



Executive Decision Group - Decision Summary Recommendations

NFIP NextGen Project

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Prepared for National Flood Insurance Program Federal Emergency Management Agency U.S. Department of Homeland Security

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This document was prepared for FEMA Mitigation Division by the NextGen Project team. The purpose of this document is to summarize the recommendations made by the Executive Decision Group. The NextGen team is in the requirement gathering and development phases for the NextGen architecture. Additionally, the NextGen team is developing prototypes and conducting pilot programs to achieve the best possible deliverables for the NFIP. As with any analysis of this nature, the analytical results are based on the best information available at the time of publication. Finally, the analysis is based on a series of assumptions that may or may not continue to be valid over time. In the completion of this analysis, OST made every effort to ensure that information was accurate and that were based on defendable business and technology assumptions.



Change History

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A Introduction

The NextGen information technology-reengineering project is steadily progressing to meet its goals to modernize the National Flood Insurance Program (NFIP). The NextGen team has defined the technical architecture and released prototypes of many NextGen applications. WYO Companies, vendors and other stakeholders are increasingly participating in pilot testing technologies and processes to the point where decisions are required on how to best utilize NextGen technologies in the future NFIP.

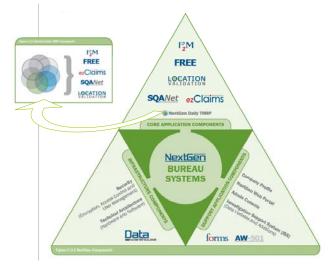
The NextGen project is taking full advantage of Internet-based technologies to deliver tools that support upfront validations, highly-accessible transaction monitoring, and timely communications. The NextGen environment is scalable based on proven hardware and software that meets FEMA and DHS standards. As with any technology modernization effort, the integrity of the data improves with processing power and speed. All NextGen modernizing efforts have been based on existing NFIP business needs, which means that some polices and procedures will have to change due to accelerating timeframes. This improved NextGen environment provides the NFIP with a foundation from which it can continue to grow and improve for the foreseeable future.

The NextGen Project

The NFIP modernization effort began as the Concept of Operations (CONOPS) project, which launched a technology development effort, now known as the NextGen project. NextGen development focuses on business-driven requirements with the end-users in mind. In 2002 and 2003, the NFIP convened five business-focused, Joint Working Groups (JWG) to help define current business processes and propose recommendations for the to-be NFIP NextGen environment. These recommendations created the critical foundation to develop the plans, schedules, standards and methodology for the NextGen components and environment.

NextGen development efforts have been organized on the following three major areas. 1) NextGen Core Application Components 2) NextGen Support Application Components 3) NextGen Infrastructure Components.

The NextGen Core Application Components provide a toolset for flood insurance stakeholders to improve their flood insurance business processes and services. These NextGen components are designed and developed to increase communications with FEMA by enabling upfront validations, quotes, and access to more



location information. Some of the Core Application Components are optional "A La Carte" applications that can be utilized to maximize communications and services. WYO companies will be able to run an initial validation of their data though the NextGen system before officially submitting for required TRRP cycles. These new technologies provide options for WYO companies and their vendors to increase and improve their interactions with FEMA and the Bureau and Statistical Agent (Bureau). The NextGen Core Application Components are listed below.

- Simple and Quick Access Net (SQANet)
- Flood Rating Engine Environment (FREE)
- EZClaims
- Flood Financial Management (F2M)
- Location Validation
- Daily NFIP Transaction Record and Reporting Process (TRRP)

NextGen Support Application Components will provide another toolset for Web-based, realtime, person-to-machine data communications for flood insurance stakeholders. The WYO Company, Vendor, FEMA NFIP and Bureau flood insurance portal will be the one-stop shop for access to insurance and mitigation data. Through NextGen Application Support Components, users can also view, enter, and submit data based on their profile and role authorizations. The NextGen Support Application Components are listed below.

- NextGen Web Portal
- Forms Application
- AW-501 & RL Maintenance Application
- Admin Console Application
- Company Profile Application
- Information Support Services Application

The NextGen Infrastructure Components are the foundation for the Core and Support Application Components. These components process, house, secure and store NFIP data. While transparent to the end user, the NextGen infrastructure represents a large development effort. The NextGen Infrastructure Components are listed below.

