



Catastrophe Incident Response Plan

Texas Windstorm
Insurance Association

Texas FAIR Plan
Insurance Association

June 1, 2015



General Manager's Message

I am pleased to submit the 2015 Catastrophe (CAT) Incident Response Plan for the Texas Windstorm Insurance Association (TWIA) and the Texas FAIR Plan Association (TFPA). The Associations' commitment to driving operational efficiency throughout the Enterprise and creating a culture of continuous improvement is reflected in this year's CAT Plan. We have transitioned from a rigid "test and correct" model to a continuous planning, assessing and corrective action model. The Plan is a result of incorporating this continuous improvement with the combined best practices from insurance industry CAT responses and the National Incident Management System. This makes it a living document to better serve the needs of our policyholders

The TWIA / TFPA 2015 CAT Plan is fully compliant with insurance codes for claims handling during a catastrophe. The Plan also has a new streamlined design making it easier to implement by everyone involved in its execution.

At TWIA and TFPA we recognize the privilege and responsibility we have in serving our policyholders. Every department taking part in yearly planning is testament to that fact. With a coordinated response as the bedrock of our Plan, we are positioned to effectively serve the recovery of Association communities when a catastrophic incident strikes Texas.

With pride in our progress and resolve for our future,

A handwritten signature in black ink, appearing to read "John W. Polak", with a stylized, cursive script.

John W. Polak, CPCU
General Manager

Table of Contents

<u>General Manager's Message</u>	2
<u>Table of Contents</u>	3
<u>Introduction</u>	4
Purpose.....	4
Background.....	4
About This Plan.....	4
Plan Objectives	5
<u>Mitigation Phase</u>	6
<u>Preparedness Phase</u>	37
<u>Response Phase</u>	61
<u>Recovery Phase</u>	76
<u>Appendices</u>	84
<u>Appendix A - CAT Plan Revisions Log</u>	85
<u>Appendix B - CAT Summary Checklist for TWIA and TFPA Staff</u>	86
<u>Appendix C - How to Submit a Claim for TWIA and TFPA Staff</u>	87
<u>Appendix D - Plan for Volunteer Enlisting for Catastrophe (CAT) Incident Response Deployment</u>	88

Introduction

Purpose

The Catastrophe (CAT) Incident Response Plan describes the activities Texas Windstorm Insurance Association (TWIA) and the Texas FAIR Plan Association (TFPA) will conduct in preparation for, and in response to, a catastrophic incident. This document demonstrates planning and mitigation efforts, deployment procedures, and the continuous improvement processes TWIA and TFPA follow throughout the year.

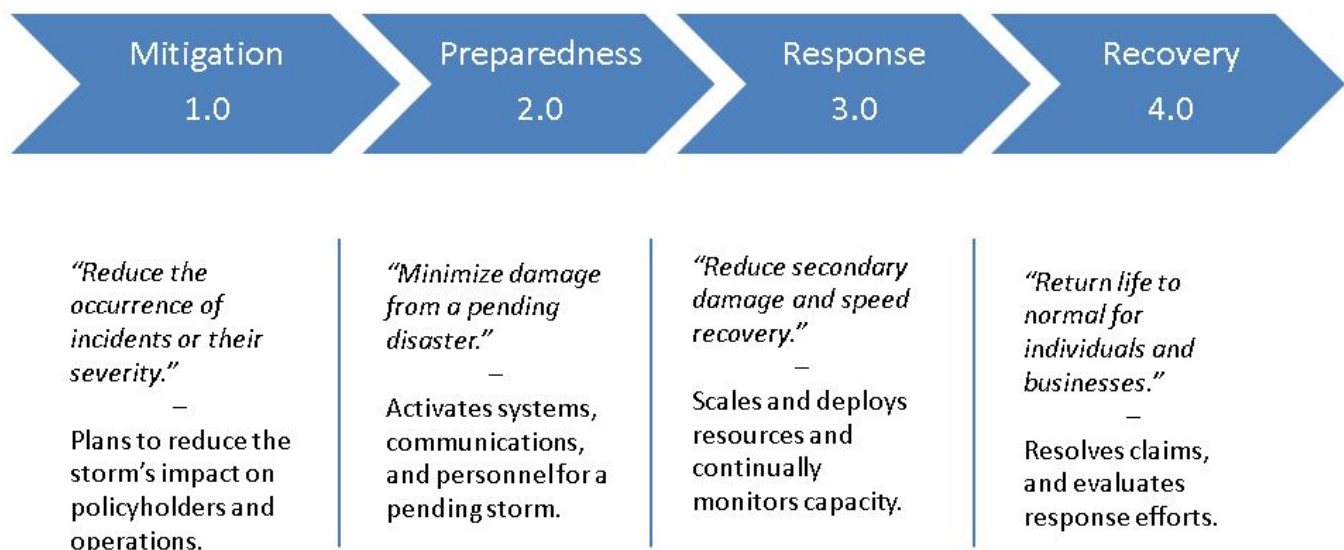
Background

Texas Insurance Code 2210.455 requirements state that TWIA must submit a CAT Plan each year, and that planning should occur for the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year). This Plan describes how the Associations will respond to incidents of varying scales, including how losses are evaluated and claims are processed if a catastrophe affects an area of maximum exposure. TFPA is not subject to Chapter 2210, but fully participates in incident planning and remains ready for the various kinds of incidents that may impact TFPA policyholders. These requirements are guidelines and should not bind the Associations to a particular course of action.

About This Plan

This Plan is aligned with the phases of catastrophic incident response followed by the Texas Division of Emergency Management (TDEM): Mitigation, Preparedness, Response, and Recovery. The Associations focus on helping policyholders recover from catastrophic incidents: in particular, making sure the insurance claims process holds up under extreme claim volume, and helping ensure normal business processes are not interrupted. The Plan provides resources and logistics for repairing covered properties, and thus for helping communities return to normal.

Plan Phases:



Plan Objectives

Objectives have been established for each phase of the Plan. The objectives are important benchmarks to ensure:

- Compliance with legal and regulatory requirements
- Compliance with required Association procedures
- Uninterrupted essential services with prompt and fair claims handling
- Modeling for staff scalability and catastrophe funding
- Coordination of action plans between Departments
- Clear roles and responsibilities for staff and vendors
- Documented processes for quality assurance
- Leadership in assisting with community recovery

Exhibit 1: Sample Objective from the Catastrophe (CAT) Incident Response Plan

1.4 Maintain Plans for Deploying Mobile and Remote Facilities			
Required outcome by plan phase.	Objective 1.4	To maintain plans for deploying mobile and remote facilities.	
	Description	Claims creates site requirements (i.e., supplies) for mobile and remote facilities. Facilities plans for providing supplies for off-site facilities.	
Purpose behind each objective.	Purpose	<ul style="list-style-type: none"> • To provide immediate policyholder assistance, including first notice of loss (FNOL), claim status information, and advanced payments. • To have off-site space to house additional customer care and data entry resources. 	
	Participants	Claims, Facilities, Legal	
Actions segmented into tasks by role and responsibility.	Action Plans	Claims <ul style="list-style-type: none"> • Establishes criteria for activating mobile and remote facilities. • Maintains contract with Bentsys Recovery Services to provide mobile office units, equipment, network, and phone patch within 48 hours of notification. • Maintains contract with Agility Recovery's ReadySuite service for off-site office space, equipment, network, phone connectivity within 48 hours of notification. • Maintains contract with Agility for gas trucks in the case of a serious catastrophe. • Identifies locations for mobile offices in TWIA/TFPA territories. • Maintains site requirements for mobile and remote offices, including supplies. Facilities <ul style="list-style-type: none"> • Works with Claims to order supplies and equipment for off-site facilities. • Plans for security for mobile and remote facilities. • Work with administrative staff to plan for packages of handbooks, policies, forms, brochures, and other documents for the off-site offices. Legal <ul style="list-style-type: none"> • Approves all vendor contracts related to off-site facilities. • Ensures all required insurance policies are in place for off-site facilities. 	
		Exhibits See Exhibit 7 "Site Plan for TWIA/TFPA Community Claims Center" in text following. Mobile and Remote Facilities Claims Processing Workflow	
Additional explanation or detail.	Additional Information	<ul style="list-style-type: none"> • Office solutions are deployed within 48 hours of landfall or when it is safe to travel. • Association utilizes available hotel and partners' office space before renting space. • The Bentsys unit supports: 30 customer seats, two reception seats, 21 computer workstations, one office, generator, HVAC, wireless network, and satellite phone. • Agility Recovery's ReadySuite supports: 48 workstations, generator, telephone and internet, computer equipment, 5 Intel servers, tape drives, printers, and fax. 	
Requirements or regulations (i.e., HB 3).	Compliance	Under construction for 2016.	
	QA or Testing	Under construction for 2016.	

Mitigation Phase (1.0)

According to the Texas Division of Emergency Management (TDEM), the goal of mitigation is not to prevent natural disasters, but to “reduce their severity.” Planning for mitigation occurs Enterprise-wide. Departments participate in personnel training, the updating of documentation, and strategic planning for how to scale up resources and supplies when faced with a catastrophic incident.

Even before an active threat is on the horizon, TWIA and TFPA have completed the work necessary for an efficient and effective catastrophic incident response. Further effort is focused on completing yearly planning, on testing prior to hurricane season, and on corrective action planning.

1.1 Maintain a Catastrophe (CAT) Incident Response Plan

Objective 1.1	To maintain a catastrophe (CAT) incident response plan.
Description	Assure a detailed Plan is in place. Update and make improvements to the Plan after an incident or a test. Annually submit updated Plan as required by Texas Insurance Code 2210.
Purpose	<ul style="list-style-type: none"> To plan for delivering essential services in the case of a catastrophic incident. To keep the Plan current with changes in the Associations' workflows and procedures.
Participants	General Manager, All Departments
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Selects the Plan committee and recruits staff to assist with updates. Sets regular meetings of the committee to develop updates. Implements feedback from Plan tests. Meets with TWIA/TFPA Departments to review updates. Submits the Plan to the Executive Leadership Team for approval. <p>All Departments</p> <ul style="list-style-type: none"> Review Plan to identify and assess ownership of roles and responsibilities. Assist with updating the Plan, including sending updates to the CAT Plan committee. Assist with training Department staff on Plan requirements. Work under Corrective Action Program (CAP) to ensure continuous improvement. Assist with implementing testing, including Department tests of relevant objectives. <p>General Manager and Executive Leadership Team review and give Plan approval.</p> <p>Communications and Legislative Affairs submits Plan to internal and external stakeholders no later than June 1.</p> <p>Claims works with Executive Leadership Team to identify areas for improvement and creates an improvement plan including testing, training and exercises to ensure continuous improvement.</p>
Exhibits, or Related Documents	Appendix A - CAT Plan Revisions Log
Additional Information	The Vice President of Claims networks with other wind pools concerning CAT mitigation and claims processing.
Compliance	Fulfills the need to model one, two, and four-in-100 year storms, and the need to describe pre- and post-storm processes as per Texas Insurance Code 2210.
QA or Testing	

1.2 Maintain Methodologies for Incident Analysis and Exposure Modeling

Objective 1.2	To maintain methodologies for incident data analysis and exposure modeling.
Description	Maintain methodologies to predict and confirm weather data in order to forecast and assess claims for a catastrophic incident.
Purpose	To plan for delivering essential services in the case of a catastrophic incident.
Participants	Claims, Actuarial
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Assigns business analyst to gather, format, and update Policy-In-Force (PIF) data. • Receives storm activity data each day across the U.S. from weather data vendor. • Maintains services with weather data vendor to automatically order wind or hail storm reports for the address of a policyholder filing a claim. • Runs regularly scheduled queries for Policy in Force (PIF) data for TWIA/TFPA. • Runs ad hoc queries for Policy in Force (PIF) data, as needed. • Trains resources on weather tracking and exposure modeling. • Evaluates and purchases web tools for storm data tracking. • Maintains process for determining potential PIF impact depending on the number of policies in impacted Association territories. • Maintains spreadsheet with formulas to model potential exposures in the case of a catastrophic incident. <p>Actuarial manages the modeling of TWIA and TFPA exposures prior to hurricane season.</p>
Exhibits, or Related Documents	<ul style="list-style-type: none"> • TWIA and TFPA Policy-In-Force (PIF) Data • Hail/Wind Shape File Data Map • In text following Exhibit 2 “Hurricane/Tropical Storm Loss Projection Model.”
Additional Information	
Compliance	Fulfills the need to describe pre- and post-incident processes as per Texas Insurance Code 2210.455.
QA or Testing	

Exhibit 2: Hurricane Loss Projection Model

Storm Data Map - Loss Projection Model					
Wind Speed (MPH)	TWIA Residential PIF	TWIA Commercial PIF	TWIA Total PIF	Projected Claim Frequency	Projected Claim Volume
< 50	51,453	8,445	59,898	5-10%	2, 995 - 5,990
50 - 69	25,248	3,636	28,884	11-35%	3,177 - 7,221
70 - 89	131,142	9,372	140,514	36-50%	36,534 - 70,257
90 - 109	24,828	2,736	27,564	51-75%	14,058 - 20,673
>109	9	2	11	76-100%	<11
Totals	232,680	24,191	256,871	...	70,823 - 107,040

1.3 Utilize Scalability Modeling to Predict Staffing Needs

Objective 1.3	To utilize scalability modeling to predict staffing needs.
Description	Model the number and type of staff needed to provide essential services for the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year).
Purpose	<ul style="list-style-type: none"> To increase the ability to activate resources after a catastrophic incident. To uphold the Associations' mission to deliver prompt and fair claims service.
Participants	Claims, General Manager
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Obtains and formats relevant data for incident modeling and exposure modeling. Creates resource scalability models for one, two, four, and ten-in-100 year incidents. Continually adapts the "Claims Resource Scalability Model" to estimate capacity based on exposure modeling and projections. Compares current resources against scalability models to gauge capacity. Continually assesses need for approved claims examiners, managers, customer care, quality assurance, field re-inspectors, field adjusters, emergency mitigation, engineers, building consultants, and contents specialists. Publishes approved vendor fee schedules. Confirms available resources and maintains approved vendor contact information. Runs indirect incident modeling in the case of incidents outside Association territories. Maintains information on supplemental resources, such as preferred repair providers (PRP), direct repair providers (DRP), and salvage resources. Maintains mobile office and off-site office staffing plans for various CAT scenarios. <p>General Manager reviews quarterly updates on vendor assignment process.</p>
Exhibits, or Related Documents	In text following: Exhibit 3 "TWIA One Percent Probability Event," Exhibit 4 "TWIA Two Percent Probability Event, Exhibit 5 "TWIA Four Percent Probability Event, and Exhibit 6 "TWIA Ten Percent Probability Event."
Additional Information	
Compliance	<ul style="list-style-type: none"> Fulfills the need to model one, two, and four-in-100 year incidents, and the need to describe pre- and post-incident processes as per Texas Insurance Code 2210.455. Additionally models ten-in-100 year incidents (i.e., 10 percent event). Fulfills the Texas Insurance Code requirement to implement indirect incident modeling once per year.
QA or Testing	

Exhibit 3: TWIA 1% Probability Event (1 in 100 year event)

Claims Resource Scalability Modeling Tool 2014 - TWIA 1% Probability Event (1 in 100 year event)												
Projected or Actual Claims	Date Range	Claims Per Day	Claims Examiners	Managers	Customer Care	Quality Assurance	TOTAL	Field Re-Inspectors	Field Adjusters	Examiner - Claims Per Day	Adjuster - Claims Per Day	Examiners Per Manager
144,250	30	4,808	401	33	167	100	701	100	962	12	5	12
39,200	30	1,307	109	9	45	27	191	9	261	Required Customer Care Resources By Claim Volume		
10,550	30	352	29	2	6	5	43	2	70	>150	>300	>600
										1.50	2.50	5.00
										Required QA Resources By Claim Volume		
										>150	>300	>600
195,000	90		539	45	218	132	935	112	1,293	1.00	2.00	3.00

Exhibit 4: TWIA 2% Probability Event (1 in 50 year event)

Claims Resource Scalability Modeling Tool 2014 - TWIA 2% Probability Event (1 in 50 year event)												
Projected or Actual Claims	Date Range	Claims Per Day	Claims Examiners	Managers	Customer Care	Quality Assurance	TOTAL	Field Re-Inspectors	Field Adjusters	Examiner - Claims Per Day	Adjuster - Claims Per Day	Examiners Per Manager
88,000	30	2,933	244	20	102	61	428	61	587	12	5	12
24,200	30	807	67	6	28	17	118	6	161	Required Customer Care Resources By Claim Volume		
6,800	30	227	19	2	2	2	24	2	45	>150	>300	>600
										1.50	2.50	5.00
										Required QA Resources By Claim Volume		
										>150	>300	>600
119,000	90		331	28	132	79	570	68	793	1.00	2.00	3.00

Exhibit 5: TWIA 4% Probability Event (1 in 25 year event)

Claims Resource Scalability Modeling Tool 2014 - TWIA 4% Probability Event (1 in 25 year event)												
Projected or Actual Claims	Date Range	Claims Per Day	Claims Examiners	Managers	Customer Care	Quality Assurance	TOTAL	Field Re-Inspectors	Field Adjusters	Examiner - Claims Per Day	Adjuster - Claims Per Day	Examiners Per Manager
48,250	30	1,608	134	11	56	34	235	34	322	12	5	12
13,600	30	453	38	3	8	6	55	3	91	Required Customer Care Resources By Claim Volume		
4,150	30	138	12	1	0	1	13	1	28	>150	>300	>600
										1.50	2.50	5.00
										Required QA Resources By Claim Volume		
										>150	>300	>600
66,000	90		183	15	64	41	303	38	440	1.00	2.00	3.00

