Discussion: Facing Wildfire Insurance Challenges: Five Lessons from the National Flood Insurance Program

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#### **Disclaimer**

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## **Summary**

- Insuring natural disasters is hard because they are correlated risks
  - Climate change makes this even harder
- 50 years of National Flood Insurance Program history can provide lessons on how insurance should be structured
  - 1. People won't buy insurance if they don't have to
  - 2. Actuarially fair insurance will be expensive in high-risk areas
  - 3. Catastrophe models can help improve insurance pricing
  - 4. Households pay attention to risk information
  - An ounce of prevention is worth a pound of cure (but even with a 16x return, we often underinvest)

#### **Comments Overview**

- Lessons 1 and 3 are quite reasonable and offer clear policy prescriptions
  - Mandate insurance coverage to ensure risk pooling and no uninsurance
  - Let insurers use catastrophe models (including forward-looking climate change) in pricing (CA recently allowed this)
- Lesson 5 is important, but more a political challenge
  - How/When should we incentivize individual adaptation?
  - How to make community investments in prevention more popular?
- Lessons 2 and 4 should be expanded upon

# Affordable or Accurate Premiums? (1/2)

- Recognizing the stock/flow nature of housing relaxes the tension between insurance affordability and accuracy
- The existing stock of homeowners made location choices based on old/inaccurate/missing climate risk information
  - Prioritize affordability over accuracy for existing homeowners in the spirit of fairness
- Incoming flows of homeowners should have relevant information and insurers can provide price signals
  - Prioritize accuracy over affordability because prospective homebuyers can choose a different location relatively costlessly

# Affordable or Accurate Premiums? (2/2)

- Failing to distinguish between the stock and flow of homeowners means "affordability" often prevails and hence society subsidizes homeowners to live in risky places
- Important general equilibrium concerns about home price collapse perpetuating unfairness for existing homeowners
  - Buyout programs?

# **Providing Risk Information to Households**

- Disclosure is better at affecting home search and home values, not insurance takeup
- Give households detailed information relevant to what they care about
  - Households care about what happens while they live there
    - Probability my SFHA home floods this year: 1%
    - Probability my SFHA home floods over 30 years: 26%

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- For wildfires
  - Not helpful: What's the chance my home burns down this year?
  - Critically important: What's the chance my home burns down while I am in it?

#### **Smaller Comments**

- Flood insurance is required on any properties with a mortgage from a federally-regulated lender
  - Even if a bank doesn't sell a mortgage to Fannie or Freddie (e.g., jumbo mortgages), it has to have flood insurance if it is in an SFHA
- Living in a coastal county doesn't mean you're automatically at a high risk of flood because counties are large
  - Only 20% of LA county is "moderate" flood risk according to First Street Foundation
- Cite Nitzan Tzur-Ilan's work on the effects of smoke
- Update discussion of California rules around catastrophe models (new rules issued in late Sept 2023)