	Stakeholder In							
NextGen Application	WYO Companies/ Vendors	States, Communities, Regions	NFIP Bureau/ Contractors	Frequency	Real-Time Person-to- Machine	Batch Machine-to- Machine	Web Services Machine-to- Machine	
NextGen Daily TRRP	Required	None	Required	Daily	0	0	•	
NextGen Portal	*	*	*	As Needed	0	•	•	
Location Validation	Optional	Optional	Optional	As Needed	0	0	0	
SQANet	Optional	Optional	Optional	As Needed	0	0	0 0 0 0	
Forms	Optional	Optional	Optional	As Needed	0	0		
Flood Rating Engine Environment (FREE)	Optional	None	Optional	As Needed	0	0		
Flood Financial Management (F2M)	Required	None	Required	Monthly	0	0		
EZClaims	Required	Optional	Required	Weekly	0	0	•	
Company Profile	Required	Nonc	Required	Minimum Yearly, As Needed	0	•	•	
Admin Console	Optional	Optional	Required	As Needed	0	•	•	
AW-501	None	Required	Required	As Needed	0	•	•	

Infrastructure Components are listed below.

- NextGen Security (Encryption, Access Control and User Management)
- NextGen Data Warehouse
- NextGen Technical Architecture (Hardware and Software Platforms)

The NFIP EDG was formed to address policies and procedures that may change as a result of the NextGen technologies and to optimize the positive impacts while minimizing any negative results. The group focused on internal NFIP technological policies, and avoided matters that fell within Congressional, DHS or FEMA policy.

EDG Meetings

Over the course of EDG meetings, FEMA, WYO company, vendor and Servicing Agent representatives met and conducted discussions that strived to strategically reach win-win decisions for all NFIP stakeholders. The group analyzed NextGen's requirements to understand possible impacts on FEMA, WYO companies and vendors. Each member actively participated and lent their expertise on every discussion topic.

This document provides high-level background and summarizes the decisions made to date. The document is divided into sections based on functional decision areas.

B New Daily TRRP Cycle Recommendations

The Executive Decision Group has reviewed a number of policies and procedures related to the Transaction Record and Reporting Process (TRRP) Cycle. EDG has made recommendations in the following areas.

- Archiving Operations
- TRRP Cycle Submission Data Type Integrity
- Error Handling
- Address Errors
- Policy Corrections

B.1 Archiving Operations

Currently, a WYO company's TRRP statistical data is archived off the mainframe if the company meets certain qualifications and goals that are based on data quality, timeless, etc. If a company is approved for archiving; data is selected for the archive; and subsequently archived data is moved off of the mainframe and onto tapes. The current archiving process benefits WYO companies by clearing non-critical error responsibilities on an annual basis. Additionally, archiving currently inhibits FEMA's access to historical data once it is moved to tape.

The NextGen Data Warehouse now has the capability to store more data and organize it in a way to facilitate FEMA analysis. The result is FEMA users will be able to query and run reports on archived data in the same way they access current data. Archiving will become a status applied to transaction records.

EDG recommends that NextGen technologies maintain the current business archiving process, which allows companies to annually eliminate errors associated with archived data. To achieve this, the NextGen team is developing statuses for errors (e.g., Current Error or Archived Error). The TRRP cycle error counting process will only count the "current error" status per company. SQANet Error reports for WYO companies will only show errors with the "current error" status.

WYO Company Business and IT Impacts

- FEMA and the Bureau will continue to "archive" WYO data and errors.
- WYO companies will not need to change their current IT processes to accommodate the updated archiving method.

FEMA Impacts

• FEMA and other NFIP stakeholders will be able to report on archived data.

B.2 TRRP Cycle Submission Data Type Integrity

A data type is the expected format for a submitted TRRP cycle data element, as defined in the TRRP Manual and Edit Specifications. For instance, Elevation Difference must be specified as a number, Policy Effective Date must be specified in the proper date format. Under the current mainframe system, many of the specified data types are not enforced by the TRRP cycle.