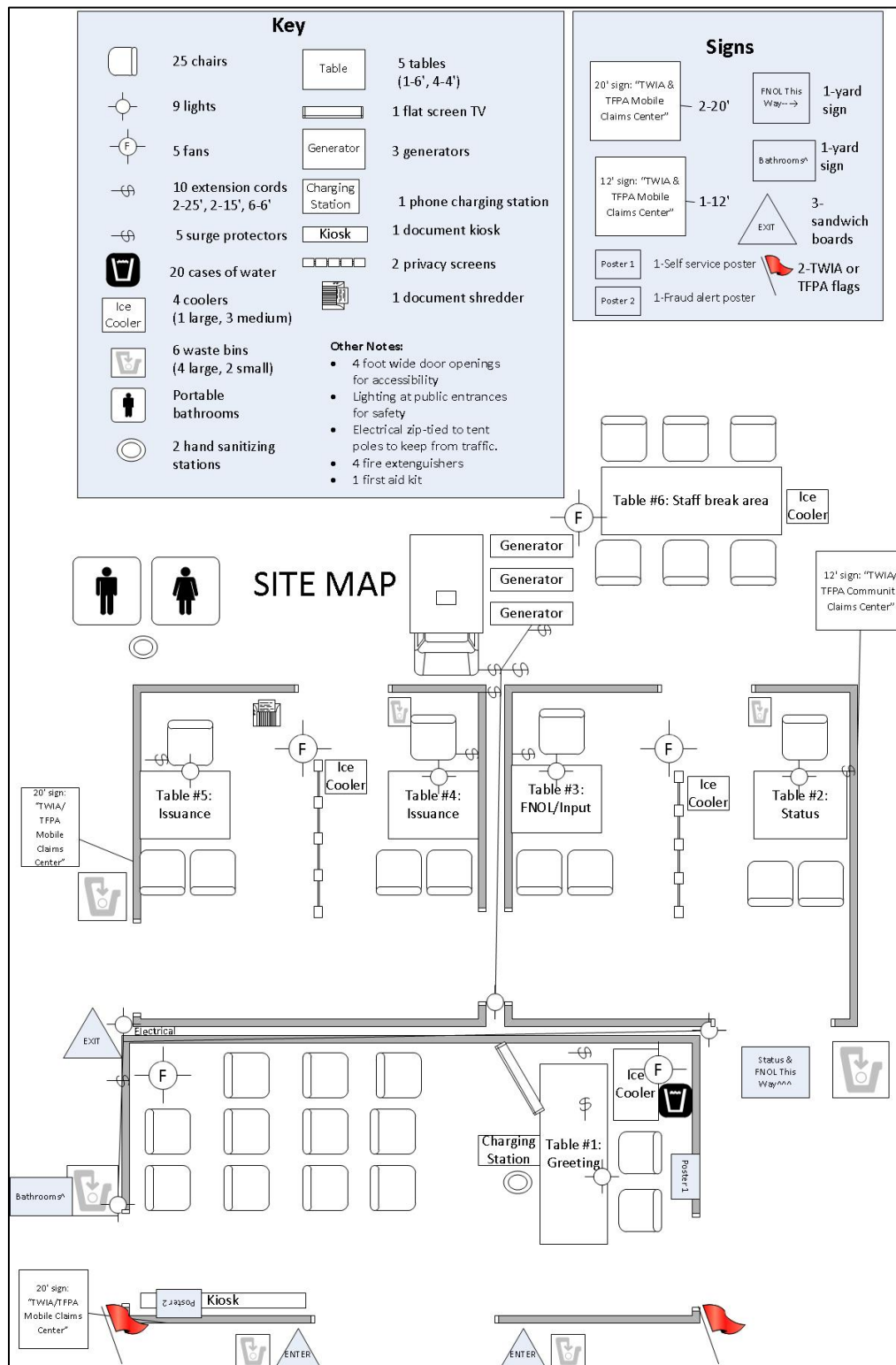
Exhibit 6: TWIA 10% Probability Event (1 in 10 year event)

Claims Resource Scalability Modeling Tool 2014 - TWIA 10% Probability Event (1 in 10 year event)												
Projected or Actual Claims	Date Range	Claims Per Day	Claims Examiners	Managers	Customer Care	Quality Assurance	TOTAL	Field Re-Inspectors	Field Adjusters	Examiner - Claims Per Day	Adjuster - Claims Per Day	Examiners Per Manager
18,250	30	608	51	4	21	13	89	13	122	12	5	12
5,600	30	187	16	1	2	1	20	1	37	Required Customer Care Resources By Claim Volume		
2,150	30	72	6	0	0	1	7	0	14	>150	>300	>600
										1.50	2.50	5.00
										Required QA Resources By Claim Volume		
										>150	>300	>600
26,000	90		72	6	23	15	116	14	173	1.00	2.00	3.00

1.4 Maintain Plans for Deploying Mobile Claims Center and Remote Facilities

Objective 1.4	To maintain plans for deploying mobile claims center and remote facilities.
Description	Create site requirements (i.e., supplies) for mobile and remote facilities.
Purpose	<ul style="list-style-type: none"> To provide immediate policyholder assistance, including first notice of loss (FNOL), claim status information, and advanced payments. To have off-site space to house additional customer care and data entry resources.
Participants	Claims, Facilities, Legal and Compliance
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Establishes criteria for activating mobile claims center and remote facilities. Maintains contract with Rentsys Recovery Services to provide mobile office units, equipment, network, and phone patch within 48 hours of notification. Maintains contract with Agility Recovery's ReadySuite service for off-site office space, equipment, network, phone connectivity within 48 hours of notification. Maintains contract with Agility for gas trucks in the case of a serious catastrophe. Identifies locations for mobile offices in TWIA/TFPA territories. Maintains requirements for mobile claims center and remote offices. <p>Facilities</p> <ul style="list-style-type: none"> Works with Claims to order supplies and equipment for off-site facilities. Plans for security for mobile claims center and remote facilities. Packages approved handbooks, policies, forms, brochures, etc. for off-site offices. <p>Legal and Compliance</p> <ul style="list-style-type: none"> Approves all vendor contracts related to off-site facilities. Ensures all required insurance policies are in place for off-site facilities.
Exhibits, or Related Documents	<ul style="list-style-type: none"> Mobile Claims Center and Remote Facilities Claims Processing Workflow In text following Exhibit 7 "Site Plan for TWIA/TFPA Mobile Claims Center."
Additional Information	<ul style="list-style-type: none"> Office solutions are deployed within 48 hours of landfall or when it is safe to travel. Association utilizes available hotel and partners' office space before renting space. The Rentsys unit supports: 30 customer seats, two reception seats, 21 computer workstations, one office, generator, HVAC, wireless network, and satellite phone. Agility Recovery's ReadySuite supports: 48 workstations, generator, telephone and internet, computer equipment, 5 Intel servers, tape drives, printers, and fax. Rentsys unit qualifies as RV, meaning few restrictions for on-site placement.
Compliance	
QA or Testing	

Exhibit 7: Site Plan for TWIA/TFPA Mobile Claims Center



1.5 Forecast Needs for Office Supplies and Equipment

Objective 1.5	To forecast needs for office supplies and equipment in the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year).
Description	Plan for ordering and repairs in the event of rapidly increased demands on office supplies and equipment, including planning for extended-hour scenarios.
Purpose	<ul style="list-style-type: none"> • To uphold the Associations' mission to deliver prompt and fair claims service. • To establish processes for ordering and delivering supplies to mobile claims center and remote facilities.
Participants	Facilities
Action Plans	Facilities <ul style="list-style-type: none"> • Maintains inventory of supplies (e.g., chairs, workstations, and storage). • Forecasts increased demand on workspaces, supplies, and equipment, including supplies needed at remote facilities. • Identifies additional food and drink vendor services and cleaning services needed. • Coordinates additional parking for staff onsite, mobile claims center, and remote facilities. • Coordinates with Claims and IT to determine process for adding mailroom, printer, scanner, and fax server capacity. • Plans for additional security and extended hour security for Austin facilities.
Exhibits, or Related Documents	Workspace Utilization Report
Additional Information	
Compliance	Fulfills the need to model one, two, and four-in-100 year incidents, and the need to describe pre- and post-incident processes as per Texas Insurance Code 2210.455.
QA or Testing	

1.6 Evaluate and Optimize Claims Technology

Objective 1.6	To evaluate and optimize claims technology needed in the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year).
Description	Determine whether current systems are sufficient, or whether upgrades or additional licenses are needed.
Purpose	<ul style="list-style-type: none"> To uphold the Associations' mission to deliver prompt and fair claims service. To expedite software and hardware purchasing during a catastrophic incident.
Participants	IT, Claims
Action Plans	<p>IT</p> <ul style="list-style-type: none"> Meets with Claims and Underwriting to review systems, identify necessary upgrades, and implement software and hardware changes. Maintains quotes for expanding software licenses. Develops network access solutions for on-site and off-site work spaces, including assessing Rentsys satellite capabilities, wireless phones, and laptops for remote facilities and mobile claims center(s). Communicates with Claims and Facilities about plans for off-site office equipment. Manages Austin phones, line/voicemail capacity, and IVR. Researches whether to increase phone numbers from ~80 currently available. Conducts performance testing of the data center for scalability response time, availability, and reliability. <p>Claims</p> <ul style="list-style-type: none"> Evaluates claims technology systems for readiness: Web portals, software, hardware, telephony, fax lines, remote access, data management, and reporting.
Exhibits, or Related Documents	
Additional Information	
Compliance	Fulfills the need to model one, two, and four-in-100 year incidents, and the need to describe pre- and post-incident processes as per Texas Insurance Code 2210.455.
QA or Testing	

1.7 Enlist TWIA/TFPA Staff for Deployment

Objective 1.7	To enlist TWIA/TFPA staff for deployment in the case of a catastrophic incident.
Description	Develop and retain resources prepared to serve after a catastrophic incident.
Purpose	To set expectations with current staff for possible needs outside of this building.
Participants	Claims, All Departments
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Creates a plan to inform both Claims and non-Claims staff of the possibility of deployment in the case of a catastrophic incident. Prepares a formal list of Claims and non-Claims staff willing to relocate to the incident area. Maintains database listing volunteers for deployment. Sets quarterly meeting for volunteers. <p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> Assists with communication of recruitment and activation for deployment. <p>All Departments</p> <ul style="list-style-type: none"> Assist with identifying staff by role available for deployment.
Exhibits, or Related Documents	<ul style="list-style-type: none"> Appendix D - Plan for Volunteer Enlisting for Catastrophe (CAT) Incident Response Deployment
Additional Information	Deployment policy to be developed for 2016.
Compliance	Fulfills the need to model one, two, and four-in-100 year incidents, and the need to describe pre- and post-incident processes as per Texas Insurance Code 2210.455.
QA or Testing	

1.8 Onboarding of Fixed and Variable Staff

Objective 1.8	To onboard fixed and variable staff.
Description	Contract with vendor resources so they can be prepared for CAT response. Develop and retain resources prepared to serve after a catastrophic incident.
Purpose	To uphold the Associations' mission to deliver prompt and fair claims service.
Participants	Claims, Human Resources, Legal and Compliance
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Verifies that vendor partners remain compliant with TWIA/TFPA requirements. • Maintains a list of approved vendors. • Provides copies of new employment contracts for Legal and Compliance and Human Resources. • Fills out SAEF for all onboarding staff (performed by Claims support staff). • Maintains claim adjuster licensing database for staff and contractors. • Conducts audits to determine any conflicts of interest with vendor contractors. • Maintains relationship with a network of contractors. • Hosts the following yearly certifications: TWIA/TFPA Residential Adjuster Certification, TWIA Commercial Adjuster Certification, TWIA/TFPA Desk Examiner Certification, TWIA/TFPA Manager and Supervisor Training. • Sends "Vendor Business Continuity Procedures Form" to approved vendors for the following: point of contact with person responsible for disaster recovery planning, disasters they are prepared to withstand, frequency of DR/BC testing, location for disaster recovery, backup power planning, and recovery time objective (RTO). <p>Human Resources</p> <ul style="list-style-type: none"> • Administers temporary/contract resources. • Distributes ethics policies and verifies signed conflicts of interest forms for staff, contractors, and vendors. <p>Legal and Compliance</p> <ul style="list-style-type: none"> • Establishes and oversees policies for staff and contractors. • Trains new staff and contractors in TWIA 101 and TWIA 201. • Coordinates training with Claims personnel to review public adjuster licensing and contract requirements, and provides procedures for reporting non-compliance. • Reviews any reported potential conflicts of interest with Claims management to develop action plan to mitigate or rectify conflicts.
Exhibits, or Related Documents	<ul style="list-style-type: none"> • Field Adjuster Online Training • Staffing Database • Vendor Business Continuity Procedures Form • In text following Exhibit 8 "Screenshot of Online Field Adjuster and Examiner Training."

Additional Information	
Compliance	Fulfills the need to model one, two, and four-in-100 year incidents, and the need to describe pre- and post-incident processes as per Texas Insurance Code 2210.455.
QA or Testing	

Exhibit 8: Screenshot of Online Field Adjuster and Examiner Training

Adjuster Certification

2021 Training > TWIA/TFPA > Adjuster Certification

Texas Windstorm Insurance Association (TWIA) and Texas FAIR Plan Association (TFPA) have partnered with 2021Training.com as their exclusive provider for online adjuster certifications.

As an adjuster, you will need to have these certifications prior to adjusting any claims for TWIA and TFPA. They're registered with the Texas Department of Insurance for CE credits. These certifications **renew annually**. Your certification will be valid for one year from the date of completion.

See FAQ below, including a list of companies that adjust claims for TWIA/TFPA

Field Adjusters

[2014 TWIA and TFPA Residential Field Adjuster Certification \(4 hr\)](#)

Course #94516 \$55

4 Texas CE Credit Hours
(3.5 General and .5 Ethics)
(Classroom Equivalent Hours) This certification is required to adjust **Residential** claims for **TWIA/TFPA** and renews annually. Your certification will be valid for one year from the date of your course completion.

[Buy Now](#)

[2014 TWIA Commercial Field Adjuster Certification \(1 hr\)](#)

Course #95300 \$15

1 General Texas CE Credit Hour
(Classroom Equivalent Hours)

This certification is required to adjust **Commercial and Complex claims for TWIA**. Complex claims include multiple location losses and condos. This is an annual certification, and the online Residential Field Adjuster Certification is a **pre-requisite** for the Commercial Certification.

[Buy Now](#)

Desk Examiners

[2014 TWIA & TFPA Desk Examiner Certification \(4 hr\)](#)

Course #95816 \$55

4 General Texas CE Credit Hours
(Classroom Equivalent Hours) This certification is required to adjust claims for **TWIA and TFPA as a Desk Examiner**. This is an annual certification. See a list of CAT companies contracted with TWIA/TFPA in the FAQs at the bottom of the screen.

[Buy Now](#)

1.9 Foster Compliance with Mandated Claims-Handling Timelines

Objective 1.9	To foster compliance with mandated claims-handling timelines.
Description	Administer training for claims-handling timelines. Coordinate Departments whose workflows are interdependent with the claims process.
Purpose	<ul style="list-style-type: none"> To efficiently provide essential insurance products and services for policyholders. To comply with sound insurance principles and regulations.
Participants	Claims, Legal and Compliance, Underwriting
Action Plans	<p>Claims trains staff in timelines, including but not limited to the following:</p> <ul style="list-style-type: none"> First Contact Timeline: Same day contact with insured if received before 4pm, 24 hours if received after 4pm. Independent Adjuster (IA) First Contact: Contact with insured within 24 hours after assignment. Send letter if contact not established within three days. IA Report Timeline: Within 15 days of assignment. Additional reports every 15 days thereafter until completed. (Examiner contacts IA Firm if 48+ hours late.) Supplemental Request for Information. Examiner sends to insured not later than 30 days after claim received (TIC 2210.573(b)). Supplemental Investigation: Complete within 55 days after claim is filed. Claim Decision Timeframe: Notify insured of claim decision in writing not later than 60 days after claim received, or the 60th day after adjuster or TWIA receives information requested from the insured (TIC 2210.573(d)). Texas Insurance Code 2210.541 and 2210.542 trainings for TFPA resources. Provides documentation to inform all TWIA/TFPA staff how to assist customers submitting first notice of loss (FNOL) or other routine requests. <p>Legal and Compliance trains resources in potential coverage, regulatory or legal concerns which could arise from a catastrophic incident, and plans for compliance with Texas Insurance Code 2210.455.</p> <p>Underwriting</p> <ul style="list-style-type: none"> Maintains a process for verifying with policy validation workflows with Claims (e.g., coverage verification and “no policy” processes). Prepares dedicated resources for real-time CAT response.
Exhibits, or Related Documents	Appendix C - How to Submit a Claim for TWIA and TFPA Staff
Additional Information	<ul style="list-style-type: none"> All intervals reflect TWIA service goals and not necessarily the full period permitted by statute or industry standards; all intervals subject to change for catastrophe claims or based extensions by Commissioner of Insurance (TIC 2210.581).
Compliance	
QA or Testing	

1.10 Ensure the Ability to Issue Claim Payments

Objective 1.10	To ensure the ability to issue claim payments in the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year).
Description	Maintain trained TWIA/TFPA resources and documented processes for making claim payments after a catastrophic incident.
Purpose	To ensure expected service levels are met or exceeded.
Participants	Claims, Accounting and Finance, IT
Action Plans	<p>Claims trains internal resources in guidelines, including but not limited to the following:</p> <ul style="list-style-type: none"> • Payment timelines: Trains all staff on expected speed to payment requirements. • Advanced payment guidelines: including additional living expenses (ALE), business interruption (BI), personal/business property, and food spoilage. • Names required on claims checks: Communicates thresholds for including mortgage companies, additional insureds, or loss payee names on claim payment checks. (Will vary depending on size of incident: not to exceed aggregate dwelling loss of \$5,000 for TFPA and \$10,000 for TWIA.) • Guidelines for replacement cost coverage (RCC): Communicates thresholds for activating the reserving and payment process. (Varies based on size of incident: not to exceed aggregate dwelling loss of \$5,000 for TFPA and \$10,000 for TWIA.) <p>Accounting and Finance</p> <ul style="list-style-type: none"> • Coordinates with Claims on manual check processes, instructions for printing checks, and information about check stock. • Helps plan for mobile claims center and remote facility scenarios, including workflows for mobile claims center check issuance. • Prepares team members to deploy in the case of a catastrophe to handle check issuance at mobile claims center and remote facilities. <p>IT ensures check-printing capabilities are available as needed internally and in the field.</p>
Exhibits, or Related Documents	<ul style="list-style-type: none"> • Check Issuance Procedures • The following items to be included in the “Claim Office Procedures” or the “TWIA Claim Examiner Handbook”: RCC guidelines, advanced living expenses (ALE) guidelines, and depreciation thresholds.
Additional Information	
Compliance	
QA or Testing	

