



August 19, 2020

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

Ann E. Misback  
Secretary, Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington, DC 20551  
Via email at [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

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



Cheryl Small, Executive Director  
National Flood Association