NextGen is required to provide the means to improve NFIP data quality. As a result, the NextGen Data Warehouse will strictly enforce selected TRRP cycle elements' data types to ensure only correctly formatted data is retained. The combination of new technologies and processes will continuously improve NFIP data quality over time. Appendix A identifies all TRRP cycle elements that will be rigorously enforced by NextGen technologies.

NextGen Data Warehouse data type enforcement will also pertain to data as it is migrated from the mainframe, with some differences in how it's treated. Migrated data will be absorbed into Data Warehouse staging tables with a report for each company that identifies data type rejects. WYO companies will have options as to how the data should be treated. WYO companies will have the following options.

1) Fix the data and resubmit (outside of TRRP cycle transactions)

2) Nullify or set defaults for inaccurate data type instances (For example, incorrectly formatted dates might be given a default date of 01/01/1900, so they can be retrieved and corrected in the future. Another example may be if water depth was reported as "x," it would be changed to null and be corrected at another time.)

WYO companies will need to address this issue and make corrections to ensure active policies are not in "limbo" within the Data Warehouse staging areas. For example, policies with incorrectly formatted effective dates will be inactive, unable to have claims, until the date is corrected. Additionally, historical data, such as inactive policies, that contain incorrectly formatted data, can be set to null or a default because there is a negligible impact.

FEMA and NextGen will work with each company to address migrated data corrections. The initial program wide NextGen data analysis is in Appendix A and addresses each individual data element.

EDG recommends supporting the NextGen TRRP cycle submission data type enforcement process, based on the low impact to WYO companies. NextGen tests and analysis from 2006 TRRP cycle data shows that WYO companies are generally submitting correct data types; there are only a few records that may yield critical errors if not corrected.

WYO Company Business and IT Impacts

- Data type enforcement will minimally impact WYO companies resulting in a very small amount of rejected records and errors than previously identified.
- WYO companies will have the ability to resubmit NextGen processed data using the daily TRRP cycle or for migrated data, outside of TRRP, with the help of the NextGen team.
- WYO company data quality and integrity will be improved.
- WYO companies will have to review migrated data type errors and make a decision to correct, nullify or set defaults as necessary.

• WYO companies will to continue to follow the TRRP Cycle Edit Specifications, including changes in error severity type (critical or non-critical errors) for identified data types (see Appendix A)

FEMA Impacts

- Higher quality data will improve analytical reporting and business intelligence.
- Minor changes will need to be made to the TRRP Edit Specifications in order to clarify the error type changes.

B.3 Error Handling

The EDG recommends that NextGen processes maintain error handling status quo providing WYO companies the same timeframe to correct errors and counting errors on a monthly basis. The EDG proposes that NextGen initiate the monthly error counting timeframe at the start of the first calendar day of the month at 12:00 am midnight and end on the last calendar day of the month at 11:59 pm.

Subsequently, on the last day of the month, the NextGen system will count new and outstanding errors. The outstanding errors will be those that a WYO company has not corrected within a particular month. For example, if a WYO company had 200 new errors during the month of January and it corrected 180 errors during the same month, then the company would carry over 20 outstanding errors into the next month. In this example, a WYO company would begin February with 20 errors.

WYO Company Business & IT Impacts

- WYO companies will potentially have a longer timeframe and more opportunities to correct errors with the daily TRRP cycle submissions.
- WYO companies will not need to change their current IT processes; they will have the convenience to report corrections on a daily or more frequent basis.

FEMA Impacts

• There is no improvement to data quality/integrity with the maintenance of the existing error handling business model.

B.4 Address Errors

In current mainframe processes, WYO companies address data is only validated for accuracy by the US Postal database following submission. Additionally each address goes through a process to generate an address key, which serves as the location identifier for a structure. These current processes result in properties improperly linked together by an address key, which may lead to TRRP errors that decrease NFIP data accuracy.