1.11 Establish Total Loss Claim-handling Guidelines

Objective 1.11	To establish total loss claim-handling guidelines.
Description	Address the variety of total loss scenarios that could occur from a catastrophic incident.
Purpose	To ensure complex losses are quickly identified and addressed efficiently.
Participants	Legal and Compliance, Claims, Actuarial and Enterprise Analytics, Underwriting
Action Plans	<p>Legal and Compliance</p> <ul style="list-style-type: none"> Helps interpret concurrent causation methodologies (i.e., Texas Insurance Code 2210.578). Documents processes and procedures for determining slab claims and implementing the concurrent loss methodology (when expert panel methodology becomes available). Plans to use outside counsel for executing concurrent causation methodologies in the case of a large catastrophe. <p>Claims</p> <ul style="list-style-type: none"> Identifies the number and locations of potential total losses for any event. Determines the need to establish dedicated work group(s) to address those claims. Ensures that ensuing losses (e.g., fire, theft, vandalism) are handled correctly. Identifies when and how to use experts to resolve total loss claims. Maintains specific procedures for resolving commercial, mobile, and residential total losses. Maintains before and after aerial imaging to resolve total loss claims. <p>Underwriting</p> <ul style="list-style-type: none"> Plans for assisting with gathering and interpreting specific data on total loss properties. Plans for providing dedicated resources to the total loss units should a dedicated work group be formed. Assists with agent relationships and customer relations related to total loss claims. Plans to communicate with agent and obtain flood certificate in the case of a CAT. <p>Actuarial and Enterprise Analytics</p> <ul style="list-style-type: none"> Identifies properties at risk due to storm surge exposures, or those most likely to have slab or total loss claims, prior to storm season. Develops pre-incident total loss/slab claim projections (i.e., heat maps and potential numbers). Works with experts to identify detailed property characteristics to improve projections. Makes projections based on data put into the expert panel tool/methodology.
Exhibits, or Related Documents	<ul style="list-style-type: none"> TDI Expert Panel Rules (Under Construction) Property Damage Evaluation Guidelines (PDEG) Claim Examiners Handbook

Additional Information	
Compliance	See Texas Insurance Code 2210.578 for information on the expert panel.
QA or Testing	

1.12 Provide Capability for Claims Processing for Telecommuting Staff

Objective 1.12	To provide capability for claims processing in scenarios with telecommuting staff.
Description	Prepare people, processes, and tools for claims processing in telecommuting scenarios.
Purpose	To uphold the Associations' mission to deliver prompt and fair claims service.
Participants	Claims, IT
Action Plans	<p>Claims trains resources in guidelines, including but not limited to the following:</p> <ul style="list-style-type: none"> • TWIA/TFPA online training: "Working Remotely in XactAnalysis." • Claims workflow plans for using the Xactanalysis program. • Instructions on Claims Examiners access to the VoIP phone system. • Procedures for batch processing Xactanalysis IDs, including emailing representative with batch names and emails of onboarded staff <p>IT</p> <ul style="list-style-type: none"> • Plans for batch-processing email accounts in the case of a CAT. • Maintains instructions for Webmail login for telecommuters. • Updates password requirements, or creates a workflow to accommodate password changes for telecommuters. • Ensures Citrix access for telecommuting Managers for QA purposes.
Exhibits, or Related Documents	<ul style="list-style-type: none"> • XactAnalysis Hybrid Program Flowchart • XactAnalysis Hybrid Roles and Responsibilities • Webmail Login for Telecommuters • GoToMeeting and GoToWebinar Process Document • VoIP Phone System Access Process (technical specs and user documents)
Additional Information	<ul style="list-style-type: none"> • During response to a major catastrophe, some Claims staff may telecommute, and be managed via managers who are telecommuting. Remote access to the claims system would be achieved with a hybrid solution between Notus and the XactAnalysis program. • The Notus Claim System will facilitate financial transactions including initial reserving, reserve changes, and payment transaction. • XactAnalysis will be used for documenting all other claim handling activity and workflow control, and will be transferred to Notus for record-keeping. • Currently, telecommuters would be locked out of email after 40 days due to password change requirements administered within the Network (i.e., in Citrix).
Compliance	
QA or Testing	

1.13 Ensure Ability to Process Complaints Promptly and Accurately

Objective 1.13	To ensure the ability to process complaints promptly and accurately.
Description	Train resources on best practices for processing TDI and non-TDI complaints. Ensure awareness of statutes related to complaints processing.
Purpose	To ensure compliance with statutes, regulations, and internal policies regarding complaints.
Participants	Communications and Legislative Affairs, Legal and Compliance, Claims, Underwriting
Action Plans	<p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> • Trains resources on complaint procedures, including TDI requirements. • Trains staff in the process for appeals in unresolved complaints. • Plans for scalable resources. <p>Legal and Compliance</p> <ul style="list-style-type: none"> • Provides applicable laws and regulatory requirements. • Plans for scalable resources. <p>Claims and Underwriting</p> <ul style="list-style-type: none"> • Identify scalable resources to respond to complaints. • Establish workflows and levels of approval authority. • Ensure follow up with customers to resolve complaints.
Exhibits, or Related Documents	<ul style="list-style-type: none"> • Complaint Training PowerPoint • Complaint Training FAQs
Additional Information	<ul style="list-style-type: none"> • Generally, there are three types of complaints (i.e., legislative, TDI, and direct). • An insurer must maintain a complete record of all complaints received during the preceding three years, or since the date of its most recent financial examination by the commissioner of insurance. • The standard for compliance purposes is a 15-day resolution of complaints.
Compliance	
QA or Testing	

1.14 Ensure Personnel Can Identify Issues of Fraud, Compliance, and Ethics

Objective 1.14	To ensure personnel can identify issues of fraud, compliance, and ethics.
Description	Train internal resources and train approved vendor resources on issues of fraud, compliance, and ethics.
Purpose	To ensure timely and accurate payments on valid claims only.
Participants	Legal and Compliance, Special Investigation Unit (SIU), Claims, Underwriting, Internal Audit
Action Plans	<p>Legal and Compliance</p> <ul style="list-style-type: none"> • Trains new staff and contractors in fraud reporting, compliance, and ethics (i.e., TWIA 101 and TWIA 201). • Communicates about Lighthouse Services whistleblower program for anonymous fraud reporting. • Administers Ethics and Conflicts of Interest Policy. • Ensures compliance with applicable fraud reporting requirements. <p>Special Investigation Unit (SIU) provides additional detail on the services offered by VRC and the list of primary indicators for desk examiners to consider.</p> <p>Claims and Underwriting</p> <ul style="list-style-type: none"> • Establish processes and procedures for identifying Claims and Underwriting fraud. • Create guidelines for reviewing files for “red flag” indicators to determine if referral to SIU is appropriate. • Conduct audits to determine any conflicts of interest with vendor contractors. <p>Internal Audit monitors requirements for all Departments for internal fraud control (i.e., corporate fidelity).</p>
Exhibits, or Related Documents	In text following Exhibit 9 “Special Investigation Unit (SIU) and Fraud Reporting Requirements.”
Additional Information	Lighthouse Services , Reporting Hotline English (877)472-2110 and Spanish (800)216-1288.
Compliance	
QA or Testing	

Exhibit 9: Special Investigation Unit (SIU) and Fraud Reporting Requirements

"THE Professional Investigative Services Leader"™



800-654-2185
www.VRCinvestigations.com

VRC is a professional investigative services provider that specializes in all aspects of insurance defense investigations. Through our core values of Truthfulness, Accuracy, and Integrity we are dedicated to providing you with the finest service, partnership, and value in the fight against insurance fraud.

SPECIAL SERVICES

- SIU (Anti-Fraud) Program
- Hospital/Medical Canvases
- Comprehensive Database Services
- State Compliance
- Vendor Management
- Due Diligence

CLAIMS SERVICES

- Recorded Statements
- AOE/COE
- Subrogation Investigations
- Accident/Site Investigations
- Property Loss Verification
- Public Records Check
- Video Job Analysis

SURVEILLANCE

- Video Surveillance
- Activity Checks
- Widow/Wellness/Disability Checks



VERACITY RESEARCH COMPANY INVESTIGATIONS

SIU SPECIAL SERVICES



Mandatory Referral to SIU

<ol style="list-style-type: none"> 1) Fire 2) Theft 3) Vandalism & Malicious Mischief 4) Liability – Bodily Injury & Property Damage 5) Any loss > \$25,000 Total Incurred 6) Suspicion that information submitted is false, altered or contains a forged signature 7) First edition policy or coverage amount increased shortly before loss reported 8) Loss reported more than 6 months from date of loss 9) Insured retains attorney or public adjuster after loss or prior to reporting loss 10) Field adjuster suspects mechanical damage 11) Claim reported following underwriting activity, especially if it's a cancellation notice <p style="text-align: center;">Recommended Referral or Reasons to Update SIU</p> <ol style="list-style-type: none"> 1) Premises are over-insured 2) Insured has previous or similar loss history 3) Property was under renovation or in poor condition at the time of loss 4) On storm-related perils, insured property is located outside of area of known storm activity 5) Individual provides altered documents 	<ol style="list-style-type: none"> 6) Individual is overly pushy, aggressive or demanding for a quick and/or reduced settlement 7) Owner cannot provide documentation confirming prior damage has been repaired 8) Actual ownership of property was transferred before date of loss 9) Evidence a recent quit claim deed was executed on the subject property 10) One neighborhood with several homeowners being solicited by the same roofer 11) Individual indicates distress over prospect of an examination under oath 12) Investigation reveals absence of family photo graphs, heirlooms, pets or items of sentimental value 13) Items claimed cannot physically fit in existing floor space 14) Recent change in family structure (divorce) or financial condition (bankruptcy, history of late payments, unemployment) 15) Losses include numerous appraised items, items of scheduled property, a large amount of cash, or family heirlooms 16) Loss amounts reported to the police and or fire department are inconsistent with the amount listed in the proof of loss or claim forms 17) Receipts are from businesses that are no longer active or we cannot determine if the businesses were ever active
---	--

SIU CONTACTS

<p>Jim Irving TWIA/TFPA SIU (940) 240-5029 Ext. 108</p>	<p>Bill Randall Assisant Vice President (940) 240-5029 Ext. 139</p>	<p>Rob Hughey Director (940) 240-5029 Ext. 152</p>	<p>Dave Stacey Vice President (940) 240-5029 Ext. 105</p>
---	---	--	---

1.15 Coordinate Information about Internal and External Bi-Lingual Resources

Objective 1.15	To coordinate information about internal and external bi-lingual resources.
Description	Share information on internal and external bi-lingual resources, and ensure availability and scalability of bi-lingual resources.
Purpose	To improve communication with policyholders and their representatives.
Participants	Claims, Human Resources
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Maintains list of external bi-lingual resources, including translation services. • Confirms approved vendors have bi-lingual resources. • Assists with Enterprise training for use of available bi-lingual resources. • Documents process for requesting bi-lingual services at TWIA/TFPA. <p>Human Resources</p> <ul style="list-style-type: none"> • Communicates to internal resources to update ADP for the languages they speak in order to identify available bi-lingual resources. • Circulates information about the bi-lingual database on Workforce Now.
Exhibits, or Related Documents	<p>TWIA and TFPA Vendor Commitments & Contact Information</p> <p>Globo Telephone Interpreting Instructions</p>
Additional Information	
Compliance	
QA or Testing	

1.16 Project Staffing Costs

Objective 1.16	To project staffing costs the Associations would incur in the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year).
Description	Calculate the four-week cost of contracted personnel during catastrophe response using the average cost and the number of staff needed during peak periods.
Purpose	To maintain a funding strategy with plans for paying for peak CAT staffing.
Participants	Claims
Action Plans	Claims <ul style="list-style-type: none"> • Maintains competitive pricing information for catastrophe pay in the insurance industry. • Utilizes the scalability model to forecast the number of staff needed and average costs for each kind of contracted staff. • Updates cost projections on a regular basis to reflect scalability and industry data. • Provides sample staffing cost projections to relevant business units.
Exhibits, or Related Documents	In text following Exhibit 10 "Sample Staffing Cost Projections."
Additional Information	<ul style="list-style-type: none"> • Assumptions are based on a four-week period at maximum staffing costs with a four-week period defined by seven-day workweeks. • Projections serve as approximations only.
Compliance	Fulfills the Texas Insurance Code 2210.455 requirement to describe the manner in which the Association will evaluate losses and fund claims after a catastrophic incident.
QA or Testing	

Exhibit 10: Sample Staffing Cost Projections

1 in 100 (1% Event)			
	Avg. Cost	# of Staf f	4 Week Cost
Claims Examiners	\$ 600.00	539	\$ 9,055,200
Managers	\$ 800.00	45	\$ 1,008,000
Customer Care	\$ 100.00	218	\$ 610,400
Quality Assurance	\$ 600.00	132	\$ 2,217,600
Reinspectors	\$ 800.00	112	\$ 2,508,800
Total			\$ 15,400,000
Field Adjusters	Allocated to the claim file		
1 in 50 (2% Event)			
	Avg. Cost	# of Staf f	4 Week Cost
Claims Examiners	\$ 600.00	331	\$ 5,560,800
Managers	\$ 800.00	28	\$ 627,200
Customer Care	\$ 100.00	132	\$ 369,600
Quality Assurance	\$ 600.00	79	\$ 1,327,200
Reinspectors	\$ 800.00	68	\$ 1,523,200
Total			\$ 9,408,000
Field Adjusters	Allocated to the claim file		
1 in 25 (4% Event)			
	Avg. Cost	# of Staf f	4 Week Cost
Claims Examiners	\$ 600.00	183	\$ 3,074,400
Managers	\$ 800.00	15	\$ 336,000
Customer Care	\$ 100.00	64	\$ 179,200
Quality Assurance	\$ 600.00	41	\$ 688,800
Reinspectors	\$ 800.00	38	\$ 851,200
Total			\$ 5,129,600
Field Adjusters	Allocated to the claim file		
1 in 10 (10% Event)			
	Avg. Cost	# of Staf f	4 Week Cost
Claims Examiners	\$ 600.00	72	\$ 1,209,600
Managers	\$ 800.00	6	\$ 134,400
Customer Care	\$ 100.00	23	\$ 64,400
Quality Assurance	\$ 600.00	15	\$ 252,000
Reinspectors	\$ 800.00	14	\$ 313,600
Total			\$ 1,974,000
Field Adjusters	Allocated to the claim file		

1.17 Maintain a CAT Funding Strategy and Plans for Managing Reinsurance

Objective 1.17	To maintain a CAT funding strategy and plans for managing reinsurance.
Description	Maintain plans for how to fund losses, including excess losses, in the case of a catastrophic incident.
Purpose	To secure sufficient funding to pay claims and other financial obligations.
Participants	Actuarial, Accounting and Finance, General Manager
Action Plans	<p>Actuarial</p> <ul style="list-style-type: none"> Communicates with reinsurance brokers to get information on contract terms and available reinsurance. Determines the amount of reinsurance to purchase each year and the terms of each year's reinsurance contracts. Manages reinsurance placement for TWIA and TFPA yearly. <p>Accounting and Finance</p> <ul style="list-style-type: none"> Provides financial projections, balance sheet, income statement, and cash flows. <p>General Manager</p> <ul style="list-style-type: none"> Coordinates between Actuarial and the CFO to make decisions about reinsurance and funding strategies. Oversees communication with the Board of Directors/Governing Committee related to funding strategy.
Exhibits, or Related Documents	
Additional Information	
Compliance	Fulfills the Texas Insurance Code 2210.455 requirement to describe the manner in which the Association will evaluate losses and fund claims after a catastrophic incident.
QA or Testing	

1.18 Outline a CAT Communication Strategy

Objective 1.18	To outline a communications strategy (i.e., a CAT communications plan) ensuring delivery of key messages to stakeholders, including policyholders, agents, and the public.
Description	Prepare communications in advance for readiness throughout the year including a suite of printed and digital materials (e.g., advertisements, educational materials, social media messaging, website blogs and announcements).
Purpose	<ul style="list-style-type: none"> To uphold TWIA's commitment to a swift, effective response to a catastrophe. To operate transparently through open communication with stakeholders.
Participants	Communications and Legislative Affairs, Claims
Action Plans	<p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> Maintains a strategic communication plan accompanied by a tactical communications plan based on incident size and location. Continually updates information about claims on the Associations' websites. Manages the creation and distribution of hurricane preparedness and claims process educational packets (printed and digital). Prepares hurricane season advertisements and reserves space for publishing. Maintains a Media Briefing Book; a reference guide for media. Develops hurricane preparedness workshop for the coastal counties. Communicates regularly to policyholders and agents on what to do in the case of an incident. Creates policy inserts with CAT Claims processing information. Leverages media to disseminate messages to policyholders, agents, and the public, including scheduling media tours when appropriate. Develops social media messaging for rapid response to incidents. Prepares bi-lingual catastrophe bulletins and advertisements. <p>Claims</p> <ul style="list-style-type: none"> Coordinates with the Communications Department to provide written catastrophe instructions for release on the TWIA and TFPA websites. Maintains FAQs for processing claims and posts on the TWIA/TFPA websites. Sends policyholder claim acknowledgements.
Exhibits, or Related Documents	Catastrophe (CAT) Incident Response Communications Plan
Additional Information	
Compliance	
QA or Testing	

1.19 To Document Information on Technology Scalability Plans

Objective 1.19	To document information on technology scalability plans for Network, IT Ops, Data Center, and Production Application in the following scenarios: 1% probability event (1 in 100 year), 2% probability event (1 in 50 year), and 4% probability event (1 in 25 year).
Description	Identify the core areas of information technology that need to be scaled pre-event or are scalable post-event.
Purpose	To ensure Associations' readiness for capacity demands up to a one-in-100-year event.
Participants	IT
Action Plans	<p>IT Ops establishes plans for the following:</p> <ul style="list-style-type: none"> • Purchasing printing services and/or printers, toner, fax machines, scanners, printers, headsets, and other office equipment. • Ensuring pre- and post-incident processes and procedures are in place to quickly scale up to meet user demands for hardware, software, and telephone needs. • Establishing relationships with staffing firms in order to scale up required resources to add and configure additional users. <p>Network</p> <ul style="list-style-type: none"> • Maintains the Internet bandwidth and capacity for up to a one-in-100-year event. • Maintains plans for ordering, installing, and configuring network switches in order to scale up ports for network access in the Austin office. (May be outsourced.) • Maintains adequate capacity for up to a one-in-100-year event at this time; if need arises, TWIA can execute in house, or shorten the timeframe by outsourcing. <p>Production Application Support</p> <ul style="list-style-type: none"> • Works with business users to prepare a list of mission critical applications necessary to support an incident response. • Establishes change management controls to ensure problems are not introduced into production environments during an incident response. • Partners with business users to determine whether or not any interruptions to production environments will be allowed and when. • Prepare to scale up staffing as needed. <p>Data Center Systems</p> <ul style="list-style-type: none"> • Maintains adequate server capacity for up to a one-in-100-year event at this time; if need arises, IT can add server capacity with no more than a two week turnaround. • Maintains contract through Rentsys for data center backup, and a contract for a DR/BC location with workstations, network, computer, telephone, and supplies.
Exhibits, or Related Documents	

