TWIA TEXAS WINDSTORM
INSURANCE ASSOCIATION

TFPA TEXAS FAIR PLAN
ASSOCIATION

2025 TWIA & TFPA

Catastrophe Incident

Response Plan

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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 continuous improvements initiatives TWIA and TFPA employ throughout the year.
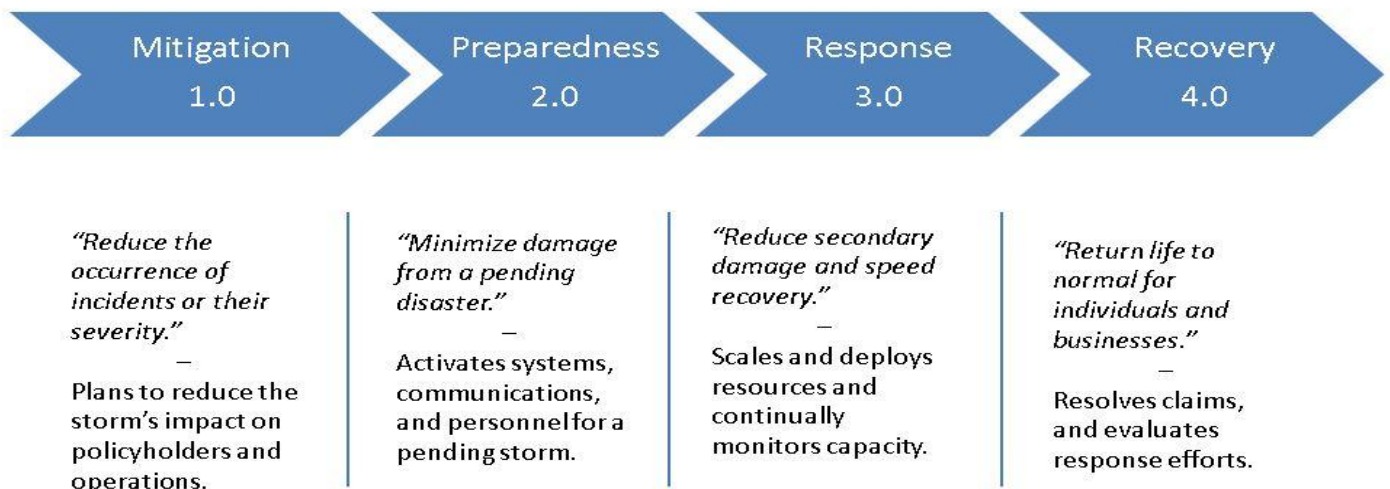
Background

Texas Insurance Code 2210.455 requires TWIA to submit a Catastrophe Response Plan on June 1st of each calendar 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). 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 provides a response framework for the Association and guidance for departments and personnel. Based on principles and best practices utilized by the Federal Emergency Management Agency (FEMA) and other response organizations, the structure of the plan is built around the four phases of a response; mitigation, preparedness, response, and recovery. Each objective in the plan covers actions and duties for both the Association and individual departments.

The objectives in the plan are broken up into eight sections; the description of the objective, the purpose, departmental and individual participants, action plans, exhibits, additional information, compliance, and QA or Testing.

Plan Phases:

Mitigation 1.0	Preparedness 2.0	Response 3.0	Recovery 4.0
"Reduce the occurrence of incidents or their severity." — Plans to reduce the storm's impact on policyholders and operations.	*"Minimize damage from a pending disaster."* — Activates systems, communications, and personnel for a pending storm.	*"Reduce secondary damage and speed recovery."* — Scales and deploys resources and continually monitors capacity.	*"Return life to normal for individuals and businesses."* — Resolves claims, and evaluates response efforts.

Mitigation Phase (1.0)

According to the Federal Emergency Management Agency (FEMA) 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	- 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	**Claims** - 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. **All Departments** - Review Plan to identify and assess 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. **General Manager and Executive Leadership Team** - Review and give Plan approval. **Legislative & External Affairs** - Submits Plan to internal and external stakeholders no later than June 1. **Claims** - Works with Executive Leadership Team to identify areas for improvement and creates an improvement plan including testing, training and exercises.
Exhibits, or Related Documents	Appendix A - CAT Plan Revisions Log
Additional Information	
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 2210.455.
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	**Claims** - 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 hailstorm 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. **Actuarial** - Manages the modeling of TWIA and TFPA exposures prior to hurricane season and provides updates to Claims
Exhibits, or Related Documents	- Hail/Wind Shape File Data Map - Exhibit 1 "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 1: 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	88,464	2,467	91,261	5-10%	4,563 – 9,126
50 - 69	79,176	3,496	82,893	11-35%	9,118 – 29,013
70 - 89	4,419	223	4,675	36-50%	1,683 – 2,338
90 - 109	37,374	2,097	39,585	51-75%	20,188 – 29,689
>109	21,388	1,105	22,60	76-100%	17,176 – 22,600
Totals	230,821	9,398	241,014	. . .	52,729 – 92,765

***The numbers identified above are based on the storm characteristics of Hurricane Harvey

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	• To increase the ability to activate resources after a catastrophic incident. • To uphold the Associations' commitment to deliver prompt and fair claims service.
Participants	Claims, IT, All Departments, General Manager
Action Plans	**Claims** • 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 mobile office and off-site office staffing plans for various CAT scenarios. **All Departments** • Use the Resource Scalability Model (Exhibits 2-5) to determine departmental scaling needs **General Manager** reviews quarterly updates on vendor assignment process.
Exhibits, or Related Documents	Exhibit 2-8
Additional Information	• In addition to complying with Texas Insurance Code 2210.455, also models ten-in-100 year incidents (i.e., 10 percent event). • This model utilizes the Maximum Claim Count numbers to create the expected claim counts and is not the same as the PML used to determine annual funding
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. • Fulfills the Texas Insurance Code requirement to implement indirect incident modeling once per year.
QA or Testing	

Exhibit 2: TWIA 1% Probability Event (1 in 100 year event)

TWIA Resource Scalability Modeling Tool 2025 Summary - TWIA 1% Probability Event (1 in 100 years) - 126,762 Claims															
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	L&EA	Accounting	L&C	Facilities /Ops	IT Ops	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
83,895	15	5,593	755	76	70	76	1	1	2	1	8	990	1,363	68	1,431
99,348	30	1,052	695	70	59	70	1	2	2	1	7	907	745	37	782
106,587	60	246	266	27	23	27	1	2	2	1	3	352	133	20	153
110,268	90	123	110	11	11	11	1	2	2	1	1	150	55	11	66

Exhibit 3: TWIA 2% Probability Event (1 in 50 year event)

TWIA Resource Scalability Modeling Tool 2025 Summary - TWIA 2% Probability Event (1 in 50 years) - 107,369 Claims															
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	L&EA	Accounting	L&C	Facilities /Ops	IT Ops	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
71,060	15	4,737	640	64	57	64	1	1	2	1	7	837	1,155	58	1,213
84,149	30	872	589	59	48	58	1	2	2	1	6	766	631	32	663
90,281	60	204	226	23	21	22	1	2	2	1	2	300	113	6	119
93,398	90	103	93	9	8	9	1	1	2	1	1	125	47	2	49

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

TWIA Resource Scalability Modeling Tool 2025 Summary - TWIA 4% Probability Event (1 in 25 years) - 75,694 Claims															
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	L&EA	Accounting	L&C	Facilities /Ops	IT Ops	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
50,097	15	3,339	451	45	41	45	1	1	0	0	4	588	814	41	855
59,324	30	615	415	42	22	42	1	1	2	0	4	545	445	22	467
63,647	60	144	159	16	16	16	1	1	2	0	2	212	80	4	84
65,845	90	73	66	5	7	7	1	0	2	0	1	91	33	2	35

Exhibit 5: TWIA 10% Probability Event (1 in 10 year event)

TWIA Resource Scalability Modeling Tool 2025 Summary - TWIA 10% Probability Event (1 in 10 years) - 37,934 Claims															
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	L&EA	Accounting	L&C	Facilities /Ops	IT Ops	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
23,953	15	2,029	274	27	27	27	1	1	0	0	2	358	389	19	408
28,365	30	373	252	21	25	25	1	1	0	0	2	330	213	11	224
30,432	60	87	97	8	10	10	1	1	0	0	1	130	38	2	40
31,483	90	44	40	3	4	4	1	0	0	0	0	54	16	1	17

Exhibit 6: Texas FAIR Plan 1% Probability Event (1 in 100 year event)

TFPA Resource Scalability Modeling Tool 2024 Summary - TFPA 1% Probability Event (1 in 100 years) - 36,251 Claims										
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
23,992	15	1,599	216	22	19	22	279	390	19	409
28,411	30	294	199	20	11	20	250	213	11	224
30,482	60	69	76	8	2	8	94	38	2	40
31,534	90	35	32	3	1	3	39	16	1	17

Exhibit 7: Texas FAIR Plan 2% Probability Event (1 in 100 year event)

TFPA Resource Scalability Modeling Tool 2024 Summary - TFPA 2% Probability Event (1 in 50 years) - 25,113 Claims										
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
16,621	15	1,108	150	15	14	15	194	270	58	328
19,682	30	204	138	14	7	14	173	148	32	180
21,116	60	47	53	5	1	5	64	26	6	32
21,845	90	24	22	2	1	2	27	11	2	13

Exhibit 8: Texas FAIR Plan 4% Probability Event (1 in 100 year event)

TFPA Resource Scalability Modeling Tool 2024 Summary - TFPA 4% Probability Event (1 in 25 years) - 11,954 Claims										
Projected Claims	Date Range	Claims Per Day	Claims Examiners	Supervisors	Customer Care	Quality Assurance	TOTAL	Field Adjusters	Field Re-Inspectors	TOTAL
7,912	15	527	71	7	6	7	91	129	6	135
9,369	30	97	66	5	4	5	80	70	4	74
10,051	60	22	25	3	1	3	32	13	3	16
10,399	90	11	10	1	0	1	12	5	1	6

1.4 Maintain Plans for Deploying Mobile Claims Center and Remote Facilities

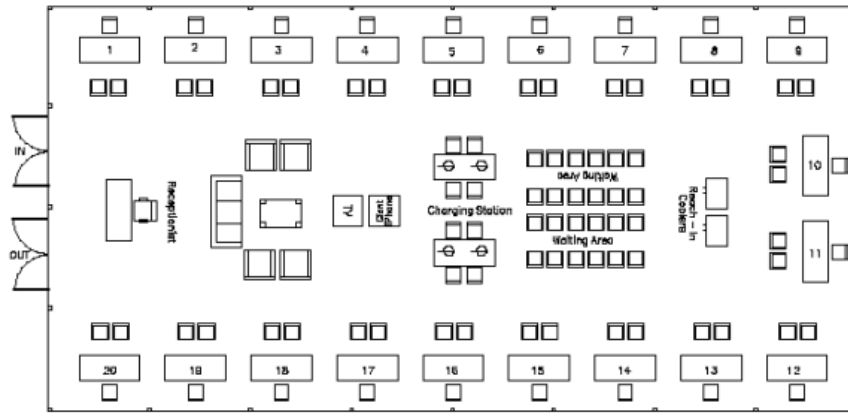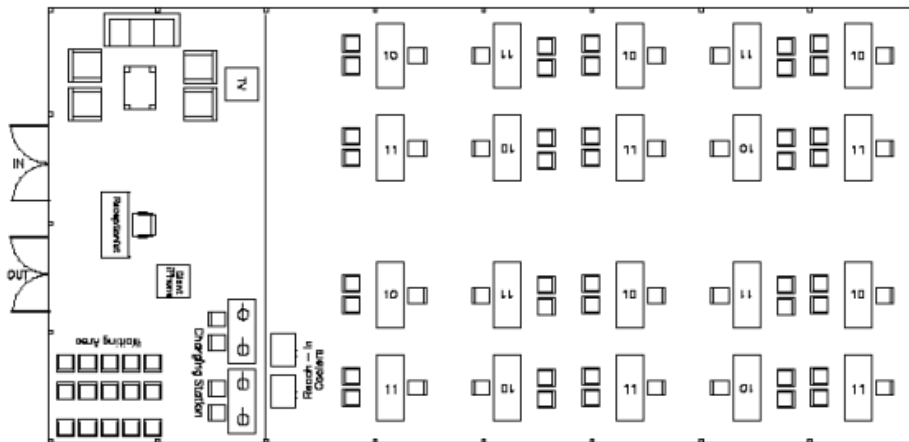|	
Objective 1.4	To maintain plans for deploying mobile claims center and remote facilities.
Description	Create site requirements (i.e., supplies) for mobile and remote facilities.
Purpose	• To prepare a physical location to provide immediate policyholder assistance, including first notice of loss (FNOL), 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	**Claims** • Establishes criteria for activating mobile claims center and remote facilities. • Maintains contract with Agility to provide mobile office units, equipment, network, and phone patch within 48 hours of notification. • Identifies locations for mobile offices in TWIA/TFPA territories. • Maintains requirements for mobile claims center. • Searches each year for additional office space for claim operations during a CAT. • Develops plans to identify roles and responsibilities in the event of a deployment of the mobile claims center. • Works throughout the year to identify possible basecamps. **Facilities** • 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. **Legal and Compliance** • Legal review of all contracts, including those related to off-site facilities. • Ensures all required insurance policies are in place for off-site facilities.
Exhibits, or Related Documents	• [Mobile Claims Center and Remote Facilities aims Processing Workflow](#) • Exhibit 6 "Site Plan for TWIA/TFPA Mobile Claims Center."
Additional Information	• 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. • Mobile Claims Centers provided by RK included a 50x50 vinyl tent, complete with HVAC and connectivity options. • The Agility unit supports: 30 customer seats, two reception seats, 21 computer workstations, one office, generator, HVAC, wireless network, and satellite phone. • Agility unit qualifies as RV, meaning few restrictions for on-site placement.
Compliance	
QA or Testing	

Exhibit 6: Site Plans for TWIA/TFPA Mobile Claims Center

40' x 80' Structure

40' x 80' Structure

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	• To uphold the Associations' commitment 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/Operations** • Maintains inventory of supplies (e.g., chairs, workstations, and storage). • Forecasts increased demand on workspaces, supplies, and equipment, including supplies needed at remote facilities based on current safety standards. • Plans to obtain additional office supplies, create building access badges, and distribute CAT Supplies Box within 48 hours of the activation of this Plan. • Identifies additional snacks and drink vendor services and cleaning services needed. • Coordinates additional parking for staff onsite with Transwestern Property Management, mobile claims center, and remote facilities. • Coordinates with Claims and IT to determine process for adding printer, scanner, and fax server capacity. • Plans for additional security and extended hour security for Austin facilities.
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	

1.6 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	• To uphold the Associations' commitment to deliver prompt and fair claims service. • To expedite software and hardware purchasing during a catastrophic incident.
Participants	IT, Claims
Action Plans	**IT** • 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 workspaces, including assessing Agility 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. • Reviews Resource Scalability Model to ensure the ability to scale up phone numbers and licenses for all four modeled storms. • Conducts performance testing of the data center for scalability response time, availability, and reliability. • Review all character limits associated with core administration systems and works with tech liaisons to ensure conformity across systems. • Look to implement automated monitoring of system queues • Work with Claims to identify software to help handle the influx of videos submitted by policyholders. • Ensure all tickets related to catastrophe response for all core applications are addressed before June 1st of each year. **Claims** • Evaluates claims technology systems for readiness: Web portals, software, hardware, telephony, remote access, data management, and reporting. • Review and address roles and authorities in Claims Center on a yearly basis. • Work with other departments to identify Claims Center access needs to create roles • Works with IT throughout the year to ensure all "workarounds" within the core administration system have been identified and addressed before June 1st of each year. • Review the system's roles and groups to ensure preparedness for onboarding of contractors.

