (Kunreuther 1968; Pasterick 1998; Hayes and Neal 2011). FEMA estimates that policyholders with discounted premiums are paying roughly 40–45 percent of the full-risk price, although their premiums are often higher than structures adhering to building codes (Hayes and Neal 2011). Nationwide, FEMA estimates that roughly 20 percent of flood insurance policies receive premium discounts.

The program thus historically has had two classes of policyholders: those paying premiums based on modeling of the flood risk, and those receiving premium discounts. FEMA made the assessment in the 1980s that the combined revenue from these two classes of policyholders should be enough to cover losses from the “average historical loss year,” which was calculated as the mean annual loss over the life of the program. The program was given borrowing authority from the U.S. Treasury to cover higher-than-average loss years. In contrast, an actuarially fair premium set by a private insurance company would include consideration of catastrophic loss years in determining risk-based rates, as well as the cost of capital and the requirement to hold significant financial reserves.

Before Hurricane Katrina in August 2005, no catastrophic loss year had occurred in the program’s history that would have been large enough to substantially alter the calculation of the average historical loss. The NFIP paid out more claims in 2005, however, than it had paid out over the entire life of the program to that point (Hayes and Neal 2011). Fully including Katrina in the program’s loss experience would have increased flood insurance premiums significantly. FEMA did not want to take this step without the explicit support of Congress and, for this reason, gave 2005 a weight of only 1 percent in calculating the average historical loss year (Hayes and Neal 2011). After Katrina, the NFIP borrowing authority had to be increased to \$20.775 billion, where it stood until Hurricane Sandy. After Sandy, Congress increased the NFIP borrowing authority to more than \$30 billion. As of August 2013, this debt stood at almost \$24 billion. To date, Congress

has not forgiven the program's debt and so taxpayer money has yet to cover claims payments. Many argue, however, that such a bailout will ultimately be required given the size of the debt burden.

The significant NFIP debt following Hurricane Katrina generated broad interest in reforming the program. A consensus in Congress emerged around the need to eliminate the premium discounts to put the program on a sounder financial footing. In early July 2012, the Biggert–Waters Flood Insurance Reform Act reauthorized the NFIP program for five years through September 30, 2017; since 2008 it had been operating under multiple short-term extensions and had even been allowed to lapse. Although the legislation institutes many changes to the operation of the program, we focus here on the changes to the pricing of insurance policies.<sup>2</sup>

Under this new legislation, beginning in 2013, premiums are being increased 25 percent a year for non-primary residences, severe repetitive loss properties, and business properties until they reflect FEMA's best estimate of the flood risk. In addition, discounted rates will be eliminated for single-family households under the following conditions: a policy lapses, sale of a property, the property sustains substantial flood damage (defined as damage greater than 50 percent of the home's value), the property is substantially improved, or a new policy is purchased. Beginning with policy renewals in October 2013, elevation certificates are required for pre-FIRM discounted policies to ensure proper pricing since rates vary with the elevation of the structure above BFE. The GAO estimated that roughly 438,000 policies nationwide will see higher rates immediately; 715,000 policies will have their premiums remain at the current level until one of the triggers is met (GAO 2013). Starting in October 2014, routine rate revisions will also include a 5 percent assessment to help the program build a catastrophic reserve fund.

The legislation also calls for phasing out *grandfathering*, a practice that enabled homeowners to keep their old premiums when a new map reclassified them into a higher-risk zone. Going forward, for these newly classified properties, the rates of the higher-risk zone will be phased in at 20 percent per year until the risk-based price is reached. The affordability and equity concerns raised over the elimination of grandfathering are causing Congress to consider proposals to delay or revise this part of the Biggert–Waters reform bill.

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<sup>2</sup> Other provisions of the Biggert–Waters bill include the following: The cap on rate revisions was increased. Previously, the Federal Emergency Management Agency (FEMA) was allowed to increase rates by no more than 10 percent annually (averaged across classes of policyholders); the Biggert–Waters bill increases this limit to 20 percent. The lowest available deductible was raised to \$1,000 for post-FIRM (flood insurance rate map) properties with less than \$100,000 of coverage and \$1,250 for more than \$100,000 in coverage; for pre-FIRM properties, the corresponding deductibles are \$1,500 and \$2,000. The new law establishes a Technical Mapping Advisory Council to advise the program on map improvements (including improvements that address sea level rise) and a task force to align levee data from the U.S. Army Corps of Engineers with FEMA's levee accreditation program. Communities that are making progress on structural flood control measures to protect against the 100-year flood are to be given reduced rates. The legislation authorizes the National Oceanic and Atmospheric Administration to determine if hurricane damage is from flood waters or wind. The bill establishes a catastrophe fund into which FEMA will deposit funds during "good" years and explicitly authorizes FEMA to purchase private reinsurance. FEMA must develop a repayment plan for its debt. FEMA flood hazard mitigation grants have been combined into one program. Penalties on noncompliant lenders have been increased. Finally, the bill authorizes many studies related to various aspects of the program to inform the adoption of any more dramatic changes to program design and operation.

### 3. The Role of Insurance and the Affordability/Equity Challenge

A well-designed flood insurance program can play an important role in linking investments in loss reduction measures with financial protection to cover damage from disasters. The insurance premium itself can act as a powerful signal as to the likelihood of a loss and encourage investment in mitigation measures if homeowners can receive premium reductions reflecting the resulting reduction in expected claim payments following a disaster. In other words, *insurance premiums should reflect risk* to signal to individuals how safe or exposed they are, and the extent to which preventive or protective measures will reduce their vulnerability to property losses. As discussed above, Biggert–Waters takes an important step in this direction by requiring risk-based premiums on a slice of properties that had historically been charged discounted premiums.

If risk-based premiums are phased in for policyholders, some residents will be faced with large price increases either because they are currently buying coverage at subsidized rates and/or because new floodplain maps indicate that they now have a higher flood risk than previously specified. These projected premium increases raise issues of affordability and equity. For some lower-wealth homeowners residing in the floodplain, higher premiums will impose an unexpected financial burden. Others may feel that they should not be required to pay much higher premiums than they had previously even if they can afford the new rates. For insurance to play its desired role, insurance vouchers financed by general taxation may be the best way to address these concerns. Low-interest loans and/or vouchers could encourage investment in loss-reduction measures that will result in lower premiums. There are several existing programs that could serve as models for developing such a voucher system and we briefly review them here.

***Housing Choice Voucher (HCV) Program***<sup>3</sup> This is the federal government's primary program for assisting very low-income families, the elderly, and the disabled so that they can afford decent, safe, and sanitary housing. The vouchers are given to families so they can use the private market to find a place to live. HCVs are administered locally by public housing agencies (PHAs) that receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the program.

Families choose where to live and are encouraged to consider several housing choices for meeting the family's needs. To be eligible for a housing voucher, the family's income may not exceed 50 percent of the median income for their county or metropolitan area. By law, a PHA must provide 75 percent of its vouchers to applicants whose incomes do not exceed 30 percent of the area's median income. The PHA inspects the property to determine that it meets an acceptable level of health and safety and that the rent is reasonable. The amount of the voucher is determined based on local housing markets. A family is required to pay 30 percent of its adjusted gross income toward housing-related expenses.

