



May 15, 2025

Secretary Kristi Noem
Department of Homeland Security
Federal Emergency Management Agency
500 C St SW
Washington, DC 20472

Re: Department of Homeland Security Request for Public Input on Experiences with FEMA Disaster Responses (Docket No. DHS-2025-0013)

Dear Secretary Noem:

On behalf of The National Association of Insurance Commissioners (NAIC),¹ we appreciate the opportunity to provide input in response to the Department of Homeland Security's Request for Public Input on Experiences with FEMA Disaster Responses, Docket No. DHS-2025-0013.² As the primary regulators of the U.S. insurance industry, state insurance departments play a critical role in managing disaster risk, promoting resilience, and protecting consumers. Our members are deeply engaged in disaster response and recovery. We have long collaborated with FEMA and other federal partners to support a coordinated response on the ground and our members appreciate the work we've done together for insurance consumers. The work of state insurance departments and the NAIC is closely aligned with FEMA's mission to protect communities before, during, and after disasters.

The NAIC is the standard-setting and regulatory support organization of the chief insurance regulators from all 50 states, the District of Columbia, and five U.S. territories. Through the NAIC, state insurance regulators establish best practices, coordinate regulatory oversight, and support strong and stable insurance markets. Our members are often among the first public officials to respond after a disaster. They work to expedite claims, provide on-site support, and coordinate with emergency managers. At every stage of recovery, protecting consumers is at the core of this work.

As we reflect on FEMA's historical disaster response practices and consider areas for improvement, we see opportunities to strengthen our partnership. Clear communication and rapid action on the ground are critical in the immediate days following a disaster. State

¹ As part of our state-based system of insurance regulation in the United States, the NAIC provides expertise, data, and analysis for insurance commissioners to effectively regulate the industry and protect consumers. The U.S. standard setting organization is governed by the chief insurance regulators from the 50 states, the District of Columbia and five U.S. territories. Through the NAIC, state insurance regulators establish standards and best practices, conduct peer reviews, and coordinate regulatory oversight. NAIC staff supports these efforts and represents the collective views of state regulators domestically and internationally. For more information, visit www.naic.org.

² <https://www.regulations.gov/document/DHS-2025-0013-0001>



insurance departments are integrated into the community and have the staff to perform this service quickly and efficiently. While FEMA remains an essential partner, as demonstrated by the examples below, there is room to improve coordination and alignment. The following are just a few examples that highlight how state emergency managers and insurance departments are responding to natural disasters that impact all states and territories and point to ways our shared work can continue to improve.

Following Hurricane Helene in late September of 2024, the Virginia Bureau of Insurance played a proactive role in response and recovery. The devastating Category 4 storm caused widespread flooding across 37 counties and cities in the western and southwestern parts of the state³. In coordination with FEMA and state officials, the Bureau visited every Disaster Recovery Center, established in the aftermath of the storm, offering on-site insurance guidance, distributing preparedness materials, and addressing consumer questions. The state deployed more than 10 centers, which operated through early December and provided vital face-to-face assistance. Ahead of the storm, the Bureau also issued public adjuster guidance, participated in preparedness seminars, and worked with the Virginia Emergency Support Team (VEST) to ensure cross-agency coordination. These efforts illustrate the essential role state insurance regulators play in aligning consumer protection with federal response and ensuring impacted residents can navigate the insurance process.

In the recent and devastating Los Angeles fires, the California Department of Insurance played a critical role in recovery. The Eaton and Palisades wildfires together destroyed over 16,000 structures, burned more than 37,000 acres, and led to the evacuation of over 100,000 residents. State insurance regulators mobilized quickly, working closely with the California Governor's Office of Emergency Services (CalOES), FEMA, and insurer catastrophe teams to deploy resources and support survivors.⁴ The Department established Disaster Recovery Centers in both Pasadena and Los Angeles County, offering in-person assistance to wildfire survivors on claims processing, coverage questions, and policy guidance. In addition to deploying staff to support these centers, the Department held multiple insurance workshops, extended consumer hotline hours, and issued emergency bulletins to ensure claim fairness and transparency. These actions highlight how state insurance departments can complement FEMA's mission by delivering direct and responsive support to affected communities in the immediate aftermath of disasters.

Recent wildfires in Oklahoma underscore the importance of rapid, coordinated disaster response. Following 30 days of drought, low humidity, and 40-60 mph winds, the fires destroyed hundreds of homes in rural areas. The Department of Insurance coordinated with

³ Va. Bureau of Ins., *Hurricane Helene Recovery Efforts* (Andrea Baytop, presenter), Nat'l Ass'n of Ins. Comm'rs, Catastrophe Insurance Working Group/FEMA Advisor Group Joint Meeting, Spring Nat'l Meeting (Mar. 25, 2025), https://content.naic.org/sites/default/files/national_meeting/3-25-25%20-Materials%20-%20CatFEMA%20-%20SprNM.pdf

⁴ Cal. Dep't of Ins., *2025 Southern California Wildfires* (Lucy Jabourian, CPCU, ARC, presenter), Joint Meeting - Catastrophe Insurance Working Group/FEMA Advisor Group, Nat'l Ass'n of Ins. Comm'rs Spring Nat'l Meeting (Mar. 25, 2025), https://content.naic.org/sites/default/files/national_meeting/3-25-25%20-Materials%20-%20CatFEMA%20-%20SprNM.pdf



insurance agents and emergency managers, while insurers were deployed into the field to begin issuing checks to impacted policyholders.⁵ The Oklahoma Department of Emergency Management then worked with FEMA to conduct damage assessments across the impacted counties.⁶