	• Work with Accounting and IT to enhance advanced payment options from MCC locations. • Collaborate with IT and Actuary to enable template-specific indemnity and expense reserves in Claims Center.
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 Maintain a Deployment Plan

Objective 1.7	To enlist TWIA/TFPA staff for deployment in the case of a catastrophic incident.
Description	Develop and maintain a deployment plan
Purpose	To set expectations with current staff for possible needs outside of this building.
Participants	CAT Plan Update Team
Action Plans	**Business Continuity Manager** • **Work with vendors to create deployment site plans for various MCC locations and living arrangements (i.e., Basecamps, RVs, etc.)** **CAT Plan Update Team** • 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, every year. • Maintains database listing volunteers for deployment. • Identifies possible testing, training, and exercise opportunities • Works with business units to ensure policies and procedures are in place to enable resources in the event of a deployment. **All Departments** • Assist with identifying staff by role available for deployment.
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	

1.8 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' commitment to deliver prompt and fair claims service.
Participants	Claims, Human Resources, Legal and Compliance
Action Plans	**Claims** • Verifies that vendor partners remain compliant with TWIA/TFPA requirements. • Maintains a list of approved vendors. • Provides copies of new staffing firm agreements for Legal & Compliance and Human Resources. • 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. • Provide annual in-person training for field adjusters in TWIA's standards, PDEG, and culture. • Hosts the following yearly certifications: TWIA/TFPA Residential Adjuster Certification, TWIA/TFPA Desk Examiner Certification, TWIA/TFPA Manager and Supervisor Training. • Creates training materials for non-claims resources to assist in status calls, etc. • Sends "Vendor Business Continuity Procedures Form" to approved vendors. • Remind staff to continue to refer non-compliance of public adjusters to SIU and/or Compliance. • Identify Claim Examiner Team locations in relation to the location of TWIA/TFPA staff each year. • Work with IT and the CET firms to train CET management regarding TWIA onboarding and system access requirements. **Human Resources** • Administers temporary/contract resources to supply labor for the Mobile Claims Unit. **Legal and Compliance** • Assigns Ethics Policy for review and acknowledgement (including Relationship Disclosures) to all new employees and contractors. • Trains new staff and contractors in TWIA 101. • Refer fraud and enforcement concerns to TDI for additional review and possible investigation.
Exhibits, or Related Documents	• [Field Adjuster Online 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.

1.9 Foster Compliance with Mandated 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	• 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	**Claims** trains staff in non catastrophe metrics expectations, including but not limited to the following: • **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.) • **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. • Provides supervisor and leadership training for TWIA/TFPA Claims staff to ensure readiness if the need arises for staff to lead teams of contract examiners. • Conduct yearly reviews of Claims letters to ensure compliance and readability for policyholders. • Create a CAT Team Lead Handbook that speaks to the workflows and processes for team leads during a catastrophe. **Underwriting** • Maintains a process for verifying coverage with policy validation workflows with Claims (e.g., coverage verification and "no policy" processes). • Prepares dedicated resources for real-time CAT response. • Works with Claims throughout the year to better understand the resources needed in the event of an activation. • Creates awareness with management on how to turn Storm Mode on/off in core applications.
Exhibits, or Related Documents	Appendix C - How to Submit a Claim for TWIA and TFPA Staff TWIA Team Lead Handbook

Additional Information	• 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 on extensions by Commissioner of Insurance (TIC 2210.581).
Compliance	
QA or Testing	

1.10 Slab Claim Settlement – Guidelines & Required Actions

Objective 1.10	TWIA Slab Claim Settlement – Guidelines & Pre-Storm Required Activities
Description	The sections prescribe guidelines TWIA must use to settle certain claims. The guidelines are based on the recommendations of a panel of experts, charged with recommending methods or models for determining the extent to which a loss may be or was incurred as a result of wind, waves, tidal surges, or rising waters not caused by waves or surge.
Purpose	• To ensure compliance with Texas statutory and regulatory requirements for TWIA to use to resolve slab claims
Participants	VP Claims, designated slab claim data analysts, slab claim team desk examiners, Vendors: Accenture, RSM/Moody's, and Texas Tech

Action Plans	**Claims**
	
	• Gather, no less than once a year, updated applicable pre-event data on insured residential structures located in the required areas.
	    ○ TWIA has contracted with RMS to annually, by June 1st, identify all insured residential structures located in the National Flood Insurance Program Zones, V, VE, and V1-V30 and provide updated and required property characteristic data.
	• Acquire pre-event high-resolution aerial and on-ground photographs of insured residential structures located in the National Flood Insurance Program Zones, V, VE, and V1-V30 to define building characteristics and terrain.
	• Work with vendors to conduct annual flyovers for aerial imagery. TWIA has contracted with NearMap for this purpose. NearMap also maintains a historical database of aerial imagery for TWIA's use.
	• Utilize on-ground photographs, available in the TWIA Underwriting files where property inspections have occurred, prior claim files, and from other sources including Geomni & Google Earth.
	• Take steps throughout the year to ensure the deployment of mobile measurement platforms and fixed surface-level devices that:
	    ○ Provide real-time wind speed and direction measurements during the applicable storm.
	    ○ Can be used both for forecasting and producing post-event wind field hind casts.
	• Wind measurements must be capable of generating gust wind speed and wind-direction time histories during an applicable storm.
	• Deploy at least 40 to 60 mobile wind measurement platforms in two layers, with the first layer in close proximity to the coastline and the second layer approximately 20 miles inland. The mobile wind measurement platforms must be deployed as follows:
	    ○ Three to five miles apart in the eyewall region of the storm
	    ○ Up to 10 miles apart in the outer regions of the storm
	    ○ With a wind speed and direction sampling frequency of 10 hertz or higher
	    ○ A temperature, barometric pressure, and relative humidity sampling frequency of 1 hertz or higher

	- Deploy sufficient mobile wind measurement platforms along the coast in front of a land-falling storm to ensure that a high-resolution wind field with small errors—no more than =/-2% of the maximum sustained wind measured in 30-minute period—can be developed for use in wind damage prediction - Where reasonable, the mobile wind measurement platforms must be co-located with surge and wave gauges. TWIA must develop one or more observational models for constructing a wind field to obtain: - Site-specific wind speed and direction time histories that are used for wind damage prediction - A wind field that can be used as input for a surge and wave model that outputs time histories for surge and wave damage prediction - Take steps to minimize errors between model estimates and the observed wind speeds and directions measured during an applicable storm. - Where data is not available from federal or state agencies, TWIA must take steps to acquire physical measurements of surge, wave, and high-water marks. Any contracts must be in place before each hurricane season. - Work with vendors to acquire up-to-date maps of policies impacted - Work with impacted departments to create stakeholder communications to inform and educate both affected policyholders and agents.
Exhibits, or Related Documents	Texas 28 TAC 5.4023 – 5.4041, Insurance Code 2210.578, TWIA Slab Claim Settlement Guidelines
Additional Information	See TWIA Slab Claim Settlement Guidelines
Compliance	5.4029 – 5.4041 of the Texas Insurance Code 2210.578, HB 3, 82nd
QA or Testing	

1.11 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	**Claims** • Works with Accounting to support mobile payments made at the Mobile Claims Center (MCC). • Payment timelines: Trains all staff on expected speed to payment requirements. • 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 RCC deadlines and process. **Accounting and Finance** • 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. • Payments issued at mobile and remote facilities are limited to $2,500 to provide additional living expenses. Additional funds may be issued through the normal claims process. • With Claims, develop a Frequently Asked Questions document to be included with the Association's internal hurricane awareness literature. • Prepares team members to deploy in the case of a catastrophe to handle check issuance at mobile claims center and remote facilities. **IT** • Ensures the check printing process with outside vendors is operating as expected.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

1.12 Provide Capability for Claims Processing for Remote 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' commitment to deliver prompt and fair claims service.
Participants	Claims, IT
Action Plans	**Claims** • Provide Claim Examiners with instructions for remote access to Genisys Phone System. • Ensure proper resources have access to remote meeting capabilities such as Microsoft Teams. • Ensures roles and permissions are set for each on-boarded user in Claims Center. • Procedures for batch processing Xactanalysis IDs, including emailing representative with batch names and emails of onboarded staff. **IT** • Plans for batch-processing email accounts in the case of a CAT. • Maintains instructions and requirements 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	• Gensis User Guide technical specs and user documents • Telework Support Documents: Found in the Policies, Operating Manuals, and Compliance Teams Team
Additional Information	• Claims Center is a web-based administration system that allows access from anywhere with an internet connection and will provide the remote claims processing capability. • Telework Information
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	Legal and Compliance, Claims, Underwriting
Action Plans	**Legal and Compliance** • Reminds staff how to identify a complaint, and of the need to forward complaints to Compliance for logging and appropriate handling. • Responds to KACE tickets that request legal opinions, highlighting applicable laws and regulatory requirements. • Plans for scalable resources. • Provides training to additional resources on complaint handing procedures. **Claims and Underwriting** • 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	• Complaint Handling Overview.pdf •
Additional Information	• Generally, there are three sources 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 (28 Texas Administrative Code Rule 21.2503). • Responses must be provided within 15 days of receipt.
Compliance	• See TAC Part 1, Chapter 21, Subchapter Q, for more information on insurers' obligations regarding complaints.
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	**Legal and Compliance** • Train resources on Legal and Compliance -procedures, including fraud reporting. • Remind all staff of reporting avenues available (internal and Lighthouse). **Special Investigation Unit (SIU)** provides additional detail on the services offered by VRC and the list of primary indicators for desk examiners to consider. **Claims and Underwriting** • 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. **Internal Audit** monitors requirements for all Departments for internal fraud control (i.e., corporate fidelity).
Exhibits, or Related Documents	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. Whistleblower Policy
Compliance	See Texas Insurance Code Section 701.051 regarding our affirmative duty to report suspected insurance fraud to TDI.
QA or Testing	

Exhibit 7: Special Investigation Unit (SIU) and Fraud Reporting Requirements

VERACITY RESEARCH COMPANY INVESTIGATIONS

VRC INVESTIGATIONS

"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
- Medical Clinic Inspection Services
- State Compliance
- Vendor Management
- Due Diligence

CLAIMS SERVICES

- Recorded Statements
- Hospital/Medical Canvasses
- Comprehensive Database
- Subrogation Investigations
- Accident/Site Investigations
- Property Loss Verification
- Public Records Check

SURVEILLANCE

- Video Surveillance
- Activity Checks

SIU SERVICES

Mandatory Referral to SIU

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

Recommended Referral or Reasons to Update SIU

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

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

Jim Schmit	Ivan Budiselich	Alicia Bell
Vice President	SIU Investigator	SIU Analyst
jamess@vrcinvestigations.com	ivanb@vrcinvestigations.com	aliciab@vrcinvestigations.com
(800) 654-2185	(800) 654-2185	(800) 654-2185
Ext. 138	Ext. 770	Ext. 172

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	**Claims** • 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. • Distributes the most up-to-date resources regarding Globo Language Line to each Claims employee. **Human Resources** • 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	TWIA and TFPA Vendor Contact Information Globo Telephone Interpreting Instructions
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, All Departments
Action Plans	**Claims** • 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. **All Departments** • Work to provide four-week staffing projections based on the resource scalability models.
Exhibits, or Related Documents	Exhibit 10 "Sample Staffing Cost Projections."
Additional Information	• 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 8: Sample Staffing Cost Projections

1 in 100 (1% Event)			
	Avg. Cost	# of Staff	4 Week Cost
Claims Examiners	$ 800.00	771	$ 14,803,200
Managers	$ 900.00	77	$ 1,663,200
Customer Care	$ 600.00	70	$ 1,008,000
Quality Assurance	$ 700.00	77	$ 1,293,600
Total			$ 18,768,000
Field Adjusters	Allocated to the claim file		
1 in 50 (2% Event)			
	Avg. Cost	# of Staff	4 Week Cost
Claims Examiners	$ 800.00	641	$ 12,307,200
Managers	$ 900.00	64	$ 1,382,400
Customer Care	$ 600.00	57	$ 820,800
Quality Assurance	$ 700.00	64	$ 1,075,200
Total			$ 15,585,600
Field Adjusters	Allocated to the claim file		
1 in 25 (4% Event)			
	Avg. Cost	# of Staff	4 Week Cost
Claims Examiners	$ 800.00	451	$ 8,659,200
Managers	$ 900.00	45	$ 972,000
Customer Care	$ 600.00	41	$ 590,400
Quality Assurance	$ 700.00	45	$ 756,000
Total			$ 10,977,600
Field Adjusters	Allocated to the claim file		
1 in 10 (10% Event)			
	Avg. Cost	# of Staff	4 Week Cost
Claims Examiners	$ 800.00	274	$ 5,260,800
Managers	$ 900.00	27	$ 583,200
Customer Care	$ 600.00	24	$ 345,600
Quality Assurance	$ 700.00	27	$ 453,600
Total			$ 6,643,200
Field Adjusters	Allocated to the claim file		

1.18 Maintain a CAT Funding Strategy and Plans for Managing Reinsurance

Objective 1.18	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 utilizing reinsurance, bonds, and public securities
Purpose	To secure sufficient funding to pay claims and other financial obligations.
Participants	Actuarial, Accounting and Finance, General Manager
Action Plans	**Actuarial** • Communicates with reinsurance brokers to get information on contract terms and available reinsurance. • Coordinates with reinsurance brokers to present recommendations on the amount of reinsurance to purchase each year and the terms of each year's reinsurance contracts to the TWIA Board of Directors. • Manages reinsurance placement for TWIA and TFPA yearly. • Work with Claims to create case reserve tables for various catastrophic incident types. These tables will be applied to the Claims Center indemnity and expense reserves after the onset of an event. **Accounting and Finance** • Provides financial projections, balance sheet, income statement, and cash flows. **General Manager** • 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(c)
QA or Testing	

1.19 Prepare CAT Communications Collateral and Plans

Objective 1.19	To prepare CAT communications 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	• To uphold TWIA's commitment to a swift, effective response to a catastrophe. • To operate transparently through open communication with stakeholders.
Participants	Strategic Communications and Legislative & External Affairs, Claims
Action Plans	**Strategic Communications and Legislative & External Affairs** • Manages the creation and distribution of hurricane preparedness educational packets (printed and digital) yearly during hurricane season. • Prepares hurricane season advertisements and reserves space for publishing. • Maintains a Media Briefing Book; a reference guide for media. • Work with internal and external stakeholders to develop an outreach strategy to promote preparedness within coastal communities • Leverages media to disseminate messages to policyholders, agents, and the public, including scheduling media tours when appropriate. • Ensures that appropriate Association resources obtain necessary media training • Develops social media messaging for rapid response to incidents. • Prepares catastrophe bulletins and advertisements. • Prepares bi-lingual catastrophe bulletins and advertisements. **Claims** • Coordinates with Communications to provide content and appropriate language for printed collateral and content for the TWIA & TFPA websites.
Exhibits, or Related Documents	• Media Briefing Material
Additional Information	
Compliance	
QA or Testing	

1.20 To Document Information on Technology Scalability Plans

Objective 1.20	To document information on scalability for technology 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 1-in-100-year event.
Participants	IT
Action Plans	**IT Ops** establishes plans for the following: • 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. • Working with Claims to carry out annual tests of the onboarding automation tools to ensure preparedness. **Network** • Maintains the Internet bandwidth and capacity for up to a 1-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 1-in-100-year event. At this time TWIA currently has enough capacity to for all cubes currently in the building. **Production Application Support** • 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. • Works with HR to determine staffing needs. **Data Center Systems** • Maintains adequate server capacity for up to a one-in-100-year event; if need arises, IT can add server capacity with no more than a two-week turnaround. • Maintains contract through Agility for workstations, network, computer, telephone, and supplies.
Exhibits, or Related Documents	
Additional Information	• IT has ownership for Enterprise disaster recovery (DR) planning covering Data Center Recovery and Office Space.
Compliance	
QA or Testing	

1.21 Understand Associations' Role in Emergency Management Incident Response

Objective 1.21	To understand the role the Association plays 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	• 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, Strategic Communications, and Legislative & External Affairs** • Maintains relationships with the federal, state, county, and local emergency management and city management entities. • 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.). • Attends meetings with state, county, local, and federal emergency management. • Obtains local mitigation plans, emergency management newsletters, and public hurricane plans for the coastal territories. • Work with TDEM Response Section Chief to coordinate placing resources in MARCs and DRCs for post 30-days field operations.
Exhibits, or Related Documents	• 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 Division of Emergency Management: http://www.txdps.state.tx.us/dem/Operations/index.htm
Compliance	
QA or Testing	

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

Objective 1.22	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	Strategic Communications, Legislative & External Affairs, General Manager
Action Plans	**Strategic Communications** • Creates all messages for distribution and posting on the TWIA/TFPA websites. **Legislative & External Affairs** • Informs Texas Legislature, Board of Directors, and TDI of modeled exposures and funding structure, and of TWIA/TFPA's Plan. **General Manager** • Oversees all communication with the TWIA Board of Directors, TFPA Governing Committee, 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	

1.23 Identify Staff for the CAT Response Team

Objective 1.22	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	All departments, CAT Plan Update Team,

Action Plans	**CAT Plan Update Team**
	
	• Work with each internal department to identify resources to serve on the CAT Response Team.
	• Ensure plan is updated each year to update the roles and responsibilities for each department.
	
	All Departments
	
	• Identify one or two senior manager level employees to serve on the response team. Each member of the response team should have the following qualities:
	    o Senior-level employee with authority to speak and act on behalf of the department to coordinate with the ELT
	    o Experience collaborating with cross-functional teams in a catastrophe response environment
	    o Understanding of departmental responsibilities, workflows, and ongoing projects, etc.
	• Ensure members of this team have annual Goals tied to the CAT Plan Update.
	
