



Council for Affordable and Rural Housing
Institute of Real Estate Management
Mortgage Bankers Association
National Affordable Housing Management Association
National Apartment Association
National Association of Home Builders
National Association of Housing Cooperatives
National Leased Housing Association
National Multifamily Housing Council

Subject: MBA Request for FFRMS Guidance

Thank you for your letters of July 17, 2024, and August 28, 2024, regarding HUD's Federal Flood Risk Management Standard (FFRMS) rule. After the August 28th letter, HUD took an immediate response to extend the internal application threshold date from September 1 to October 1. The January 1, 2025, regulatory deadline remains in place.

The July letter asked why the FFRMS implantation date is not tied to the FHA mortgage insurance application. The FFRMS rule at 24 CFR Part 55 applies to all HUD programs, and compliance is tied to completion of the environmental review, not an application. An application submission prior to January 1, 2025, would not stop the clock for applying the new rule to an environmental review that is not completed until after January 1, 2025, because Part 55 compliance is determined and certified via the environmental review record and supporting documentation.

HUD has provided [two webinars](#) on the FFRMS rule, updated the [WISER module](#), added [new FAQs](#), and provided [guidance](#) on the FFRMS rule, with more information being added regularly.

Housing staff have led FFRMS sessions at the HMAC, SMAC and WMAC conferences and provided written responses to general and project specific FFRMS questions. Housing has provided internal training to its field staff and is planning two upcoming trainings specifically for Multifamily and Healthcare partners.

- [Defining FFRMS for Housing Partners Part 1](#)

Overview of how to define the FFRMS floodplain using the Climate Informed Science Approach (CISA), 0.2 percent annual chance floodplain, and Freeboard Value Approach methods for Housing programs including Multifamily, Healthcare, and Hospital FHA (including Risk-Sharing), RAD, GRRP and Asset Management.

October 21, 2-3:30 ET.

Register [here](#).

- Defining FFRMS for Housing Partners Part 2

Defining FFRMS floodplain for areas behind levees and other unique floodplain areas; determining the required elevation; and using Flood Insurance Study data for Housing programs including Multifamily, Healthcare and Hospital FHA (including Risk-Sharing), RAD, GRRP and Asset Management.

November 4, 2-3:30 ET.

Register [here](#).

We close this letter with answers to lender questions about FFRMS. These will be posted soon as a Fact Sheet at the [Housing Environmental website](#) on the HUD Exchange.

Sincerely,

DocuSigned by:
Ethan Handelman
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Ethan D. Handelman, Deputy Assistant Secretary
Multifamily Housing Programs, HT