Tennessee demonstrates how states help bridge recovery efforts with FEMA. After Hurricane Helene, Tennessee experienced severe flooding across the state. Eight counties were declared disaster areas, and hundreds of homes were destroyed or damaged. Efforts were coordinated to assist those immediately affected by the hurricane. The Tennessee Department of Commerce and Insurance deployed staff to Disaster Recovery Centers to provide immediate support and insurance guidance to first responders, local agencies, and affected consumers. These centers were later transitioned to FEMA.⁷ The Department also issued a claims data call to insurers and partnered with health authorities and federal agencies to help ensure uninsured residents could access needed prescriptions and care.⁸

The Texas Department of Insurance maintains a designated disaster response coordinator that works closely with the Texas Division of Emergency Management and FEMA. During declared emergencies, the Department extends the operating hours of its Consumer Help Line and deploys staff to affected regions to provide in-person assistance, resolve claims disputes, and ensure compliance with insurance laws.⁹ Furthermore, the Department monitors insurer response plans and facilitates rapid claims processing.¹⁰

These examples are representative of the collaborative Insurance Department/FEMA relationships that our teams have developed across the country to assist local residents. Departments – individually and collectively through regional meetings – have also worked with FEMA on flood insurance challenges and the National Flood Insurance Program (NFIP). Most flood insurance policies written in most states are NFIP policies, and regulators appreciate the

⁵ Okla. Ins. Dep't, Wildfire Insurance Resources, <https://www.oid.ok.gov/consumers/insurance-basics/disasters/wildfires>

⁶ Oklahoma Insurance Department, Press Release, Oklahoma Insurance Department Shares Guidance After Fires, High Winds Impact State (Mar. 18, 2025), https://www.oid.ok.gov/release_031825/.

⁷ Tenn. Emergency Mgmt. Agency, Hurricane Helene Updates, <https://www.tn.gov/tema/updates/hurricane-helene.html>.

⁸ Tenn. Dep't of Commerce & Ins., Bulletin No. 24-04, Claims Reporting Requirements - Hurricane Helene (Oct. 2024), <https://www.tn.gov/content/dam/tn/commerce/documents/insurance/bulletins/Bulletin24-04.pdf>.

⁹ Tex. Dep't of Ins., TDI's Role in Disaster Response, <https://www.tdi.texas.gov/consumer/storms/cpmdisrole.html>.

¹⁰ Tex. Dep't of Ins., Help for Texans Affected by Disasters, <https://www.tdi.texas.gov/consumer/disasters.html>.



relationship that we have built with local and national FEMA representatives focused on consumer education, mitigation, and disaster response.

In addition to state-level coordination during specific disasters, the NAIC also maintains a centralized Catastrophe Resource Center, which serves as a key support tool for state insurance departments before, during, and after disaster events.¹¹ The Center provides curated guidance and regulatory materials to assist states in managing insurance-related disaster response, promoting consumer protection, and coordinating with insurers. Resources include disaster preparedness checklists, consumer alerts, bulletins on expedited claims handling, public adjuster guidance, and model documents developed in collaboration with state regulators. The site also offers summaries of past state actions, allowing departments to quickly reference effective practices used in prior events. By providing a common hub of trusted, regulator-approved materials, the Catastrophe Resource Center strengthens state readiness, supports interagency coordination, and promotes consistency in response across jurisdictions.

Additionally, the NAIC has partnered with FEMA through the formation of the NAIC/FEMA (C) Working Group. Prior to establishing this working group, the NAIC held meetings with several FEMA regional offices and state insurance commissioners to strengthen existing relationships and explore opportunities for collaboration across all phases of disaster management. Topics of discussion included strategies to close the flood insurance gap through the National Flood Insurance Program and the development of the private flood insurance market; coordinated roles of state departments, FEMA, and NAIC before, during, and after disasters; and joint priorities related to consumer messaging and resilience planning. These meetings have significantly improved communication and fostered more meaningful collaboration between state insurance regulators and FEMA.

FEMA's path forward must integrate the voices of the officials who deliver immediate support on the ground during emergencies. As the committee considers improvements to FEMA's disaster response processes, we recommend several changes to strengthen coordination.

First, FEMA should improve coordination with state insurance departments during and after disasters. One potential way of doing that is by establishing designated liaisons and joint communication protocols. Second, FEMA should enhance the clarity and consistency of its public messaging on the roles of the National Flood Insurance Program, private insurance, and federal assistance to ensure timely and accurate information is delivered to communities allowing them to recover faster and reducing consumer confusion. Third, FEMA should streamline the NFIP claims and appeals process. Delays often lead to consumer complaints over a program that state insurance regulators have limited jurisdiction to resolve. Finally, long-term resilience demands better alignment between federal recovery funds and state insurance incentives, mitigation, and building code modernization. This would include a seat at the table for state insurance regulators when FEMA forms hazard mitigation grant programs and disaster rebuilding guidelines.

¹¹ Nat'l Ass'n of Ins. Comm'rs, *Catastrophe Resource Center*, <https://content.naic.org/catastrophe-resource.htm> (last visited Apr. 17, 2025).



State insurance regulators offer unique value in disaster response and recovery. As trusted officials on the ground, they are integrated into their communities. They are strongly positioned to provide real-time feedback and consumer assistance. We urge FEMA to strengthen its partnership with state insurance regulators as it seeks to improve disaster response.

Thank you for the opportunity to provide feedback. We look forward to continued partnership with FEMA and to advancing our shared work on disaster readiness and recovery.

Sincerely,

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Commissioner
North Dakota Insurance Department

Scott White
NAIC President-Elect
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