	CAT Response Team Roles & Responsibilities:
	
	• **Business Continuity Manager**
	    o Work with all departments to identify resources for the team
	    o Responsible for schedule and facilitating all storm response briefings
	    o Responsible for providing briefing updates to the Executive Leadership Team
	    o Provide each department with an Action Items list to help guide response activities
	    o Identify one person each year to receive an award related to their work on the CAT Plan

- **Accounting**
  - Report on ongoing issues with payments
  - Coordinate needs with Mobile Claims Centers

- **Actuary & Enterprise Analytics**
  - Coordinate with Claims to ensure appropriate reserves are set as per Objective 2.8
- **Claims**
  - Provide regular updates on:
    - Claim Count
    - Number of contractors onboarded
    - If deployed, number of MCC visitors & payments made
    - Extended working hours that need to be supported
- **Facilities**
  - Report on space utilization
  - Coordinate with departments to identify ad-hoc needs
  - Report on status of MCC and field operations and resource needs
- **HR**
  - Coordinate with departments to help bring on contractors
  - Coordinate and set standards for CAT Pay and Deployment Pay
- **IT**
  - Report on ongoing issues with onboarding, phones, core administration systems, and the other infrastructure
  - Report on any planned Production Support Releases.
- **L&C**
  - Report out on issues pertaining to extensions of deadlines and communications with TDI
  - Track and coordinate with involved departments on complaints and inquiries
- **L&EA**
  - Communicate with key stakeholders on appropriate CAT Plan activities
  - Provide updates regarding media coverage, legislative inquiries, and
- **Operations**
  - Provide updates regarding printing and mailing operations
- **Strategic Communications**
  - Provide updates on communications to internal and external stakeholders
  - Support departments to create ad-hoc content as issues arise
  - Report on the activities that have been carried out surrounding the CAT Communications Plan

	• **UW**
	    o Report on call volume for Policy Services and any issues/trends arising from those calls
	    o Coordinate with Claims to solve coverage verification issues
	    o Provide updates regarding the Policy Moratorium Backlog

Exhibits, or Related Document	
Additional Information	
Compliance	
QA or Testing	

Department	Name	
Accounting	Marianne Moul	Al Fulkerson
Actuarial & Enterprise Analytics	Jordan He	Jim Murphy
Claims	David Harkin	Lance Cooke
Facilities	Sonia Craig	Larry Martin
HR	Michelle Russell	Ethan Yelle
IT	Mike Williams	Michael Eleftheriades
Legal & Compliance	Becky Campo	Rhonda Scott
Legislative & External Affairs	Anna Stafford	Aaron Taylor
Operations	Michael Dinges	Ritika Sood
Strategic Communications	Sarah Edstrom	Matt Stillwell
Underwriting	John Jackson	Andy Alexander

1.24 Prepare Systems & Collateral for Association Surcharge

Objective 1.24	To prepare internal systems for the implementation and execution of an Association surcharge and ensure collateral for internal and external stakeholders.
Description	As a part of TWIA's statutory funding structure, the Association is charged with implementing a surcharge against the entire Book of Business in certain circumstances. This objective should ensure the annual activities that must occur in order for TWIA to implement the surcharge.
Purpose	To ensure TWIA's core administration systems are enabled to quickly implement a surcharge To operate transparently through open communication with stakeholders.
Participants	Accounting, Underwriting (Policy Services), Strategic Communications, Legislative & External Affairs
Action Plans	**Accounting** • Prepare staff to carrying out the activities associated with issuing the Surcharge. This includes ensuring the roles and responsibilities of each staff member **Underwriting** • Create documentation and job aids to provide staff and the call center with foundational knowledge • Ensure call scripts are created and prepared for distribution • Train managers on handling escalation calls **Strategic Communications** • Create plain-language information about the role surcharges play in our catastrophe funding by working with involved departments • Create content to address pre-landfall activities, as well as post-approval activities that will need to be carried out after the Commissioner approves a request to issue the Surcharge **Legislative & External Affairs** • Communicate with Board, Legislature, TDI, and other stakeholders on Surcharge activities. **IT** • Carry out a trial run of the Surcharge work (batch process, etc.) before June 1st of every year to ensure systems are set up to carry out needed tasks

Exhibits, or Related Documents	**Association Surcharge Tasks Roles & Responsibilities**
Additional Information	
Compliance	Texas Insurance Code Ch 2210.612(b)
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 CAT Plan Activation

Objective 2.1	Track environmental conditions, model exposures, and communicate CAT Plan activation criteria when 500+ claims are expected or received from a single incident.
Description	Monitor potential incident(s) and location(s) for severe weather and other catastrophic incidents (e.g., wind, hail, and lightning). Track available incident information in real-time to determine whether or not to activate the Plan. Analyze criteria to help determine when to activate the CAT Plan.
Purpose	To ensure appropriate response for every type of catastrophic incident.
Participants	Claims, Actuarial and Accounting & Finance, Strategic Communications, Legislative & External Affairs, General Manager

Action Plans	**Claims**
	
	• Identifies a resource to track weather that may impact the coverage area and communicate updates of the progress/track of a storm to Association management.
	• Works with Claims BA resources to conduct pre- incident claim volume modeling using available policy in force (PIF) and storm shape data.
	• Stays informed of National Weather Service (NWS) alerts and warnings through iNWS products and services.
	• Provides updates to Executives and Association management to provide insight into current conditions and projections.
	• Considers the following in the decision to activate Plan:
	   o Involved cause(s) of loss (e.g., wind and/or hail).
	   o Severity of the incident (e.g., wind speed, hail size, depth of storm surge).
	   o Location and concentration of claims (e.g., widespread or centralized).
	   o Access to food and water.
	   o Status of communication resources.
	   o Habitability of homes and building mobility within the affected area.
	• At the discretion of the VP of Claims – The VP is to send a request to the General Manager to activate the plan. This request should include reasoning for activation.
	
	Actuarial and Accounting & Finance
	• 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.
	
	General Manager
	
	• Reviews conditions and data provided and determines whether or not to activate the Plan.

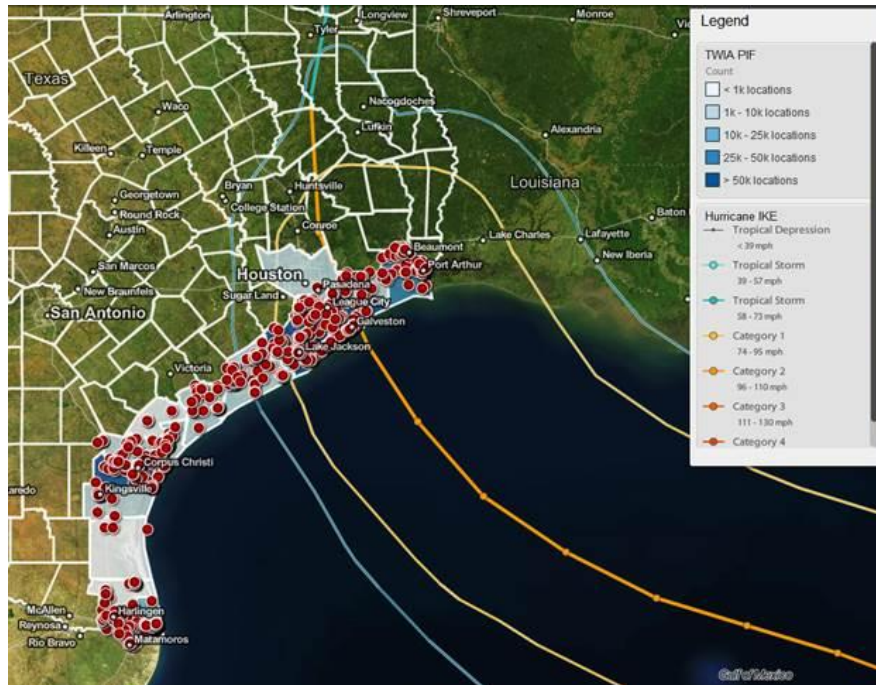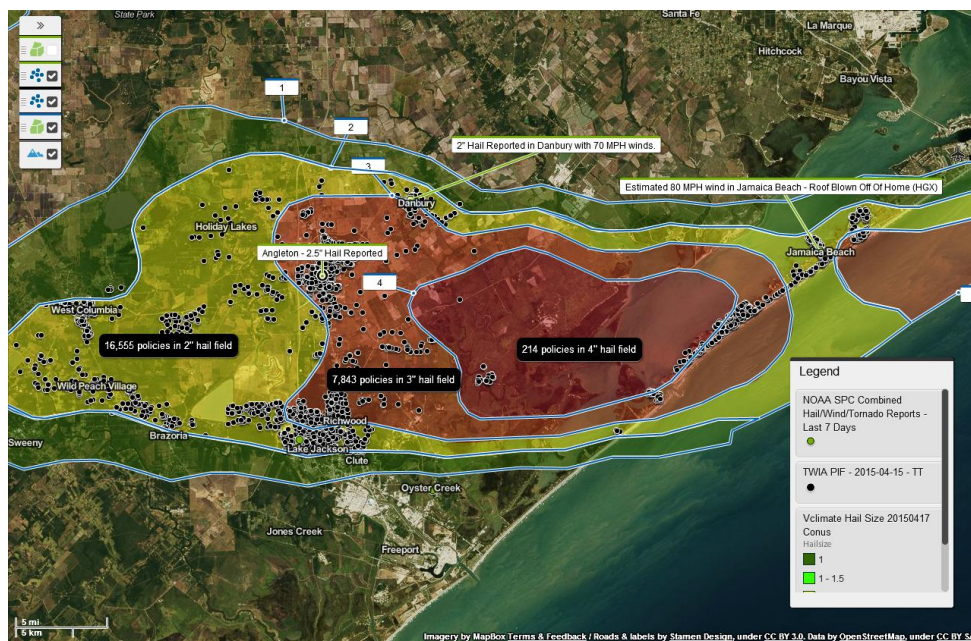|	
	Legislative & External Affairs and Strategic Communications • Provides updates to staff, agents, the Board of Directors, and other external stakeholders based on Plan activation. • Copy involved departments on Agent Blasts, including Insurance Ops.
Exhibits, or Related Documents	
Additional Information	• The Business Continuity Manager, along with Claims Management, is responsible for tracking current weather conditions that may lead to increased claim volume. • 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 10: Sample Storm Data Map

Exhibit 11: Sample Storm Data Map Angleton, Texas

2.2 TWIA Slab Claim Settlement: Pre-Storm Requirements

Objective 2.2	TWIA Slab Claim Settlement: Pre-Storm Requirements
Description	The sections prescribe guidelines TWIA must use to settle certain claims. The guidelines are based on the recommendations of a panel of experts, appointed under Insurance Code 2210.578 and charged with recommending methods or models for determining the extent to which a loss may be or was incurred as a result of wind, waves, tidal surges, or rising waters not caused by waves or surge.
Purpose	• To ensure compliance with Texas statutory and regulatory requirements for TWIA to use to resolve slab claims • These guidelines apply only when TWIA expects at least 500 residential slab claims
Participants	Claims – VP Claims and a designated team of slab claim data analysts and slab claim desk examiners

Action Plans	**Pre-Landfall Requirements and Timing for TWIA Slab Claim Settlements**
	• TWIA must make an initial determination as to the expected number of claims when the organized weather system is in the Gulf of Mexico or within the boundaries of longitude 80 degrees west and latitude 20 degrees north.
	• The association must make a final determination as to the expected number of claims no later than 24 hours before expected landfall.
	• Ensure the availability of pre-event, high-resolution, aerial and on-ground photographs of insured residential structures located in the National Flood Insurance Program Zones, V, VE, and V1-V30 to define building characteristics and terrain.
	• Take steps to ensure that as soon as possible after an applicable storm, the association can acquire and process high-resolution aerial photographs and light detection and ranging (LIDAR) measurements.
	• Ensure the deployment of mobile measurement platforms and fixed surface-level devices that:
	    ○ Provide real-time wind speed and direction measurements during the applicable storm
	    ○ Can be used for both forecasting and producing post-event wind field hind casts
	• Deploy at least 40 to 60 mobile wind measurement platforms in two layers, with the first layer in close proximity to the coastline and the second layer approximately 20 miles inland. The mobile wind measurement platforms must be deployed as follows:
	    ○ Three to five miles apart in the eyewall region of the storm
	    ○ Up to 10 miles apart in the outer regions of the storm
	    ○ With a wind speed and direction sampling frequency of 10 hertz or higher
	    ○ A temperature, barometric pressure, and relative humidity sampling frequency of 1 hertz or higher
	    ○ Deploy sufficient mobile wind measurement platforms along the coast in front of a land-falling storm to ensure that a high-resolution wind field with small errors—no

	more than =/-2% of the maximum sustained wind measured in 30-minute period—can be developed for use in wind damage prediction • When possible, the mobile wind measurements platforms should be co-located with surge and wave gauges.
Exhibits, or Related Documents	Texas 28 TAC 5.4023 – 5.4041, Insurance Code 2210.578, TWIA Slab Claim Settlement Guidelines
Additional Information	See TWIA Slab Claim Settlement Guidelines
Compliance	5.4029 – 5.4041 of the Texas Insurance Code 2210.578, HB 3, 82nd
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, Executive Leadership Team, Claims, IT, Strategic Communications, Legislative & External Affairs, All Departments
Action Plans	**General Manager and Executive Leadership Team** meet and review priorities: • Activating vendor resources and deployed resources. • Setting claims systems and website to "CAT mode." • Notifies vendor of authorization for customer surveys above set limit. • Activating disaster recovery and business continuity (DR/BC) plans where needed. • Determine the level of priority for communication with external stakeholders. **Claims** • Management to establish and communicate changes in work hours through Claims Center's broadcast messaging tool. • Determines whether to activate mobile claims center and remote facilities. • Establishes the name of the incident templates. • Meets with Communications to provide information to help determine the level of communication with external stakeholders. EPM • Ensure the Governance Team reviews Enterprise Project Management (EPM) portfolio and determine whether preparations and response activities take priority over enterprise-wide or department projects. • Coordinate with CAT Response Team if decisions are made to reprioritize projects **Strategic Communications and Legislative & External Affairs** • Determines whether to publish CAT communications within 72 hours of catastrophe designation, depending on severity of incident. • Determines whether to notify agents, TDI, the Texas Legislature, TWIA/TFPA staff, and the Board of Directors about Plan activation and estimated exposure within 24 hours of catastrophe designation, depending on severity of incident. • Determine if an agent-only webinar is needed. • Identify needs additional resources to assist with social media. • Provide the Governance Team with the EPM portfolio upon activation of this plan. • Communicate any change in priorities of current programs or projects to employees.

	IT • Determines whether to order supplies and equipment. • Works with Claims Tech Liaisons to identify needed test environments (Cln01, Trn03, etc.) • Works with other departments to place the IVR into CAT Mode. • Determines whether to add software licenses to scale for additional users. **All Departments** • Schedule preliminary team meetings for individual departments to advise separately on Plan activation and identify duties and responsibilities found within. • Schedule an all departmental strategic planning meeting 96 hours before landfall.
Exhibits, or Related Documents	
Additional Information	• 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 Activate CAT Response Team

Objective 2.4	Organize and activate a response team, with representatives from each department, to a coordinate an Association-wide response.
Description	Upon activation of this plan and at the direction of the VP of Claims, the Business Continuity Manager is to identify appropriate resources and set up meetings to begin coordinating response activities, as per this Plan.
Purpose	To ensure an organized response and support situational awareness throughout the organization.
Participants	Business Continuity Manager, All Departments
Action Plans	**Business Continuity Manager** • Sends meeting invites to team members to act as their department's representative. • Determine if there is a need for space in the office to utilize as the Emergency Operations Center • Conduct initial situational awareness meeting within 24 hours of the CAT Plan's activation. • Sets schedule for future meetings throughout the response. • Sends update reports to the Executive Leadership Team • Disseminate action-item lists to staff to ensure compliance with the Plan. • Ensure briefing information and decision points are raised to the General Manager and Executive Leadership Team. **CAT Response Team Members** • Provide updated reports on departmental Key Performance Indicators to the Team • Ensure regular reporting back to departmental leaders and compliance with responsibilities within the Plan. • Identifies empowered proxies if unable to attend meeting
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.5 Coordinate with Local, County, State, and Federal Officials

Objective 2.5	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	Claims, Strategic Communications, and Legislative & External Affairs
Action Plans	**Claims** - 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. - Participate in scheduled Texas State Disaster Coalition briefings. - Makes contact with district coordinators and emergency managers in relevant cities, counties and territories. - Provide list of essential services to share with local authorities to gain access to the affected areas and identify claims on buildings that are essential to the recovery effort. - Watches for reentry orders to determine when deployments can begin. - Works to place one resource at the main Emergency Operation Center (EOC). - Determine ground conditions based on interaction with emergency managers. - Work with Communications to set up a post-landfall meeting with agents in the affected area to provide information regarding field operations and identify possible key issues for the response. **Strategic Communications and Legislative & External Affairs** - Works as needed with Claims. - Identifies a resource to monitor local announcements regarding evacuation/reentry, road closures, and other announcements and provide updates to Incident Commander throughout the event. - Contacts city mayors, chambers of commerce, and other public officials in the affected area.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.6 Determine Whether Incident Requires the Suspension of New Business

Objective 2.6	To determine whether incident requires the suspension of new business.
Description	Determine whether to suspend issuance of new business, and notify relevant stakeholders (e.g., agents and regulatory authorities). Prioritize new business process during suspension.
Purpose	• To efficiently provide essential insurance products and services for policyholders. • To comply with the TWIA Plan of Operation and sound insurance principles.
Participants	Claims, Actuarial, Underwriting, General Manager, Strategic Communications, and Legislative & External Affairs

Action Plans	**Claims**
	• Business Continuity Manager is to track all potential events and storms as they approach the Gulf of Mexico or the 80/20 zone.
	• Based on the updates from NOAA and/or the National Weather Service, determine if a named hurricane has entered the Gulf of Mexico or the 80/20 zone.
	• Once confirmed by NOAA and/or the National Weather Service, the Business Continuity Manager is to immediately send a notification to the VP of Underwriting and the Assistant VP that include the following information;
	    o Exact time the storm entered the zone (or the exact time of the official weather update)
	    o The most recent NWS Weather Update Report
	    o Information regarding the storm's path and likelihood of impact on the TWIA or TFPA coverage area.
	