***Food Stamp Program***<sup>4</sup> Under the federal food stamp program, a family is given vouchers to purchase food based on their annual income and family size. The idea for the program was born in the late 1930s, revived as a pilot program in 1961, and expanded nationwide in 1974. Its current structure was implemented in

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<sup>3</sup>[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/programs/hcv/about/fact\\_sheet](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/about/fact_sheet) provides for more details on housing cost vouchers

<sup>4</sup> [http://www.frac.org/html/federal\\_food\\_programs/programs/fsp.html](http://www.frac.org/html/federal_food_programs/programs/fsp.html) provides more details on the food stamp/SNAP program.



1977 with the goal of alleviating hunger and malnutrition by permitting low-income households to obtain a more nutritious diet through normal purchasing of food from grocery stores.

On Oct. 1, 2008, the federal Food Stamp Program was renamed the Supplemental Nutrition Assistance Program (SNAP). The federal government funds the program and shares administrative costs with the states. As of August 2013, more than 47.6 million individuals participated in the program. SNAP is currently up for renewal as part of the 2013 Farm Bill with proposals by the House to cut nearly \$40 billion in funding for the program over 10 years and by the Senate to cut \$4.1 billion over 10 years on top of the elimination of a temporary increase in food stamp payments that was part of the stimulus bill.

**Low Income Home Energy Assistance Program (LIHEAP)<sup>5</sup>** The mission of this program is to assist low-income households in meeting their immediate energy needs. Funding is provided by the federal government but is administered by the states to help eligible low-income homeowners and renters pay heating or cooling expenses. Eligibility is based on similar criteria used for the food stamp program. The federal government became involved in awarding energy assistance funds to low-income households program as a result of the increase in oil prices resulting from the Organization of Petroleum Exporting Countries (OPEC) oil embargo in 1973. Approximately \$2.9 billion in federal funds has been allocated to the program in fiscal year 2014.

**Universal Service Fund (USF)<sup>6</sup>** The Federal Communications Commission created the USF in 1997 to ensure that consumers in all regions of the nation have access to telecommunications services that are reasonably priced, relative to those in urban areas. To achieve this goal, the USF provides discounts that make basic, local telephone service affordable to low-income consumers in high-cost rural areas. The program pays up to \$30 of the telephone service installation fees, and provides up to \$200 for a one year, interest-free loan for any additional installation costs. It also provides discounts of up to \$10 per month for phone service depending on the location. All telecommunication carriers that provide service internationally and between states pay contributions into the USF. The carriers may build this factor into their billing systems if they choose to recoup this amount from their customers.

We suggest, similar to these programs, that any vouchers to help cover the costs of flood insurance for low-income households come from general taxpayer funds. This financial arrangement implies that everyone in society has some responsibility for providing assistance to those who need special treatment.

#### **4. A Case Study of Ocean County, New Jersey**

We motivate our voucher and loan proposal with a case study that focuses on the affordability of flood insurance in Ocean County, New Jersey. We chose to study Ocean County since it was hard hit by Hurricane Sandy, has many NFIP policies-in-force, and also has a substantial middle-income or low-income population. However, these issues are not unique to Ocean County or coastal New Jersey. Similar concerns about the affordability of flood insurance have been raised in Boston and surrounding areas, the Outer

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<sup>5</sup> For more details on the LIHEAP program go to <http://www.acf.hhs.gov/programs/liheap/>

<sup>6</sup> For more details on the USF program go to [http://en.wikipedia.org/wiki/Universal\\_Service\\_Fund#Low\\_income](http://en.wikipedia.org/wiki/Universal_Service_Fund#Low_income)

Banks of North Carolina, southern Mississippi, southern Louisiana, and New York City (e.g., Conti 2013; Hampton 2013; Lee 2013; McCormick 2013; City of New York 2013; Wharton Risk Center 2013).

Ocean County, immediately north of where the center of Sandy came ashore, sustained heavy damage from the storm; FEMA estimates that roughly half the damage in New Jersey occurred there, with 40,000 damaged buildings.<sup>7</sup> The total taxable base in Ocean County reportedly fell \$3.6 billion due to the storm (O'Neill 2013). Several communities in the county were especially devastated. Toms River residents were not allowed back for months, and an estimated 90 percent of homes were damaged. Images from Seaside Heights made headlines, particularly the iconic roller coaster that fell off the pier into the ocean during the storm; about 60 percent of residences in the town were damaged (O'Dea 2013). Ocean County has a number of vacation and second homes. Among full-time residents, however, many are lower-income or retired, such that substantial increases in flood insurance rates could be a challenge. The U.S. Census Bureau estimates that over 21 percent of county residents are more than 65 years old, in contrast to 14 percent for the state of New Jersey as a whole. The homeownership rate is over 80 percent, higher than the state average of 67 percent; the median value of owner-occupied housing units is \$284,100 compared to \$349,100 for the state as a whole. Although the 9.5 percent of county residents below the poverty line is quite close to the state average, the median household income is roughly \$10,000 less, at \$60,700.

The analysis in this section uses quantitative information from the following sources: data provided to us by FEMA on NFIP policies sold in 2012, socio-demographic and economic data from the U.S. Census Bureau's American Community Survey<sup>8</sup> at a census-tract level, and estimates of storm surge inundation from Hurricane Sandy produced by the FEMA Modeling Task Force based on U.S. Geological Survey field data.<sup>9</sup>

#### *4.1. Take-up Rates and Premiums before Sandy*

In 2012, more than 238,600 NFIP policies were in force in New Jersey. The vast majority of those policies were in the four counties that have ocean shoreline: Monmouth, Ocean, Atlantic, and Cape May, all of which experienced surge damage from Sandy. In Ocean County in 2012, there were nearly 53,000 policies-in-force, including slightly more than 44,000 single-family residential policies. Still, prior to Hurricane Sandy, many households in flood-prone communities failed to purchase flood insurance. Using data from FEMA on NFIP policies-in-force in 2012, coupled with an estimate of the total households in each census tract, we calculate the take-up rate for residential policies by tract in Ocean County. Since we do not have data on the number of households located in SFHAs, take-up rates are estimated across the entire census tract.

Figure 1 shows take-up rates for residential properties in Ocean County census tracts along with an estimate of the extent of the storm surge from Hurricane Sandy. Take-up rates in the county covered the entire spectrum, based largely on proximity to the coast. Countywide, the mean take-up rate was almost 20 percent and the median was less than 2 percent. For tracts that experienced some surge, the mean take-up

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<sup>7</sup> Reported online by the Robert Wood Johnson Foundation ("'Unprecedented Destruction': Ocean County Public Health Continues to Respond to Hurricane Sandy"): [http://www.rwjf.org/en/blogs/new-public-health/2013/03/\\_unprecedented\\_destr.html](http://www.rwjf.org/en/blogs/new-public-health/2013/03/_unprecedented_destr.html).

