



**FEMA**

W-04091

November 19, 2004

MEMORANDUM FOR: Write Your Own (WYO) Company Principal Coordinators, WYO Vendors, NFIP Servicing Agent, and Independent Adjusting Firms

A handwritten signature in black ink, appearing to read "James S. P. Shortley".

FROM: James S. P. Shortley, Director of Claims  
Claims Section, Risk Insurance Branch  
Mitigation Division  
Emergency Preparedness and Response Directorate

SUBJECT: Flood Insurance Claims Guidance

### **1. Limited Coverage for Elevated Building Slabs**

The Standard Flood Insurance Policy (SFIP) provides limited coverage for elevated Post-FIRM buildings located in Zones A1-A30, AE, AH, AR, AR/A, AR/AE, AR/AH, AR/A1-A30, V1-V30, and VE (see SFIP III. Property Covered A.8.a. (1)-(17)).

Specifically, SFIP III. A.8.a. (17) states that coverage is limited to “Footings, foundations, posts, pilings, piers, or other foundation walls and anchorage systems required to support a building.”

Slabs are covered only if they are part of the foundation. To be part of the foundation, a slab must be at least 6 inches thick containing rebar and tied into the posts, pilings, piers, or other foundation walls required to support the building.

### **2. Waiver of Elevated Building Coverage Limitation**

In our previous Flood Insurance Claims Guidance of May 7, 2004, you were informed that a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR) for a Post-FIRM elevated building, obtained after the loss, will be considered effective as of the date of the loss. The LOMA or LOMR removes the Post-FIRM elevated building from the Special Flood Hazard Area, and the elevated building limitations of the SFIP then do not apply to the area beneath the lowest elevated floor.

However, if the lowest adjacent grade of the property is below the Base Flood Elevation (BFE), this will prevent a LOMA or LOMR from being issued to the property owner, so that the property owner will not be able to obtain full coverage for the enclosure.

We have discovered some buildings where the lowest adjacent grade is below the BFE, but the lowest floor (enclosure floor) is above the BFE. Such buildings comply with the NFIP Floodplain Management Regulations, in that the lowest floor of the building is elevated to or above the community's BFE. This means the enclosure does not have the higher risk of flooding that elevated building enclosures normally have. Claims for such buildings should be sent to FEMA with a request for a waiver of the elevated building coverage limitation.

### **3. No Coverage for Sewage Grinder Pumps**

Properties constructed in the majority of the coastal areas have a sewage grinder pump, which is an integral part of the septic system. The sewage grinder pump pulverizes sewage and converts the sewage to a slurry for pumping. These systems require earth excavation for installation. SFIP IV. Property Not Covered 8. excludes coverage for "Underground structures and equipment, including wells, septic tanks, and septic systems." Thus, sewage grinder pumps are not covered by the SFIP.

cc: IBHS, FIPNC, Government Technical Representative

Suggested Routing: Claims, Data Processing, Marketing, Underwriting,