Additional Information	<ul style="list-style-type: none"> IT has ownership for Enterprise disaster recovery (DR) planning.
Compliance	
QA or Testing	

1.20 Understand Associations' Role in Emergency Management Incident Response

Objective 1.20	To understand the role the Associations play in the Emergency Management Incident Response System, and how to coordinate and interact with local, county, state, and federal emergency management agencies.
Description	Understand the emergency management incident response command structure. Establish points of contact and meet with local, county, state, and federal emergency management.
Purpose	<ul style="list-style-type: none"> To share information and solicit feedback about TWIA's CAT planning and response. To improve coordination with emergency management resources. To ensure optimal response for the people and businesses we commonly serve.
Participants	Claims, Communications and Legislative Affairs
Action Plans	Claims and Communications and Legislative Affairs <ul style="list-style-type: none"> Maintains relationships with the following agencies: Texas Division of Emergency Management (TDEM) - disaster district coordinators, county emergency management coordinators (EMCs), relevant city management, and FEMA. Attends relevant meetings/conferences (e.g., Texas State Disaster Coalition (TSDC) meetings, Texas Emergency Management Conference, Coastal Bend Hurricane Conference, Emergency Management Association of Texas symposium.) Hosts meetings with state, county, local, and federal emergency management. Obtains local mitigation plans, emergency management newsletters, and public hurricane plans for the coastal territories. Considers whether to include TWIA information in local mitigation plans, newsletters, and hurricane plans. Creates a plan for ongoing communication and test training and exercises (TT&E) for each of these entities (where invited, or where possible).
Exhibits, or Related Documents	<ul style="list-style-type: none"> Emergency Management Resources Contact List TDEM District Coordinator Areas Texas State Disaster Coalition Catastrophe Plan
Additional Information	Websites Texas State Disaster Coalition: http://www.tdi.texas.gov/consumer/storms/hcoalition.html Local and regional mitigation plans unit: TDEM.PLANS@dps.texas.gov Emergency Management Association of Texas: http://www.emat-tx.org/ Texas Emergency Management Conference: http://www.txdps.state.tx.us/dem/conference/txEmerMgmtConf.htm Texas Division of Emergency Management: http://www.txdps.state.tx.us/dem/Operations/index.htm
Compliance	
QA or Testing	

1.21 Identify Junctures to Inform Internal and External Stakeholders of Plan Efforts

Objective 1.21	To identify appropriate junctures to inform internal and external stakeholders of Plan efforts.
Description	Update the TWIA/TFPA Board of Directors, TDI and the Texas Legislature of the Associations' CAT readiness, testing, and compliance. Assist with posting notices, including bulletins on the TWIA/TFPA website.
Purpose	To operate transparently through open communication with stakeholders.
Participants	Communications and Legislative Affairs, General Manager
Action Plans	<p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> • Informs Texas Legislature, Board of Directors, and TDI of modeled exposures and funding structure, of TWIA's Plan. • Creates all messages for distribution and posting on the TWIA/TFPA websites. <p>General Manager</p> <ul style="list-style-type: none"> • Oversees all communication with the TWIA/TFPA Board of Directors, TDI, and the Texas Legislature. • Prepares Board of Directors meeting agendas and the posting of notices. • Submits agenda items for the Board of Directors' meetings.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

Preparedness Phase (2.0)

Since disasters cannot be prevented, it is necessary to promote a state of preparation for expected or pending incidents. This phase is called preparedness, and it is a response to a known potential threat. For TWIA and TFPA, preparedness means minimizing impact to claims processing by closely monitoring the severity and development of a particular incident.

Based on the development of an incident, executive leadership decides whether to activate catastrophe plans and communicate with external stakeholders. When it is clear the disaster will strike, TWIA and TFPA begin to set in motion the resources and business processes necessary for a timely response. This phase happens from the first notice of the incident and continues until landfall, or until it is reasonable to begin responding to the incident.

2.1 Track Weather and Model Exposures

Objective 2.1	To track weather and model exposures.
Description	Monitor potential incident(s) and location(s) for severe weather and other catastrophic incidents (e.g., wind, hail, lightning, and wildfire). Track available incident information in real-time to determine whether or not to activate the Plan.
Purpose	To have sufficient incident data for determining whether to activate the Associations' Plan and/or suspend new business.
Participants	Claims, Actuarial, Accounting and Finance, Underwriting
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Conducts pre- incident claim volume modeling using available policy in force (PIF) and storm shape data. • Monitors weather and other conditions (i.e., wildfires) to assist with understanding the likelihood of a catastrophic incident, and to assess if pre- or post- incident analytical activity is required for helping determine whether to activate the Plan. • Stays informed of National Weather Service (NWS) alerts through iNWS, which also provide non-weather data (e.g., aerial imagery, infrared, lidar). <p>Actuarial and Accounting & Finance</p> <ul style="list-style-type: none"> • Models expected claim volume, average payments, and total incurred. • Provides guidance to the General Manager whether a pending incident will be a catastrophic loss that could impact funding adequacy. <p>Underwriting reviews projected path of incident(s) and discusses with the General Manager the suspension of policy/coverage binding activity.</p>
Exhibits, or Related Documents	In the text following: Exhibit 11 "Sample Storm Data Map Hurricane Ike" and Exhibit 12 "Sample Storm Data Map Angleton April 2015."
Additional Information	<ul style="list-style-type: none"> • Incidents will be monitored up to two weeks before potential impact. • The following sites are used to help track activity: Verisk Climate <http://www.veriskclimate.com/> NOAA Storm Prediction Center <http://www.spc.noaa.gov/> Weather Underground <http://www.wunderground.com/hurricane/> Hailwatch Reports <http://www.hailwatch.com/> iNWS alerts, <Hurricane.gov>, <mobile.weather.gov>, <NWSChat.weather.gov>, www.weather.gov, morning and other NWS briefings (email, phone, Webinar)
Compliance	
QA or Testing	

Exhibit 11: Sample Storm Data Map Hurricane Ike

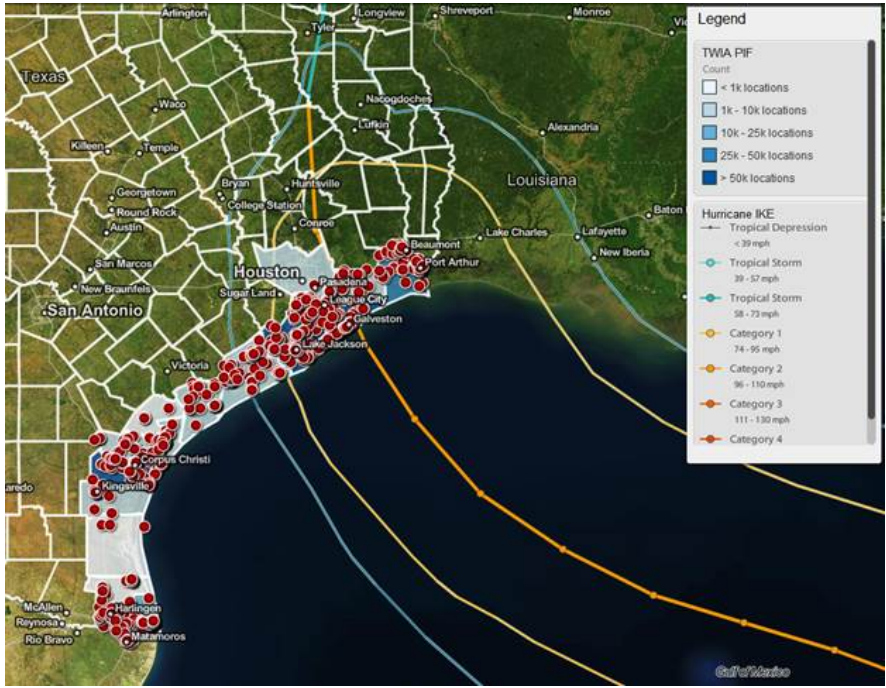
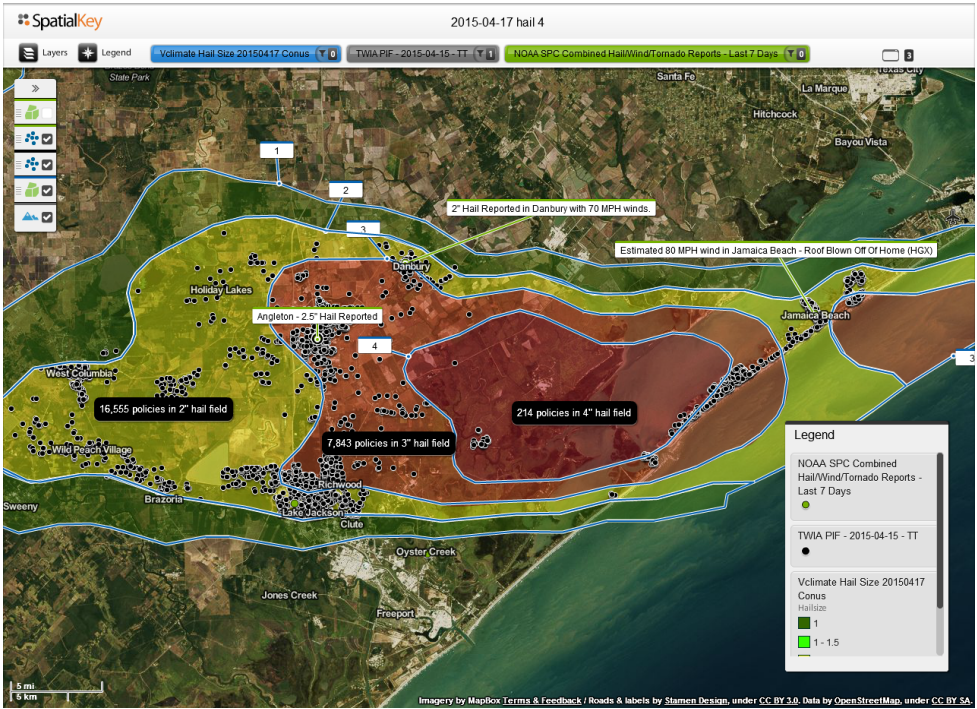


Exhibit 12: Sample Storm Data Map Angleton, Texas April 2015



2.2 Communicate CAT Plan Activation Criteria

Objective 2.2	To communicate CAT Plan activation criteria when 500+ claims are expected or received from a single incident.
Description	Analyze criteria to help determine when to activate the CAT Plan.
Purpose	To ensure appropriate response for every type of catastrophic incident. To identify critical success factors for early identification and response.
Participants	Claims, General Manager
Action Plans	<p>Claims considers the following in the decision to activate Plan:</p> <ul style="list-style-type: none"> • Involved cause(s) of loss (e.g., hurricane, tornado, wind and hail). • Severity of the incident (e.g., wind speed, hail size, depth of storm surge). • Location and concentration of claims (e.g., widespread or centralized). • Access to food and water. • Status of communication resources. • Habitability of homes and building mobility within the affected area. <p>Claims</p> <ul style="list-style-type: none"> • Determines if CAT Plan should be activated, as per Objective 2.1 above. • Recommends Plan should be activated by the General Manager. <p>General Manager</p> <ul style="list-style-type: none"> • Approves activation of the Plan.
Exhibits, or Related Documents	
Additional Information	<ul style="list-style-type: none"> • Incident type determines how far in advance the Plan is activated, such as hurricane incidents, which are typically activated three to five days in advance of landfall.
Compliance	
QA or Testing	

2.3 Prioritize CAT Preparation and Response Activities upon CAT Plan Activation

Objective 2.3	To prioritize CAT preparation and response activities upon CAT Plan activation for potential immediate action.
Description	Identify critical success factors for early identification and response. Review these priorities to ensure transparency and communication from the start.
Purpose	To ensure appropriate response for every type of catastrophic incident. To promote accountability to the Plan for all Departments.
Participants	General Manager and Executive Leadership Team, All Departments
Action Plans	<p>General Manager and Executive Leadership Team meet and review priorities to decide on:</p> <ul style="list-style-type: none"> • Activating vendor resources and deployed resources. • Setting claims systems and website to “CAT mode.” • Notifying Survey Monkey of authorization for customer surveys above set limit. • Activating disaster recovery and business continuity (DR/BC) plans. • Establishing the estimated date of the incident and when to advise Departments to schedule strategic planning (96 hours before landfall). • Determining whether preparation and response activities take priority over other Enterprise Department functions or projects. <p>Claims</p> <ul style="list-style-type: none"> • Establishes and communicates changes in work hours, so team members can remain on alert for mandatory overtime. • Determines whether to activate mobile claims center and remote facilities. • Establishes the name of the incident templates. <p>Communications</p> <ul style="list-style-type: none"> • Determines whether to publish CAT communications. • Notifies agents, TDI, the Texas Legislature, TWIA/TFPA staff, and the Board of Directors about Plan activation and estimated exposure. <p>IT</p> <ul style="list-style-type: none"> • Determines whether to order supplies and equipment. • Changes telephone systems (i.e., IVR) to CAT Mode. • Determines whether to add software licenses to scale for additional users. <p>All Departments</p> <ul style="list-style-type: none"> • Schedule preliminary team meetings to advise on Plan activation. • Schedule a strategic planning meeting 96 hours before landfall. <p>Facilities notifies all personnel and contractors of CAT status using one-call messaging.</p>
Exhibits, or Related	

Documents	
Additional Information	<ul style="list-style-type: none"> • This typically occurs immediately after CAT Plan is activated. • For TFPA the incident naming convention is a 3-digit numerical code that is the sequential number of the incident followed by the last two digits of the year (e.g., 1st incident of 2015 is 115). • For TWIA the naming convention is the month, date, and a location name we give it (e.g., 041415Coastal and 042715Beaumont).
Compliance	
QA or Testing	

2.4 Coordinate with Local, County, State, and Federal Emergency Management

Objective 2.4	To coordinate with local, county, state, and federal emergency management resources in response to a catastrophic incident.
Description	Obtain and share information to coordinate action plans to ensure we comply with command structure for emergency response, while also executing on our Plan.
Purpose	To ensure timely and compliant response to the CAT Plan in an emergency environment controlled by governmental entities.
Participants	TDI TWIA Ombudsman, Claims, Communications and Legislative Affairs
Action Plans	<p>Texas Department of Insurance TWIA Ombudsman</p> <ul style="list-style-type: none"> • Confirms locations of emergency operations centers. • Sends information gathered by the State Emergency Response Team (SERT). • Sends information about the extent of damage compiled by each county. <p>Claims</p> <ul style="list-style-type: none"> • Confirms incident information with TDI TWIA Ombudsman. • Refers to TDEM’s emergency condition alerts (e.g., Level I, Level II, and Level III). • Checks FEMA Region VI Situational Awareness Briefing, or Weather Threat Briefing. • Makes contact with district coordinators, mayors, and representatives in relevant counties and territories. • Contacts local authorities to gain access to the affected areas and identify claims on public buildings essential to the recovery effort (e.g. police and fire departments). • Arranges tour of the disaster area with disaster coordinators when it is safe. <p>Communications and Legislative Affairs works as needed with Ombudsman and Claims.</p>
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.5 Decide whether Incident Requires the Suspension of New Business

Objective 2.5	To decide whether incident requires the suspension of new business.
Description	Decide whether to suspend issuance of new business, and notify relevant stakeholders (e.g., agents and regulatory authorities). Prioritize new business process during suspension.
Purpose	<ul style="list-style-type: none"> To efficiently provide essential insurance products and services for policyholders. To comply with sound insurance principles.
Participants	Claims, Actuarial, Underwriting, General Manager, Communications and Legislative Affairs
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Sends data on the projected path of the incident to Underwriting for the purposes of work prioritization. Sends incident data to Actuarial to get assistance determining when an incident is encroaching upon or has breached the area delimited by the 20th parallel north and the 80th meridian west in the Gulf of Mexico (i.e., 80/20 designation). <p>Actuarial sends assessment of 80/20 designation to Underwriting and to the General Manager for determination of the Associations accepted/projected incident location.</p> <p>Underwriting</p> <ul style="list-style-type: none"> Recommends appropriate action on hurricane binding exception based on the Associations' accepted/projected incident location. <p>General Manager</p> <ul style="list-style-type: none"> Decides whether to approve the recommendation to implement the hurricane binding exception by Underwriting. Decides whether to approve "CAT mode," and alerts executive leadership team. <p>Underwriting</p> <ul style="list-style-type: none"> Emails agents on claim reporting procedures when TWIA predicts a significant multi-county impact but the incident does not meet "Hurricane Binding Exception." Emails agent claim procedures about suspending applications and quotes, restating agent binding authority if incident meets "Hurricane Binding Exception." Sends IT updates to CGI Agent Portal with banner re: suspension of business in affected counties. Prioritizes new business processing when applications and quotes are suspended, requalifying renewals and endorsement requests. Serves as a resource to Claims for template catastrophe reserving. Sends Communications and Legislative Affairs an agent bulletin on suspensions for the TWIA website. Considers pulling a list of top agents to contact via the call center. <p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> Reports to Texas Legislature and TDI on TFPA /TWIA's suspension of acceptance to new business in impacted counties. Distributes an Agent Bulletin, updates the website with an Agent specific posting, and posts on Facebook and Twitter regarding the suspension of new business.