	Underwriting
	• Activates Storm Mode in TWIA policy administration system immediately after the designation of a Hurricane within the 80/20 point or within the Gulf of Mexico.
	• For storms that are determined to not be a threat to the coverage area based on the NHC forecast;
	    o VP of UW will work with the appropriate resources to determine the track of the storm. If deemed to not be a threat to the coverage area, will send a message to the GM recommending the immediate lifting of the moratorium. If approved by the GM, the message will be recorded in the system of record.
	• Recommends appropriate action for the suspension of TFPA business based on the Associations' accepted/projected event location.
	• Updates Policy Administration systems, including informational banners, based on the direction of the General Manager.
	• 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 Strategic Communications an agent bulletin on suspensions for the TWIA website and works to continue to communicate with agents throughout the moratorium.
	• Considers pulling a list of top agents to contact via the call center.

	General Manager • Decides whether to approve the recommendation to implement the hurricane binding exception for Texas FAIR Plan by Underwriting. • Determines if the projected path of the storm will impact the TWIA coverage area or if it appears that the coverage will not be impacted. • Determine whether or not to resume normal business if the Hurricane sits within the 80/20 designation or within the Gulf of Mexico and will not affect the TWIA coverage area. **Strategic Communications and Legislative & External Affairs** • 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. • Distributes an Agent Bulletin, updates the website with an Agent specific posting, and posts on Facebook and Twitter regarding claim reporting procedures when TWIA predicts a significant multi-county impact but the incident does not result in the suspension of business.
Exhibits, or Related Documents	• [How to Activate Storm Mode](#)
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. • The following roles have permission to deactivate Storm Mode in policy administration system General Manager, Vice President of Underwriting, Chief Actuary and Vice President of Enterprise Analytics, and assigned Senior Underwriting Managers
Compliance	Hurricane binding exception found in the Plan of Operation at 28 TAC 5.4001(d)(2)(E)(ii).
QA or Testing	

2.7 Determine if Incident Requires Association Surcharge & Implement

Objective 2.7	To prepare internal systems for the implementation and execution of an Association surcharge and ensure collateral for internal and external stakeholders.
Description	As a part of TWIA's statutory funding structure, the Association is charged with implementing a surcharge against the entire Book of Business in certain circumstances. This objective should ensure the annual activities that must occur in order for TWIA to implement the surcharge.
Purpose	To ensure TWIA's core administration systems are enabled to quickly implement a surcharge To operate transparently through open communication with stakeholders.
Participants	Accounting, Underwriting (Policy Services), Strategic Communications, Legislative & External Affairs, Insurance Ops, IT
Action Plans	**Actuarial** • Once made aware of a storm's impact, begin working with claims to assess the size and possible impact to the Associations. • Provide information regarding projected monetary impact to Accounting and Association leadership **Accounting** • Work with Actuarial and Claims through the Governance Team and ELT to determine if a surcharge will be needed in order to pay claims from the storm. • Once a decision has been made to issue the surcharge, information all departments of the decision immediately • Identify the Surcharge Assessment Date based off of current information **Underwriting** • Carry out preview training for UW staff to establish foundational knowledge • Once SAD date been determined, work with the Call Center to provide a just-in-time overview of the surcharge reasoning and process, and how this will impact Policyholders and Agents • Distribute detailed phone scripts to staff • Send a link to a "podcast" or recording that details and outlines the reasoning and process for the Surcharge **Strategic Communications** • Work with Legislative & External Affairs to determine the content and timing of external communications, website updates, and social media posts related to the Surcharge.

	Legislative & External Affairs • Work with the General Manager once the internal decision has been made to issue the surcharge to notify the TDI Commissioner and Comptroller that estimated losses are expected to exceed our catastrophe year's premium and other revenue • Notify the Board of Directors and request approval for TWIA to inform the Comptroller that TWIA must draw from the CRTF, request approval from the Board to request approval from the TDI Commissioner to issue Class 1 bonds • Begin notifying other external stakeholders concurrently with Commissioner and Comptroller notifications • After the initial Board meeting, send updates and communications to stakeholders regarding the result of the meeting • Set up meeting with key legislative offices to discuss Board actions and projected needs **Insurance Operations** • Before the billing run begins, review new Pitney Bowes folder structure path, etc. for mass mailing • Validate folder structure for Surcharge Documents is prepared to receive the PDFs that will be sent to mail **IT** • Work with Accounting and Underwriting to carry out a batch trial run
Exhibits, or Related Documents	
Additional Information	
Compliance	TIC 2210.612(b)
QA or Testing	

2.8 Activate and Optimize Technology for CAT Response

Objective 2.8	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 staff have the technology to respond in accordance with the Plan.
Participants	General Manager and Executive Leadership Team, Claims, Actuarial, Underwriting, IT
Action Plans	**Claims** • Requests incident template from CGI and sets reserves (e.g., indemnity and expense). • Reports to General Manager and Claims when templates are ready. • Recommends a storm template be created in in Claims Center with appropriate incident dates and make any necessary updates for the Claims Center for Policyholders and Agents. • Senior management to meet with Actuarial to determine appropriate indemnity and expense reserves for the incident. • If new reserves amounts have been decided upon, a Senior Claims Manager will instruct Claims Business Analyst(s) to update Claims Center with the new indemnity and expense reserves. The Business Analyst will then send confirmation of the change to the Claims leadership team. **Actuarial** • Meet with Claims management to determine the appropriate indemnity and expense reserves for the event. **Underwriting** • Places Policy Center in Storm Mode and monitors backlog **IT** • Prices new PC computers, extra monitors, and supplies such as toner. • Communicates the request for additional equipment to the General Manager. • Works with Agility to ensure availability of required technology. • Orders computers at first notice of the incident since delivery takes two weeks. **Insurance Operations** • Contact Pitney Bowes Planet Press and let them know batches would be pushed throughout the week and weekend. • Ensure required bandwidth for storm – Based on the size of the event, move document's Archiving Time from 6pm to 11pm upon activation of the plan.

	• Use "Envelope Type" to determine which letters are storm related. Ensure the costs related to these letters are tied to the storm's Cost Code and not a part of Insurance Operations day-to-day budget conformance goals. **General Manager and Executive Leadership Team** • Approve equipment purchases beyond applicable authorities.
Exhibits, or Related Documents	
Additional Information	• The following roles have permissions to set TWIA TOS systems in CAT mode: General Manager, Underwriting Management, Vice President of Claims, and the Chief Information Officer. • The following roles have permissions to set up storm templates and change reserves in Claims Center; VP of Claims, Senior Claims Manager, Senior Claims Business Analyst, and Associate Claims Business Analyst. • May decide to use equipment in training rooms in lieu of ordering new equipment to shorten time frames.
Compliance	
QA or Testing	

2.9 Manage Publication of CAT Communications and Advertisements

Objective 2.9	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	Strategic Communications, General Manager and Executive Leadership Team
Action Plans	**Claims** • Works with Strategic Communications and Legislative & External Affairs to provide information and approvals, as needed. **Strategic Communications:** • Gets input from Claims to determine which stakeholder groups need to be notified of CAT Plan activation. • 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 agents of the status of the catastrophe planning and response. • 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 where to buy media for geographies identified as impacted by the incident. • 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. • Meets with approved media contacts and confirms Associations' level of readiness at agreed intervals. **General Manager and Executive Leadership Team** • Coordinates with Strategic Communications to develop catastrophe preparedness and response media content.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.10 Activate an Efficient and Scalable Call Center

Objective 2.10	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	• 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	**Strategic Communications** • Creates call routing scripts for catastrophic incidents and edits diagram accordingly. • Works with Claims to create talking points or scripts for the Call Center staff in the case of an incident. **Policy Services** • Alert the Call Center and scale based on the initial storm projections. • Set the CAT IVR as the main IVR in the Gensis system. **Claims** • Provides a diagram for the call routing and the script for the messages to the Call Center. • Coordinates with Policy Services to activate the CAT specific IVR set up. • 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 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 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. **General Manager and Executive Leadership Team** approve changes to call center configurations, and call routing, including IVR.

Exhibits, or Related Documents	• Exhibit 13 "TWIA and TFPA Enterprise Call Center and Key Stakeholders," Exhibit 15 "Calls Answered Report: Call Center," Exhibit 16 "Abandoned Calls Report: Call Center."
Additional Information	There are multiple configurations, separate for TWIA and FAIR Plan: • **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. • **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	

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

Objective 2.11	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** • 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. • Works with Facilities to onboard those resources that will work in-person from the Austin office. ○ Note: Work with Facilities to identify the appropriate layout of the office. • 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. • Ensures staff and contractors are provided information about the KACE ticket process and how to troubleshoot problems
Exhibits, or Related Documents	• [TWIA and TFPA Vendor & Contact Information](#)
Additional Information	
Compliance	
QA or Testing	

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

Objective 2.12	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	**IT**
	• Ensures SAEFs submitted before 5pm are addressed before 8am the next day. SAEF's received after five will be addressed before 12pm the following day.
	• 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:
	    o System User Admin – user access and controls
	    o Help Desk – user support
	    o Desktop Hardware/Software and Network – configuration and utilization
	    o Ongoing monitoring of printers/copiers
	
	Strategic Communications and Legislative & External 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.
	
	Operations
	• Scales up mail room processing hours and production capabilities to meet increased demand for postal services including after-hours and weekends.
	
	Actuarial & Enterprise Analytics
	• Considers increasing resources to assist with reporting to reinsurers, conducting reserve adequacy activities, and analytics support for Enterprise.
	
	HR
	• Scales up to assist with onboarding potential large numbers of internal and external resources.
	
	Legal & Compliance
	• Assess the need for additional legal support, taking into consideration potential levels of disputed or litigated claims.
	• Ensures 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. • Assess the need scale up to handle a potential increase in compliance related requests, including public information requests. **Accounting & Finance** • 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. **Underwriting** • Provide a list of Essential Services within the affected area to Claims. • Help other Departments either in the office or at mobile claim centers.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

2.13 Activate Association Employee Catastrophe and Deployment Compensation Policy

Objective 2.13	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	Impacted Departments, General Manager, Accounting
Action Plans	**All Departments** • 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. **General Manager** authorizes the catastrophe pay provisions and alerts Executive Leadership Team. **Accounting** • 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	CAT Pay Policy CAT Pay Timesheets
Additional Information	• 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.
Compliance	
QA or Testing	

2.14 Determine Pre-Incident Staging Needs and Processes to Follow

Objective 2.14	To determine pre-incident staging needs and processes to follow.
Description	Pre-incident staging is the assembly of responders for each of these areas: Independent Adjusters, quality assurance, SIU, and legal and policy services.
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, Strategic Communications, and Legislative & External Affairs
Action Plans	**Claims** • Works with vendors to determine if incident requires pre-incident staging. • Manages SIU vendor. • 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. • Alerts Strategic Communications if SIU is being deployed and what collateral they may need. **Legal and Compliance** • Approves orientation material for best practices and compliance. **Strategic Communications and Legislative & External Affairs** • Sends communications to let the public and key stakeholders know about incident staging and fraud awareness. • Begin work with municipalities and other partners to host informational events in the affected area(s) within 30 days of landfall. • Provides communication collateral for SIU vendor personnel to distribute.
Exhibits, or Related Documents	
Additional	
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	• 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	**Underwriting** provides pre-incident risk management reports, including aerial imagery, obtained via the Risk Visualization Program. **Claims** works with aerial imagery vendor pre- or post- incident to obtain aerial images. **Aerial Imagery Vendor** • 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. **Claims** obtains approval from General Manager to incur costs. **General Manager** approves cost for aerial imagery.
Exhibits, or Related Documents	
Additional Information	• FAA clearance is typically given within 24-48 hours after the incident. • NearMap 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 • NearMap 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	• To efficiently provide essential insurance products and services for policyholders. • To comply with sound insurance principles.
Participants	Claims, Legal and Compliance, Underwriting
Action Plans	**Claims:** • Assesses stakeholder needs for loss reporting, securing advance payments, and guidance for temporary repairs/protection of property. • Based on information from Actuary, Senior Claims Manager to request Claims Business Analyst change system indemnity and expense reserves in the applicable claims administration system. • Communicates thresholds for 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. • Ensures examiners are placed in the appropriate groups in Claims Center. • Monitors total loss procedures and advanced payments during an incident. • 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. • Asses the need to adjust the Claims Center Activity Patterns to assist in proactive communication. • 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. • Sets in place a workflow to have examiners escalate any Underwriting issues to their direct supervisor/manager, who in-turn will inform the resources identified by the Underwriting Department. • Ensure all departments are made aware of extended shift work throughout the entire response. ○ No later than Wednesday of each week during the response, Claims Management shall make all departments aware of extended shift work through the weekend. **Legal and Compliance** • Be available to answer questions. • Engages outside counsel to assist depending on size of incident.