Within the NextGen Data Warehouse a Property Site Repository, will store addresses as location attributes; and not as the primary key, unlike current processes described above. All TRRP address data will be parsed, standardized, enhanced and corrected. Although each address submitted by WYO companies will be retained in its original form, each address will be linked to its respective NFIP Official Address, where possible. Additionally, each location will be assigned a location ID. In this design a location may be associated with one or more addresses and each address will have its own address ID. The combination of location and address information, in conjunction with other data elements, provides NFIP stakeholders the ability to uniquely identify policies and claims locations

The EDG recommends that if a WYO company reports an invalid address that can still be matched one-to-one to a NFIP official address, the WYO company should not receive an address error. This matching utilizes NextGen's Location Validation to help "fix" address errors. It is important to note that NextGen technologies would be able to assist WYO companies in validating some address errors, but will not be able to validate all addresses. There will still be errors, based on established address error codes that will count against WYO companies' TRRP standings.

Most importantly, address data needs to contain enough information to match an address. NextGen's Location Validation technologies use additional datasets to validate addresses, however WYO companies will need to continue to submit complete addresses, including apartment numbers, post/pre street directions, etc.

EDG recommends that the NFIP Official Address should be used as the means to identify errors, in WYO company-reported addresses. The NextGen Location Validation Services should assist WYO companies in reducing address errors, given the various services provided to the WYO companies. However Location Validation may not be able to validate all addresses. The EDG acknowledges that TRRP address errors will have to remain critical until FEMA is satisfied that address errors are not impacting NFIP data accuracy and the rules can be changed.

Partial Submitted 2001 North Capital Washington, DC	NextGen Parsed, Standardized and Corrected Address ID: 000007778 (NFIP Unique Number) Location ID = 000002846 2001 N Capitol St NE Washington DC 20002-1327 Roof-Top Latitude/Longitude: 38.917156/-77.008894
<u>As-Is Key</u> -Address Key based on NAIC and Address -Not unique or easily matched	Record Type: Street Valid Mailing Address: Y

WYO Company Business and IT Impacts

- Address errors should decrease for each company over time.
- Companies that use Location Validation web services should have zero address errors. Consuming web services may require changes to WYO company systems depending on their systems' currency.
- WYO company IT systems will require no changes to implement the Location Validation TRRP Cycle recommendation.
- WYO companies will have the opportunity to receive validated address information to feed into their systems in standard formats.
- WYO companies should experience improved address data quality in NFIP reports for disaster coverage, trends, etc.

FEMA Impacts

- Data matching will be improved with standardized addresses.
- Data quality for addresses to be able to better match repetitive loss structures, track CBRA appeals from one policyholder to another, etc.
- FEMA should experience improved address data quality in NFIP reports for disaster coverage, trends, etc.

B.5 Policy Corrections – This needs to be futher discussed before a descision is made

Under the current mainframe system, data must be re-submitted in a specific manner in order to modify previously-submitted data. In order to make a policy correction under the NextGen system, EDG recommends that companies be allowed to submit a replacement record. Rather than containing asterisks and nulls for values to be modified, the replacement record will only contain the required data fields to be corrected. The existing record will be modified with the updated information contained in the replacement record.

WYO Company Business Impacts

• The replacement record capabilities will improve and streamline business processes for policy corrections.

WYO Company IT Impacts

- WYO TRRP submissions will no longer require additional data to replace records on the mainframe.
- WYO company IT systems will require modification to format replacement records.

FEMA Impacts

- TRRP processing and performance levels will be increased.
- TRRP scalability for future Web services development efforts will be improved.

C Financial Management Impacts

The Executive Decision Group has reviewed a number of policies and procedures related to the financial management process and its impacts on the NextGen Flood Financial Management (F2M) application. EDG has made recommendations in the following areas.

- Financial Reporting Cycle
- Front-End Balancing
- Input Standardization, Accountability and Access Control
- Internal Bureau Reporting Requirements
- WYO Company Supporting Document Upload
- Monthly Upload of Reconciliation Data
- Financial Management Process and Impacts

C.1 Financial Reporting Cycle

Under the current financial management process, a WYO company's monthly financial management activities correspond to the TRRP statistical file submitted by the WYO company for the specific reporting month.