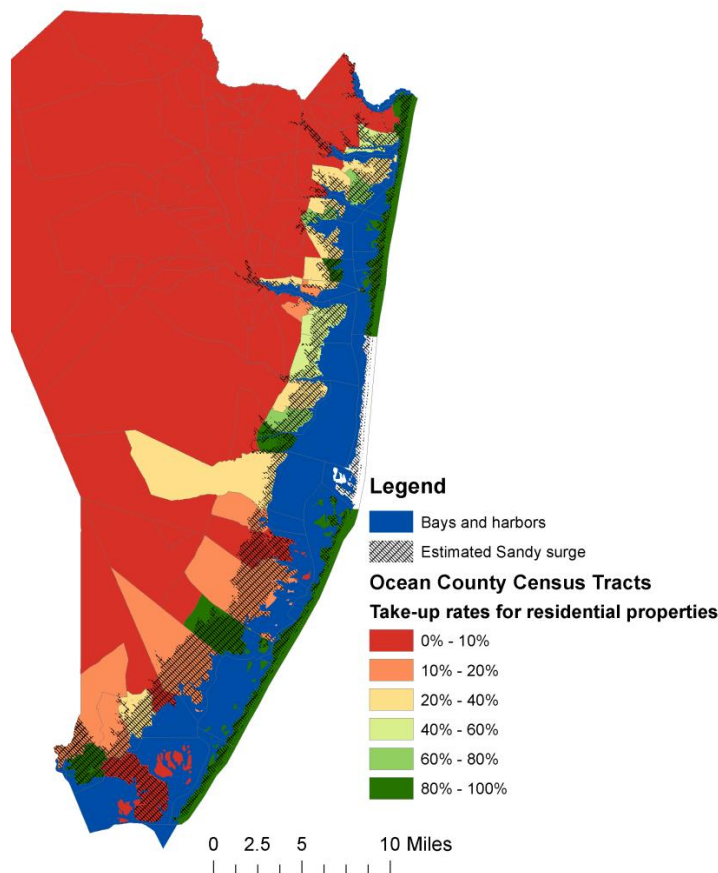
<sup>8</sup> The U.S. Census Bureau provides GIS shapefiles that couple the American Community Survey five-year estimates to census tracts. We downloaded these data for the 2007–2011 estimates (the most recent available) for the state of New Jersey (<http://www.census.gov/geo/maps-data/data/tiger-data.html>).

<sup>9</sup> Thanks to H.E. "Gene" Longenecker, III, for providing these data.

rate was 34 percent and the median was almost 14 percent. As seen in the figure, tracts along the ocean tended to have very high take-up rates, between 80 percent and 100 percent. It appears that those facing the highest risk of storm surge in Ocean County purchased a flood insurance policy; this may reflect the effect of the mandatory purchase requirement in SFHAs: a higher percentage of the area in tracts near the ocean are in these areas compared to tracts further inland. Note that the one tract in Figure 1 that is not shaded along the ocean is largely state protected lands with no properties. The land in the bay at the southern end of the map is also largely not developed.

For comparison, we find that the average take-up rate for flood insurance across the state was only 6 percent, the average take-up rate in tracts that experienced at least some surge from Sandy throughout the state was almost 15 percent, and the average take-up rate for tracts on the ocean was 75 percent.<sup>10</sup> Roughly 40 census tracts (out of more than 2,000 in the state) had take-up rates quite close to 100 percent in New Jersey, and almost all of them are located on the ocean coast.

**Figure 1. Take-up Rates for Residential NFIP Policies in Ocean County, New Jersey**



<sup>10</sup> Our calculation includes condominiums and mobile homes in both the numerator and denominator. In areas having multistory buildings, however, take-up rates among those at risk will be underestimated because residents on higher floors are counted in the denominator, but they will not be at risk of suffering flood damage. The take-up rates for high-risk households are likely to be underestimated since we do not have data on the number of structures in the floodplain by census tract and so must estimate take-up rates across the entire tract.

#### 4.2. Increasing Rates: Biggert–Waters and Revised Hazard Maps

Prior to the phase-in of Biggert–Waters rate changes and the adoption of new maps, median premiums in Ocean County for single-family homes were \$806 for A zones, \$3,144 for V zones, and \$376 for X zones (outside both the 100-year and 500-year flood zones). These are similar to insurance premiums rates nationwide. The most recent actuarial rate review provides the average annual premiums across the country for non-discounted policies: \$513 in A zones, \$3,088 in V zones, and \$417 outside of SFHAs (Hayes and Neal 2011).<sup>11</sup>

Some coastal New Jersey homeowners will see their premiums increase over the next several years if the provisions of the Biggert–Waters Flood Insurance Reform Act continue to be implemented. As discussed above, pre-FIRM property currently receiving a discounted premium will have this subsidy phased out if the property is sold or the owner lets his flood insurance policy lapse. Discounts will also be phased out for nonprimary residences (i.e., second homes) and for property that suffered substantial flood damage from Hurricane Sandy. FEMA estimates that in census tracts that experienced some damage from Sandy in Ocean County, the percentage of households with major or severe damage ranges from around 10 percent to almost all properties in the Township of Toms River and the Township of Brick (New Jersey Department of Community Affairs 2013).

FEMA estimated that 17,984 properties in Ocean County, New Jersey currently receive a premium discount.<sup>12</sup> This represents almost 34 percent of the total number flood insurance policies in the state and is greater than the nationwide average of 20 percent. These data were provided to us at the community, or municipal, level. Figure 2 shows the distribution of the number of discounted policies across municipalities in Ocean County as of January 2013. The color indicates the absolute number of discounted policies in a municipality, and the figure written within each is the percentage of policies-in-force that is discounted. The highest percentage of discounted policies (73 percent) is in South Toms River Borough.<sup>13</sup> Little Egg Harbor Township has the second highest (57 percent). Whereas only 11 percent of homes in South Toms River had major or severely damaged homes, in the Township of Little Egg Harbor, it was 90 percent.

