



July 1, 2020

The Honorable Peter Gaynor
Administrator
Federal Emergency Management Agency
500 C St SW
Washington, DC 20024

Dear Administrator Gaynor,

The Association of State Floodplain Managers (ASFPM), International Association of Emergency Managers (IAEM), and the National Emergency Management Association (NEMA) commend FEMA's efforts to consolidate flood insurance data on a common platform (PIVOT) and replace the more than 40 discrete legacy applications which previously housed disparate pieces of information which is critical to NFIP administration, hazard mitigation programs and planning, emergency management, and to assist communities in becoming more flood resilient. Using PIVOT will ultimately provide for a more comprehensive understanding of flood risk nationwide.

Challenges with the implementation of such system overhauls inevitably arise due to new policies and an unfamiliarity with new systems. As FEMA has transitioned to PIVOT, states have encountered challenges in stakeholder system access delays and varied levels of training on using PIVOT at all levels of government.

To administer the National Flood Insurance Program (NFIP), FEMA obtains and maintains certain Personally Identifiable Information (PII) related to flood claims and flood map changes. This information has long been available to appropriate state and local floodplain managers and emergency managers to effectively carry out their emergency planning and response responsibilities as well as floodplain management and mitigation grant programs.

Since PIVOT's introduction last year, states have experienced significant delays in approvals for appropriate staff to access the system due to PII concerns. It is critical that this information is safeguarded according to the Privacy Act and that all system users abide by its stipulations, but the delays for appropriate user access impact activities including but not limited to hazard mitigation and flood management plans, flood mitigation grant applications with adequate information to satisfy FEMA requirements, participation in the Community Rating System (CRS), disaster recovery, and floodplain management. Without access in a timely and reasonable manner, states and localities face additional hurdles in order to carry out their job duties effectively. It also has significant real-world implications for funding, as states and localities without access to this data are not able to complete the Benefit-Cost Analysis that is requisite for receiving Hazard Mitigation Grant Program funding.

To ensure the appropriate practitioners are informed as to the needs of their jurisdictions for flood risk reduction, the process to obtain access must be improved and clearly communicated to potential users. At this time, completing the process requires obtaining a community's Chief Executive Officer's signature twice, and at the end of the executed agreement, a community must still re-request the necessary information. A clearer and more streamlined process will help eliminate the current backlog of users applying to access the system and reduce the workload for FEMA staff responsible for approving access requests.

Another pivotal issue for PIVOT's success as a platform is adequate training of both state users and FEMA officials. Because the new system maintains information from a multitude of previous platforms, when users access PIVOT they must navigate through a maze of different reports to access the data relevant to their needs. At present, the lack of comprehensive training on the platform and its data capabilities has led to concerns that users are still facing challenges accessing data once in the system.

Timely access to actionable data via the PIVOT system is a critical issue the floodplain management and emergency management community faces. The ability to be able to effectively carry out flood risk reduction efforts has been hampered due to the cumbersome process that is a result of the launch of PIVOT. With increased communication and training this can be properly addressed to ensure the PIVOT system supports communities' efforts to be informed of their risk and take action to reduce that risk before floods occur.

Sincerely,

Association of State Floodplain Managers

International Association of Emergency Managers

National Emergency Management Association

Cc: David Maurstad, Administrator
Federal Insurance and Mitigation Administration