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When a revised Flood Insurance Rate Map (FIRM) panel becomes effective, all previous map changes for that panel are superseded.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). LOMCs are FEMA documents used to revise or amend the effective FIRM: Letters of Map Amendment (LOMAs), Letter of Map Revision Based on Fill (LOMR-Fs), or Letters of Map Revision (LOMRs) based on conditions other than fill. Frequently, the results of LOMCs are too small to show on the revised panel. During a flood risk project, FEMA prepares two documents to assist a community in maintaining the FIRM – a Summary of Map Actions, or SOMA, and a Letter of Map Change Revalidation, or LOMC-VALID, 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 the LOMCs as a result of revisions to the FIRM. The SOMA identifies whether (1) a LOMC has been incorporated into a revised FIRM panel, (2) a LOMC is superseded by new information used to prepare the revised FIRM panel, or (3) a LOMC will be revalidated (i.e. remain in effect) once the revised FIRM panel becomes effective. FEMA issues the SOMA at two milestones in the mapping lifecycle.

- FEMA issues an initial SOMA, called a Preliminary SOMA, along with Preliminary copies of the FIRM and Flood Insurance Study (FIS) report.
- FEMA issues a Final SOMA along with the Letter of Final Determination, which finalizes the flood hazard information shown on the FIRM and FIS report, initiates the 6-month adoption/compliance period, and establishes the effective date.

The LOMC-VALID Letter lists previously issued LOMCs that have been reaffirmed against the flood hazard information on the revised FIRM. A LOMC-VALID Letter becomes effective 1 day after the effective date of a revised FIRM. The LOMC-VALID Letter does not list LOMCs that have been incorporated into a revised FIRM panel, LOMCs that are superseded by new or revised flood hazard information, or LOMCs that are no longer effective.

For More Information:

- To download copies of LOMC-VALID Letters, please visit the FEMA Flood Map Service Center website: https://msc.fema.gov/portal.
- For community contact information for communities affected by coastal flood risk studies in the Southeastern United States, please visit: www.southeastcoastalmaps.com/Pages/coastal_contacts.aspx.
- For additional information regarding the coastal flood risk studies in progress in the Southeastern United States, please visit: www.southeastcoastalmaps.com.
valid. While the SOMA is a preliminary assessment of which LOMCs may still be valid after the new revised FIRM becomes effective, the LOMC-VALID Letter is the final determination indicating the LOMCs that remain valid. The LOMC-VALID Letter is considered legally binding, in the same manner as an original LOMA or LOMR-F, provided that a copy of the original determination document accompanies the LOMC-VALID Letter.

Together these documents are meant to assist community officials with the maintenance of the FIRM. FEMA conducts careful research to verify whether the original determination of a LOMC is no longer valid because of changes or revisions to the FIRM. If the determination for structures or property in the original LOMC has changed, FEMA will not revalidate the LOMC. 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 (e.g., elevation information);
- Revised hydrologic and hydraulic analysis; or
- Revised or new topographic information.

The SOMA and LOMC-VALID Letter are mailed to the community Chief Executive Officer, or CEO, and the community Floodplain Administrator, or FPA. If community officials wish to distribute this information to its citizens, they must take any necessary action to do so.

What does it mean when a LOMC is superseded?

When a LOMC is superseded, it means that the original determination issued by FEMA is no longer valid and the property or structure is considered to be located within a mapped Special Flood Hazard Area (SFHA), or high-risk flood zone, on the revised FIRM. The SFHA is the area that would be inundated by the base, or 1-percent-annual-chance (100-year), flood. A LOMC may be superseded for several reasons:

- The original case may be incomplete or contain insufficient information to verify that a structure or property is not in the SFHA on the revised FIRM panel.
- The elevation of the structure, or the Lowest Ground Elevation, as provided in the original LOMC application is below the final Base Flood Elevation (BFE).
- Other technical information on which the original LOMC determination was based (e.g., topographic data, hydrologic data, hydraulic data) has changed.

The reason a LOMC will be superseded when the revised FIRM panel becomes effective is recorded on the Preliminary SOMA.

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

When a LOMC is superseded and a structure or property is classified as being in an SFHA, FEMA recommends that property owners take steps to protect their structure from the potential increased 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 for insurance agents to convey to property owners of un-revalidated structures that they must act quickly if they want to minimize increases in the cost of purchasing flood insurance.

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

What happens if a structure or property is newly mapped in an SFHA?

Once the final, effective 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 becomes effective and a policy is in place, then property owners may be able to take advantage of cost-saving rating options. If a structure was built in compliance with the FIRM in effect at the time of construction, the property owner may benefit from the FEMA “grandfathering” rules (see below).

Property owners whose structures are newly mapped into an SFHA from a low- or moderate-risk zone on or after April 1, 2015, may be eligible for a Newly Mapped procedure policy if the applicant obtains coverage that is effective within 12 months of the map revision date and if the property meets the loss eligibility requirements. A Newly Mapped procedure policy may offer a property owner substantial savings over a Standard Flood Insurance Policy.