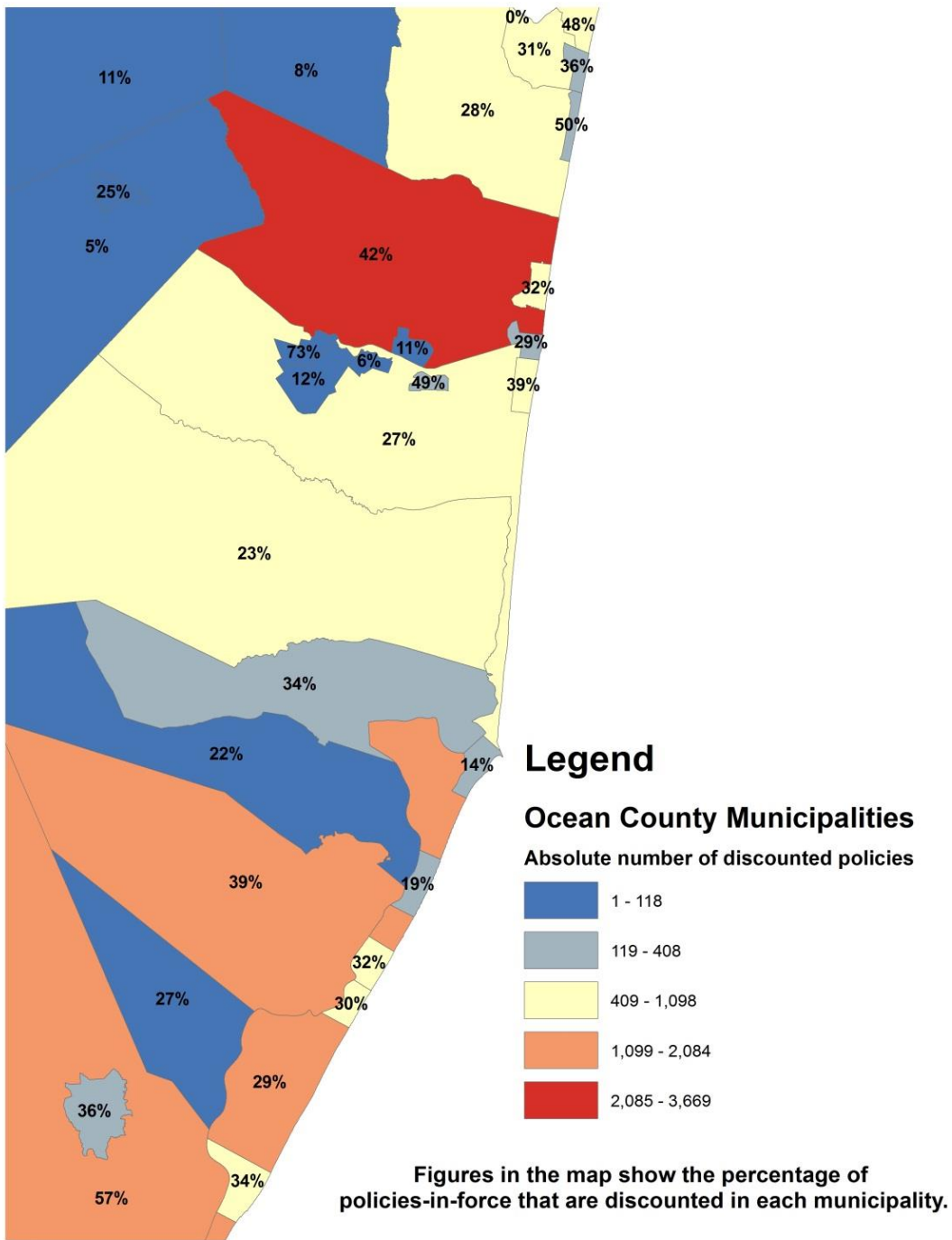
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<sup>11</sup> These non-discounted premiums are similar to the averages for the state of New Jersey. Out of all the policies in the state in 2012, the median premium for A zones was slightly more than \$1,000, the median premium for V zones was more than \$3,200, and the median premium in an X zone was \$405.

<sup>12</sup> We thank Tim Scoville, Kevin Montgomery, and Michael Miles for providing these data.

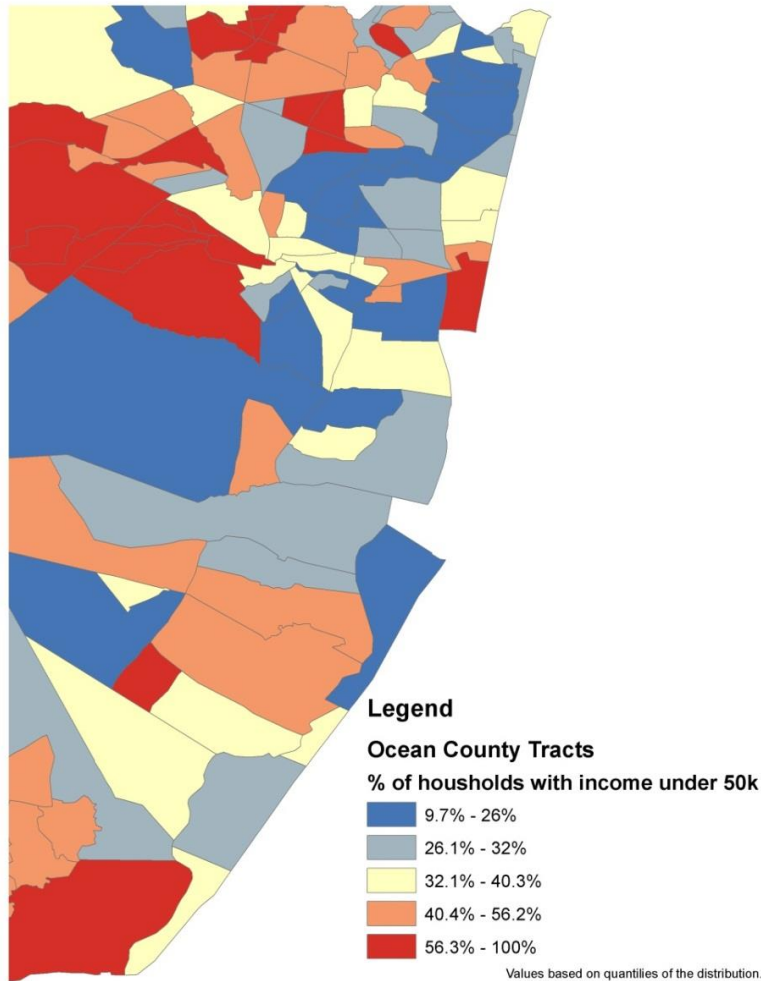
<sup>13</sup> Note that South Toms River is distinct from Toms River.

Figure 2. Discounted Policies in Municipalities of Ocean County, New Jersey



Full elimination of the premium discounts could more than double rates, on average. The median pre-FIRM annual premium for single-family homes in Ocean County in 2012 was \$1,238. If we assume that this rate was 40 percent of the full-risk rate, the new risk-based premium of \$3,095 would be roughly 5 percent of the median income in the county, which is \$60,700. Although some families will be able to afford these increases, it will be a burden for others. Figure 3 shows the percentage of households by census tract making less than \$50,000 a year. The percentage differences illustrate the heterogeneity with respect to the percentages of low- to middle-income households where affordability is likely to be a concern.

