We hope for an opportunity to supplement these comments and we urge you to **extend the deadline** to allow for more input from a broader member distribution. These comments are preliminary in nature and highlight some initial questions and thoughts for your consideration.

Action 1: CLOSE GAPS

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Bolded Lead-In High-Level Wording on Closing Gaps Apobloof 1000 enstabling litmate, resilevatory strategy adduese the legal avaitates using portigrossection gaps and the

Because it appetent flat 1th((sg2e)2-6(r)4((th))20(h)21(b20(h)t1)))gT (ng)TJE(N1)CrETE/Astifact BMCa 174.6 330.24 387 v, this could be within the existing committee structure and open processes.

¹ NAMIC Membership includes more than 1,500 member companies. The association supports regional and local mutual insurance companies on main streets across America and





This is the first stakeholders are learning of a possible new staff developed dashboard that will "inform state and jurisdiction specific priorities for insurance availability."

In terms of status, where is the dashboard in its development? Which NAIC group will oversee the proposed new NAIC Protection Gap Dashboard? Has this been anticipated for the charges for the upcoming year? Who will have access to the NAIC Protection Gap Dashboard? What permissions/protections are expected? What is the level of data granularity? How will numbers and gaps be determined/calculated/defined? Will additional discussion and details be provided through other open NAIC processes?

There are likely many more questions.

1B – Event on Policy to Close Protection Gaps

This is the first stakeholders are learning of an event at which state regulators and researchers will be convened to discuss policies relating to protection gaps.

When is this event planned? Will it be an open event? How will guests and speakers be selected?

1C – Local Government Mitigation Priorities

What does "encourage local governments to include insurance access as a priority to local mitigation projects" mean?

Reducing risks for vulnerable populations must involve reducing risks. Things like land use planning (and nature based planning), smart zoning, and building codes are essential to "bend down the



Action 2: FLOOD INSURANCE BLUEPRINT

2A – National Risk Mitigation Awareness Initiative

As drafted, this mentions increasing awareness of risk mitigation. Of course, this is a worthwhile goal. Kindly consider whether to also increase awareness of risk in addition to risk mitigation: ... "increase awareness of <u>flood risk and</u> risk mitigation recommendations..."

Action 3: COMPREHENSIVE DATA

3A – Data, Trends & Risk Priorities

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