	Actuarial models actual exposure to an incident and other data analysis, as needed.
Exhibits, or Related Documents	
Additional Information	Hurricane Binding Exception: After a windstorm is designated as a hurricane by the United States Weather Bureau being in the Gulf of Mexico or within the boundaries of 80 degrees west longitude and 20 degrees north latitude.
Compliance	
QA or Testing	

2.6 Activate and Optimize Claims Technology for CAT Response

Objective 2.6	To activate and optimize Claims technology for CAT response.
Description	Coordinate the updating of the Claims system, portals, and websites. Purchase additional computers. Communicate about IT support during a CAT.
Purpose	To ensure resources have the technology to respond in accordance with the Plan.
Participants	General Manager and Executive Leadership Team, Claims, IT
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Requests incident template from CGI and sets reserves (e.g., indemnity and expense). • Reports to General Manager and Claims when templates are ready. • Recommends activation of “CAT mode” on Association websites, portals and the Notus claims system, and sets the estimated incident dates. • Updates “Notus” to “CAT mode,” with incident name, date range, and reserves. <p>IT</p> <ul style="list-style-type: none"> • Updates policy system with changes to counties where business has been suspended. (System flags temporarily suspended issuance or coverage changes.) • Prices new PC computers, extra monitors, and supplies such as toner. • Communicates the request for additional equipment to the General Manager. • Works with Rentsys to ensure availability of required technology. • Orders computers at first notice of the incident since delivery takes two weeks. <p>General Manager and Executive Leadership Team approve equipment purchases.</p>
Exhibits, or Related Documents	
Additional Information	<ul style="list-style-type: none"> • The following roles have permissions to set TWIA TOS systems in CAT mode: General Manager, Underwriting Manager, Claims Manager, IT Manager. • May decide to use equipment in training rooms in lieu of ordering new equipment to shorten time frames.
Compliance	
QA or Testing	

2.7 Manage Publication of CAT Communications and Advertisements

Objective 2.7	To manage publication of CAT communications and advertisements.
Description	Execute the communications plan to inform the public, policyholders, and stakeholders of preparations in the pre-incident phase, as well as response efforts.
Purpose	To operate transparently through open communication with stakeholders.
Participants	Communications and Legislative Affairs, General Manager and Executive Leadership Team
Action Plans	<p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> • Meets with team to review communications plan and reviews for execution. • Runs print advertisements in appropriate news outlets to report claims procedures. • Runs radio spots in appropriate outlets to report claims procedures. • Posts messaging across pertinent social channels (Facebook and Twitter) to promote claims procedures. • Publishes announcements on the TWIA/TFPA websites. • Alerts evacuating policyholders to bring their policy and agent contact information via print advertisements, radio spots, social media and TWIA/TFPA websites. • Includes remote office information in print advertisements and radio spots. • Determines appropriate geographies for ad campaign based on evacuation sites. • Distributes press release with information on the incident, either: "Advice on Hurricane Preparedness in Context of Approaching Storm" or "Hurricane Has Hit." • Establishes a relationship with the Texas Disaster Recovery liaison and attends phone conferences on behalf of TWIA and TFPA. • Conducts media training for executives and disaster duty spokespersons, and prepares talking points for media interviews. • Meets with approved media contacts and confirms Associations' level of readiness at agreed intervals. <p>General Manager and Executive Leadership Team</p> <ul style="list-style-type: none"> • Coordinates with or delegates to Communications and Legislative Affairs to develop catastrophe preparedness and response media content.
Exhibits, or Related Documents	Catastrophe (CAT) Incident Response Communications Plan
Additional Information	
Compliance	
QA or Testing	

2.8 Activate an Efficient and Scalable Enterprise Call Center

Objective 2.8	To activate efficient and scalable Enterprise call center solutions.
Description	Optimize the configuration of our internal and external call centers to scale up our communications with stakeholders in response to a catastrophic incident.
Purpose	<ul style="list-style-type: none"> To ensure the customer's ability to communication in real-time with a live person. To ensure no interruption to the service levels we offer. To establish performance metrics and tracking mechanisms.
Participants	Claims, General Manager and Executive Leadership Team
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Provides a diagram for the call routing and the script for the messages. Coordinates with IT and All Departments to record the messages (English and Spanish). Confirms available resources for recording messaging, or confirms back up plans. Plans to measure call agent performance and quality using VOIP recordings. Evaluates existing phone numbers (~81) and whether there is additional need. Evaluates whether to update and modify telephony to implement IVR capabilities. Configures the order of options according to IVR diagram from Claims. Notifies translation service providers of expected volume spike per contract requirement. Notifies outsourced Enterprise call center providers of expected volume spike per contract requirement. Assigns dedicated resource(s) to monitor and evaluate call volumes, agent capacity, and compliance with average speed of answer (ASA) and call abandonment rates. Confirms ability to make outgoing customer satisfaction survey calls, if requested. Tests call center's ability to provide 24/7/365 loss reporting services, such as confirming call routing matches IVR workflows. <p>General Manager and Executive Leadership Team approve changes to call center configurations, and call routing, including IVR.</p>
Exhibits, or Related Documents	<ul style="list-style-type: none"> Interactive Voice Response (IVR) Workflows In the text following: Exhibit 13 "TWIA and TFPA Enterprise Call Center and Key Stakeholders," Exhibit 14 "Call by Day Report: Call Center," Exhibit 15 "Calls Answered Report: Call Center," Exhibit 16 "Abandoned Calls Report: Call Center."
Additional Information	<p>There are multiple configurations, separate for TWIA and FAIR Plan:</p> <ul style="list-style-type: none"> Business Hours: Gives English or Spanish options, and instructions for reaching correct Department. New claims are routed to a call center vendor and existing claims to a desk examiner. After-hours: Announces an "after-hours" message. Routes general callers to voicemail and claims status calls to the claims call center vendor. Business Hours during Incident Response: Given expected increase in claims call volume, the option to select Claims is presented to the caller first.

	<ul style="list-style-type: none"> • After Hours during Incident Response: The option to select Claims is presented first, before the option that the office is closed.
Compliance	
QA or Testing	

Exhibit 13: TWIA and TFPA Enterprise Call Center and Key Stakeholders

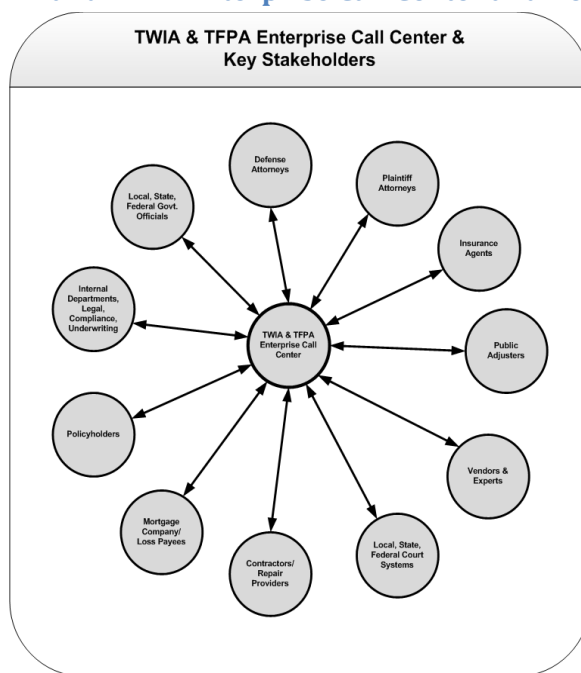


Exhibit 14: Call by Day Report: Call Center

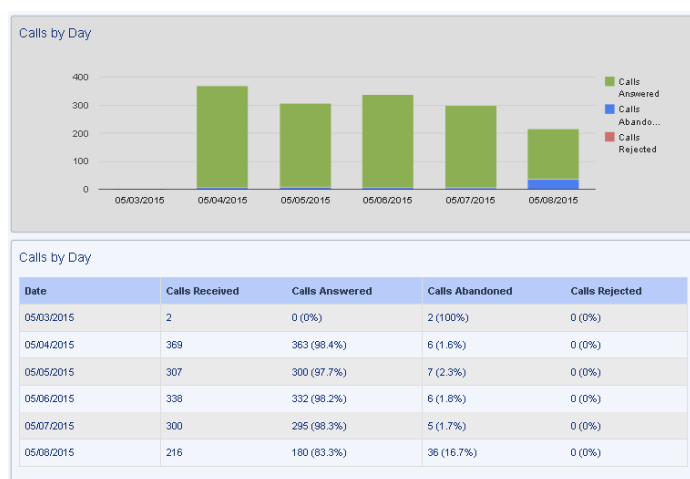


Exhibit 15: Calls Answered Report: Call Center

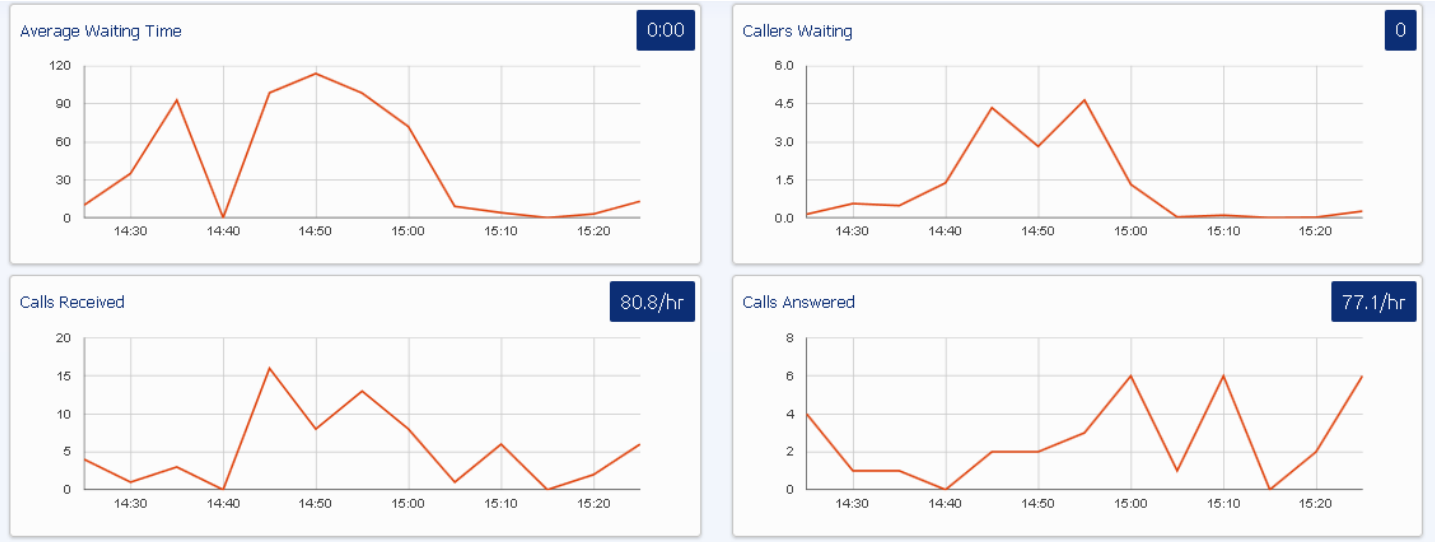
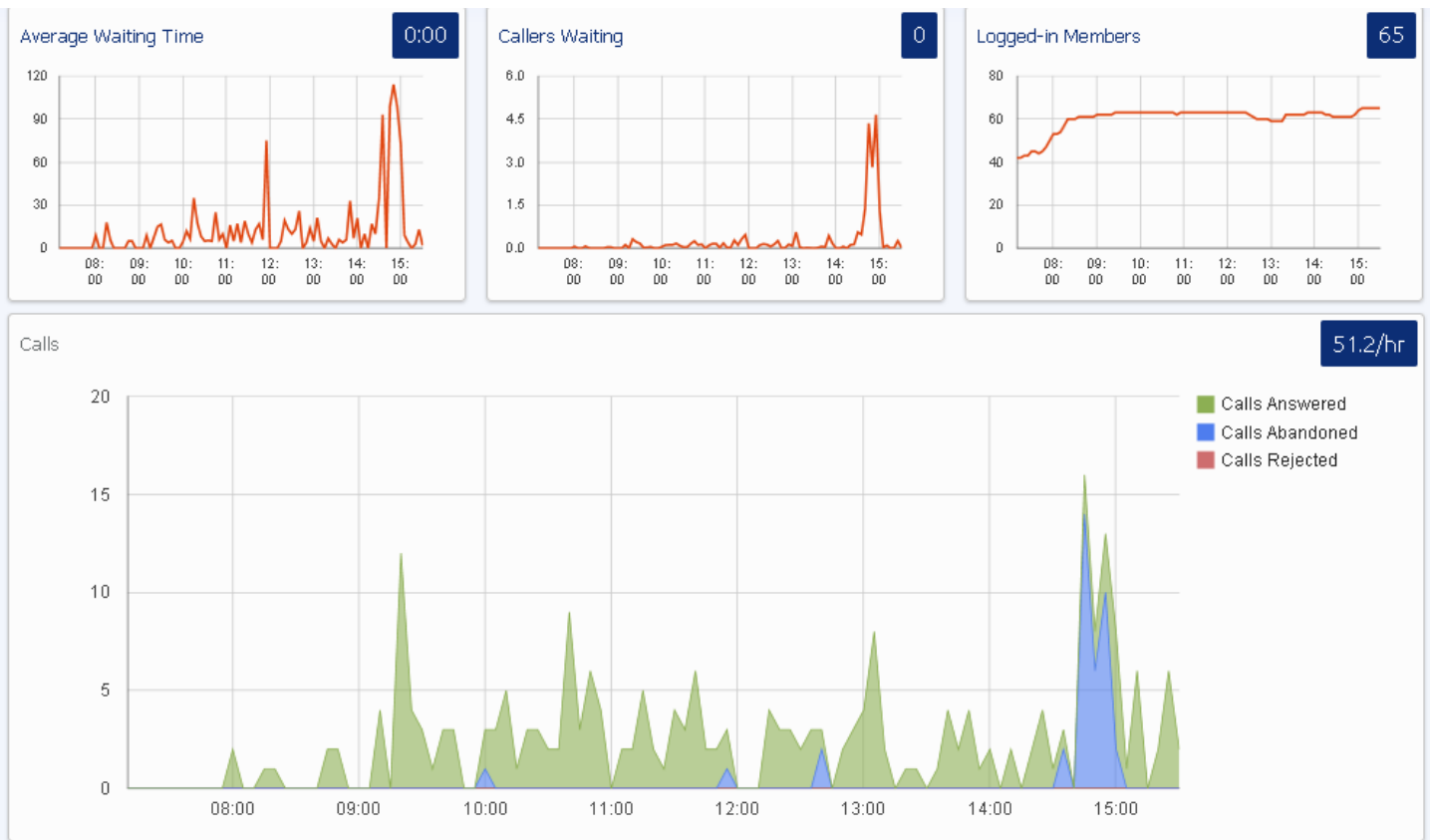


Exhibit 16: Abandoned Calls Report: Call Center



2.9 Activate and Scale Up Staff and Vendor Resources for Claims Processing

Objective 2.9	To activate and scale up staff and vendor resources for claims processing.
Description	Identify potential increase in business activity for a variety of incidents in order to scale up and activate additional resources. Determine the number and type of resources needed based on predicted new business activity, including claim volumes.
Purpose	To ensure all Departments are prepared for changes or increases in business activities after a catastrophic incident.
Participants	Claims
Action Plans	Claims <ul style="list-style-type: none"> • Notifies all staffing firms to complete process of identifying, notifying and preparing all resources by requested role for immediate deployment upon request. • Confirms current available staff and support staff capacity with Human Resources. • Anticipates and prepares for attrition with any staff type to ensure identification and staging of additional resources for immediate onboarding as needed. • Compares to needed capacity considering loss complexity, and determines numbers of desk examiners, field adjusters, and field adjusters for re-inspection. • Activates Special Investigation Unit (SIU) resources for coordination with desk and field resources. • Republishes the current vendor fee schedule document. • Notifies vendors of claim projections, locations, and incident staffing models, and sends a current TWIA/TFPA Claims organizational chart with contact information. • Adjusts desk claim examiner staffing based on incident models and claims received. • Conducts orientation and training to certify additional resources as TWIA/TFPA trained staff, including field adjuster training on workflows and procedures. • Requests scalability Plans from firms and tracks current vendor commitments.
Exhibits, or Related Documents	<ul style="list-style-type: none"> • TWIA/TFPA Adjuster Fee Schedule • TWIA and TFPA Vendor Commitments & Contact Information • Staffing Database
Additional Information	
Compliance	
QA or Testing	

2.10 Activate and Scale Up Staff and Vendor Resources at the Enterprise Level

Objective 2.10	To activate and scale up staff and vendor resources at the Enterprise level.
Description	Identify the potential increase in business activity for a variety of incidents in order to scale up and activate additional resources. Determine the number and type of resources needed based on predicted new business activity.
Purpose	To ensure all Departments are prepared for changes or increases in business activities after a catastrophic incident.
Participants	All Departments
Action Plans	<p>IT considers increasing work hours for existing staff, re-prioritizing current projects, or adding staff to scale to support stakeholders before, during, and after an incident including:</p> <ul style="list-style-type: none"> • System User Admin – user access and controls. • Help Desk – user support. • Desktop Hardware/Software and Network – configuration and utilization. • Ongoing monitoring of printers/copiers. <p>Communications and Legislative Affairs considers increasing work hours for existing staff, re-prioritizing current projects, or adding staff to scale for increase in need to communicate with all stakeholders before, during, and after an incident.</p> <p>Facilities & Operations scales up mail room processing hours and production capabilities to meet increased demand for postal services including after-hours and weekends.</p> <p>Actuarial & Enterprise Analytics considers increasing resources to assist with reporting to reinsurers, conducting reserve adequacy activities, and analytics support for Enterprise.</p> <p>HR scales up to assist with onboarding potential large numbers of internal and external resources.</p> <p>Legal & Compliance:</p> <ul style="list-style-type: none"> • Understands any increases in need for additional legal support especially where the Texas Insurance Code 2210.578 mandated TWIA expert panel may be involved or levels of disputed or litigated claims become a concern. • Ensures additional resources are available to assess compliance with the CAT Plan and all laws, rules and regulations related to a response to any incident. • Scales up to assist with the onboarding process as needed. <p>Accounting & Finance</p> <ul style="list-style-type: none"> • Identifies Accounting & Finance support functions for other Departments either in the office or at mobile claim centers. • Monitors check activity for increases in requests for check clearance status, stop pays, or voids. <p>Underwriting identify functions that need to scale up to:</p> <ul style="list-style-type: none"> • Assist with any increases in Underwriting business activity.