**Figure 3. Percentage of Households Earning Less than \$50,000 per Year by Census Tract**

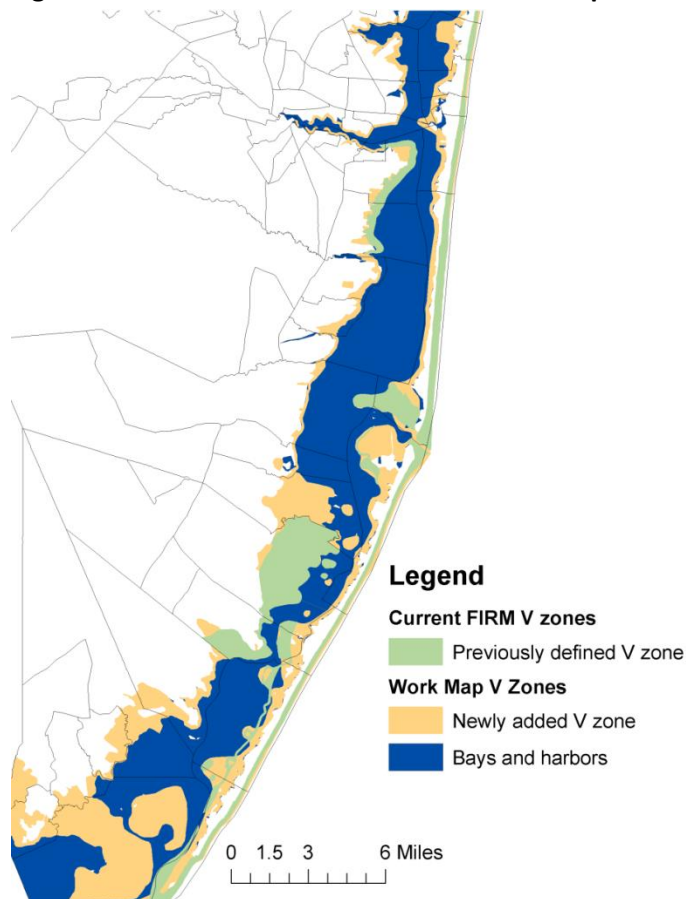


Another reason why premiums will increase for many homeowners is the adoption of the new flood maps coupled with the elimination of grandfathering under Biggert–Waters. Prior to Sandy, FEMA had been in the process of updating the FIRMs for coastal New Jersey and New York. Before final maps are released, FEMA can issue advisory maps (akin to first drafts) and then update these to work maps and then to the final FIRM. Advisory maps for coastal New Jersey and New York were issued within two months after Sandy to guide rebuilding activity due to damage from the hurricane. The previous maps had not been revised in more than 25 years. The remapping incorporates recent data, improved methodology for mapping coastal

flood hazards, and any changes in conditions such as erosion, since the old maps were produced. The advisory maps showed a much-expanded SFHA, which upset residents in these areas who would have to pay significantly higher rates when the maps were finalized.

In June 2013, FEMA updated the advisory maps to work maps for some areas, including Ocean County. These work maps *reduced* the expanded high hazard area of the advisory maps in almost all locations. These work maps, one step closer to being final, still do not yet influence rate setting, but will in the near future when they are finalized and adopted by the communities. FEMA reported that the V zone shrank in the work map Ocean County by 45 percent over the advisory maps (CBS 2013). This indicates the advisory maps had been overly protective in defining the high risk zones. In Ocean County, the entire SFHA in the work maps does not differ dramatically from that of the current FIRM; however, the V zones have expanded in relation to the current FIRM but less so than in the advisory maps. Figure 4 shows the V zones on the current FIRM in Ocean County as well as the newly defined V zones on the work maps. In 2012, 47,755 policies were in Ocean County's A zones and 1,140 were in V zones. Using parcel data for Ocean County,<sup>14</sup> we calculate that 4,503 parcels intersect the V zone in the original maps, and 11,294 intersect the V zone in the work maps, an increase of almost 6,800 structures over the current FIRM.

**Figure 4. V Zones in Current FIRM and Work Map**



<sup>14</sup> These data are made available to the public online by the New Jersey Office of Information Technology and the Office of Geographic Information Systems.

The question homeowners are asking is, “What will finalized flood maps mean for my insurance premium?” Premiums vary across A and V zones and also depend on the difference between the height of the home and the estimated base flood elevation (BFE). The advisory and work maps recently released by FEMA have updated BFEs. Currently, these are referred to as advisory BFEs, or ABFEs. When the new maps are finalized, the updated BFEs will be used for setting rates. In the meantime, the state of New Jersey has required the use of ABFEs for the reconstruction of substantially damaged homes to ensure that rebuilding will conform to the newer hazard information. Without precise elevation data for each property to compare to the estimated BFEs on the advisory and work maps, it is difficult to say how many homeowners will discover that their properties are below the updated BFEs.

For those homes whose elevation is below the BFE, so-called *negatively elevated properties*, premiums could be quite high. Using the rates set in the 2013 *Flood Insurance Manual* (FEMA 2013), we calculated annual insurance premiums for A and V zone properties at various elevations relative to their BFEs as shown in Table 1.<sup>15</sup> We consider a post-FIRM, one- to four-family residence purchasing \$250,000 coverage. The 2013 rates include the new 5 percent catastrophe reserve charge from Biggert–Waters. The premiums for A zone properties are a function of the number of stories and whether the property has a basement. The range of premiums for the V zone properties depends on the ratio of the amount of coverage purchased relative to the replacement value of the property. FEMA does not currently provide premium estimates for A zone properties more than one foot below BFE or for properties in V zones more than three feet below BFE.

**Table 1. 2013 NFIP Annual Premiums for a post-FIRM, One- to Four-Family Residence Purchasing \$250,000 Coverage**

	<i>3 feet below BFE</i>	<i>1 foot below BFE</i>	<i>At BFE</i>	<i>1 foot above BFE</i>	<i>4 feet above BFE</i>
<i>A zone</i>	Not rated	\$2,199– \$4,483	\$778– \$1,315	\$429– \$616	\$296
<i>V zone</i>	\$13,950– \$23,150	\$8,950– \$15,925	\$6,750– \$12,050	\$4,675– \$8,725	\$2,050– \$4,150

V zones have higher rates than A zones because of the storm surge risk. Rebuilding is also more costly because there are stricter codes in V zones than in A zones. More specifically, A and V zone properties must be elevated to the BFE, but V zone properties must also be protected against wave action, wind, and erosion. V zone properties must be raised on pilings, whereas A zone properties could have a foundation or crawl space below BFE.

<sup>15</sup> FEMA has commissioned a study by the National Academy of Sciences on the rating for negatively elevated properties, so these premiums could change in the future. More information on the study can be found online at: <http://www8.nationalacademies.org/cp/projectview.aspx?key=49587>



## 5. Lowering Premiums through Hazard Mitigation

Insurance premiums can be made more affordable through hazard mitigation. Elevating a house so it is above BFE could save thousands, if not tens of thousands, of dollars on annual flood insurance premiums as shown in Table 1;<sup>16</sup> however, it is an expensive mitigation measure. A recent *New York Times* article estimated that the cost of elevating a house can range from \$10,000 to \$100,000 depending on its size, weight, and when it was built (Harris 2013). One company in New Jersey that elevates homes estimates on its website that the average cost is \$45,000 to \$50,000, and another New Jersey company offers a range of \$30,000 to \$100,000.<sup>17</sup>

Homeowners have four sources of potential government funding to assist them in elevating their properties. First, a homeowner could apply for a subsidized disaster loan from the Small Business Administration (SBA) to cover the costs of repair to his or her property after a disaster. The amount of the loan can be increased by up to 20 percent of the total disaster damage if the additional funds are used to make hazard mitigation improvements to the property, such as elevating it.<sup>18</sup>

Second, a homeowner with an NFIP policy whose property was substantially damaged (meaning that repairs will cost at least 50 percent of the building's pre-disaster value) may be eligible to receive Increased Cost of Compliance (ICC) payments (a coverage included in most standard NFIP policies) of up to \$30,000 to reimburse the costs of bringing a structure into compliance with building regulations in place.<sup>19</sup> In communities that have adopted the new ABFEs, ICC funds will be available to help homeowners elevate to the required levels. In communities that have not adopted the ABFEs, however, funds will be available only to comply with the effective FIRM. Further, the total cap on insurance claims for flood damage to residential structures is \$250,000 (the coverage limit), and ICC funds are not available to cover property damage in excess of this cap.<sup>20</sup>

Third, Hazard Mitigation Grant Program (HMGP) funds are made available to states by FEMA following a presidential disaster declaration to fund hazard mitigation measures that pass a cost-benefit test. Local governments can develop projects for the use of HMGP funds and submit their proposals to the state. If a community applies for and receives HMGP funds for elevating structures, residents of that community could potentially obtain financial assistance to help fund a portion of the costs of undertaking this measure.<sup>21</sup>

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<sup>16</sup> The NFIP currently gives reductions in premiums when homes are elevated. There are other hazard mitigation options that may be cost-effective for reducing flood damages, but for which the homeowner would not receive a discount on their NFIP premium. This is why we focus our attention on home elevation. On the costs of different flood management strategies for New York City, see Aerts et al. (2013).