In the NextGen environment, TRRP data will be processed on a daily basis and financials and reconciliations will remain monthly, as it is today. When a WYO company makes a daily TRRP submission, it will indicate the reporting month for the TRRP submission file. This is similar to the way WYO companies conduct business today, but instead of one TRRP submission that is marked as financial "month X;" it will be daily submissions that are marked financial "month X."

The daily TRRP statistical data will be totaled for the financial month, so the monthly financials and reconciliation can be completed, submitted and processed.

EDG supports and recommends this solution. This option will eliminate any confusion that might be caused by deciding between system data or WYO company transaction date to determine the reporting period. It allows WYO companies to determine their monthly financial period.

WYO Company Business and IT Impacts

- WYO companies must coordinate the daily TRRP process to ensure the correct daily TRRP is labeled with the financial reporting month on each daily TRRP submission before submitting the file.
- WYO companies will have greater flexibility to define the financial reporting period for TRRP submissions.
- WYO companies will need to add a header record to the daily TRRP file to indicate the reporting period. There will be no changes to the actual TRRP transaction record layouts for financials.

FEMA Impacts

• FEMA needs to review and define guidelines to the new business process, such as once a WYO company changes a TRRP submission financial month they cannot go back to the prior month

C.2 Front-End Balancing

Under the current system, a WYO company's monthly TRRP submission is balanced against a report of record counts and financial metrics, including net written premium, net federal policy fee, net paid losses and special allocated LAE, before the full TRRP cycle is processed. This front-end balancing process is conducted manually under the current system.

FEMA requires NextGen technology to establish and maintain daily TRRP cycle processes, which necessitates an automated front-end balancing process.

EDG recommends the inclusion of header, reconciliation and footer sections in the daily TRRP file to report the record counts and financial metrics. The transactions contained in the TRRP file will be compared with the reported values; if the totals do not match, the file will be suspended and the WYO company or their vendor will be notified. WYO companies will be notified if the TRRP submission was a successful or failed via automated emails. The new layout specifications are detailed in Appendix B.

WYO Company Business and IT Impacts

- WYO companies will have to report basic statistical financial metrics for each daily TRRP submission.
- WYO companies will have to modify their IT systems to meet header, reconciliation and trailer records in the TRRP. This includes creating basic IT procedures to sum record and

Daily TRRP Cycle

Header Record (new) Reconciliation Record (Net Federal Policy Fee, Net Written Premium, Net Paid Loss; SALAE) (new) TRRP Records (existing layout) Trailer Record (new)

dollar totals; and a new export file with the new sections. The existing TRRP record layout is not changing.

WYO companies will receive daily TRRP communications, via email, to inform them that TRRP cycle submissions were successful or if submissions failed. Submission failure notifications will include information about a failure; specifically identifying issues that prevented data from loading into the NFIP Data Warehouse.

FEMA Impacts

- Improved tracking and oversight of the TRRP submissions; facilitating the audit process.
- Risk transfer from manual processes to automated processes.

C.3 Input Standardization, Accountability and Access Control

Under the current financial submission process, WYO companies manually submit an Excel spreadsheet file that contains monthly financial exhibits and monthly reconciliations via unsecured email or postal mail. The Bureau manually receives and reviews the data, before it is uploaded into the mainframe.

The F2M application provides authorized users with the ability to view and enter WYO company data related to financial management.

NextGen is providing two methods (listed below) for WYO companies or their vendors to submit their monthly financial data; any combination of the two options may be selected.

- Status Quo: The F2M application will provide WYO companies with the ability to upload an Excel spreadsheet with their monthly financial information. The spreadsheet format must be NextGen standardized to facilitate the upload process.
 - Benefit: WYO companies that are comfortable with the current spreadsheet submission process will only need to change the way they deliver the information (via Web-based upload rather than e-mail).
- Online Data Entry: The F2M application will provide WYO companies with the ability to enter their monthly financial information into a web-based form.
 - Benefit: WYO companies that do not have automated processes may utilize this option as an alternative to submission of an Excel spreadsheet.

For security and privacy reasons, NextGen is limiting F2M access to specific WYO company, vendor, Bureau and FEMA personnel. EDG is recommending that each WYO company or their vendor select their preferred method for securely submitting data from the following list.