What is “Grandfathering”? When risk designations change, flood insurance rates change as well. An existing policyholder (one that obtained a policy prior to the publication of the revised FIRM) can take advantage of the FEMA “grandfather” rules and use the rate for the previous, lower-risk zone. The NFIP also permits the transfer of a flood insurance policy to a buyer when a property is sold; therefore, anyone who buys the structure will be eligible for the grandfathered rate, as long as continuous coverage has been maintained. If continuous flood insurance coverage has been maintained, the property owner will have the option of using the current rating criteria for their property or having the rate based on the flood zone or BFE that was in effect when the structure was originally built.

If a LOMC was not included in the list on the LOMC-VALID Letter, can a property owner obtain a new LOMC? In response to the revised FIRM, some property owners may believe that their properties have been incorrectly omitted from the LOMC-VALID Letter and mapped into an 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 SFHA on the new FIRM, 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 the LOMA or LOMR-F process. When evaluating a decision to request a new LOMC, property owners should determine whether data that would provide evidence that the new FIRM should be amended or revised are available.

For additional information on how to request a LOMC, FEMA encourages interested property owners to contact the Map Specialists in the FEMA Map Information eXchange (FMIX). Property owners can contact the FMIX by telephone, toll free, at 1-877-FEMA MAP (1-877-336-2627), and choosing “Option 1”; by email at femamapspecialist@riskmapcds.com; or by live chat at www.floodmaps.fema.gov/fhm/fmx_main.html.

What is the effect of a successful LOMC on flood insurance requirements? If FEMA determines that a structure 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 insurance premiums generally are lower for structures outside the SFHA.

Many flood claims are made by property owners whose structures are located outside the SFHA. 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 flood can, and do, occur. Because flooding also occurs in areas of moderate or minimal flood risk, FEMA strongly encourages flood insurance coverage in these areas even if it is not required by law or a lender.

What about properties and structures that are not affected by changes to the FIRM? If the updated FIRM does not change the flood risk for a certain property or structure and the owner holds a previously issued LOMC, then the LOMC for that specific property or structure remains valid. Once FEMA
finalizes the FIRM, all valid LOMCs for each FIRM panel will be included on the LOMC-VALID Letter, confirming that the status of the property or structure with regard to the new FIRM has not changed.

As noted above, while there may be no change to the status of a property or structure, FEMA recommends that property owners review their insurance coverage to ensure that their property and contents are adequately protected, as the risk of flooding has been reduced, not eliminated. Not having a flood insurance policy could have disastrous consequences, leaving the property owner with no financial protection from future flood losses. FEMA also encourages property owners to ask their flood insurance agents for help in getting the best available rate for their structures and taking advantage of any discounts that may be available.

**What does it mean when a LOMA or LOMR-F is revalidated?**

When FEMA revalidates a LOMC, it means that the original determination made for that previously issued LOMA or LOMR-F is still valid when compared to the flood hazard information on the revised FIRM. The case number of a revalidated LOMA or LOMR-F is listed in the LOMC-VALID Letter sent to the community CEO and FPA.

As mentioned earlier in this document, the LOMC-VALID Letter:

- Becomes effective 1 day after the publication of the revised FIRM;
- Confirms that the structure or property listed in the original LOMA or LOMR-F determination is considered to be located outside the SFHA on the revised FIRM; and
- Is considered legally binding, in the same manner as an original LOMA or LOMR-F, provided a copy of the original determination document accompanies the LOMC-VALID Letter.

**How can property owners obtain a copy of the SOMA or LOMC-VALID Letter?**

Property owners can contact local officials to obtain a copy of a SOMA or LOMC-VALID Letter. FEMA mails the SOMAs and LOMC-VALID Letters to the community CEOs and FPAs. For contact information for CEOs and FPAs in communities affected by recent coastal flood risk studies in the Southeastern United States, please visit: [www.southeastcoastalmaps.com/Pages/coastal_contacts.aspx](http://www.southeastcoastalmaps.com/Pages/coastal_contacts.aspx).

Property owners also can download LOMC-VALID Letters from the FEMA Flood Map Service Center website: [https://msc.fema.gov/portal](https://msc.fema.gov/portal). For general assistance with obtaining a copy of a SOMA or LOMC-VALID Letter, or questions regarding LOMAs, LOMR-Fs, and LOMRs, property owners may contact a Map Specialist in the FMIX by telephone, toll free, at 1-877-FEMA MAP (1-877-336-2627), and choosing “Option 1”; by email at femamapspecialist@riskmapcds.com; or by live chat at [www.floodmaps.fema.gov/fhm/fmx_main.html](http://www.floodmaps.fema.gov/fhm/fmx_main.html).