<sup>17</sup> See LBI House Raising's "Frequently Asked Questions" (<http://lbihouseraising.com/faqs/>) and Axis Builders, LLC's "Cost To Raise a House in NJ" (<http://www.njhouseraising.com/index.php/cost-to-raise-your-home>).

<sup>18</sup> For more on Small Business Administration loans and other disaster aid available to homeowners, see Kousky and Shabman (2012).

<sup>19</sup> For more on the ICC program, see: [www.fema.gov/library/viewRecord.do?id=1477](http://www.fema.gov/library/viewRecord.do?id=1477). Legislation passed in 2004 allowed this coverage to be used to cover the nonfederal cost-share component associated with FEMA mitigation grants, even in the absence of a flood loss.

<sup>20</sup> If a home with coverage of \$250,000 is totally destroyed and FEMA inspections indicate that a claim of \$250,000 is warranted, no extra Increased Cost of Compliance (ICC) funds will be available for the homeowner. We thank Jeffrey Woodward of FEMA for helpful comments on the use of ICC funds.

<sup>21</sup> More details on the HMGP can be found on FEMA's website at: <http://www.fema.gov/hazard-mitigation-grant-program>.

A fourth potential source of funds is Community Development Block Grants. The supplemental legislation passed after Sandy funneled substantial amounts of money to affected states through Community Development Block Grants. Plans on the use of the funds must be developed and approved by the Department of Housing and Urban Development (HUD). If plans include elevating homes, this could be another source of funds with which homeowners might mitigate future flood damage to their properties—should they apply and receive funding.<sup>22</sup>

### *5.1. Designing a Coupled Voucher and Mitigation Program*

As discussed above, the NFIP has historically given premium discounts to make insurance less costly, but these were never means-tested or targeted to low-income property owners. Here, we propose using vouchers, rather than relying on pre-FIRM discounts and grandfathering, to address the affordability problem.<sup>23</sup> We suggest coupling means-tested vouchers with hazard mitigation requirements to be financed with low-interest loans. By requiring hazard mitigation, future disaster losses would be reduced both for the NFIP and for low- and middle-income families. We suggest limiting this program to homeowners in A and V zones, the two zones where insurance is required as a condition for a federally insured mortgage.<sup>24</sup> Second homes would not be eligible for vouchers.

Such a voucher program has two key aspects. First, it operates in parallel with risk-based premiums that are essential for communicating information about flood risk to communities, developers, and residents. Second, vouchers (based on the household's income) are used not only to cover a portion of the increased insurance premium, but also to cover the costs of the loan for mitigating damage to the residential property.

The amount of the combined insurance and loan voucher would be determined using a sliding scale based on annual family income.<sup>25</sup> For instance, if income is less than \$X, the household could pay \$Y toward an insurance policy where \$Y is an amount considered to be affordable. If the NFIP premium is higher than \$Y, the voucher would be the difference between the NFIP premium and \$Y. The federal government could cover the costs of this voucher, or a fee could be assessed on all NFIP policies. A national dialogue is required to determine who should bear the costs of making flood insurance affordable to those in need.

We recommend that this voucher system be independent of the NFIP. Hence, it may be more appropriate to locate it within HUD, rather than FEMA since HUD operates the Housing Choice Voucher program described in Section 3 that provides a model for how such a system could work for flood insurance as noted by the Association of State Floodplain Managers (2013). In the HUD program, the Public Housing Agency determines a payment standard as the amount needed to rent a moderately priced unit in a given housing market. Eligible families are expected to pay 30 percent of their adjusted gross income toward rent and utilities. The voucher is generally the difference between the payment standard and 30 percent of the family's adjusted gross income.

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<sup>22</sup> More details on the disaster related CDBGs can be found on the HUD website: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/communitydevelopment/programs/drsl](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/drsl).

<sup>23</sup> The same concepts for addressing affordability issues could be used to deal with equity or fairness concerns.

<sup>24</sup> Flood insurance rates in other zones are likely to be relatively inexpensive so that affordability issues are unlikely to arise there.

<sup>25</sup> One may also want to modify the size of the voucher based on total family assets.

Before implementing a voucher program for the NFIP, research would need to be conducted to identify a reasonable percentage of gross income that could be allocated to flood insurance. To illustrate how such a voucher system would operate, we assume that this percentage is determined to be 5 percent. In this case, a family earning roughly the median Ocean County income of \$60,000 a year could pay up to \$3,000 toward their NFIP policy. If they lived in a V zone with their property at BFE and an insurance premium of \$6,700, then they would receive a voucher for \$3,700.

Certain hazard mitigation measures can reduce the risk of damage to properties in a flood event that could then be translated into a premium reduction. The much lower NFIP rates for homes elevated above BFE provide a financial incentive to invest in this mitigation measure if the annual cost of a loan to elevate a property is less than the annual savings in NFIP premiums. Many homeowners may thus elect to obtain a loan from the SBA or a private institution and mitigate their homes. If a homeowner is receiving a voucher to cover the costs of flood insurance, however, she may have a reduced incentive to take the loan and make the necessary investments in hazard mitigation because she will not reap the benefits financially of a reduced premium.

This is why we propose that the voucher program be coupled with mitigation requirements and a loan program. To be eligible for the voucher, standards would be adopted for the required level of mitigation. This could simply be compliance with the baseline floodplain management ordinances discussed above.<sup>26</sup> Policyholders would then be given a low-interest loan, perhaps through the SBA, to invest in the necessary mitigation. This loan would be repaid via the reduction in insurance premiums, ultimately reducing the amount of the voucher over time. The following examples illustrate how the program would work.

Consider two single-family property owners, one in an A zone and one in a V zone, both purchasing an NFIP policy for \$250,000 of coverage. Assume that each property is three feet below BFE, such that the annual premium for the A zone resident is \$4,000,<sup>27</sup> and the annual premium for the V zone resident is \$18,550. Further assume, for the sake of this example, that each homeowner is eligible for a flood insurance voucher and currently makes \$50,000 a year. Using 5 percent of gross income as our measure, these individuals would be expected to pay \$2,500 toward flood insurance. If no hazard mitigation were undertaken, the A zone resident would receive a flood insurance voucher for \$1,500, and the V zone resident would receive one for \$16,050. This is summarized in the top panel of Table 2.

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<sup>26</sup> As stated above, we focus on elevating houses since that is a mitigation activity for which homeowners currently receive a premium discount in the NFIP. We are not aware of any study evaluating whether these premium reductions are commensurate with the reduction in expected damage from future flooding. FEMA may want to consider the cost-effectiveness of other hazard mitigation measures and provide premium discounts to reflect the reduced flood-related damage to the property and contents. The Insurance Institute for Building and Home Safety has several recommendations on their website of flood loss reduction measures such as raising electrical outlets, installing a backflow valve, and making sure the grading in the yard directs water away from the building (see: <http://www.disastersafety.org/flood/prepare-respond-recover/>).