	Underwriting • Researches in real-time to support Claims handling process when claim is filed where no policy is identified. • Immediately coordinates with Claims to determine the need for resource availability for extended hours and weekend work. • Ensure underwriters are provided appropriate resources to know how to backdate coverage requests. • 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 Claims with the names and contact information (phone and e mail) of the identified resources, two primary contacts and their back-ups, to assists in resolving commercial and residential coverage issues for TWIA and TFPA claims. • 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. • Provides Workforce optimization/planning for assistance to Claims.
Exhibits, or Related Documents	• Exhibit 18 "Sample Daily Incident Summary Report."
Additional Information	
Compliance	
QA or Testing	

Exhibit 13: Sample Daily Incident Summary Report

2024 Hurricane Beryl Storm Report	Grand Total	TWIA					TFPA
		TWIA Total	Commercial	Residential	Mobile Home	No Policy & Unverified	Cat Code 04-24
New Claims	42,328	32,158	755	30,400	238	765	10,170
Closed Claims	22,566	14,360	278	13,086	232	764	8,206
Open Inventory	19,762	17,798	477	17,314	6	1	1,964
% Closed	53.3%	44.7%	36.8%	43.1%	97.5%	99.9%	80.7%
Closed With Payment	15,603	10,073	89	9,783	201	-	5,530
% Closed With Payment	36.9%	31.3%	11.8%	32.2%	84.5%	-	54.4%
Closed Without Payment	6,963	4,287	189	3,303	31	764	2,676
% Closed Without Payment	16.5%	13.3%	25.0%	10.9%	13.0%	100%	26.3%
Open With Payment	11,971	10,360	318	10,037	5	-	1,611
% Open With Payment	28.3%	32.2%	42.1%	33.0%	2.1%	-	15.8%
Open Without Payment	7,791	7,438	159	7,277	1	1	353
% Open Without Payment	18.4%	23.1%	21.1%	23.9%	0.4%	0.1%	3.5%
Paid Indemnity	$401,299,921	$319,852,095	$28,381,173	$289,490,970	$ 1,979,951	$ -	$ 81,447,826
Paid Expense	$ 48,450,478	$ 39,165,640	$ 6,319,782	$ 32,632,904	$ 212,954	$ -	$ 9,284,838
Outstanding Indemnity	$ 63,502,357	$ 58,632,779	$16,238,457	$ 42,394,122	$ 200	$ -	$ 4,869,579
Outstanding Expense	$ 5,868,589	$ 4,939,558	$ 1,737,786	$ 3,185,772	$ 16,000	$ -	$ 929,031
Total Incurred	$519,121,345	$422,590,071	$52,677,198	$367,703,768	$ 2,209,105	$ -	$ 96,531,274
Average Paid	$ 14,553	$ 15,654	$ 69,733	$ 14,606	$ 9,611	-	$ 11,402
Avg # Days - FNOL to Inspect	5.9	6.0	7.1	5.9	5.4	-	5.9
Avg # Days - Inspect to TWIA	3.0	3.0	8.8	2.9	2.9	-	2.8
Avg # Days - TWIA to Payment	13.6	13.8	32.5	13.5	13.2	-	12.8
Avg # Days - FNOL to Payment	22.2	22.6	48.7	22.0	21.3	-	21.1
TDI Claims Complaints	55	51	3	48	0	0	4
# TDI Complaints as a % of All Claims	0.130%	0.159%	0.397%	0.158%	0.000%	0.000%	0.039%

3.2 Slab Claim Settlement – Guidelines & Post-Storm Activities

Objective 3.2	TWIA Slab Claim Settlement – Guidelines & Post-Storm Required Activities
Description	The sections prescribe guidelines TWIA must use to settle certain claims. The guidelines are based on the recommendations of a panel of experts, appointed under Insurance Code 2210.578 and charged with recommending methods or models for determining the extent to which a loss may be or was incurred as a result of wind, waves, tidal surges, or rising waters not caused by waves or surge.
Purpose	To ensure compliance with Texas statutory and regulatory requirements for TWIA to use to resolve slab claims
Participants	VP Claims, slab claim data analysts, and slab claim team desk examiners
Action Plans	**Claims** - The adjuster must use the "Damage Estimation Detailed Report" provided based on the information input into the probabilistic model approach. - The Damage Estimation Detailed Report provides the following key information the adjuster must use to understand the extent of damage to the structure including damage to each structural component. The Damage Estimation Detailed Report must be shared with the policyholder including each time the model approach is run and a new updated Damage Estimation Detailed Report is generated. The report includes the following important information: - Basic information about the slab claim, including storm name, policy number, claim number, address, etc 24 "Property Characteristic" data elements input into the model approach for the structure, e.g. roof shape, roof covering, roof age, length and width of structure, etc - Wind damage at the time of maximum surge - Weighted damage at the time of maximum surge - Hydro Time Histories - Wind Time Histories - Damage Time Histories - Damage Time History Table - Surviving Structure Water Line - Use the Observational Model Approach, along with the Probabilistic Model Approach. In using the observational model approach, TWIA must consider the following: - Modeled or observed surge and wave heights - Peak wind speed - Post-event high-resolution aerial photographs and light detection and ranging (LIDAR) measurements - Observed damage to surviving structures - The observational model approach is used to: - to inform the probabilistic model approach to obtain better damage predictions

      o   validate the probabilistic model approach; and/or
      o   provide an additional methodology to estimate the damage to the structure components that can be used in the adjusting process

Surviving Structure Inspections

- Desk-top or Virtual Inspections
  - Aerial, satellite, drone, and other photographic images of structure exterior
  - Photographs and measurements of structure interior including attic and crawl spaces where safe
  - Field adjuster and expert reports for surviving surrounding structures
  - LIDAR
  - Professional surveyor water line marks and heights
  - FEMA NFIP claim information
  - Non-FEMA flood carrier information
  - Policyholder provided information
- On-scene Inspections
  - Obtain photographs of exterior, interior, and contents of surviving structures where possible
  - Obtain photographs and measurements of water line levels if found
  - LIDAR measurements

Obtaining and Using Policyholder Provided Information

- Determine if the information from the property characteristic data and hazard modules used to create the Damage Estimation Detailed Reports is as accurate as possible.
- Ensure the policyholder understands they have the opportunity to obtain, review, challenge, and see corrected, the information TWIA has obtained before and after the storm and used to support their claims decisions.
- Provide the policyholder with the information they have obtained before or after the storm TWIA used as input into the Probabilistic Model Approach for purposes of creating the Damage Estimation Detailed Reports.
- A letter must be sent to the policyholder not later than 30 days after the policyholder files a residential slab claim, that accomplishes the following:
  - Notifies the policyholder that the association will use the wind damage evaluation method
  - Requests the policyholder sends TWIA any information they have for:
    - Wind speed and direction, and surge and waves, at the site of the structure for the duration of the applicable storm
    - Damage to the structure during the applicable storm
    - New information on the characteristics of the structure
  - Includes a copy of the current data in the property database on the structure's characteristics

Where the policyholder provides new or additional information that is different from the information TWIA has and used to create the Damage Estimation Detailed Report, the slab claim team examiner must determine if the information is correct and usable in its current format.

If the information submitted by the policyholder is correct and in the proper format, the slab claim team examiner must submit the new information to a slab claim data analyst to input into the slab claim model run portal. The slab claim data analyst must then run an updated Damage Estimation Detailed Report is run based on the information submitted by the policyholder.

Once the updated Damage Estimation Detailed Report is available, the slab claim team examiner must review the new report and determine if any changes in the information in the report would result in a different and improved claim result for the policyholder.

Adjusting residential slab claims

TWIA must adjust residential slab claims using the damage estimates obtained from the Damage Estimation Module.

TWIA must use the wind damage estimates obtained in the Damage Estimation Module to determine the scope of work and associated costs for each component that was likely damaged by wind. The necessary information from the Damage Estimation Module to support the adjustment of exterior and interior damage to a residential structure is provided in the Damage Estimation Detailed Report**.**

The damage estimation module does not generate estimates on damage to contents; TWIA must determine the amount to pay for contents by taking into consideration:

- The adjuster's knowledge and experience
- Information about the structure from the property characteristics database, the policyholder, and other sources, including applicable information from the damage estimation module

Required Initial Notice Letters

- A letter must be sent to the policyholder not later than 30 days after the policyholder files a residential slab claim, that accomplishes the following:
- Notifies the policyholder that the association will use the wind damage evaluation method
- Requests the policyholder sends TWIA any information they have for:
  - o Wind speed and direction, and surge and waves, at the site of the structure for the duration of the applicable storm
  - o Damage to the structure during the applicable storm
  - o New information on the characteristics of the structure
- Includes a copy of the current data in the property database on the structure's characteristics.

Claim Disposition Letters

- o When a claim disposition letter is sent, the letter must include the following:
  - ▪ A complete residential slab claim report and a summary of the results of the wind damage evaluation
  - ▪ A complete residential slab claim report must include the following:
    - The percentage of damage to each component of the structure, as determined in the damage estimation module

	• All the information that the association used in making that determination, including the following:
	    • Information on the characteristics of the structure
	    • Wind and wave and surge time histories
	    • All information used in the observational approach

Exhibits, or Related Documents	Texas 28 TAC 5.4023 – 5.4041, Insurance Code 2210.578, TWIA Slab Claim Settlement Guidelines
Additional Information	• TWIA Slab Claim Settlement Guidelines
Compliance	• 5.4029 – 5.4041 of the Texas Insurance Code 2210.578, HB 3, 82nd
QA or Testing	

3.3 Implement a Risk-Based QA Approach

Objective 3.3	Ensure compliance with Association guidelines and statutory requirements using a risk-based approach.
Description	In addition to monitoring the compliance of all claims and ensure compliance with a focus on the claims which pose the highest risk to policyholders, external stakeholders, and the association.
Purpose	• Ensure the claims which pose the highest risk to policyholders, external stakeholders, and the associations are being handled to the highest standards possible • Be able to report on and attest to the quality of handling on those claims
Participants	Claims, Legal and Compliance, Communications & Legislative Affairs
Action Plans	**Claims** - Identify claims with the highest risk to policyholders, external stakeholders, and the Associations. - Enact Quality Assurance plans to audit, review, and ensure compliance on those claims. - Provide regular reporting during events on the status of those claims. - Identify opportunities for additional instruction/clarification to improve handling. - Assist C&LA in identify opportunities for outreach to policyholders and external stakeholders. **Legal & Compliance** - Works with Quality Assurance to carefully audit, review, and ensure compliance. - Serve as subject matter experts on coverage topics. - Assist with training as needed. **Strategic Communications** - Coordinate and execute messaging and other outreach to help policyholders with these complex, high-risk claims.
Exhibits, or Related Documents	
Additional Information	• Quality Assurance plans are internal documents, regularly reviewed and updated
Compliance	Recommendation 3.5 of the 2018 Sunset Advisory Commission's report.
QA or Testing	Two QA teams; one to focus on desk examiner and supervisory performance and one to focus on IA/expert selection process, communication with stakeholders, estimates, etc. for thoroughness and quality.

3.4 Administrate Complaint-Handling Process

Objective 3.4	To administer the 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 commitment to providing quality customer service.
Purpose	To ensure complaints are properly addressed to avoid further escalation and to prevent future complaints where possible.
Participants	Claims, Legal and Compliance
Action Plans	**Claims** • Ensures that staff understand how to identify a complaint and know that complaints should be forwarded to the Compliance team for appropriate logging and handling. • 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 complaint information for continuous improvement to reduce complaints. • Arranges meetings with staff to reinforce customer service objectives and telephone etiquette as trends emerge from complaint data. • Works with C&LA through a KACE queue to identify and address inquiries from external stakeholders. **Legal & Compliance** • Meets with internal stakeholders to review complaints and disputed claim data. • Estimates complaint volume based on exposure and determines whether additional resources are required to assist with responding to increased volume of complaints. • Ensures all complaints are logged accurately and that responses appropriately address the issues presented. • Ensures response deadlines are met. **Legislative & External Affairs** • Assists as needed in the complaint handling process, especially related to legislative complaints. • Identifies a resource to assist with the KACE queue process for inquiries.
Exhibits, or Related Documents	• [Complaint Handling Overview](#) • [Complaint Training FAQs](#)
Additional Information	• **TDI** assigns a PRI (problem report identification) number to each complaint file and notifies the complainant that the complaint is being sent to TWIA/TFPA for review. • All complaint records must be kept for at least three years or since the date of its most recent financial examination by the commissioner of insurance.
Compliance	See 28 TAC Part 1, Chapter 21, Subchapter Q, for more information on insurers' obligations regarding complaints
QA or Testing	

3.5 Communicate Roles and Responsibilities of Claims Support and Customer Care

Objective 3.5	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	**Claims Support Staff** oversees parts of the Claim lifecycle, including but not limited to: • 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. • Voiding checks and issuing stop pays for claim files. **Claims Support Staff and /or Customer Care Staff** may assume the following during a CAT: • 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. • Works to understand where specific issues should be transferred to (re: TWIA Call Sheet) • Assisting in assigning claims. • 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 and paper FNOL documents.
Exhibits, or Related Documents	
Additional Information	Based on incident size, multiple claims support and/or customer care units may be utilized.
Compliance	
QA or Testing	

3.6 Manage IT Support

Objective 3.6	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' commitment to deliver prompt and fair claims service.
Participants	IT, Claims
Action Plans	**IT** • Provides support for Mobile Claims Centers and any remote sites for the Associations. • 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 Claims Center, Call Center Portal, Policy Explorer, and Claims Center for Policyholder and Agents. • 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. **Claims** • Ensure Sr. Claims Manager(s) provide IT Ops management with information regarding overtime and weekend work plans each week.
Exhibits, or Related Documents	
Additional Information	• 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	

3.7 Manage Office Supplies, Office Space, and Equipment

Objective 3.7	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 and safety in the case of an incident.
Participants	IT, Facilities
Action Plans	**Claims** • Houses an up-to-date seating chart for the Department, if the office is in use. This list shall be updated upon notification of an influx of contractors, sent to Facilities and all Claims Employees. **IT** • 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. **Facilities** • 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. • Coordinates with Operations Manager to order 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. • Coordinate with Transwestern to programs HVAC system for extended office hours. • Manages additional staff parking needs with Transwestern Property Management and the Austin Oaks Church. • Marks TWIA parking spaces • Makes arrangements for remote parking and a shuttle in the event of the parking lot overflowing. • 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	• Available cubicles are equipped with PCs and phones.
Compliance	
QA or Testing	

3.8 Manage Check Stock for Payments and Check Processor

Objective 3.8	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	**Accounting and Finance:** • Determines need for remote manual check process and/or digital distribution • Ensures staff have FAQ documents for remote digital payments to answer questions about the availability of digital payments and other. • Funds manual check accounts with initial balances. • Establishes and maintains a check log. • Manages inventory for the following options: system-generated checks, manual checks, digital distributions, advanced payments, and signature stamps. • Works with Claims to reconcile on-site payments immediately with on-site computers and network access and reconciles daily where network access is not available. • Provides manual checks for Mobile Claims Centers for the first week of a deployment. • Provides support for on-site electronic payments at the Mobile Claims Centers. • Controls check endorsement process. • Manages banking relationships to minimize disruptions to customer payments. **IT** • Administers permissions for CheckProcessor.exe file in the check processor machine from list of claims users with permissions to print claims checks. • Works with Accounting to support digital distribution. • 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). **Claims** coordinates with Accounting for secure check issuance, proper digital distribution procedures and daily reports for electronic payments, and any exceptions.
Exhibits, or Related Documents	Check Issuance Procedures
Additional Information	
Compliance	
QA or Testing	

3.9 Identify, Evaluate, and Report Possible Fraudulent Activity

Objective 3.9	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	• 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	**Claims** • Refers the claim to SIU for evaluation based on internal SIU referral requirements. **SIU** • 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. • Makes fraud referrals to TDI and sends copies to Compliance. **Legal and Compliance** • Refer cases of suspected fraud and/or enforcement issues to TDI including vendor fraud, policyholder fraud, agent fraud, and internal fraud. • Communicates with TDI fraud and enforcement staff and/or appropriate federal, state, and local governments when necessary. • Send out Association-wide messaging, reminding all personnel to be alert and how to report suspected fraud.
Exhibits, or Related Documents	• Claim Examiner Handbook • Exhibit 7 "Special Investigation Unit (SIU) and Fraud Reporting Requirements."
Additional Information	• Web portal or phone call to SIU. • Suspected Insurance Fraud Report via TDI. • Under 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	See Texas Insurance Code Section 701.051 regarding our affirmative duty to report suspected insurance fraud to TDI
QA or Testing	

3.10 Coordinate Emerging Legal Issues with In-House and/or Outside Counsel

Objective 3.10	To coordinate emerging legal issues with in-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	- 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** - 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	

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

Objective 3.11	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, and Communications & Legislative Affairs
Action Plans	**Claims** • Determines the need for an extension of time to accept claims and defines the required extension. • Immediately files a KACE ticket with Legal & Compliance to request the extension(s) from TDI **Legal and Compliance** • Assists Claims in formatting the request for an extension. • Sends request for extension to the appropriate stakeholders at TDI. • Provides updates in the CAT Response Team briefings that will keep departments aware of any proactive extensions of deadlines given my TDI for policies under 541/541 **Legislative & External Affairs** • Informs Legislators, Board Members, and other external stakeholders as appropriate if and when an extension is granted.
Exhibits, or Related Documents	
Additional Information	
Compliance	Statute 2210.581 governs the amount of time the TWIA has to process and accept claims.
QA or Testing	

3.12 Secure Catastrophe Funding

Objective 3.12	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	**Actuarial** • 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. **Accounting and Finance** • Assists in securing funding from public securities. • Manages short and long-term funding needs with the Board of Directors and the General Manager. **General Manager** • 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	TWIA Annual Report
Additional Information	Exhibits found within the TWIA Annual Report provide visualizations of the funding plans for the entire hurricane season with plans for funding in the case of multiple storms (1 in 100, 1 in 50, and 1 in 25 year storms).
Compliance	Texas Insurance Code Ch.2210.455(c)
QA or Testing	

3.13 Track Losses and Reserve Adequacy

Objective 3.13	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	Actuarial, Claims, Accounting and Finance
Action Plans	**Actuarial** • 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. **Claims** • Ensures that workgroups are set up properly in Claims Center to ensure proper segmentation. • Works with actuary and General Manager on volume, severity, complexity of reported losses, expected losses and status of plan implementation. **Accounting and Finance** • Manages and projects cash flow
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

