



August 19, 2020

Office of the Comptroller of the Currency
Chief Counsel's Office (Attention: Comment Processing)
400 7th Street SW, Suite 3E-218
Washington, DC 20219
Via email at regs.comments@occ.treas.gov

Ann E. Misback
Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Via email at regs.comments@federalreserve.gov

Robert E. Feldman, Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
Via email at comments@fdic.gov

David P. Grahn, Director, Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090
Via email at reg-comm@fca.gov

Gerard P. Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428
Via facsimile at 703.518.6319

Re: Request for Extension of Comment Period for Loans in Areas Having Special Flood Hazards;
Interagency Questions and Answers Regarding Flood Insurance; OCC Docket ID OCC-2020-0008;
Federal Reserve System Docket No. OP-1720; FDIC RIN 3064-ZA16; FCA RIN 3052-AD42; NCUA
RIN 3133-AF14

Dear Sir or Madam:

We applaud the Agencies' collective efforts to prepare and release the proposed guidance and needed update to the "Interagency Questions and Answers Regarding Flood Insurance" (the "Q&A"). The National Flood Association ("NFA") recognizes this was a significant undertaking involving the Agencies' efforts to compile guidance provided over the recent years following changes in the flood insurance laws in 2012 and 2014. We note that almost 90 questions and answers are either new or substantially revised—an impressive effort. We also want to commend you on the proposed organization as we have heard from our members that find the new organization to be more user-friendly and easier to keep current going forward.

The Q&A has been a critical resource for lenders, service providers, and other stakeholders for many years; therefore, when revisions are proposed, it is critical that impacted parties consider and comprehend these proposed changes in order that the Agencies can have the benefit of thoughtful feedback for deliberation. Thus, we appreciate this comment period and look forward to providing our comments for your consideration. We also know that member companies are working on their own respective comments and we invite your consideration of these as well.

Given the criticality of the resource, the volume and depth of content that needed to be included from 2012 and 2014 laws, and the number of new or substantially revised questions and answers, we respectfully request an additional 60 days after the current September 4, 2020 comment deadline for stakeholders to provide complete and carefully considered feedback. This would permit NFA members, and other interested stakeholders, to have sufficient time to consider and prepare remarks for the Agencies' consideration.

Thank you for consideration of this request. We look forward to contributing to this important effort.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl A. Small".

Cheryl Small, Executive Director
National Flood Association