<sup>27</sup> Although the 2013 *Flood Insurance Manual* does not have an A zone rate for properties three feet below base flood elevation, we made a conservative extrapolation.

**Table 2. Example Calculation of Costs of Mitigation Loan and NFIP Premiums**

	A zone property	V zone property
<i>Insurance voucher without mitigation</i>		
Premium 3 feet below BFE	\$4,000	\$18,550
Homeowner pays	\$2,500	\$2,500
Flood insurance voucher provided by the federal government	\$1,500	\$16,050
<i>Insurance voucher with mitigation</i>		
Cost to elevate 1 foot above BFE	\$25,000	\$55,000
Annual loan payment (3%, 20 years)	\$1,680	\$3,660
Premium 1 foot above BFE	\$520	\$6,700
Homeowner pays	\$2,200	\$2,500
Combined insurance and loan voucher provided by the federal government	\$0	\$7,860
Total savings from mitigation	\$1,800	\$8,190

Now, link the insurance voucher program to hazard mitigation. Under our proposed program, to qualify for the insurance voucher the homeowner would be required to elevate the house and would be given an SBA loan for this purpose. The voucher would cover the combined costs of the annual loan payment and the insurance premium in excess of \$2,500. The voucher is tied to the individual and their income level, but the loan would be attached to the property so that it would be transferred should the property be sold.

Assume that the requirement for receipt of the voucher is that the homeowner must elevate the property to one foot above BFE and that the cost of elevation is \$25,000 for the A zone property and \$55,000 for the V zone property.<sup>28</sup> Both residents receive a 20-year loan at a 3 percent rate<sup>29</sup> to cover these costs, resulting in annual payments of \$1,680 and \$3,660, respectively. Once the homes are elevated, annual NFIP premiums drop to \$520 for the A zone resident and \$6,700 for the V zone resident.

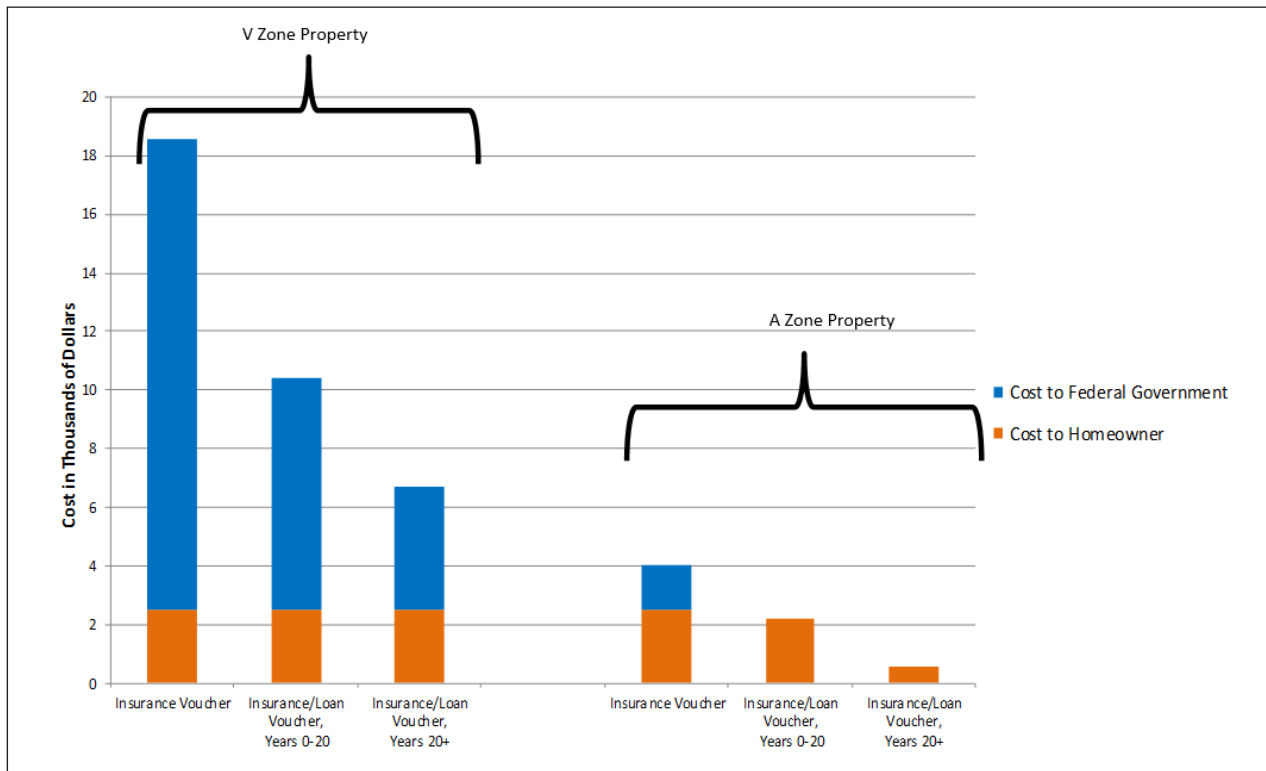
After elevation, no voucher is required for the A zone resident because the coupled loan payment and premium, at \$2,200, is less than the \$2,500 that the homeowner is required to pay (based on income) for insurance. The total cost to the homeowner of elevating her house is less than what she would pay for insurance when her house is not elevated (\$2,500). For the V zone resident, after mitigation, the combined payment for the loan and premium payment is \$10,360; the homeowner pays \$2,500 and the federal government pays \$7,860. This is summarized in the bottom panel of Table 2.

<sup>28</sup> Elevating at the time of new construction can be less expensive than renovating existing homes.

<sup>29</sup> These rates could vary depending on the SBA's determination of whether the individual can obtain credit elsewhere. If the SBA determines an individual can obtain credit elsewhere, the interest rate is currently 5% and is 2.5% for those unable to obtain credit elsewhere (see: <http://www.sba.gov/content/disaster-loan-program>).

Figure 5 shows the costs of the insurance-only voucher and the combined insurance and loan voucher. It also shows the payments after the loan has been fully repaid. The savings from coupling mitigation with the insurance voucher are quite substantial, as shown in the figure and in the last row of Table 2. During the life of the loan, the total annual savings (the difference between the premium with no mitigation and the combined loan and premium after mitigation) are \$1,800 for the A zone property and \$8,190 for the V zone property.

