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April 24, 2015

The Honorable Craig Fugate
Administrator
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20410

Dear Administrator Fugate:

The National Association of REALTORS® (NAR) is writing to support the application of **Lisa Sharrard (Jones) for the Flood Insurance Advocate position.** This position was created by Section 24 of the Flood Insurance Affordability Act (Public Law #113-89). Its principal responsibilities are two-fold: 1) to educate property owners about their flood risk, maps and mitigation and 2) aid them in obtaining and verifying the accuracy and reliability of the flood insurance rate information. We believe that Ms. Sharrard would make an ideal candidate to fulfill these dual roles and would tirelessly advocate for the fair treatment of homeowners and small businesses under the National Flood Insurance Program.

NAR supported the creation of the Advocacy office because property owners and buyers were turning to our members for help after FEMA failed to verify a number of questionable rate quotes by Write-Your-Own (WYO) companies. Virtually all of these quotes lacked documentation and were too cryptic for us to replicate -- let alone validate. Most were not covered by FEMA's rate tables and developed by WYOs using special, individualized ratings, known as "Submit-to-Rate." Verifying these required an insurance background as well as experience with the lengthy FEMA guidelines and a complicated set of procedures that were unknown to us at the time.

Lisa Sharrard was referred to NAR as an independent, expert consultant who had successfully advocated for our members and their clients with the WYOs. She had been the NFIP coordinator for South Carolina from 1994-2010, so she understood the insurance side of NFIP as well as its flood mapping, community compliance, and mitigation programs. She knew the questions to ask about the rate quotes and where to go in FEMA for the answers. Drawing on her years of insurance underwriting experience -- both as a licensed property/casualty producer and senior professional trainer for the NFIP Direct Program, Ms. Sharrard was able to quickly pinpoint the problems and distill the information so our members could follow the rating calculations step-by-step and see the patterns where the process was breaking down. Ms. Sharrard became NAR's "Go-To" advisor for the most complicated ratings. She provided a series of trainings from the documentation one needs to challenge a flood insurance mis-rating to how to reform the CRS Program. She provided the inaccurate-rate-quote examples which formed the basis of NAR's testimony before Congress in support of the Affordability Act. We envisioned someone with her skill sets as the Advocate when we worked with Congress to develop the provisions which created the Office and ultimately were signed into law.



NAR recommends Lisa Sharrard for the Flood Insurance Advocate. Thank you for establishing the Interim Flood Advocate's Office and detailing the right interim staff to launch and chart a sound course toward a permanent office. We look forward to working with you and the Office as the transition continues.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Polychron". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chris Polychron
2015 President, National Association of REALTORS®

cc: Brad Kieserman, Deputy Associate Administrator, Insurance
David Stearrett, Acting Flood Insurance Advocate