FEMA

Understanding FEMA's Summary of Map Actions and Revalidation Letter

What are the Summary of Map Actions and Revalidation Letter and Why are they Needed?

When a revised Flood Insurance Rate Map (FIRM) panel becomes effective, all previous map changes for that panel are superseded. Each time a panel is physically republished, the panel must be updated to include any changes in the flood hazard information made via Letters of Map Change (LOMCs). A LOMC is a document used to revise or amend the FIRM, such as a Letter of Map Amendment (LOMA), Letter of Map Revision based on Fill (LOMR-F) or Letters of Map Revision (LOMR). Frequently, the results of LOMCs are too small to show on the revised panel. During a map revision, FEMA prepares two documents to assist a community in maintaining the FIRM: a Summary of Map Actions (SOMA) and a Revalidation Letter.

The SOMA provides a comprehensive list of previously issued LOMCs for a community and assists community officials and property owners in determining the status of these LOMCs as a result of revisions to the FIRM. The SOMA identifies if the outcome of a current LOMC is likely to be incorporated into the revised panel, superseded by new information used to prepare the revised panel, or revalidated once the revised panel becomes effective. The SOMA is issued in conjunction with the publication of a community's preliminary or final FIRM.

For More Information

For more information on LOMCs please visit www.fema.gov or www.floodsmart.gov and search for the terms "LOMC" and "LOMA"

For more information on purchasing flood insurance please contact your flood insurance agent.

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The Revalidation Letter lists previously issued LOMCs that have been reaffirmed for the new FIRM. A Revalidation Letter becomes effective one day after the publication of a community's new or revised final FIRM. The Revalidation Letter does not list LOMCs that have been incorporated into the revised panel, LOMCs that are superseded by new or revised mapping, or LOMCs that are no longer valid. While the SOMA is a preliminary assessment of which LOMCs may still be valid after the new maps are issued, the Revalidation Letter is the final, effective determination of the LOMCs which remain valid. The Revalidation Letter is considered legally binding, in the same manner as an original LOMR-F or LOMA, provided that a copy of the original determination accompanies the Revalidation Letter.

Together these documents are meant to assist community officials in the maintenance of the community's FIRM. Careful research on each LOMC is conducted to verify if the original determination of a LOMC is no longer valid because of changes or revisions to the FIRM. If the determination for structures or lots in the original LOMC has changed, the LOMC will not be revalidated. Should a LOMC not be eligible to be revalidated, the SOMA will identify the LOMC as superseded and provide a reason for this conclusion. Reasons may include lack of required data or information necessary for adequate review (such as elevation information), revised hydrologic and hydraulic analysis, or revised or new topographic information. The SOMA and Revalidation Letter are mailed to community officials; therefore, if a community wishes to distribute this information to its citizens, it must take any necessary action to do so.

Answers to Common Questions about the Summary of Map Actions and Revalidation Letter

The questions and answers below are provided to give more information to community officials and property owners about SOMAs and Revalidation Letters and how these documents impact property owners in your community.

Q: What does it mean when a LOMC is superseded?

A: When a LOMC is superseded it means that the original determination is no longer valid and the property or structure is considered to be located within a Special Flood Hazard Area (SFHA) or high-risk flood zone on the revised map. There are several reasons why a LOMC may be superseded:

1. The original case may be incomplete or contain insufficient information to verify that the structure or property is not in the SFHA on the revised map.
2. The elevation of the structure, or the Lowest Ground Elevation, as provided in the original LOMC application, is below the proposed or final Base (1% annual chance) Flood Elevation (BFE).
3. Other technical information on which the original LOMC determinations were based, such as topography or hydrologic and hydraulic data, has changed.

The reason a LOMC has been superseded is recorded on the SOMA.

Q: What action(s) should be taken when a LOMC is superseded?

A: When a LOMC is superseded and a structure or property is classified to be in a SFHA, FEMA recommends that property owners take steps to protect their structure from potential risk and contact a local flood insurance provider for information about flood insurance. Property owners are likely to be surprised that their flood zone designation has changed; however, it is important to convey to property owners of un-revalidated structures that they must act quickly to minimize the cost of purchasing flood insurance.

Timing is important because while the FIRM is in the preliminary phase, property owners may be eligible for lower insurance premiums using the National Flood Insurance Program's (NFIP) "grandfathering" rule that allows property owners to use their previous zone status in the premium calculation, if more favorable than the revised flood zone placing the structure in the SFHA (see below).

Q: What happens if a structure or property is in the SFHA?