3.14 Carry out Activities for the Issuance of the Association Surcharge

Objective 3.14	To prepare internal systems for the implementation and execution of an Association surcharge and ensure collateral for internal and external stakeholders.
Description	As a part of TWIA's statutory funding structure, the Association is charged with implementing a surcharge against the entire Book of Business in certain circumstances. This objective should ensure the annual activities that must occur in order for TWIA to implement the surcharge.
Purpose	To ensure TWIA's core administration systems are enabled to quickly implement a surcharge To operate transparently through open communication with stakeholders.
Participants	Accounting, Underwriting (Policy Services), Strategic Communications, Legislative & External Affairs, Insurance Ops, IT
Action Plans	**Executive Leadership Team** • Work with Actuarial and Claims through the Governance Team and ELT to determine if a surcharge will be needed in order to pay claims from the storm. • Once a decision has been made to issue the surcharge, information all departments of the decision immediately • Inform the Board of Directors that we will need to begin drawing from the Catastrophe Reserve Trust Fund (CRTF) and the other layers of funding (bonds, etc,.) • Identify the SAD date based off of current information **Accounting** • Prepare Accounting specialists for the upcoming increase in billing and payments • Make sure Bank of America is made aware of the increased volume in received payments to the BOA lockbox in Dallas **Underwriting** • Create documentation and job aids to provide staff and the call center with foundational **Strategic Communications** • Work with Legislative & External Affairs to determine the content and timing of external communications, website updates, and social media posts related to the Surcharge. • Implement the change management plan once approval of the request to issue a surcharge has been received. **Legislative & External Affairs** • At minimum, 11 days before the 2nd Board meeting, post to the TWIA website and send communication providing information regarding the Board meeting and the reasoning for it

	• Once decision is made to make formal request, utilize draft template that includes information on Ultimate Loss Estimate (including LAE), information on revenue, reserves, CRTF balance, and any assessments made, details on the terms of public securities that surcharge will repay, a cost-benefit analysis, and certification of BoD approval. • Begin personal outreach to key legislative stakeholders concurrent with the request being made. **Insurance Operations** • Contact print vendor to information of expected volume (based on current PIF) no less than 10 days prior to the date of mailing • Provide just-in-time training for mailroom staff to handle incoming surcharge payments • Once IT has started the batch run to create the PDF invoices. o For every 20k (or 2GB) documents, Ins Ops will pull them from the designated directory. NOTE: it takes roughly 20 minutes to push each "package" to the vendor • Once the documents are sent to the vendor, it should take 48 hours for the vendor to process and mail. • Ensure staff are prepared to process policyholder surcharge payments that are sent to TWIA's offices **IT** • Coordinates with each department through the CAT Response Team regarding the Surcharge Batch run date (should avoid end of month or holidays). • Once the SAD has been set and TWIA has the green light, IT will work with Accounting to create the Surcharge in Billing Center and assess and validate preliminary settings for batch job run. • Confirm and coordinate with Ins Operations that the print job has kicked off successfully
Exhibits, or Related Documents	
Additional Information	
Compliance	TIC 2210.612(b)
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, Strategic Communications, and Legislative & External Affairs
Action Plans	**General Manager** determines whether to deactivate "Storm Mode" and "CAT mode," and alerts executive leadership team. **Underwriting** - Recommends to General Manager the deactivation of "Storm Mode" and the restoration of normal insurance application procedures in impacted counties. - Upon approval from the General Manager, deactivates "Storm Mode" - Notifies Communications and Legislative Affairs to place "Normal Processing Mode" Agent Bulletin on TWIA Website. - Advises staff of return to normal processing guidelines. **Claims** - Recommends to the General Manager the deactivation of "CAT Mode" in Claims Center and Claims Center for Policyholders and Agents. - Determines the final dates for the templates used for the incident. **Strategic Communications and Legislative & External Affairs** - 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. - Prepares agent bulletin and email to send TWIA/TFPA agents information on restoration of normal submission procedures, offsite office closings, restating agent binding authority, and claim reporting procedures.
Exhibits, or Related Documents	How to Deactivate Storm Mode
Additional Information	The following roles have permission to deactivate Storm Mode in policy administration system General Manager, Vice President of Underwriting, Chief Actuary and Vice President of Enterprise Analytics, and assigned Senior Underwriting Managers
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	• To operate transparently through open communication with stakeholders. • To ensure a quality customer service experience.
Participants	Strategic Communications
Action Plans	**Strategic Communications determines whether to:** • Run full-page "After the Storm" newspaper ads with claims process and contact information. • Run radio ads with claims process and contact information. • Send press release to follow up with media in affected areas. • Offer interviews with TWIA/TFPA to key reporters regarding insurance issues. • Craft and post "After the Storm" message for publication on the TWIA/TFPA websites. • Post "After the Storm" information on social platforms (Facebook, Twitter). • Continue to work with city and state officials to identify needs and help coordinate events.
Exhibits, or Related Documents	
Additional Information	
Compliance	
QA or Testing	

4.3 Monitor Surcharge Payments and Ensure Long-term Reporting

Objective 4.3	To prepare internal systems for the implementation and execution of an Association surcharge and ensure collateral for internal and external stakeholders.
Description	As a part of TWIA's statutory funding structure, the Association is charged with implementing a surcharge against the entire Book of Business in certain circumstances. This objective should ensure the annual activities that must occur in order for TWIA to implement the surcharge.
Purpose	To ensure TWIA's core administration systems are enabled to quickly implement a surcharge To operate transparently through open communication with stakeholders.
Participants	Accounting, Underwriting (Policy Services), Strategic Communications, Legislative & External Affairs, Insurance Ops, IT

Action Plans	**Accounting**
	
	• Once the due date for policyholders to make their payments for the Surcharge has passed, coordinate with UW to ensure Notices of Cancellation will be issued.
	    o This process should mirror the day-to-day cancellation process
	• Reporting:
	    o Summary due to TDI by the end of the 1st Quarter
	    o Detailed summary due to TDI by the end of the 2nd Quarter
	    o At least quarterly, report on the projected needs for an Association Surcharge as the financials develop
	
	Strategic Communications
	
	    o Work with Legislative & External Affairs, Accounting, and Underwriting/Policy Services to provide any support for external communications regarding surcharge due date, etc.
	
	Legislative & External Affairs
	
	• Provide regular updates to the Legislature, TDI, and other key stakeholders on implementation of the surcharge.

Exhibits, or Related Documents	
Additional Information	
Compliance	TIC 2210.612(b)
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	**IT** • Works with Agility 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. **Facilities** • 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 snack and drink vendor services and cleaning services to restore pre-CAT status. • Communicates to restore parking to pre-CAT status. • Reconcile car rental returns **Claims** works with IT and Facilities to ensure that supplies and technologies are transitioned to pre-CAT status.
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, All Departments
Action Plans	**Claims** • 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. **Facilities and Human Resources** • Participate in Association debriefs after response efforts. • Perform audits of contractors for compliance with requirements. • Conduct surveys to rank vendors by degree of performance. • Assign Department personnel to evaluate the observations and make recommendations. • Schedule Department meeting to discuss recommendations. • Schedule Department meeting to discuss recommendations, and plan changes. • Send report to General Manager within 30 days of response efforts. **All Departments** • Evaluate compliance of vendors, contractors, and service providers with agreements and assess need for any resulting amendments, terminations, or new agreements. **Legal & Compliance** • Work with vendor manager to review contracts to determine compliance with terms, and identify termination requirements where necessary
Exhibits, or Related Documents	
Additional Information	
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	• 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	CAT Plan Update Team, Claims
Action Plans	**CAT Plan Update Team** ensure awareness and compliance with the CAP including: • 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. **Claims** • 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	
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	**All Departments** Assist with development and execution of test, training, and exercises (TTE), including: • 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: Executive Leadership - by plan roles and responsibilities • Training: All Staff – by plan roles and responsibilities and include into annual Rights & Responsibilities training • 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	
Compliance	
QA or Testing	

Appendices

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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
5/25/16	CAT Plan Update Team, David Williams, Vice President	Inclusion of After-Action Report Items
11/28/16	Christine Reschke, David Lawson, and Erin Espinoza	Revisions to Objectives 2.6 and 4.1 to ensure proper assignment of responsibilities relating to Storm Mode
12/13/16	David Lawson, Jim Murphy	Reassignment of responsibilities in Objective 3.12
05/01/17	CAT Plan Update Team	Inclusion of After-Action Report items and adjusted funding structure information
08/22/17	David Lawson, Erin Espinoza	Changed hurricane binding exception language to align with Plan of Operations and fixed hyperlinks in the table of contents
5/30/18	CAT Plan Update Team	Addition of After-Action Reports from Hurricane Harvey.
5/28/19	CAT Plan Update Team	Updates from After Action Reports, removal of funding structure exhibits, updates to auxiliary documents, and workflow/process document updates.
7/31/19	David Lawson	Inclusion of new Claims action item in Objective 2.6
5/27/20	CAT Plan Update Team	Addition of After-Action Reports from the past year.
5/26/21	CAT Plan Update Team	Addition of After-Action Reports for the past year.
5/25/22	CAT Plan Update Team	Addition of After-Action Reports from the past year and full review of Deployment Plan.
5/27/23	CAT Plan Update Team	Addition of After-Action Report form the past year
5/29/24	CAT Plan Update Team	Addition of After-Action Reports from the past year and updated modeled storm event numbers and models
5/28/25	CAT Plan Update Team	Addition of After-Action Reports for the past year.

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.
☐ In the case of DR/BC activation, remain alert for department-level instructions for recovery.

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 - **TWIA/TFPA Catastrophe Deployment Plan**

2025 CAT Deployment Plan

June 1st, 2025

Table of Contents

Living Document Disclaimer

This is a living document prepared for the Texas Windstorm Insurance Association and Texas FAIR Plan Association. In the event of any inconsistency or discrepancy, the controlling policy, regulation, or law prevails. All content found within this plan is subject to change. Printed or distributed copies cannot be controlled. Announcements contained in such printed or electronic materials are subject to change without notice and may not be regarded in the nature of binding obligations on the Association.

Introduction

Overview

The 2025 Deployment Plan and Volunteer Handbook is intended to outline a strategy to identify staff and recruit volunteers in the event that the Association deploys in response to an incident, to identify the roles and responsibilities of individual business units in the event of deployment, and to provide deployment guidelines and preparation information for volunteers.

A deployment of TWIA and TFPA's resources in response to an incident is an important piece of the Associations' catastrophe operations, providing immediate assistance to our policyholders throughout our coverage areas. Our deployed staff will be the face of the Associations in our response to a disaster and are a way we are able to provide quality service to our policyholders in extreme circumstances.

As well as providing Association operating procedures for deployment, this handbook provides expectations, guidelines, roles and responsibilities, and tips on preparing volunteer's family for a disaster and making contingency plans when deployed. Preparation for the unique demands of deployment is necessary to mitigate staffing issues and to ensure employees are truly able to meet the goals we set when responding to a catastrophe.

Pre-Season Activities (1.0)

Pre-season activities involved the yearly planning and actions that need to be addressed prior to any actual deployment, as well as addressing those actions that will need to take place in closer proximity to an event. This includes enlisting volunteers, training and testing, setting expectations for deployment communication, and preparing policies and procedures.

1.1 Maintain a Deployment Plan

Objective 1.1	To maintain a plan that prepares for deployment in response to an incident
Description	Ensure a detailed plan is in place. Update and make improvements to the plan after a deployment or a test.
Purpose	To plan for deploying employees to impacted coverage areas in the case of a catastrophic incident.
Participants	General Manager, Executive Leadership Team, CAT Plan Update Team, All Departments
Action Plans	**CAT Plan Update Team** • Reviews After Action Reports (AARs) and work with Executive Leadership Team to identify areas for improvement. • Creates recommendations to the executive sponsor regarding possible testing, training and exercises to ensure continuous improvement. • Meets with TWIA/TFPA Department Subject Matter Experts (SMEs) to review updates. • Submits the plan to the Executive Leadership Team for approval no later than June 1st of each year. **All Departments** • Review plan to identify and assess ownership of roles and responsibilities • Assist with updating the plan, including sending updates to the CAT Plan Update Team • Assist with training Department staff on plan requirements. • Assist with implementing testing, including Department tests of relevant objectives. **HR** • Review Mobile Claims Center layouts to ensure compliance with the Americans with Disabilities Act as it relates to TWIA & TFPA staff. **General Manager and Executive Leadership Team** • Review Plan. **Legislative & External Affairs** • Attaches Deployment Plan to the Annual Report Card and sends to external stakeholders.
Exhibits	
Additional Information	

1.2 Prepare Deployment Staff for Assignment

Objective 1.2	To maintain a staffing model that accounts for the skills and experience needed to successfully deploy in response to a catastrophic incident.
Description	The Associations will have deployment volunteers who are available to serve policyholders in a variety of deployment scenarios, as well as discern the appropriate staff to deploy in extreme circumstances.
Purpose	To identify available volunteer resources for deployments and select appropriate staff.
Participants	General, All Departments
Action Plans	**All Departments** • Review requirements and responsibilities for deployed employees and any staffing recommendations from CAT Plan Update Team. • Communicate with staff about requirements and responsibilities of deployment, including the ability to be away from home, living and working in adverse conditions for two weeks or more. • Make sure ADP contact info is up-to-date with staff . **Claims** • Ensure field staff have CAT Deployment equipment for a deployment (car magnets, lanyards, shirts, hats, etc.) **Facilities** • Work with Claims to understand the requirements and needs for deployments. • Identify staff that will work with Claims to bring equipment to Mobile Claims Centers and manage all TWIA & TFPA Facilities
Exhibits	
Additional Information	

1.3 Train in Customer Service & Conduct during Catastrophic Incidents

Objective 1.3	To train staff in customer service skills and codes of conduct when working at a deployment site.
Description	Assure standards of customer service and professional behavior are in place and that deployment volunteers are familiar with them.
Purpose	To provide policyholders with a safe, professional experience, and to uphold the Association's ethics and best business practices when out in the field.
Participants	General Manager, All Departments
Action Plans	**CAT Plan Update Team** • Benchmarks against industry deployment plans and their codes of conduct and customer service standards and include those into the Deployment Volunteer's Agreement • Meets with departments to adapt policies they own to the Plan. • Recommends training to ensure staff are prepared to exhibit behaviors and practices appropriate for deployment. • Makes staff aware of overtime and volunteer and/or mandatory CAT deployment. • Ensures that the latest Deployment and CAT Pay Policy are available and reviewed by deployment volunteers. • Provide training to Association resources on an annual basis. **All Departments** • Makes recommendations of any changes needed. **All Departments** • Attend training in deployment customer service and codes of conduct.
Exhibits	
Additional Information	

1.4 Maintain Vendor Relationships to Quickly Enlist Services

Objective 1.4	To maintain vendor relationships to quickly enlist services for a deployment event.
Description	Assure the Association has contacts with vendors that can provide manual labor, security, and other services in the event of an incident
Purpose	• To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	General Manager, All Departments
Action Plans	**Facilities** • Ensure contracts with security firms to provide 24/7 security for the deployment sites. • Maintains relationships with rental car vendors. • Maintains relationships with hotels/motels and other lodging options as primary or secondary options for housing • Maintains relationship with vendors to provide shirts, hats, etc. **Claims** • Maintains relationships with hotels and motels and other lodging options as primary or secondary options for housing. • Explores options for basecamp sites and other housing, meals, and meeting space options that could serve as a primary alternate to hotels and motels for deployed staff. • Maintain contract with RK EMS for MCC units **HR** • Maintains contracts with vendors to provide manual labor and greeters at the deployment site.
Exhibits	
Additional Information	TWIA understands that vendors relationships should account for the fact that vendors located on the coast and in close proximity to the coast may not be available if evacuations occur.

Pre-Event Activities (2.0)

Pre-event activities include the activities needed once a known storm or other incident is approaching and the Associations have determined that deployment may be needed. These activities include alerting volunteers of a possible deployment, initiating work with vendors to procure supplies and resources, and setting up plans to be ready for the day of deployment.

2.1 Communicate with Deployment Volunteers & External Stakeholders about Deployment Sites

Objective 2.1	To ensure constant and clear communication with deployment resources and external stakeholders
Description	Once the CAT Plan has been activated and an incident is imminent, deployment communications will need to cascade effectively to internal and external stakeholders
Purpose	To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	General Manager, Executive Leadership Team, Communications & Legislative Affairs, Claims, Operations
Action Plans	**Claims** • VP of Claims to advise the Executive Leadership Team and the General Manager regarding the location of the deployment sites and the resources needed. • Coordinates with local, county, state, and federal emergency management personnel to communicate the location of the deployment site. • Work with FEMA and local officials to identify Disaster Recovery Centers (DRC) locations and work to place resources within the center, if possible. **Strategic Communications** Communicates the location of deployment sites to external stakeholders via the TWIA website, social media, and other channels. **External Affairs** • Sends information about deployment sites to the TWIA Ombudsman, legislative offices, media, and other interested parties. ○
Exhibits	
Additional Information	It is important to note that in a non-storm catastrophe, there may be no watch phase, volunteer standby phase, or 24-hour activation alert.