**Figure 5. Cost of Program to the Federal Government and a Hypothetical Homeowner**



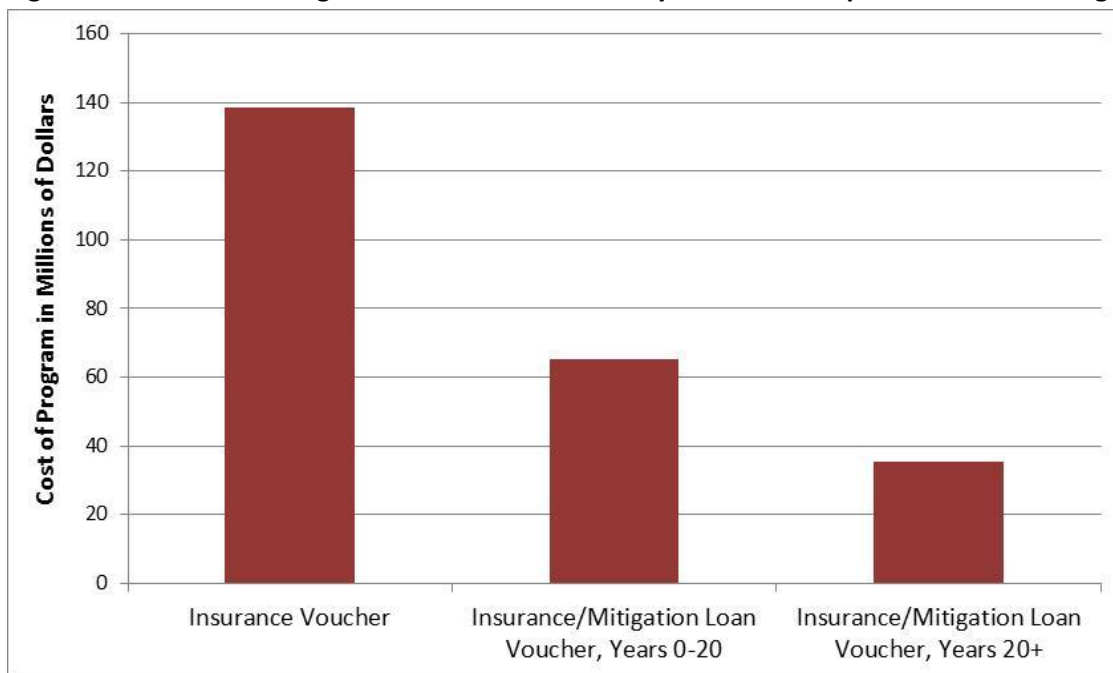
Everyone benefits from this program. The homeowner has affordable annual payments and a safer home. The NFIP has lowered its exposure through mitigation and has improved its financial soundness through pricing that is closer to risk based. The financial institution providing the mortgage to the homeowner has a more secure investment because expected losses from a flood event are reduced. And the general taxpayer benefits from a potentially reduced need for disaster aid or bailouts of the NFIP.

One complication to consider in the design of such a program is what would happen to a mitigation loan if the homeowner moved. We recommend that (a) the insurance voucher be tied to the policyholder and his or her income level and (b) the mitigation loan be tied to the property and thus taken over by the new homeowner. The new resident would need to apply for a voucher based on his or her income; the loan payment would be part of the mortgage.

Estimating the number of homeowners nationwide that would qualify for vouchers would require a detailed analysis of income levels and the distribution of households in relation to flood risk. As a starting point, we calculated the cost of vouchers for low- to middle-income residents in Ocean County in census tracts that experienced at least some storm surge from Hurricane Sandy. Data from the American

Community Survey enabled us to identify the total number of households in various income brackets. We focus on annual income brackets less than \$50,000 a year (2011 dollars). Using the mean income of the bracket and the threshold of being able to pay 5 percent of one’s income toward insurance, we calculate the amount of the voucher based on the elevation costs detailed in Table 1. We assume a take-up rate equal to the mean of these tracts of 34 percent and assume an even split between A and V zone properties. These rough estimates of total cost are shown in Figure 6.

**Figure 6. Estimates of Program Costs for Ocean County Tracts That Experienced Storm Surge**



This proposed program would need to be complemented by a broader array of policies related to flood risk management. For example, our proposal is likely to increase insurance penetration and mitigation activity by low-income individuals, but it does not address community-level hazard mitigation investments. Land use regulations, building codes, warning systems, and other investments, such as constructing sea walls, dunes or levees, should be considered in the suite of policies related to managing hurricane or flood-related risks. The NFIP Community Rating System program is designed to incentivize these types of investments.

The federal government could also offer economic incentives for individuals in flood-prone areas to move to higher and safer ground as Governor Cuomo has done for homeowners in Staten Island (SI) and Suffolk County, Long Island in the wake of Hurricane Sandy under the NY Rising Housing Recovery Program. In Oakwood Beach, SI, strong community support has been a driving force behind the initiative, with 312 homeowners in that neighborhood indicating that they are willing to relocate to less flood-prone areas. Under the buyout program, properties purchased will be maintained as open space or transformed into coastal buffer zones, parks or other non-residential uses that will help protect nearby communities from the impact of extreme weather.<sup>30</sup>

<sup>30</sup> For more details on the buyout program see <https://www.governor.ny.gov/press/11182013-staten-island-homeowners-affected-by-hurricane-sandy>

## 6. Conclusions and Suggestions for Future Research

A challenge at the heart of NFIP pricing is who should pay for catastrophes. This is an issue all governments face when dealing with catastrophic risks. Part of the motivation for the Biggert–Waters Flood Insurance Reform Act of 2012 was that individuals choosing to locate in hazard-prone areas should bear the costs of living there. Some also argued that it was inequitable to have other policyholders or the general taxpayer subsidizing the insurance premiums of these properties.

On the other hand, there is a public interest in helping low- and middle-income residents afford insurance. Although some areas subject to severe flooding have high amenity values and attract affluent homeowners who can afford the necessary insurance, housing costs in other high hazard areas are inexpensive and thus attract families that cannot afford to reside in other locations. Many argue that these households should be given financial assistance so they can afford insurance as a matter of equity. Linking such assistance to required mitigation measures increases their safety, reduces future flood losses, and lowers the financial cost of insurance vouchers. It will also reduce the financial burden on the general taxpayer.

Coastal areas are dynamic and the risks will continue to change over time. Erosion events, local subsidence, and sea level rise all contribute to changing flood risk for coastal communities. Remapping to take account of these changes will be necessary and should be done with more frequency than in the past. The current remapping effort in the Sandy-impacted region has shown how disruptive abrupt changes in the delineation of risk can be for homeowners and communities. A coupled loan and voucher program could help ease the necessary transitions for homeowners as new information on a risk becomes available.

This year has seen the introduction of several pieces of legislation in Congress all aimed at slowing or completely repealing the elimination of the discounted rates that took effect with the Biggert–Waters Flood Reform Act. We argue that while it is imperative to address the issue of affordability, this should be done in a means-tested manner separate from NFIP pricing.

Our examination of the trade-off between risk-based pricing and affordability in the NFIP has raised questions for future research. A more detailed, nationwide analysis is needed to estimate the costs to the federal government of a coupled voucher and loan program, as well as the expected benefits in terms of reduced flooding losses in the future. This could include an assessment of what a low-income household could reasonably be expected to pay toward insurance. Surveys of residents, both in and out of floodplains, regarding their perception of the equity of risk-based pricing and insurance vouchers could help inform the public dialogue on this issue.

Future studies could also compare and contrast other approaches with means-tested vouchers for addressing the tension between risk-based pricing and affordability of disaster coverage. These include government provision of disaster assistance, relocating households out of harm's way, and various compulsory and voluntary government disaster insurance programs. These arrangements distribute the costs of disasters between homeowners and the government in different ways and also have different impacts on total disaster exposure. Finally, it will be important to examine how climate change is likely impact coastal flood risks in the light of sea level rise and changing storm patterns and its effect on insurance prices and affordability issues.

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