A: Once the final FIRM has been published, a letter is mailed to the property owner by the lending institution stating that flood insurance is required. If insurance is not purchased within 45 days of the letter the lender may force-place insurance on the structure. Forced-placed flood insurance can be significantly more expensive than a policy purchased by a homeowner. For Federally-backed mortgage holders, a property owner will be required to purchase flood insurance when the FIRM becomes effective. However, if flood insurance is purchased before the revised FIRM become effective and a policy is in place, then property owners will be able to take advantage of cost-saving rating options (for example, Preferred Risk Policy Extension or "Grandfathering").

Q: What is "Grandfathering"?

A: When risk designations change, flood insurance rates change as well. As an existing policyholder (one that obtained a policy prior to the publication of the final updated FIRM), a property owner can take advantage of FEMA's "grandfather" rules and use the rate for the previous, lower-risk zone. It is important to note that the NFIP also permits the transfer of a flood insurance policy to a buyer when a property is sold; therefore anyone who buys the house will be eligible for the grandfathered rate, as long as continuous coverage is maintained.

Q: If a LOMC was not included on the Revalidation Letter, can a property owner obtain a new LOMC?

A: In response to the updated FIRM, some property owners may believe that their properties have been incorrectly omitted from the Revalidation Letter and placed in a SFHA and, therefore, are subject to the mandatory Federal flood insurance requirement for structures with a Federally-backed mortgage. If information is available proving that their property or structure should not be shown in the newly-revised SFHA, property owners can request a new LOMC. Based on the type and size of request, individuals, groups of property owners, or community officials may request changes to the FIRM based on new or revised data using a Letter of Map Amendment (LOMA) or Letter of Map Revision based on Fill (LOMR-F). When evaluating a decision to request a new LOMC, property owners should determine if data is available that would provide evidence that the newly published FIRM should be amended. For more information on requesting a LOMC, please contact FEMA's Map Information eXchange (FMIX) at 1-877-336-2627 or visit the website at http://www.fema.gov/national-flood-insurance-program-0/letter-map-change-lomc.

Q: What is the effect of a successful LOMC on Flood Insurance Requirements?

A: If FEMA determines a structure or property is outside the SFHA, the mandatory Federal flood insurance requirement will no longer apply. A lender may still require flood insurance as a condition of the loan, but premiums are lower for structures outside the SFHA. It is important to know that many flood claims are made by property owners located outside the high-risk flood zone and that the issuance of a LOMC does not mean the structure or property is safe from all flooding. Floods greater than the 1-percent-annual-chance event (100-year flood) can, and do, occur. Therefore, because flooding also occurs in areas of moderate or minimal flood risk, FEMA recommends flood insurance coverage, even if it is not required by law or a lender.

Q: What about properties that are not affected by changes to the FIRM?

A: If the updated FIRM does not change the flood risk for a certain property location and the owner holds a previously issued LOMC, then the LOMC for that specific property remains valid. Once the FIRM is finalized, all valid LOMCs will be included on the Revalidation Letter (which confirms that there is no change to the property's status in regard to the new FIRM). As noted above, while there may be no change to a property's status, FEMA recommends that property owners review their insurance coverage to ensure that their property and contents are protected, as the risk of flooding has been reduced, not removed. FEMA also recommends that property owners talk to their insurance agent about qualifying for a low-cost Preferred Risk Policy.

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Q: What does it mean when a LOMC is revalidated?

A: When a LOMC is revalidated it means that the original determination of a previously issued LOMC is still valid when compared to the results of a new or revised map. The case number of a revalidated LOMC is listed in a community's Revalidation Letter. This letter becomes effective one day after the publication of a new or revised FIRM, and confirms that the structure or property listed in the original LOMC determination is considered to be located outside of the SFHA on the updated map. The Revalidation Letter is considered legally binding, in the same manner as an original LOMR-F or LOMA, provided that a copy of the original determination accompanies the Revalidation Letter.

Q: How can property owners obtain a copy of the Summary of Map Actions document or the Revalidation Letter?

A: SOMAs and Revalidation Letters are mailed to community officials rather than individual property owners. Property owners can contact their local floodplain administrator to obtain a copy of the SOMA or Revalidation Letter. The Revalidation Letter is also available on the Map Service Center website at http://www.msc.fema.gov. For general assistance regarding how to obtain a SOMA or Revalidation Letter, property owners may contact FEMA's Map Information eXchange (FMIX) at 1-877-336-2627.

Q: Who should be contacted if property owners would like copies of their LOMCs?

A: Property owners who would like copies of their LOMCs can contact their local floodplain administrator or visit FEMA's Map Service Center website at http://www.msc.fema.gov for more information.

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