2.2 Initiate Services with Approved Vendors for Logistics

Objective 2.2	To engage approved vendors to acquire transportation, lodging, meals and other on-site supplies needed.
Description	Assure the Association has resources for transportation, lodging, and meals during a deployment event.
Purpose	• To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	Operations, Accounting, HR
Action Plans	**Claims** • Determine what deployment solutions are needed including lodging, meals, etc. • Once decision on basecamp provided by ELT, the Business Continuity Manager will contact RK EMS to activate the resources required for the deployed. **Facilities** • Contacts car rental vendors to obtain enough vehicles for the deployment. • Identify one single point of contact for deployment vendors in the field • Ensures deployment sites are equipped with water and ice for policyholders • Works with accounting to ensure all purchasing policies are adhered to **Legal & Compliance** • Ensures the Association maintains insurance for drivers. **HR** • Maintains contract with contract labor vendor to help set up the deployment site. • Works with legal to determine guidelines for vehicle use.
Exhibits	
Additional Information	The Associations' Purchasing Policy applies unless instructed otherwise by the General Manager.
Compliance	

2.3 Determine Operational Funding Mechanisms

Objective 2.3	Enable resources and mechanisms to maintain the deployment site and the needs of deployment volunteers
Description	The daily operations of a deployment site may require bulk purchases, providing meals to volunteers, diesel fuel for the generator(s), and alternative funds in the event that normal purchasing mechanisms are affected. The Association needs to ensure deployment policies and procedures allow for proper controls, while providing flexibility to fund a variety of deployment scenarios.
Purpose	• To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	Claims, Incident Commander, Executive Leadership Team (ELT), Accounting, Operations
Action Plans	**Claims** • Provides recommended size and scope of deployment to Operations and Accounting, as well as location of the deployment, in relation to the need to utilize advanced payments. • Identify which of the scenarios are needed: a small deployment with the Mobile Claims Center, a large scale deployment in response to large events, multiple deployment sites in different areas. • Determines any other constraints related to deployment that may impact the need for funds, i.e., areas without internet access where credit cards cannot be used. • Identify number of staff that are anticipated for the deployment. **Catastrophe Claims Manager** • Communicates any need for deployment volunteers to submit expense reimbursement forms to obtain advances, if appropriate. • Gathers expense reimbursement forms from deployment volunteers and submits to Accounting for advances, if needed. **Executive Leadership Team** • Makes a determination as to the lodging options based on the projections and recommendations from Claims. • Determines if any deployed staff will need to be issued Credit Cards and follows the process laid out in the Purchasing and Contract Management Policy. **Facilities** • Coordinate with Claims Manager to identify the items needed for the deployment site(s) and works with Accounting to determine the best method of purchasing. **Accounting** • Will review the needs of the deployment site(s) provided by Operations and will determine how best to purchase items for the site(s) • The CFO will make any final determination as to the mechanisms used to purchase items

Exhibits, or Related Documents	
Additional Information	• Only the General Manager can approve any deviations from current purchasing policies or procedures
Compliance	• Corporate Credit Card Procedures • Monthly Credit Card Reconciliation Form • Guide to DVR submissions and approvals in ImageRight • Employee Expense Reimbursement Form
QA or Testing	

2.4 Initiate Technological Systems for Deployment

Objective 2.3	To communicate with IT and vendors to deploy remote communications technology
Description	Communicate with TWIA/TFPA IT Department and Agility to deploy remote satellites and other needed technology to the location of the Mobile Claims Center(s).
Purpose	To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders. Ensure remote connectivity is available at remote sites.
Participants	Claims, IT, Executive Leadership Team
Action Plans	**Claims** • Provides information and recommendations to the Executive Leadership Team to guide decisions regarding the level of deployment. • Maintain contract with Agility, or other vendors, for remote satellite communication technology that is deployable with the Mobile Claims Center. • Communicates with IT regarding the scale of deployment to ensure enough equipment is deployed. **Executive Leadership Team** • Determines the level of deployment and whether to deploy Mobile Claims Center(s) or Agility unit(s), based on recommendations from Claims. **IT** • Communicates with Agility to ensure the availability of required technology. • Ensures the appropriate amount of equipment is deployed (i.e., laptops, printers, etc.). • Begins prepping laptops at the 24-hour Activation alert. • Ensure that each laptop is imaged with all of the most recent software downloads. • Provides support throughout the deployment • Coordinating with Facilities for space on our rental truck for IT equipment (I.e., laptops, printers, hotspots, tablets, etc.).
Exhibits	See Appendix B for the layout of the Mobile Claims Center
Additional Information	

Day of Deployment Activities (3.0)

Activities on the day of deployment play a crucial role in the overall implementation of the deployment plan. This section refers to the activities surrounding the deployment volunteers assembling before leaving for the remote site. They will be debriefed as to the specifics of the deployment situation, receive necessary resources, supplies, communications, and training. Any needed legal notices or agreements should be executed on this day if they have not been already. The day of deployment will also include safe transportation to the field office or mobile claims center, as well as coordinating the logistics for setting up the mobile claims center.

3.1 Coordinate Staff for Rapid and Safe Deployment to Impacted Areas

Objective 3.1	To coordinate deployment volunteers and staff to ensure an organized deployment
Description	The Association needs to be able to gather all deployment volunteers and organize contractors for a rapid and organized deployment to the impacted area.
Purpose	• To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	Operations, Claims, HR, Deployment Volunteers and Facilities
Action Plans	**Facilities** • Distribute I.D. badges for deployment staff and volunteers. • Distribute shirts, lanyards, hats, vest, office supplies, etc. • Determines if contract labor is required for the set up and engages vendors to request resources. **Strategic Communications** • Announces activation (issued after a hurricane or tropical storm has made landfall and will include logistical details surrounding the deployment) Of our MCCs and updating the websites and socials with info on where the MCC will be set up, times, etc. • **Legislative and External Affairs** Prepares additional collateral and instructions for how to deal with media inquiries or legislative inquiries while in the field. • Provide updates to media and legislative contacts regarding the MCC, etc. **Claims** • Coordinates and communicates with Facilities regarding the level of deployment. • Communicates with the adjusting resources and other relevant vendors to inform them of the deployment location. • Coordinates with local, county, state, and federal officials as needed. • Works with the Texas State Disaster Coalition to understand other remote claims operations in the area. **HR** • Communicates with labor firms to make sure manual labor contractors can get to the deployment site easily. • Provide I.D. badges to deployment firms for contract labor.
Exhibits	
Additional Information	

3.2 Coordinate Equipment for Rapid and Safe Deployment to Impacted Areas

Objective 3.2	To gather all of the necessary equipment for a deployment
Description	Some of the equipment for deployment is kept in a storage unit. It is important to ensure all of the needed equipment is deployed.
Purpose	• To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	Claims, Operations
Action Plans	**Claims** • Communicates the specific supplies and equipment needed at MCC and the number of resources that will be deployed to Facilities • Check point for appointments and the content and workflows that need to be put in play with that decision (I.e., phone appointments, etc.). **Facilities** • Designates employee(s) to gain access to the storage facility to pick up equipment (i.e., generators, tents, tables, etc…). • Ensures sanitation stations and restroom facilities have all appropriate amenities. • Obtains a rental truck to haul supplies and equipment to the deployment site. • Works with Claims and other departments to understand the amount of supplies needed. • Works with IT to coordinate the delivery of IT equipment to the MCC.
Exhibits	
Additional Information	Information regarding the storage unit, its inventory, and its location can be obtained through the Operations/Facilities Department.

Deployment Phase (4.0)

Ongoing deployment activities are needed to maintain a safe, appropriate, and effective work environment while at the deployment site. This includes ways to check that policies and procedures are being followed and that best practices for safety on site are maintained. There needs to be channels for communication with the Associations' main offices throughout deployment to ensure business operations are meeting Association standards and to mitigate any risks during deployment.

4.1 Enforce TWIA/TFPA Codes of Conduct/HR policies and Maintain Safety at the Site

Objective 4.1	To ensure compliance with all TWIA/TFPA policies, procedures, and codes of conduct and to maintain safety at the site
Description	While deployed, all TWIA/TFPA policies and procedures apply to staff members. The policies and codes of conduct shall be enforced by management and the HR representative.
Purpose	To ensure the safety and security of all TWIA/TFPA personnel while deployed.
Participants	HR, Operations, Claims Deployment Volunteers
Action Plans	**Human Resources** • Provides materials to reinforce policies (i.e., OSHA Guidelines, Gun Policies Sign as per Law, etc.), including all TWIA and TFPA policies. • Identifies medical facilities in the area and confirms that they are operational. • Communicates emergency contacts (e.g., hospital, police, fire) to deployed staff. • Provides information on evacuation procedures and stays apprised of local evacuation orders and communicates to staff if there is a need. • Provide material surrounding safety practices. **Facilities** • Maintains contracts with on-site security vendors that can provide 24/7 protection at the deployment site. • There should be no less than 2 security officers on duty per site. • Provides safety equipment for the deployment site (i.e., first aid kits, fire extinguishers, defibrillator) and communicates the location to all deployed staff. • Ensures that all tripping hazards are identified with red tape and all appropriate areas are barricaded. • Responsible for creating ID badges at the site. **Claims** • Ensures the enforcement of all TWIA/TFPA policies and codes of conduct • Send deployed contractor list to Facilities email address (facilities@kbox.twia.org) to create ID Badges.
Exhibits	TWIA/TFPA Employee Handbook TWIA/TFPA Safety Manual
Additional Information	All TWIA/TFPA policies, procedures, and codes of conduct apply to all staff in the event of an incident.

4.2 Ensure the MCC is Prepared to Open to Policyholders

Objective 4.2	To ensure the Mobile Claims Center site is prepared to begin allowing visitors
Description	Prior to the site being opened, IT and Operations will need to communicate the state of readiness of both the physical site and the readiness of the technology.
Purpose	To ensure the site is fully operational prior to opening
Participants	IT, Operations, Site Manager
Action Plans	**Operations** - Identifies one resource on-site to communicate with RK EMS regarding any changes or additions to the MCC. - Manages the contractors who are setting up the exterior site and ensures the site is set up according to the plans. **IT** - Begins set-up of equipment once Claims has completed site. - Works with Agility staff to ensure the proper set up of remote satellites. - Ensures that all laptops, phones, and other equipment is working as expected. - Once the connection and performance have been confirmed, IT will communicate this to the Site Manager. **Site Manager** - Officially opens the site to visitors once IT, Claims and Facilities have confirmed the site is ready - Inspects MCC site within 72 hours of site activation and makes RK EMS aware of any issues or defects in equipment. - Once the site set-up has been deemed ready by the site manager, the site manager lead will communicate this with IT representatives.
Exhibits	• [Mobile Claims Center - Site Map](#)
Additional Information	
Compliance	

Returning from Deployment (5.0)

An organized and well-timed departure is key to the operation. The return should include plans for transitioning employees back to the normal work environment, including clearly communicating relevant information to returning staff, collecting feedback from deployment volunteers, and supporting staff with wellness resources. Managers and staff who have remained at the Association main offices will also need information about returning staff and how to transition from roles and responsibilities that changed with deployment.

5.1 Close Offices and Communicate about Closures

Objective 5.1	To ensure the organized departure of deployment volunteers and the take-down of all deployment sites
Description	Assure the Association closes deployment sites in an organized fashion and ensure proper communication to external stakeholders and deployment volunteers
Purpose	To efficiently deploy to remote sites in order to provide the quickest and most effective service to policyholders.
Participants	General Manager, Executive Leadership Team, Communications & Legislative Affairs, Claims, Operations
Action Plans	**General Manager and Executive Leadership Team** • Determine when to close the deployment site(s). **Strategic Communications and Legislative & External Affairs** • Sends communications to external stakeholders about the closing of the deployment site and ensure we communicate with stakeholders no less than 14 days prior to closing. **Claims** • Coordinates with FEMA and local officials to communicate closures of any Claim Centers and determine the need to place resources within a Disaster Recovery Center (DRC) **IT** • Coordinate the return of equipment (hot spots, tablets, et.). **Facilities** • Coordinate with Claims Management to identify needs in closing of the deployment site(s) • Ensures the return of rental cars and other equipment • Returns all equipment taken from the Austin storage unit
Exhibits	
Additional Information	The Site Manager is ultimately responsible for the orderly take down and closing of designated deployment sites. • KACE Ticket Process for Rental Cars

Deployment Staff Handbook (6.0)

This section of the Deployment Plan is to serve as a resource for volunteers who are deployed for TWIA or TFPA in response to an incident. Pre-planning for deployment is essential. This portion of the plan will provide you with tips on how to prepare yourself for a deployment. It will also provide information regarding deployment guidelines, volunteer roles and responsibilities, and other resources.

6.1 Deployment Preparation

Objective 6.1	Prepare deployment volunteers for dealing with policyholders after a catastrophic incident
Description	The stress associated with a catastrophe and rebuilding process for policyholders can be overwhelming. As a deployment volunteer, you are responsible for serving as their trusted guide throughout the process.
Purpose	• To prepare volunteers and set expectations
Participants	Deployment Volunteers
Details	**Deployed Staff Expectations** • **Prepare for varied reactions** - Understanding that policyholders may respond to trauma differently is key in providing appropriate customer service. The emotions you see on site may vary and being aware of how to address each situation is crucial. • **Establish trust by being an active listener** – Avoid making assumptions, give your undivided attention, and be sure to ask follow-up questions. Acknowledge their situation. Avoid diminishing the policyholder's experience by saying 'it's not that bad.' • **Gather the facts** – Who, what, when, why, what next. • **Don't speculate** – Communicate accurate information only. If you don't know, say so and get back with the customer once you have an answer. • **Be the trusted guide, not the hero** – Rather than over promising and setting false expectations, be their expert source of information to guide them through this process. • **Plan ahead** – We encourage you to prepare yourself and your family before a catastrophe occurs. Have the materials you need to perform the duties you are responsible for carrying out.
Exhibits	
Additional Information	

6.2 Deployment Expectations

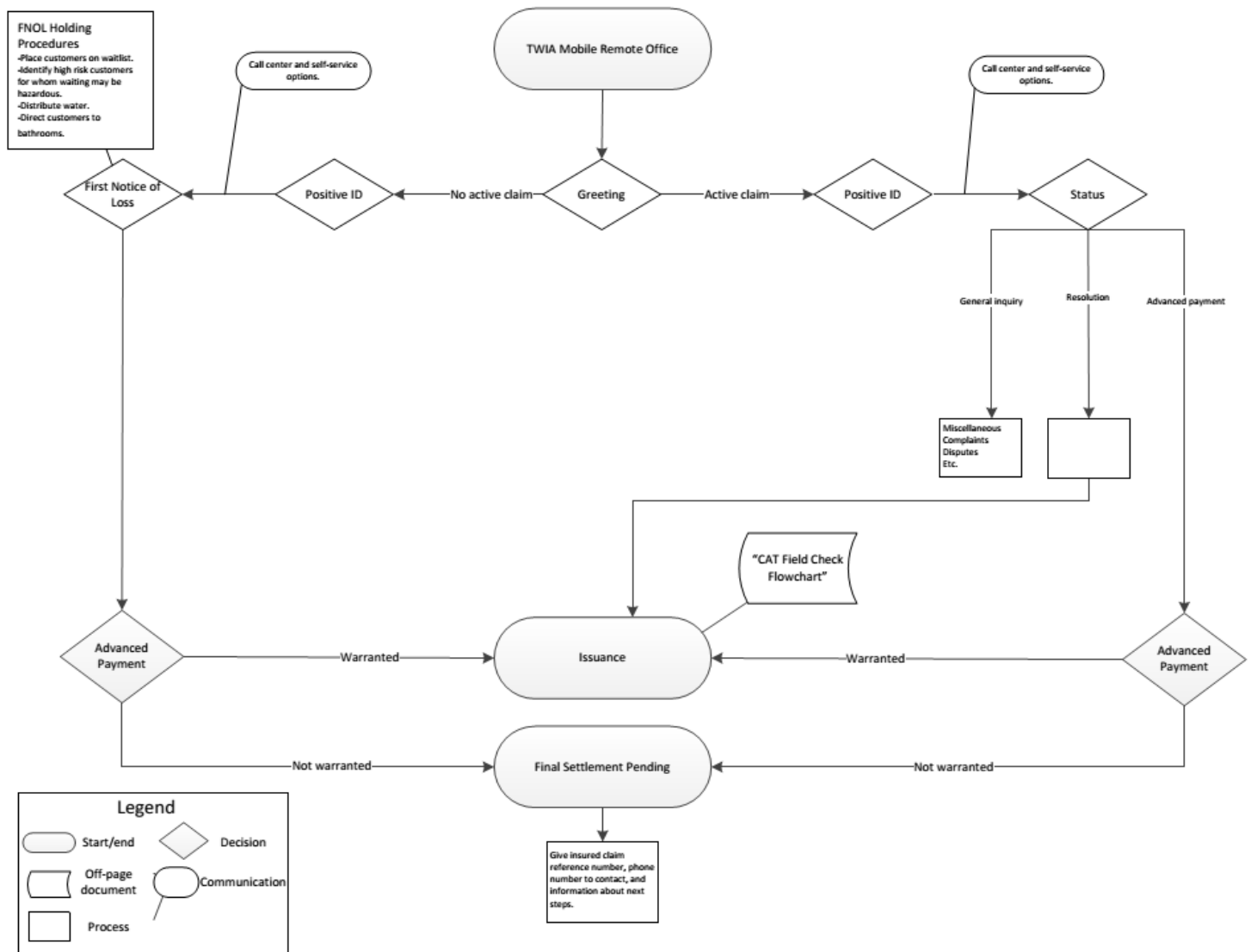|	
Objective 6.2	Learn and uphold expectations of deployed staff
Description	As an employee of the Associations, you have responsibilities to your supervisors, managers, and your fellow employees. Even in extreme circumstances, you are to uphold the mission, vision, and values of the Associations
Purpose	• Identify actions that would be regarded as improper conduct
Participants	Deployment Volunteers
Details	**Deployment Staff should understand how to avoid the following improper actions:** • Failure to meet the expectations for your responsibilities as a deployment staff member of TWIA & TFPA . • Leaving your workstation or the deployment site without first receiving permission from your supervisor or manager o Breaks throughout the day must comply with Texas Labor Law but timing may be at the discretion of the Site Supervisor • Falsifying or withholding of facts on any company records, including applications, time sheets, etc. • Excessive absenteeism or tardiness. • Failure to follow policies, procedures, and guidelines contained in the employee handbook • Failure to follow safety rules. • Conduct during business hours which could be construed as negative. • Contracting with stakeholders to perform work of any kind for them. • Non-disclosure of interest in any vendor or stakeholder. • Threatening, intimidating, coercing, or interfering with the work of others. • Disorderly conduct. • Any form of harassment or discrimination. • Failure to report accidents immediately. • Discourtesy towards policyholders, agents, or any stakeholders. • Possession of firearms or explosives or other weapons on company premises, including parking areas. • Employees will not show up to the worksite under the influence of drugs or alcohol, nor can employees bring any intoxicant onto company property.
Exhibits	
Additional Information	The Associations reserve the right to discipline, up to and including, termination of an employee regardless of whether or not the conduct or performance is described in the above list.