	<ul style="list-style-type: none"> • Backfill deployed staff. • Help other Departments either in the office or at mobile claim centers.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.11 Activate Association Employee Catastrophe and Deployment Compensation Policy

Objective 2.11	To activate policies and procedures as required for “Association Employee Catastrophe and Deployment Compensation Policy.”
Description	Address pay provided to staff and managers who are deployed or working extended hours due to a weather incident.
Purpose	To compensate both non-exempt and exempt staff for deployment and/or extended hour work.
Participants	Claims, General Manager, Human Resources
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Evaluates the results of pre-incident modeling suggesting the scale of incident. • Establishes extended hours based on operating requirements and business needs. • Proposes CAT pay authorization. <p>General Manager authorizes the catastrophe pay provisions and alerts Executive Leadership Team.</p> <p>Human Resources</p> <ul style="list-style-type: none"> • Posts catastrophe timesheets with CAT pay plan on employee reference drive. • Collects catastrophe timesheets for processing. • Enters time inputting on the catastrophe timesheets for non-exempt staff into ADP. • Enters deployment pay and extended shift pay on payroll log for processing.
Exhibits, or Related Documents	Association Employee CAT Pay Policy
Additional Information	<ul style="list-style-type: none"> • This policy does not apply to contracted workers. • Deployment pay and extended shift pay are not included in an employee’s annual base salary for classification and pay purposes. • Provisions remain in effect until the General Manager determines deployment sites and extended hours are no longer necessary to support the response. • Association Employee Catastrophe and Deployment Compensation Policy under construction for 2016.
Compliance	
QA or Testing	

2.12 Coordinate Staff for Deployment to Mobile Claims Center and Remote Facilities

Objective 2.12	To coordinate staff for deployment to mobile claims center and remote facilities.
Description	Determine the number and type of resources and locations needed based on predicted new claim volume. Add additional capacity from approved vendors.
Purpose	To ensure local response within the communities affected by catastrophic incident.
Participants	Claims
Action Plans	Claims <ul style="list-style-type: none"> Identifies mobile claims center locations and expected volume for each location. Identifies Claims and non-Claims resources by number and type. Activates and deploys locations and people after needs are determined. Notifies Claims and non-Claims resources of deployment plans and schedules. Appoints a Claims or non-Claims resource to manage the site. Ensures communication plan between mobile claims center, remote facilities, and main office. Coordinates and establishes work schedules. Designates and notifies the following roles: claims leaders, claims examiners, claims coordinators, quality assurance, accounting, IT, legal, SIU, and other resources. Ensures all personnel required to be licensed are properly licensed.
Exhibits, or Related Documents	<ul style="list-style-type: none"> Mobile Claims Center and Remote Facilities Claims Processing Workflow In text following Exhibit 17 “Mobile Claims Center Office Staff Roles.”
Additional Information	
Compliance	
QA or Testing	

Exhibit 17: Mobile Claims Center Staff Roles

Claims Supervisors	Responsible for ensuring TWIA/TFPA's ability to provide service to its policyholders, including paying claims in a timely manner. Provide leadership and ensures the availability of required infrastructure.
Claims Examiners	Review the reports generated by the field adjusters, make claims decisions, communicate decisions to policyholders, and issue claim and expense payments.
Accounting Deployment Lead Specialist	Responsible for maintaining the security of the signature stamp and signing each field check utilizing the signature stamp, as well as ensuring all field check registers are delivered to TWIA's home office in Austin.
Accounting Deployment Specialist	Responsible for maintaining the security of the field checks and field registers, as well as writing all field checks and maintaining a record of all field checks written on a field check register.
Customer Greeters	Welcome customers, answer questions, assist with customer information sheet, and direct policyholders to the correct resource(s).
Claims Service Representative	Review customer information sheet, assess policyholders' needs and discuss policy information, explain the steps of the claim process, and determine need for advance payments.
Maintenance and Support	Supply fuel for generators, assist with site setup and takedown, arrange meals for staff, clean facilities, and run errands.
EagleView Connect Explorer Power User	Responsible for using the EagleView platform to access aerial imagery onsite at the mobile claims center. Trains mobile claims staff in EagleView platform.
Administrative positions	Answer customer questions, inventory office supplies, and assists in FNOL process.
Site Manager	A Claims or non-Claims leader with overall responsibility for ensuring all activities are taking place in accordance with this Plan. Claims Supervisor on site may also be assigned this role.
Underwriting Representative	Expert in policy-processing and Underwriting present at mobile claims center. When not directly performing assistance role, they will assist with other roles where possible.
IT Representative	Expert in IT to provide support for hardware/software and network connectivity.
Communications Representative	Communications may be present to assist with complaints, respond to onsite media, and coordinate outreach events (e.g., town hall meetings).
Security	Facilities is responsible for providing on-site security for mobile claims center and remote facilities. Plans include outsourced security vendors.

2.13 Determine Pre-Incident Staging Needs and Processes to Follow

Objective 2.13	To determine pre-incident staging needs and processes to follow.
Description	Pre-incident staging is the assembly of responders for each of these areas: TWIA Claims, independent adjuster, quality assurance, SIU, leadership and staff, legal and policy services. Where warranted, key leadership and staff should be deployed within 24 to 72 hours prior to the occurrence of an incident, or immediately after.
Purpose	To onboard and orient leadership and trainers in real-time to ensure cascading of policies and procedures to be followed by each entity in response to a specific incident.
Participants	Claims, Legal and Compliance, Communications and Legislative Affairs
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Works with vendors to determine if incident requires pre-incident staging. • Manages SIU vendor and ensures stakeholders are protected against fraud. • Identifies staging and site deployment locations. • Prepares staging locations, and coordinates the deployment of resources to those sites. • Begins staging locations for vendor orientation and deploy vendors so they are on the ground near landfall (i.e., safe locations proximate to the impacted area). • Coordinates with SIU mobile unit to set up in the same location. • Contacts approved vendors to activate temporary living facilities. • Provides regular updates to CAT Manager on site status. • Meets with team and finalize deployment details. <p>Legal and Compliance approves orientation material for best practices and compliance.</p> <p>Communications and Legislative Affairs sends communications to let the public know about incident staging and fraud awareness.</p>
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.14 Coordinate Supplies for Mobile Claims Center and Remote Facilities

Objective 2.14	To coordinate supplies for mobile claims center and remote facilities.
Description	Coordinate to ensure mobile claims center, remote facilities, and housing are equipped.
Purpose	<ul style="list-style-type: none"> To provide immediate policyholder assistance, including first notice of loss, claim status information and advance payments. To have a staging area for additional claim resources, including adjusters, experts, quality assurance, and the special investigation unit (SIU).
Participants	Claims, Facilities, Claim Supervisor
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Determines appropriate mobile office solution based on scale and geographic spread of loss: single vehicle, multiple vehicle, Rentsys, or large "Basecamp." Determines potential staging and site deployment locations based on claim volume (projected or actual), and verifies availability of the sites. Coordinates information for rental vehicle drivers with claims supervisor, secures rental vehicles, and confirms insurance coverage. Contacts the Accounting Department to report the quantity of mobile claims center and remote facilities, emergency claims field checks, field check registers, signature stamps, and request the assignment of deployment personnel, who will issue and control all emergency claim field checks. Due to risks to power and system connectivity, maintains back up plan for a manual workaround with each mobile claims center or remote facility having a regular load of current data policy available in thumb drive, CD-Rom and/or printed documents. <p>Facilities</p> <ul style="list-style-type: none"> Provides physical security solution for mobile claims center and remote facilities. Rents or purchases equipment, including vehicles, toilets, chairs, tables, tents, generators, fans, signs/banners, documents, manuals, and bottled water. Arranges delivery of all equipment and supplies, including loading delivery rental car (i.e., cargo van). <p>Claim Supervisor</p> <ul style="list-style-type: none"> Confirms availability of computers, checks, signs, tables, canopies, and security. Communicates with Operations and vendors about scheduling delivery of supplies. Determines configuration of vehicles, trailers, and equipment. Oversees the set-up of the field office and notifies CAT Manager when operational. <p>Accounting secures checks and petty cash.</p>
Exhibits, or Related Documents	

Additional Information	Utilize available hotel and vendor/partners' office space before renting space.
Compliance	
QA or Testing	

2.15 Procure Post-Incident Aerial Imagery of Incident Damage

Objective 2.15	To procure post-incident aerial imagery of incident damage.
Description	Schedule flyovers to confirm exposures and incident damage as part of the post-incident process.
Purpose	<ul style="list-style-type: none"> To provide TWIA expert panel with aerial images and other services in support of their requirements. To facilitate before and after comparisons of the condition of the property.
Participants	Underwriting, Claims, Aerial Imagery Vendor, General Manager
Action Plans	<p>Underwriting provides pre-incident risk management reports, including aerial imagery, obtained via the Risk Visualization Program.</p> <p>Claims works with aerial imagery vendor pre- or post- incident to obtain aerial images.</p> <p>Aerial Imagery Vendor</p> <ul style="list-style-type: none"> Tracks major incidents and maps out flight plans according as soon as it is safe. Maps paths for aerial imagery, typically covering up to 200 square miles per day. Sends flight plans to Claims via the Vendor Manager. Proceeds once they receive approval from TWIA and clearance from the FAA. Sends aerial images within 24-48 hours of flight completion. <p>Claims obtains approval from General Manager to incur costs.</p> <p>General Manager approves cost for aerial imagery.</p>
Exhibits, or Related Documents	
Additional Information	<ul style="list-style-type: none"> FAA clearance is typically given within 24-48 hours after the incident. EagleView is TWIA/TFPA's aerial imagery vendor. Point of contact is Jim King. Aerial imagery will be 6" resolution or greater, and will be available in a separate tab in EagleView CONNECT Explorer. Eagle has agreed that for significant incidents of industry interest, they will do a flyover. Cost will be determined at time based on number of people who sign up. We will determine whether we sign up, based on estimated costs and needs.
Compliance	
QA or Testing	

Response Phase (3.0)

Response represents the time period immediately after a catastrophic incident occurs and typically lasts up to 90 days post- incident. The response phase is characterized by heavy customer contact and high property inspection, payment, and claim closure activity, with the majority (90 percent or more) of all the incident claims reported, evaluated, processed, and closed during this time.

During this phase, it is important for the Enterprise to immediately recognize needs to increase capacity for serving our policyholders, including claims, vendor manager, mobile claims offices and remote facilities to serve impacted communities on the ground.

3.1 Ensure Compliance with Established Guidelines and Performance Standards

Objective 3.1	To ensure compliance with established Association guidelines and performance standards.
Description	Ensure ethical, timely, and efficient incident response.
Purpose	<ul style="list-style-type: none"> To efficiently provide essential insurance products and services for policyholders. To comply with sound insurance principles.
Participants	Claims, Legal and Compliance, Underwriting
Action Plans	<p>Claims:</p> <ul style="list-style-type: none"> Assesses stakeholder needs for loss reporting, securing advance payments, and guidance for temporary repairs/protection of property. Communicates thresholds for withholding replacement cost coverage (RCC) benefits, including mortgagee on claim payments. Sends a reminder about best practices for administering thresholds, including how to distribute threshold information. Communicates manner in which ALE claims will be handled during catastrophe. Assigns claims depending on loss complexity. Monitors total loss procedures and advanced payments during an incident. Reminds examiners to help policyholders with finding emergency repair service providers and board up services. Enforces claim handling timeframes, IA timelines, and payment timelines. Utilizes the services of experts (e.g., engineers and building consultants) to help mitigate disputed claims. Measures first notice of loss (FNOL) and call center metrics, adjuster and examiner cycle times payments, file closings, and reopen rates. Evaluates desk examiner claims handling using quality assurance criteria. Distributes regular incident summary reports, including claim volume, volume of escalated claims, projected new claim volume and expected total incurred. Deploys re-inspectors to monitor field adjuster performance. <p>Legal and Compliance</p> <ul style="list-style-type: none"> Temporarily staffs the floor to answer questions. Brings in outside counsel to assist depending on size of incident. Establishes assistance paths via phone calls and email where onsite presence is not available. <p>Underwriting</p> <ul style="list-style-type: none"> Researches in real-time to support Claims handling process when claim is filed where no policy is identified. Provides dedicated resources to assist with identifying which buildings and items are covered and which are not, where a commercial policy has multiple items, Provides Underwriting information as needed in real time, including information from Underwriting files: policy application and renewal information, inspection

	reports, risk visualization reports, other insurance company information for fire and flood, certified copies of policies and endorsements. <ul style="list-style-type: none"> Provides Workforce optimization/planning for assistance to Claims.
Exhibits, or Related Documents	<ul style="list-style-type: none"> In text following: Exhibit 18 "Sample Daily Incident Summary Report." CAT Plan Claim Triage and Assignment Process
Additional Information	
Compliance	
QA or Testing	

Exhibit 18: Sample Daily Incident Summary Report

Santa Fe Storm (5/1/13)	All Claims	Commercial	Residential	Mobile Home	No Policy
New Claims	3,910	91	3,779	31	8
By Line of Business	100%	2%	97%	1%	0%
Closed Claims	3,352	42	3,271	31	8
Open Inventory	687	49	508	0	0
% Closed	86%	46%	87%	100%	100%
Closed With Payment	1,958	14	1914	22	8
% Closed With Payment	50%	15%	51%	71%	100%
Closed Without Payment	444	10	420	6	8
% Closed Without Payment	11%	11%	11%	19%	100%
Re-Opened Claims	350	N/A	N/A	N/A	N/A
% Re-Opened	9.0%	N/A	N/A	N/A	N/A
Paid Indemnity	\$36,417,224	\$842,357	\$35,353,141	\$221,725	\$0
Paid Expense	\$2,833,312	\$66,586	\$2,746,797	\$19,929	\$0
Outstanding Indemnity	\$8,836,084	\$2,549,750	\$5,276,334	\$10,000	\$0
Outstanding Expense	\$647,379	\$251,348	\$395,379	\$1,000	\$0
Total Incurred	\$49,248,706	\$4,762,521	\$44,233,531	\$252,654	\$0
Avg. No. Days - FNOL to Inspect	3.3	3.8	3.3	3.4	N/A
Avg. No. Days - Inspect to TWIA	3.5	4.7	3.4	4.1	N/A
Avg. No. Days - TWIA to Payment	7.7	11.5	7.6	6.3	N/A
Total No. Days - FNOL to Payment	14.3	19.2	14.2	13.6	N/A
Average Paid	\$10,039	\$9,988	\$10,083	\$7,552	\$0
Comments: Re-Open information by line of business not available (N/A)					

3.2 Manage Mobile Claims Center and Remote Facilities

Objective 3.2	To manage mobile claims center and remote facilities, including operations and staff.
Description	Provide a TWIA presence in the impacted communities to allow for loss reporting, advance payments to policyholders, and face-to-face resolution of policyholder concerns.
Purpose	<ul style="list-style-type: none"> To provide immediate policyholder assistance, including first notice of loss (FNOL), claim status information and advance payments. To have a staging area for additional claim resources, including adjusters, experts, quality assurance, and the special investigation unit (SIU).
Participants	Claims, Accounting and Finance
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Coordinates roles and responsibilities and personnel to and from site. Ensures adherence with the TWIA and TFPA policies, workflows, and procedures. Meets with the team frequently to discuss questions, concerns, and trends. Coordinates with Maintenance staff to provide meals for personnel. Ensures a customer-centric workflow. Maintains inventory of office supplies, handbooks, policies, forms, and brochures until administrative staff are deployed and can have this delegated to them. Provides regular updates to CAT Manager, including operations reporting. Completes operations reporting, including issues and recommendations. Responsible for end-to-end claims process management from FNOL to payment. <p>Vendor Manager</p> <ul style="list-style-type: none"> Ensures that the vendor partners execute on contracted services. Communicates with Claims single point of contact (SPOC) designees to get assistance with vendor management. <p>Accounting and Finance controls check process including securing check signature stamp, maintaining check stock, controlling check endorsement process, establishing and maintaining a check log, and processing payments.</p>
Exhibits, or Related Documents	<ul style="list-style-type: none"> Mobile Claims Center and Remote Facilities Claims Processing Workflow Single Points of Contact (SPOC) for Vendors
Additional Information	<ul style="list-style-type: none"> Because there is a risk to power, voice communications, and system connectivity, our back up plan is to have a manual workaround with each mobile claims center or remote facility with current policy data available on a thumb drive, CD-Rom and/or printed documents. Deployed resources may be asked to assume one or more roles at any time. Designated non-Claims leadership may be assigned leadership roles off-site.
Compliance	
QA or Testing	

3.3 Administrative Complaint-Handling Process

Objective 3.3	To administrate complaint-handling process.
Description	Coordinate processing general written complaints, appeal complaints, and legislative complaints. Ensure appropriate complaint response, consistent with statutory requirements and aligned with our mission to provide quality customer service.
Purpose	To ensure complaints are properly addressed to avoid further escalation and to prevent future complaints where possible.
Participants	Claims, Communications and Legislative Affairs
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Ensures that staff follows complaint-handling process. • Communicates information from escalated complaint calls to impacted personnel. • Administers surveys to gauge whether claim handling is satisfactory to customers. • Communicates with principals of approved vendors and the Legal and Compliance Department on issues of ethics, conflicts of interest or fraud. • Uses compliant information for continuous improvement to reduce complaints. <p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> • Monitors complaint resolution process. • Meets to review complaints disputed claim data and survey results. • Arranges meetings with staff to reinforce customer service objectives and telephone etiquette as trends emerge from complaint data • Estimates complaint volume based on exposure, and estimates time needed for complaint handling and resources needed to meet additional complaint volume. • Ensures all complaints are being logged accurately and completely, and responded to as appropriate for all business units. • Ensures all written complaints are referred to Communications and Legislative Affairs for follow-up and inclusion in complaint log.
Exhibits, or Related Documents	<ul style="list-style-type: none"> • Complaint Training PowerPoint • Complaint Training FAQs
Additional Information	<ul style="list-style-type: none"> • TDI assigns a document number to complaint file and sends letter to the insured letting them know the complaint is being sent to TFPA for review. • An insurer must maintain a complete record of all complaints received during the preceding three years, or since the date of its most recent financial examination by the commissioner of insurance.
Compliance	
QA or Testing	

