From: Mui, Cherry (DFS)
To: Beydler, Nancy; Kinerney, Butch
Subject: Re: Second Exposure: Residential Mitigation Grant Program Model Act
Date: Friday, November 6, 2026 8:34:50 AM
Attachments: image001.png
image002.png
image003.png
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Hi Nancy and Butch -

We would like to submit a suggestion for the Residential Mitigation Grant Program Model Act:

In Section 8 discussing Applicant Eligibility, A(1) states that an applicant shall "[b]e the owner of record of an Eligible Residence …". However, depending on a State's regime for determining proof of ownership, certain property owners, like heirs property owners may face challenges with accessing grant funding. We suggest adding a Drafting Note that advises States to consider their proof of ownership requirements to access grant funding, and whether it aligns with state-level policy goals, especially those aimed at supporting low-income and low-wealth households in rural and urban communities.

Thank you.

Best,
Cherry

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From: Beydler, Nancy <nbeydler@naic.org>
Sent: Monday, October 26, 2026 10:27 AM
To: Kinerney, Butch <bkinerney@naic.org>; Beydler, Nancy <nbeydler@naic.org>
Subject: Second Exposure: Residential Mitigation Grant Program Model Act

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