- **Manual Data Entry** NextGen servers utilize a SSL Certificate that secures and encrypts data that is manually entered into F2M and other NextGen applications. This process requires users to manually enter data on a monthly basis.
- Upload a File (via "Browse" button) F2M will provide the facility to upload monthly financial data stored in the standardized Excel spreadsheet. The Excel spreadsheet will be secured using a locally-stored (e.g. Public Key Infrastructure (PKI) Token) to encrypt the spreadsheet file during the upload and transfer process.

WYO Company Business Impacts

• WYO companies will maintain the same financial management processes, though their monthly submission method may change.

WYO Company IT Impacts

- WYO companies may select their preferred method both for submitting and securing monthly financial data submissions.
- The impact on IT systems will vary based on the selected method for submitting and securing monthly financial data submissions.

FEMA Impacts

• FEMA will not be impacted by the potential changes in submission methods by WYO companies.

C.4 Internal Bureau Reporting Requirements

Under the current financial management process, the Bureau follows specific internal reporting requirements for financial activities. EDG is recommending that NextGen maintain and support existing Bureau processes, as listed below.

- Maintain Financial Statements Formatting Requirements, which follow Generally Accepted Accounting Principles (GAAP) and include Management Notes.
- Support processes for primary Bureau monthly financial reports that cover all WYO Companies and the SDF to be delivered to FEMA by the 5th calendar day, including the following reports.
 - Balance Sheet
 - o Income Statement
 - Statement of Changes in Financial Position
 - o Statement of Cash Flows
- Support Bureau 12th day (e.g., June data reported by August 12th) Monthly Reporting Responsibilities to FEMA, including the following reports.
 - WYO Consolidated Treasury Remittance Report
 - NFIP Direct Treasury Remittance Report
- Support Bureau Deposits Details Report due by the 3rd workday of the month following the month of deposit.
- Support WYO Financial Submissions Timeliness Report through automated processes by the 12th calendar day of the second month.
- Support Account Receivables Details Report due by the 12th calendar day of the second month. The report includes what is owed and what has been collected during a given month.
- Support the WYO Companies and NFIP Servicing Agent Consolidated Financial/Statistical Variance Report due by the 21st calendar day of the second month. This report includes any current and historical variances for the NFIP Servicing Agent and WYO Companies' Net Written Premiums, Net Paid Losses and Federal Policy Fees.
- Support Prior Term Refunds Consolidated and Detailed Reports due by the 12th calendar day of the following month, showing all refunds issued and all due expense allowances.
- Support Annual Statements generation, including all Footnotes and Disclosures.

WYO Company Business Impacts

• WYO companies will not be impacted by the maintenance of the Bureau internal reporting requirements.

WYO Company IT Impacts

• WYO companies will not need to change their IT systems as a result of the maintenance of the Bureau internal reporting requirements.

FEMA Impacts

• FEMA will not be impacted by the maintenance of the Bureau internal reporting requirements.

C.5 Company Supporting Document Upload

With each monthly financial submission, WYO companies need to submit supporting documentation. Currently, companies mail this information to the Bureau. EDG recommends that companies have the option to upload soft copies or mail the supporting documentation. This recommendation is the same for the authorization signatures.

C.6 Monthly Upload of Reconciliation Data

This will be included in the NextGen Standard Monthly Financial Spreadsheet, see C.3.

C.7 Financial Management Process and Impact – EDG still needs to review the options

- TRRP Timeframe, Durations and Cutoff Dates
- System of Record Date
- Stakeholder Access
- Archiving Process Impact
- Company Merger Process Impact

D NextGen WYO Company Migration Planning – Upcoming EDG Topic

D.8 WYO Company and NextGen TRRP Submission Plan

- WYO company/vendor migration schedule
- WYO company exception handling procedure
- WYO Company Tests
- Reconcile Acceptable Differences (Based on EDG Guidance)
- Performance (Ensure Daily Cycle Time)

D.9 Transistion to Daily TRRP

- NextGen TRRP Cycle Timeframe
- Company Testing Scheduling
- Transition Date

E Appendix A

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F Appendix B – Daily TRRP Cycle Submission Layout

TBD