3.4 Communicate Roles and Responsibilities of Claims Support and Customer Care

Objective 3.4	To communicate roles and responsibilities of Claims support staff and customer care.
Description	Perform tasks to support the claim lifecycle. Assume responsibilities beyond normal staff roles in the case of an incident.
Purpose	To efficiently provide essential insurance products and services for policyholders.
Participants	Claims
Action Plans	<p>Claims Support Staff oversees parts of the Claim lifecycle, including but not limited to:</p> <ul style="list-style-type: none"> • Monitoring TWIA/TFPA email accounts for: Call Center template for initial contacts, data from the online FNOL form, and data from the online contact forms. • Inputting claim information from main TWIA/TFPA email boxes into the system. • Maintaining records data on vendor services and invoices, and paying invoices. • Researching coverage and contacting insured or agent in the case of no coverage. • Assisting with claim triage, assignment, dispatch and workload balancing processes. • Running as needed ISO reports on each claim, Association capacity permitting. • Voiding checks and issuing stop pays for claim files. • Managing the CGI fax queue. <p>Claims Support Staff and /or Customer Care Staff may assume the following during a CAT:</p> <ul style="list-style-type: none"> • Completing contacts, such as: acknowledging receipt of claim, providing insured a claim number, obtaining a description of damage, advising insured of next steps, providing claim status and field adjuster information, advising on reporting concerns. • Assisting in assigning claims. • Fulfilling roles and responsibilities for XA hybrid claims support procedures. • Handling urgent calls and transfers policyholders to claims examiner when needed. • Escalating serious claims (e.g., uninhabitable property or business interruption). • Coordinating with field adjusters on priority inspections. • Assisting with payment processing for emergency ALE payments, indemnity payments, and vendor invoices, if given proper authorities. • Processing incoming/outgoing mail, faxes, and paper FNOL documents.
Exhibits, or Related Documents	<ul style="list-style-type: none"> • XactAnalysis Hybrid Program Flowchart • XactAnalysis Hybrid Roles and Responsibilities
Additional Information	Based on incident size, multiple claims support and/or customer care units may be utilized.
Compliance	
QA or Testing	

3.5 Manage IT Support

Objective 3.5	To manage ongoing IT support after landfall of a catastrophic incident.
Description	Determine whether to suspend regular IT operations to provide support for Claims' extended hours of operation.
Purpose	To uphold the Associations' mission to deliver prompt and fair claims service.
Participants	IT
Action Plans	IT <ul style="list-style-type: none"> • Provides support for Rentsys unit and Agility Recovery's Readysuite site. • Provides support in Austin for extended hours of operations. • Assists with computer issues, setting up new PCs as needed, and internet support. • Developers provide support for all TWIA applications such as Notus, CallCenter Portal, Policy Explorer, and Policyholder Portal. • Evaluates impact for changes to nightly maintenance runs vs. Claims' extended hours and evaluates if iteration deployment plan can be deferred or frozen. • Communicates with business units to evaluate iteration risks and deployment plan. • Monitors systems with Orion (monitoring tool) on an ongoing basis.
Exhibits, or Related Documents	
Additional Information	<ul style="list-style-type: none"> • IT generally works in production enhancements and fixes which are developed, tested, and deployed every two weeks. These will be reconsidered during a CAT to allow for IT to scale up support functions. • IT personnel should be available 24 hours a day including weekends to provide support for CAT operations.
Compliance	
QA or Testing	

3.6 Manage Office Supplies, Office Space, and Equipment

Objective 3.6	To manage office supplies, office space, and equipment during a response.
Description	Manage all aspects of the main Austin office, including supplies and space, security, and vendor services (e.g., catering and cleaning). Set up and maintain equipment for office spaces.
Purpose	To drive operational efficiency in the case of an incident.
Participants	IT, Facilities
Action Plans	<p>IT</p> <ul style="list-style-type: none"> • Researches, purchases, and configures new equipment during an incident. • Works with Facilities to setup PCs and phones for additional cubicles. • Uses tool allowing IT Operation to create Active Directory accounts in large volumes, which saves an average of 15 minutes per account. • Confirms hardware, software, network connectivity and voice communications capabilities are functioning and secure. <p>Facilities</p> <ul style="list-style-type: none"> • Manages the Austin physical plant. • Enlists security guards, cleaning services 7 days a week, 24-7 building repairs vendors, and enlists janitorial to secure the building nightly. • Orders mailroom supplies (printer, scanner and fax server capacity), including paper, supply closet, postage funds, and access cards. • Coordinates additional coffee, vending, and common area supplies. • Programs HVAC system for extended office hours. • Confirms parking with Austin Oaks church, formerly First Evangelical Free Church, to be assigned as needed. • Marks TWIA parking permit spaces, and issues, tracks parking permits. • Coordinates with management to assign workstations based on availability. • Locates off-site office space and off-site storage space, if needed.
Exhibits, or Related Documents	Workspace Utilization Report
Additional Information	<ul style="list-style-type: none"> • As of March 2015, there are 122 cubicles and 3 offices available with an additional 119 spaces in various conference and meeting rooms. • Available cubicles are equipped with PCs and phones.
Compliance	
QA or Testing	

3.7 Manage Check Stock for Payments and Check Processor

Objective 3.7	To manage check stock and check processor when payments exceed typical volume.
Description	Manages check issuance onsite in mobile claims center and remote facilities. Maintain check-printing equipment.
Purpose	To drive operational efficiency in the case of an incident.
Participants	Accounting and Finance, IT, Claims
Action Plans	<p>Accounting and Finance:</p> <ul style="list-style-type: none"> • Determines need for remote manual check process and/or electronic funds transfer. • Funds manual check accounts with initial balances. • Establishes and maintains a check log. • Manages inventory for the following options: system-generated checks, manual checks, advanced payments, and signature stamps. • Maintains communications with mobile and off-site offices to regularly check on the status of check inventory. • Reconciles on-site payments immediately with on-site computers and network access, and reconciles daily where network access is not available. • Controls check endorsement process. • Manages banking relationships to minimize disruptions to customer payments. <p>IT</p> <ul style="list-style-type: none"> • Administers permissions for CheckProcessor.exe file in the check processor machine from list of claims users with permissions to print claims checks. • Purchases rollers and toner supplies and replaces weekly or as needed. • Advises personnel to regularly check printers and assists with daily check printing. • Supports on-site printing and mailing from Austin, as well as off-site (e.g., desk examiner or customer care unit). <p>Claims coordinates with Accounting for secure check issuance and exceptions.</p>
Exhibits, or Related Documents	Check Issuance Procedures
Additional Information	
Compliance	
QA or Testing	

3.8 Identify and Evaluate Possible Fraudulent Activity

Objective 3.8	To identify and evaluate possible fraudulent activity.
Description	Utilize Special Investigation Unit (SIU) services for compliance with state fraud reporting requirements. Support enterprise-wide awareness of different types of fraud: vendor fraud, policyholder fraud, and internal fraud.
Purpose	<ul style="list-style-type: none"> To ensure stakeholders are aware of potential fraudulent activities. To ensure all claims are legal and accurate. To fulfill duties to report any cases of fraud.
Participants	All Departments
Action Plans	<p>SIU</p> <ul style="list-style-type: none"> Assists with identifying suspicious claim practices, including gathering information and following up with suspected policyholders or vendors. Works with other carriers to identify trends in suspect claims. Communicates with Claims on any suspicious practices or red flag items. <p>Legal and Compliance</p> <ul style="list-style-type: none"> Investigates any reported or suspected cases of fraud, including the following types: vendor fraud, independent fraud, policyholder fraud, and internal fraud. Communicates with TDI fraud staff and/or appropriate federal, state and local governments when necessary. <p>Claims refers the claim to SIU for evaluation based on internal SIU referral requirements.</p> <p>All Departments re-assign any TWIA/TFPA staff to Compliance manager for purposes of investigating suspected act of fraud.</p>
Exhibits, or Related Documents	<ul style="list-style-type: none"> TWIA/TFPA Fraud Referral Form Claim Examiner Handbook
Additional Information	<ul style="list-style-type: none"> Web portal or phone call to SIU. Suspected Insurance Fraud Report via TDI. Texas Insurance Code 701.051 there is an affirmative duty for TWIA to report suspected insurance fraud to TDI. Duty to report not later than the 30th day after the date.
Compliance	
QA or Testing	

3.9 Coordinate Emerging Legal Issues with House and/or Outside Counsel

Objective 3.9	To coordinate emerging legal issues with house and/or outside counsel.
Description	Maintain proper resources to correctly interpret policy contracts and claim handling requirements, including staffing for: disputed or litigated claims and Texas Insurance Code 2210.578 expert panel claims.
Purpose	<ul style="list-style-type: none"> To scale legal resources to assist with catastrophic incidents. To ensure compliance with applicable laws and statutes.
Participants	Legal and Compliance
Action Plans	Legal and Compliance <ul style="list-style-type: none"> Maintains up-to-date knowledge of case law in order to determine trends in disputed claims industry-wide. Conducts in-depth research on issues lending towards litigation (e.g., depreciation). Identifies and confirms the availability of contracted counsel to assist with coverage interpretations. Projects disputes and litigation rates to determine resources needed. Identifies the patterns of issues and determine avenues to find resolution. Coordinates between different firms to handle workload on lawsuits emerging if volume of suits exceeds Association capacity. Understands any increases in need for additional legal support especially where the Texas Insurance Code 2210.578 mandated TWIA expert panel may be involved or levels of disputed or litigated claims become a concern.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

3.10 Determine Need for Extension of Time for Claim Acceptance and/or Denial

Objective 3.10	To determine need for extension of time for claim acceptance and/or denial.
Description	Determine when a request of extension of time is needed because the Associations do not have the capacity to accept claims in 60 days. Apply for extension with TDI.
Purpose	To ensure claims are processed within statutory guidelines.
Participants	Claims, Legal and Compliance
Action Plans	<p>Claims determines the need for an extension of time to accept claims and defines the required extension.</p> <p>Legal and Compliance</p> <ul style="list-style-type: none"> • Assists Claims in formatting the request for an extension. • Sends request for extension to the appropriate stakeholders at TDI. • Informs Claims, Legislators, and Board Members, if and when extension is granted,
Exhibits, or Related Documents	
Additional Information	
Compliance	Statute 2210.581 governs the amount of time the Associations have to process and accept claims.
QA or Testing	

3.11 Secure Catastrophe Funding

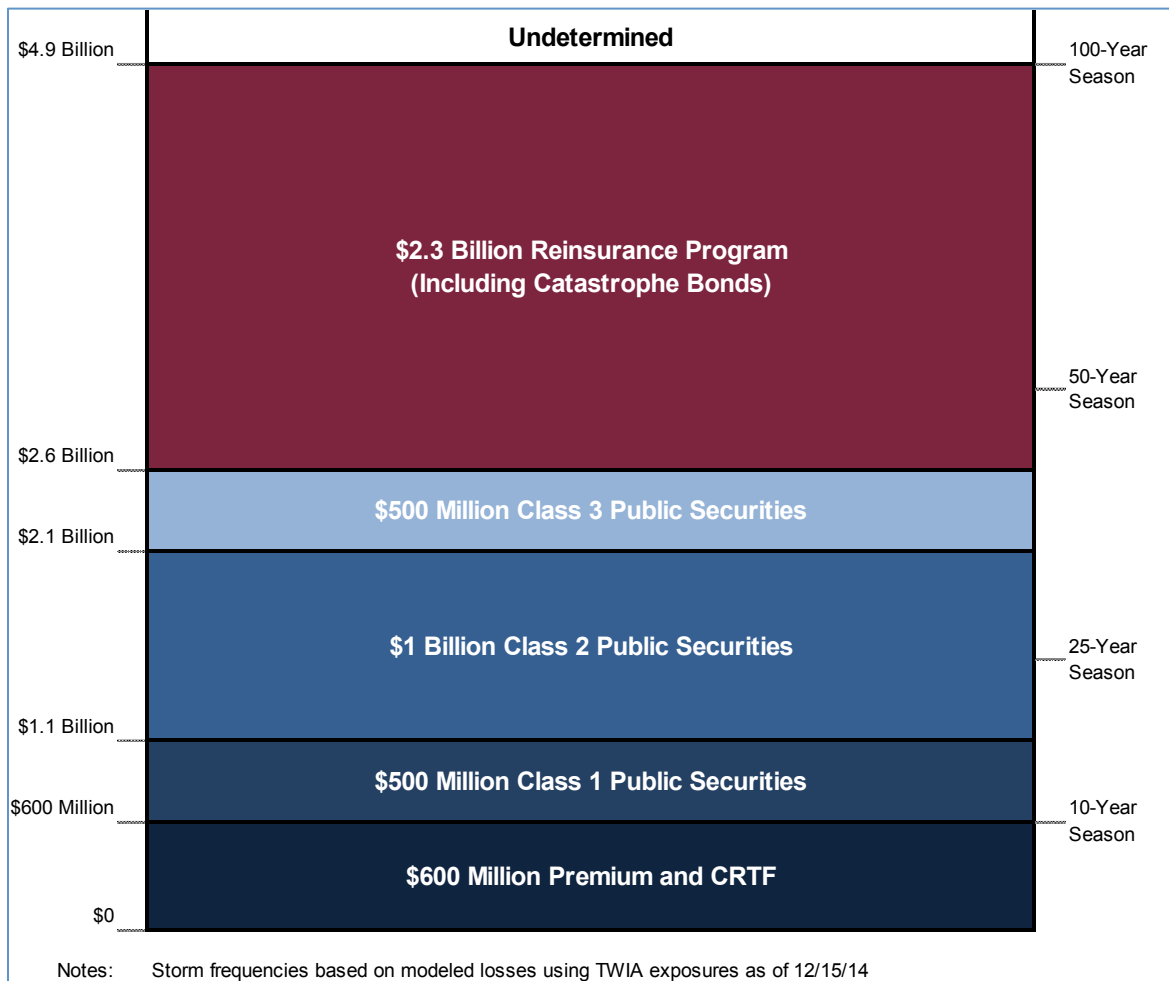
Objective 3.11	To secure catastrophe funding to support the funding needs based on loss estimates and actual claims experience.
Description	Estimate short term and long term funding needs. Assist with public security funding and reinsurance. Communicate with external stakeholders about securities issuance and assessments.
Purpose	To ensure adequate funds are available to pay claims in a timely manner.
Participants	Actuarial, General Manager, Accounting and Finance
Action Plans	<p>Actuarial</p> <ul style="list-style-type: none"> • Manages reinsurance recovery process with reinsurance brokers, including onsite claim file reviews. • Manages short and long term funding needs with the Board of Directors and the General Manager. • Assists in securing funding from public securities. <p>Accounting and Finance</p> <ul style="list-style-type: none"> • Assists in securing funding from public securities. • Manages short and long term funding needs with the Board of Directors and the General Manager. <p>General Manager</p> <ul style="list-style-type: none"> • Informs the commissioner and comptroller of total estimated catastrophic losses and potential reinsurance recoveries, and updates them with changes to estimates. • Communicates with bond and other legal counsel as to proper processes in statute and plan of operation for post- incident securities issuance. • Should a deficit occur, at the direction of the Commissioner, TWIA/TFPA shall either request the issuance of public securities as authorized by Chapters 2210 and 2211 of the Insurance Code (respectively), or assess participating insurers.
Exhibits, or Related Documents	In text following Exhibit 19 “Sources of Funding - Single Storm” and Exhibit 20 “Sources of Funding – Hurricane Season.”
Additional Information	Note that Exhibit 19 demonstrates compliance with Texas Insurance Code 2210 by planning for scenarios with a single storm (1 in 100, 1 in 50, and 24 year storms). Exhibit 20 includes funding plans for the entire hurricane season with plans for funding in the case of multiple storms.
Compliance	
QA or Testing	

Exhibit 19: Sources of Funding – Single Storm Scenarios*

Event	Estimated Losses (in millions)	Sources of Funding			
		Premium Revenue (in millions)	CRTF (in millions)	Public Securities (in millions)	Reinsurance (in millions)
1% (1 in 100)	\$4,669	\$125	\$475	\$2,000	\$2069
2% (1 in 50)	\$2827	\$125	\$475	\$2,000	\$227
4% (1 in 25)	\$1,509	\$125	\$475	\$909	0
10% (1 in 10)	\$519	\$125	\$394	0	0

*Estimates current as of 06/01/2015.

Exhibit 20: Sources of Funding – Hurricane Season*



*Estimates current as of 06/01/2015.

3.12 Track Losses and Reserve Adequacy

Objective 3.12	To track losses and reserve adequacy.
Description	Monitor losses and projections to ensure adequate reserves and funding are allocated for paying claims and other financial obligations.
Purpose	To secure sufficient funding to pay claims and other financial obligations.
Participants	Underwriting, Claims, Accounting and Finance
Action Plans	<p>Underwriting</p> <ul style="list-style-type: none"> • Conducts quarterly reserve reviews and estimates incurred but not reported (IBNR). • Calculates potential funding needs and assists in communications to stakeholders. • Monitors reported losses, payment projections, and reserve adequacy. • Reports on expected cash flows and ultimates, and key projected financial metrics attached for TWIA and TFPA. • Serves as a resource to Claims for template catastrophe reserving. <p>Claims</p> <ul style="list-style-type: none"> • Segments losses based on whether the claim is residential or commercial. • Segments residential losses as non-complex, complex or multiple locations/buildings. • Works with actuary and General Manager on volume, severity, complexity of reported losses, expected losses and status of plan implementation. <p>Accounting and Finance</p> <ul style="list-style-type: none"> • Manages and projects cash flow
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

Recovery Phase (4.0)

According to Texas Division of Emergency Management, recovery is defined as “long-term activities that help return life to normal for individuals, businesses, and infrastructure.” In the recovery phase, the vast majority of claims are closed and Association operations are being scaled back to normal.

During this phase, the corrective action program is fully implemented and activated, including review of all after action reports to determine the level of Plan updates and need for future testing, training, and exercises.