6.3 Reporting for Deployment

Objective 6.3	Report for deployment according to the plans and instructions of the Association
Description	Deployment Volunteers should be alert to the following phases and activities that will happen upon the activation of the CAT Plan, when there are plans to deploy:
Purpose	• Assure the proper communication of the details of departure and the disbursement of supplies, and ensure an organized departure
Participants	Deployment Volunteers
Details	**Deployment Staging** • Upon arrival to the meeting site, volunteers will be briefed in greater detail regarding the deployment (i.e., directions to the site, lodging information, and information on any road blocks). • Facilities will supply TWIA/TFPA polos, vests, hats, and badges at this time. • will be issued TWIA/TFPA car magnets and provided with any reentry letters needed. **Deployment Attire** • Staff should prepare for all types of weather (heat, humidity, rain, etc.). • Dress should reflect a professional appearance. • Staff will be expected to wear casual Friday dress, their TWIA/TFPA branded shirt, vest, and I.D. badge.
Exhibits	
Additional Information	Volunteers should bring enough supplies (i.e., personal toiletries, shoes, socks) for a deployment of no more than 2 weeks

6.4 Transportation to the Deployment Site and Lodging

Objective 6.3	Be aware of transportation plans to the site, as well as lodging
Description	Deployment volunteers will be provided information regarding standards and expectations surrounding traveling to the site and lodging.
Purpose	• Ensure an organized departure
Participants	Deployment Volunteers
Details	**Deployment Transportation** • Utilize the KACE process for the rental cars, etc. **Deployment Lodging** • Where possible, lodging arrangements will be made by the Claims Department. Information regarding the location and check-in will be reviewed at the briefing that will occur prior to departure. • If not possible for the Associations to obtain enough lodging in the area, basecamps will be utilized. Basecamps utilize open space as a place to set up sleeping quarters for volunteers. • Room assignments will be made by the Site Manager prior to departure. There should be no more than four volunteers to a room and no less than three to a room. • Deployment Volunteers will be responsible for settling any outstanding incidental expenses not reimbursed by the Associations (i.e., room service, laundry service, etc.). • If it is determined that advances will be made for expenses, volunteers will need to submit their expenses to their manager on a weekly basis.
Exhibits	
Additional Information	

Appendix A – TWIA/TFPA Mobile Remote Offices Workflow

FNOL Holding Procedures
- Place customers on waitlist.
- Identify high risk customers for whom waiting may be hazardous.
- Distribute water.
- Direct customers to bathrooms.

Call center and self-service options.

TWIA Mobile Remote Office

Call center and self-service options.

First Notice of Loss — Positive ID — No active claim — Greeting — Active claim — Positive ID — Status

General inquiry — Resolution — Advanced payment

Miscellaneous Complaints Disputes Etc.

"CAT Field Check Flowchart"

Advanced Payment — Warranted — Issuance — Warranted — Advanced Payment

Not warranted — Final Settlement Pending — Not warranted

Give insured claim reference number, phone number to contact, and information about next steps.

Legend
- Start/end
- Decision
- Off-page document
- Communication
- Process

Appendix B – Alternate Mobile Claims Center Layout

Mobile Claims Site Map

Key

- 36 Chairs
- Generator — 3 Generators
- 9 Lights
- Table — 6 Tables (2-6', 4-4')
- 4 Fans
- Charging Station — 1 Phone Charging Station
- 6 Extension Cords 6-25'
- 6 Surge Protectors
- Men's Portable Restroom
- 20 Cases of Water
- Ice Cooler — 4 Coolers (1 Large, 3 Medium)
- Women's Portable Restroom
- 6 Waste Bins (4 Large, 2 Small)
- Reserved Seating
- 2 Hand Sanitizing Stations
- 1 Document Shredder

Key

- Adjustable Tent Wall
- 20' Sign: "TWIA & TFPA Mobile Claims Center" — Claim Center 1 – 8x20
- Stanchion Retractable Belt
- Welcome Sign — Welcome Sign 1- 12'
- 14 Stanchions
- 4 Fire Extinguishers
- FNOL This Way → — 1 Yard Sign
- 4- 15' Tear Drop Flags (TWIA/TFPA)
- 1 – Fraud Alert Poster
- Sand Bag
- Enter — 2 Entrance A-Frame Boards
- 2 First Aid Kit
- Exit — 2 Exit A-Frame Boards
- OSHA Heat Stroke Safety Poster (5)

MCC Support Unit to Rentsys

Rentsys Unit

Ice Cooler

Ice Cooler

Exit

Entrance

Ice Cooler

Ice Cooler

Electrical

Charging Station

10 ft.

Handicap Service Table

Ice Cooler

10 ft.

10 ft.

Electrical

10 ft.

Up

Up
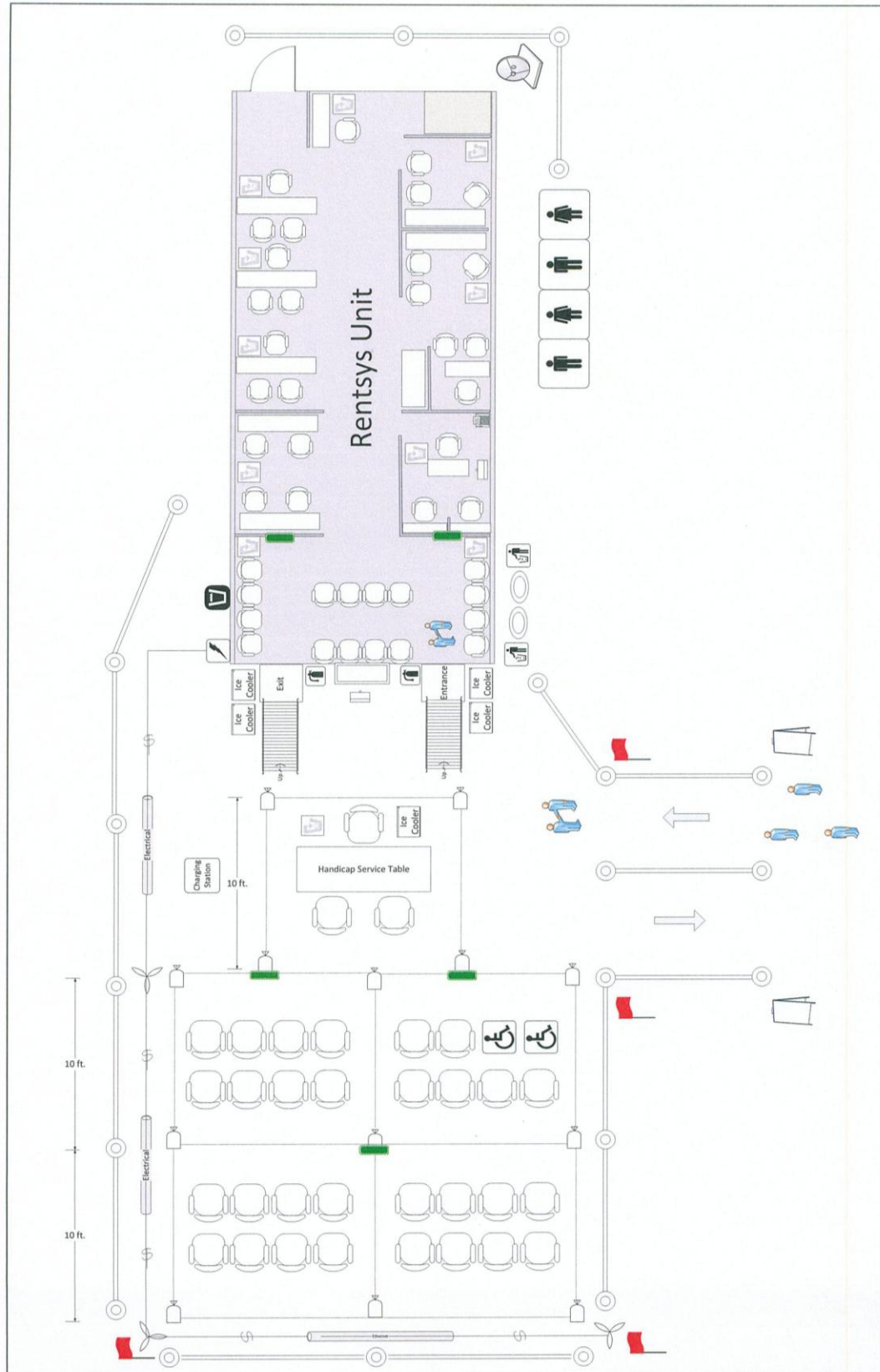
Appendix C – Deployment Position Expectations

Role Expectations – Mobile Site Supervisor(s)

The claims supervisor that is deployed is responsible for ensuring TWIA/TFPA's ability to provide service to its policyholders, including paying claims in a timely manner. The supervisor is also responsible for ensuring the availability of required infrastructure. The Claims Supervisor is also responsible for:

- Supervise the deployment site and the deployment volunteers
- Handle escalated or difficult situations
- Answer general questions
- Meets with claims staff to brief them on expectations, responsibilities, and any specific instructions
- Ensures claims staff are adhering to TWIA/TFPA claims guidelines and are meeting statutory requirements
- Works with staff to identify the need to issue advanced payments
- Review and approve all coverage decisions involving a denial or partial denial of coverage
- Issuing payments that exceed the authority of the Claims Examiners at the deployment site

Role Expectations – Mobile Site Representative

Reviews the reports generated by the field adjusters, make claims decisions, communicate decisions to the policyholders, and issue claim and expense payments.

- Review adjuster reports and bring claims to conclusion according to TWIA/TFPA guidelines
- Discuss the disposition of the claim with the policyholder and walk them through any next steps
- Serve as a resource for policyholders with questions about their coverage
- Ensure all denials and partial denials are approved by TWIA/TFPA management
- Advise policyholders on the need to mitigate damages to prevent further damage to their property
- Identify the need to issue advanced payments to policyholders
- Will be responsible for filling out the Advanced Payment Agreement with the policyholder if any advanced payments are needed and properly document them in Claims Center
- Advise and explain to policyholders the WPI-8 processes

Role Expectations – Accounting Deployment Specialist Lead

Responsible for maintaining the security of the signature stamp and signing each field check, utilizing the signature stamp, as well as ensure all field check registers are delivered to TWIA's home office.

- This resource will be responsible for checking out the signature stamp from the Accounting Department
- Along with the responsibilities mentioned above, this resource may be needed to assist with other duties at the deployment site
- Will ensure enough check stock for the deployment and will communicate with the home office if more checks are needed after the first week
- Responsible for compliance with all Accounting policies and procedures at the deployment site
- Will be responsible for checking out the field check register and will be responsible for the return of this register

Role Expectations – Accounting Specialist

Responsible for maintaining security of field checks and field registers, as well as writing all field checks and maintain a record of the checks written in the register.

- When coverage has been verified by Claims, this resource will be responsible for promptly writing the field check
- This resource may be asked to fulfill other duties at the deployment site if needed
- Responsible for ensuring accounting practices are adhered to, along with the policies and procedures
- Ensures that that the Advanced Payment Agreement is filled out appropriately and signed prior to writing any checks

Role Expectations – Customer Greeters

Welcome customers, answer questions, assist with the filing out of the customer information sheet, and direct policyholders to the correct resources.

- Warmly welcome policyholders
- Must maintain a customer friendly disposition and show empathy with stakeholders affected by the incident
- Is responsible for understanding TWIA/TFPA's claims procedures in order to assist policyholders and answer questions about the process
- Must be able to answer basic questions about the claims processes and TWIA's overall policies and procedures

Role Expectation – Claims Services Representative

Review customer information sheet, assess policyholder's needs and discuss policy information, explain the steps of the claims process, and determine the need for advanced payments.

- Must determine the needs of the policyholder and guide them to the right resource to assist them
- Responsible for reviews of the Policyholder Information Sheet and verifying coverage
- Once coverage is verified, this person will determine the Policyholder's need for an advanced payment
- Will provide additional help to claims staff at the deployment site and fill in any other role, as needed

Role Expectations – Facilities Coordinator

This person(s) will be a non-Claims leader responsible for coordinating with Site Managers and Austin Facilities Coordinator to ensure all services and goods are being provided for as needed, along with following duties;

- Manage and schedule security services
- Manage and distribute office supplies
- Ensure a constant fuel supply to all site generators that require it
- Ensure a supply of snacks, ice and water at each location

Role Expectations – Catastrophe Manager

A Claims or non-Claims leader with overall responsibility for ensuring all activities are taking place in accordance with the Plan. Claims Supervisors on site may also be assigned to this role.

- Ultimately responsible for the set-up, operations, and take down of the deployment site
- Ensures compliance with claims handling processes and with all orders from local, county, state, and federal officials
- Will manage all deployment volunteers and staff at the deployment site
- Responsible for receiving and keeping track of all exempt and non-exempt timesheets and will submit these timesheet to HR every Monday by 9:00am
- Provides daily site operations reports to Sr. Claims Management for general performance of the site, number of site visitors, number of FNOL's entered, number of payments issued, and information as to why the site should continue to operate at that site.
- Ensure compliance with liability policies and ensure each site is equipped with hard copies.

Role Expectations – Underwriting Representative

This resource will service as the expert in policy processing and the Underwriting representative at the deployment site. When not directly involved in underwriting issues, this resource will assist with other roles where possible.

- Is responsible for all inquiries regarding Underwriting issues
- Must be proficient in using TWIA/TFPA policy systems
- Answer general questions
- Be available to assist with a variety of duties at the deployment site

Role Expectation – IT Representative

This person must be an expert in IT to provide support for the hardware, software, and network connectivity at the deployment site.

- Ensures the ability to access TWIA/TFPA's core system applications
- Works with the Austin office to troubleshoot issues if needed
- Make sure there is enough technology equipment for all of the resources

Role Expectation – Communications Representative

Strategic Communications and/or Legislative & External Affairs may be present to assist with onsite media, collect feedback from stakeholder groups, and coordinate outreach events (e.g., Townhall meetings).

- Handles all media requests at the deployment site
- Works with local agents and officials to make them aware of TWIA/TFPA's presence in the area
- Organizes Townhall and other public events to educate the public on TWIA/TFPA policies and issues specific to the incident
- Provides assistance at the deployment site, where needed