4.1 Restore Normal Insurance Application Procedures

Objective 4.1	To restore normal insurance application procedures if weather incident meets 'Hurricane Binding Exception' and threat has passed.
Description	Initiate the restoration of normal business. Update the settings in the policy system.
Purpose	To restore essential insurance services after a catastrophic incident.
Participants	Underwriting, General Manager, Communications and Legislative Affairs, Underwriting
Action Plans	<p>Underwriting recommends to General Manager the deactivation of "CAT Mode" and the restoration of normal insurance application procedures in impacted counties.</p> <p>General Manager decides whether to deactivate "CAT mode," and alerts executive leadership team.</p> <p>Underwriting</p> <ul style="list-style-type: none"> • Notifies IT to deactivate "CAT Mode" in Notus, according to the procedures documented in the <i>Storm Mode User Guide</i>. • Notifies IT to deactivate "CAT Mode" in the CGI Agent Portal. • Notifies Communications and Legislative Affairs to place "Normal Processing Mode" Agent Bulletin on TWIA Website. <p>Communications and Legislative Affairs</p> <ul style="list-style-type: none"> • Oversees taking down the "CAT mode banner" on the website. • Reports to Texas Legislature and TDI on TFPA /TWIA's restoration of normal insurance procedures in impacted counties. <p>Underwriting</p> <ul style="list-style-type: none"> • Prepares agent bulletin and email to send TWIA agents information on restoration of normal submission procedures, offsite office closings, restating agent binding authority, and claim reporting procedures. • Coordinates with Communications and Legislative Affairs for approval of agent bulletins, posting of bulletins to website, and sending emails. • Advises staff of return to normal processing guidelines. <p>IT</p> <ul style="list-style-type: none"> • Deactivate "CAT Mode" in Notus, according to the procedures documented in the <i>Storm Mode User Guide</i>. • Deactivate "CAT Mode" in the CGI Agent Portal.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

4.2 Communicate with Public and External Stakeholders

Objective 4.2	To communicate with public and external stakeholders about the recovery phase.
Description	Alert the public and external stakeholders when catastrophe response has been successful, and outline steps for the phase of recovery.
Purpose	<ul style="list-style-type: none"> • To operate transparently through open communication with stakeholders. • To ensure a quality customer service experience.
Participants	Communications and Legislative Affairs
Action Plans	Communications and Legislative Affairs <ul style="list-style-type: none"> • Considers running full-page “After the Storm” newspaper ads with claims process and contact information. • Considers running radio ads with claims process and contact information. • Considers sending press release to follow up with media in affected areas. • Considers offering interviews with TWIA/TFPA to key reporters regarding insurance issues. • Crafts and posts “After the Storm” message for publication on the TWIA/TFPA websites. • Posts “After the Storm” information on pertinent social platforms (Facebook, Twitter).
Exhibits, or Related Documents	Catastrophe (CAT) Incident Response Communications Plan
Additional Information	
Compliance	
QA or Testing	

4.3 Release Contracts and Dismantle Site(s) of Mobile Claims Center and Remote Facilities

Objective 4.3	To release contracts and dismantle site(s) of mobile claims center and remote facilities.
Description	Tear-down and clean up mobile sites. Coordinate inventory of supplies at mobile sites and off-site offices. Release vendor contracts where relevant.
Purpose	To return mobile operations back to home office operations.
Participants	Claims, Facilities, Communications and Legislative Affairs
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> Communicates with Rentsys Recovery Services to release mobile office units and equipment, when they are no longer needed. Conducts final staff meeting to discuss any pertinent information before closing the mobile claims center and remote facilities, including: rental vehicle return procedures, final timesheet processing, final expense report processing, and return-to-work instructions for personnel. Confirms completion of final site clean-up. Coordinates the tear-down plans and release of equipment, ensuring site is left clean in the case of a Basecamp temporary housing scenario. Coordinates check out protocols in the case of hotel lodging. Oversees return of rental cars, when they are no longer needed. <p>Facilities</p> <ul style="list-style-type: none"> Works with Claims to inventory company equipment and supplies. Works with Claims to collect all documents, including handbooks, policies, forms, and brochures. Communicates with Agility Recovery's ReadySuite service to release off-site office space when it is no longer needed. Communicates with security vendors release off-site office services when they are no longer needed. <p>Communications and Legislative Affairs communicates to stakeholders on the closing of mobile and remote facilities.</p>
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

4.4 Transition Supplies to Pre-CAT Status

Objective 4.4	To transition supplies to the level needed for normal business procedures.
Description	Return supplies, security, and vendor services to pre-CAT levels. Deactivate extra equipment and phones.
Purpose	To drive operational efficiency.
Participants	IT, Facilities, Claims
Action Plans	<p>IT</p> <ul style="list-style-type: none"> • Works with Rentsys to deactivate systems technology for mobile claims center. • Deactivates excess phones. • Inventories computers, extra monitors, and supplies such as toner. • Returns excess, mistakenly ordered, or faulty equipment if applicable. • Returns any equipment taken from training rooms and reconciles supplies. <p>Facilities</p> <ul style="list-style-type: none"> • Deactivates security badge for contractors. • Inventories and reconciles supplies (e.g., chairs, workstations, and storage). • Evaluates actual demand on workspaces, supplies, and equipment to determine changes to supply planning. • Communicates with security services to restore pre-CAT status. • Communicates with food and drink vendor services and cleaning services to restore pre-CAT status. • Communicates to restore parking to pre-CAT status. <p>Claims works with IT and Facilities to ensure that supplies and technologies are transitioned to pre-CAT status.</p>
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

4.5 Conduct Reviews of Vendors, Contractors, and Service Providers

Objective 4.5	To conduct reviews of vendors, contractors, and service providers.
Description	Evaluate vendors and contractors based on observations made during the incident activities and make recommendations for changes to vendors, or processes and procedures.
Purpose	To ensure we partner with the best available vendor resources.
Participants	Claims, Facilities, Human Resources, Legal and Compliance
Action Plans	<p>Claims</p> <ul style="list-style-type: none"> • Participates in Association debriefs after response efforts. • Gathers feedback from units that worked with vendors, contractors, and service providers for recommendations on improvements to be made. • Conducts surveys to rank vendors by degree of performance. • Assigns Department personnel to evaluate the observations and recommendation. • Schedules Department meeting to discuss recommendations, and plan changes. • Sends report to General Manager within 30 days of response efforts. <p>Facilities and Human Resources</p> <ul style="list-style-type: none"> • Participates in Association debriefs after response efforts. • Conduct surveys to rank vendors by degree of performance. • Assigns Department personnel to evaluate the observations and make recommendations. • Schedules Department meeting to discuss recommendations. • Schedule Department meeting to discuss recommendations, and plan changes. • Sends report to General Manager within 30 days of response efforts. <p>Legal and Compliance</p> <ul style="list-style-type: none"> • Coordinate with business units to evaluate compliance of vendors, contractors, and service providers with agreements and assess need for any resulting amendments, terminations, or new agreements.
Exhibits, or Related Documents	
Additional Information	Will likely be a part of the Corrective Action Program (CAP) process.
Compliance	
QA or Testing	

4.6 Implement a Corrective Action Program (CAP)

Objective 4.6	To implement and follow a corrective action program (CAP) to ensure continuous Improvement of the Plan.
Description	Evaluate Enterprise performance and Plan adequacy based on lessons learned or observations made during an incident, or during testing training and exercises (TTE).
Purpose	<ul style="list-style-type: none"> To compel Enterprise resources to identify strengths and weaknesses. To ensure a process is in place so the value of lessons learned is not lost.
Participants	All Departments
Action Plans	<p>All Departments ensure awareness and compliance with the CAP including:</p> <ul style="list-style-type: none"> Assigning Department personnel to evaluate the observations and recommendations. Documenting activities or findings into after action report format and file with designated CAP manager. Participating in Association debriefs after response efforts. Scheduling Department-wide meeting to discuss recommendations. Participating in Enterprise feedback sessions for a full review with all key players within several weeks of the incident. <p>Claims</p> <ul style="list-style-type: none"> Creates an After Action Report with all documented issues to assess product, services and future recommendations. Creates a CAP document to include: issues raised in the after-action report and their recommended resolutions, work assignments for each issue or cluster of issues, timeframes for review and completion, a TTE plan with milestones for implementing and documenting the solutions.
Exhibits, or Related Documents	After Action Program Template
Additional Information	For now, after action reports are filed via email to a central point of contact in Claims.
Compliance	
QA or Testing	

4.7 Conduct Testing, Training, and Exercises (TTE)

Objective 4.7	To conduct testing, training, and exercises (TTE) of the catastrophe (CAT) incident response plan.
Description	Ensure that the CAT Plan supports the common overall goal of preparedness.
Purpose	To provide activities to identify areas of strength, areas of improvement, obtain leadership buy-in, allow staff to practice procedures, help to inform and train staff.
Participants	All Departments
Action Plans	<p>All Departments Assist with development and execution of test, training, and exercises (TTE), including:</p> <ul style="list-style-type: none"> • System tests – Performance, Scalability, Reliability, and Functionality. • Procedures tests – Claims and non-Claims • Discussion-based exercises (e.g., Seminars, Workshops, Tabletop, and Games) • Operations-based exercises (e.g., Drills, Functional, and Full-scale) • Training: Leadership - by plan roles and responsibilities • Training: All Staff – for roles and responsibility • Training: Desire is to include cross-training where possible especially for mobile or remote workers • Controls- Process and analytics for plan compliance and testing
Exhibits, or Related Documents	
Additional Information	<ul style="list-style-type: none"> • Current incidents allowing for 2015 testing effort to be completed. • Corrective Action Program activated and will drive need for additional changes and tests for rest of 2015 and into 2016.
Compliance	
QA or Testing	

Appendices

[This page intentionally left blank.]

Appendix A - CAT Plan Revisions Log

Date	Revised By	Description
08/23/11	Julie Kronbach, Consultant	Rewrite of TWIA and TFPA Catastrophe Plan
03/31/12	David Williams, Vice President and Claims Management Team	Rewrite of TWIA and TFPA Catastrophe Plan to include updated workflows and procedures
05/06/13	David Williams, Vice President, and Claims Management Team	Completed rewrite of TWIA and TFPA Catastrophe Plan to include HB3 requirements and updated workflows and procedures
08/22/13	John Morrison	Added Appendix U: Association Employee CAT Pay Policy
08/29/13	John Morrison	Moved phone system responsibilities from Operations to IT
05/15/14	Claims Management Team	Revised and updated Catastrophe Plan including House Bill 3 requirements
5/31/15	General Manager, Executive Leadership Team, and Enterprise Subject Matter Experts	Rewrite of TWIA and TFPA Catastrophe Plan

Appendix B - CAT Summary Checklist for TWIA and TFPA Staff

Before Hurricane Season:

- ☐ Participate in development and testing of the CAT Plan
- ☐ Participate in development and testing of the Disaster Recovery/Business Continuity (DR/BC), the plan for when a disaster affects the Austin office.
- ☐ Participate in all TWIA/TFPA mandatory trainings
- ☐ Learn how to take first notice of loss (FNOL) information from policyholders in the case of a misdirected call
- ☐ Update emergency contact information and all languages spoken in the ADP system
- ☐ Create a plan for your household in the case of CAT deployment and/or mandatory overtime
- ☐ Identify where to check for information on office closings, and regularly access for information.

While Monitoring a Pending Storm:

- ☐ Remain on alert for one-call messaging notifying of activation of the CAT Plan
- ☐ Remain on alert for mandatory overtime based on Association needs
- ☐ Activate plans at home for deployment and/or overtime
- ☐ Attend preliminary Department meeting for briefing on CAT Plan duties and roles
- ☐ Attend Department strategic planning meeting 96 hours before landfall
- ☐ Remain on alert for the activation of “storm mode” in the policy system, and pay attention to emails from IT indicating updates to systems technology
- ☐ Refer all media requests to Communications
- ☐ Prepare for role transitions (i.e., taking on a temporary position specific to the CAT)
- ☐ If chosen to deploy, prepare to travel to the impacted area or a nearby staging area when it safe to do so.

After Landfall of a Storm:

- ☐ Follow statutory timelines for claims and complaints
- ☐ Assist contract resources in complying with Association policies
- ☐ Report the following kinds of fraud when you see them: vendor fraud, policyholder fraud, internal fraud, and independent resource fraud
- ☐ For all misdirected calls, help the policyholder as much as possible, including taking FNOL information
- ☐ Participate in ongoing CAT meetings and briefings
- ☐ Continue referring all media requests to Communications
- ☐ If deployed, uphold TWIA and TFPA policies and procedures for professional behavior

Post-Event Phase:

- ☐ If deployed or at an offsite facility, assist with dismantling and cleaning the site
- ☐ Return equipment and supplies distributed to you for CAT response
- ☐ Remain on alert for the de-activation of “storm mode” in the policy system, and pay attention to emails from IT indicating updates to systems technology
- ☐ Prepare for role transitions (i.e., transitioning out of your temporary CAT role)
- ☐ Participate in Department Enterprise evaluations of CAT response
- ☐ Participate in conducting reviews of contractors and service providers

Appendix C - How to Submit a Claim for TWIA and TFPA Staff

Providing Policyholder Assistance during a Catastrophe

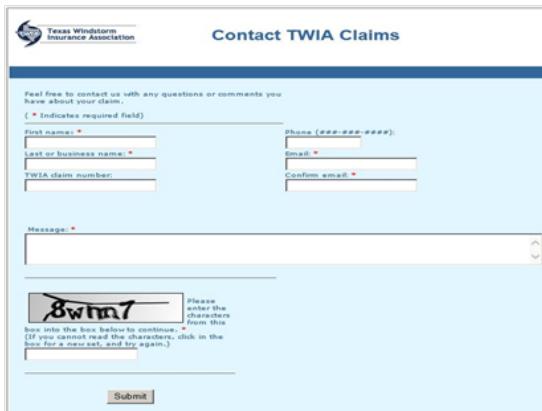
When receiving an errant phone call during a catastrophe, please provide direct customer service. If the insured has filed a claim, use the **online contact form** to submit an inquiry. If the insured has not submitted a claim, use the **claim reporting tool**. The instructions below outline how to submit these online forms on behalf of the insured.

→**Ask the following.** “Have you filed a claim yet? Has your agent filed a claim for you?” For insureds with existing claims, see: “A. How to Submit the Online Contact Form.” For insureds needing to file a claim, see: “B. Using the Online Claim Reporting Tool.”

A. How to Submit the Online Contact Form

1. **Go to Policyholders** via the main navigation bar on the TWIA or TFPA homepage and scroll to select “Claims Center.”

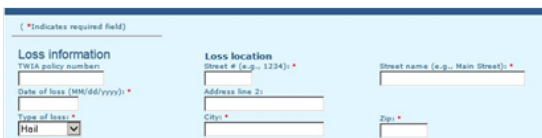
2. **Click on the “request a claim status online” link**, which takes you to the portal <<https://portal.twia.org/twia/pub/simpleContact>>.



3. **Complete the form on the insured's behalf.** Include a message about the inquiry, and let the insured know they will receive a phone call from Claims within a few hours.

B. Using the Online Claim Reporting Tool

1. **Select “Report a Claim”** in the mid-section of the TWIA or TFPA homepage, which takes you to the portal <<https://portal.twia.org/twia/pub/simpleFNOL>>.



2. **Enter TWIA/TFPA policy number provided by the customer.** Leave blank if they do not have it.

3. **Enter the exact date of damages under “Date of Loss.”** Request their best estimate if they do not know.

4. **Select the type of loss.** Most are wind or hail related. A plumbing leak is a water claim. You can use your judgment.

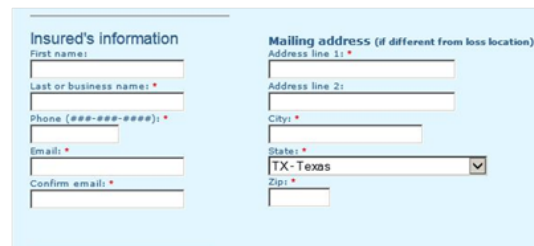
5. **Record your name, and the “Description of Loss.”** Your name helps to identify how the FNOL came in. For the description, take notes on the location(s) of damage. Ex: “Shingles on ground in back of house. Roofer found hail hits. Interior leaks in living room and master bedroom closet. Tree impact on front of home.”



6. **Enter the address of loss location.** Confirm the address is the same as where the damages occurred.

7. **Enter the insured's info.** Verify the spelling of their name, phone number, and email. (If the insured has no email, use claimsassist@twia.org OR tfpa.claims@texasfairplan.org.)

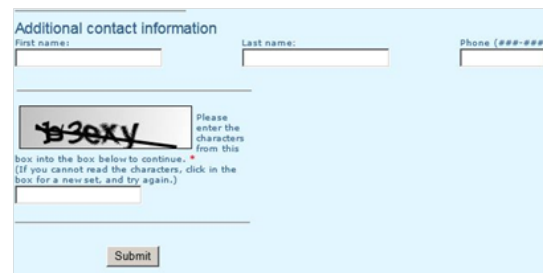
8. **Insured's mailing address.** Only required if the mailing address is different from the loss location.



9. **Additional contact info.** Enter additional contacts for the claim (e.g., husband, daughter, etc.).

10. **Submit the form.** Type in the characters from the CAPTCHA into the blank field and click submit.

11. **Closing.** Please let the insured know they will receive a phone call from Claims within a few hours.



Appendix D - Plan for Volunteer Enlisting for Catastrophe (CAT) Incident Response Deployment

Purpose

The purpose of this document is to outline a strategy to ensure the enlistment of staff in the months prior to hurricane season for response to a catastrophic incident.

The Plan seeks to:

Identify Staff and Recruit Volunteers for:

- Deployment to mobile and remote offices
- Deployment positions for all Department functions

Educate staff on:

- Roles and responsibilities for deployment during a CAT.
- Information about mandatory overtime and volunteer and/or mandatory CAT deployment.

- I. **Volunteer Recruitment** (The following deliverables should be sent annually no later than July 1st of each year).
 - a. Instructions for updating ADP system (languages spoken, address, and emergency info).
 - b. Email to Department heads, including list of positions for remote facilities and mobile claims center.
- II. **Maintain List of Prepared Volunteers.** (The following will be done annually.)
 - a. Compile list of volunteers from each Department, including data on deployment positions they could fill.
 - b. Annual meeting with volunteers to discuss expectations for deployment needs outside of the main office.
 - c. Updates to the database with information on volunteers for deployment.
- III. **Day of Deployment Communication** (sent when CAT Plan is activated)
 - a. Checklist of what to bring when deployed.
- IV. **Returning from Deployment** (sent when remote and mobile facilities are closed)
 - a. Description of the returning to the office and resources TWIA offers for adapting post-catastrophe.