Program Adjustments for the Community Rating System

As discussed in the last issue of the NFIP/CRS Update, the Community Rating System (CRS) has adjusted how the Insurance Services Office, Inc. (ISO) will conduct CRS cycle verification visits for the near future. Keeping the CRS moving along and fostering community readiness in the current flood and hurricane season remains important. Flood-risk-reduction outreach, promoting flood insurance, and response planning will remain keys to readiness.

CRS Verification Visits

ISO/CRS Specialists will continue with cycle verification visits with communities remotely, as needed. In-person verification visits can be conducted depending on a community’s and ISO’s ability to do so. ISO/CRS Specialists will be in touch with community CRS Coordinators to schedule or, if needed, to reschedule visits. ISO will continue to use the current verification procedures for remote or in-person visits, which includes correspondence and a CRS crosswalk before a call and/or online meeting, the 30-day letter, and follow-up work. For some communities, even if a remote visit is scheduled, field work may be required. The field portion of the visit will be conducted when appropriate.

Annual Recertification

Annual recertification packets will continue to be sent out. The CRS Resource Specialists recognize some community officials are continuing to work from home, but note that recertifications of many CRS credited elements do not require attachments. For activities and elements that do require a progress report, an after-action report, or other attachments, we are hopeful that you will have an opportunity to provide this later. As always, if you have any questions, please contact your CRS Resource Specialist.

Updates on CRS Training

The CRS Webinar Series is back! Please visit the Training & Videos page of the CRS Resources website for updates to the schedule. The July CRS course (E0278) at the Emergency Management Institute (EMI) has been cancelled. The (4-day) field-deployed CRS courses and 2-day CRS courses are being rescheduled, as needed. See Training Opportunities on page 15.
The 2021 Addendum to the 2017 CRS Coordinator’s Manual

In the last NFIP/CRS Update newsletter, the CRS announced that the Federal Emergency Management Agency (FEMA) plans to issue a 2021 Addendum to the 2017 CRS Coordinator’s Manual, to be effective January 2021. The Addendum will be used by communities in conjunction with the current Coordinator’s Manual. The Addendum will serve as a “bridge” between the existing guidance materials and the more comprehensive update that is anticipated to be needed as FEMA implements updates and changes to the National Flood Insurance Program (NFIP).

The 2021 Addendum will include two new prerequisite requirements, several new CRS credit opportunities, and some updates and modifications aimed at simplifying credit and reporting requirements. The 2021 Addendum is not expected to be a large document. Below is a summary of its planned content. More information and guidance will be provided for the new credit opportunities in the coming months.

**CRS Prerequisites**

The Class 9 prerequisite for FEMA Elevation Certificates will be changed to require 90% accuracy at a community’s annual review, plus a requirement for a community to have written Elevation Certificate management procedures (element ECMP). All communities will receive 38 points under Activity 310 (Elevation Certificates) for ECMP. Credit for element Elevation Certificates under Activity 310 will be retired.

A new Class 8 prerequisite will require communities to adopt and enforce at least a 1-foot freeboard requirement (including equipment or mechanical items) for all residential buildings constructed, substantially improved, and/or reconstructed due to substantial damage, throughout its Special Flood Hazard Area (SFHA) where base flood elevations have been determined. Communities should have received letters from ISO regarding this new prerequisite. See Frequently Asked Questions on Class 8 Freeboard.

**New Credit Opportunities**

**Activity 370 (Flood Insurance Promotion)** will be modified to offer additional credit for the flood insurance coverage improvement plans (element CP) and implementation (element CPI), and technical assistance (element TA). New elements will be added to provide credit for enhanced flood insurance promotion efforts. These new elements will be much like bonus credit for CP and CPI.

Under **Activity 510 (Floodplain Management Planning)**, a new sub-element will be created for the development of floodplain species assessments under natural functions plan (element NFP). Credit for the development of Level 1 and Level 2 floodplain species assessments is aimed at encouraging communities to develop a better understanding of the endangered species within their entire community, and of appropriate community measures (including CRS-credited items) that protect endangered species.

[Activity 510](#) will also have a new element for the development of a community substantial damage properties management plan (element SDPMP). Such a plan
identifies steps that a community can take well before a flood to efficiently and effectively meet the NFIP requirement for assessing flood damage and making substantial damage determinations.

Under **Activity 610 (Flood Warning and Response)**, credit will be provided for flood response operations (element FRO) when plans include damage assessment tasks, floodplain management teams, and/or substantial damage assessment procedures to meet NFIP requirements, as well as local ordinance requirements for substantial damage, including cumulative substantial damage.

**Modifications and Updates**

- Paragraph 116.a. of Section 116, Other Program Priorities, in the *Coordinator’s Manual* will be renamed “Natural Floodplain Functions and Endangered Species” to place more attention on CRS activities that protect threatened and endangered species. Although new credit for floodplain species assessments will be provided under Activity 510 (Floodplain Management Planning), there are a number of activities that support endangered species and habitat protection. They will be highlighted in Section 116.a.

- Section 301 and Activity 310 (Elevation Certificates) will be modified to reflect the changes made in the Class 9 prerequisite for Elevation Certificates and the new ECMP credit. Elements ECPO and ECPR will not be changed.

- Section 404, Sea Level Rise Projections and the CRS, will be updated to reflect changes in available sea level rise projections.

- The impact adjustment in Activity 450 (Stormwater Management) for stormwater management regulations (element SMR) and watershed management (WMP) credit will be simplified. Rather than calculate an impact adjustment based on watersheds outside the community, only regulated watersheds within the community will be included. Other clarifications for watershed master planning credit will also be made.

More information on the 2021 Addendum’s new credit opportunities, simplifications, and modifications/updates will be presented in upcoming issues of this newsletter. There will also be webinars about the Addendum, and the CRS team will be presenting a concurrent session at the *Association of State Floodplain Managers’ Annual National Conference* June 10.

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**New Process for Repetitive Loss Data**

As many CRS Coordinators, floodplain managers, and other CRS enthusiasts know, FEMA’s protocols for repetitive loss data are changing. ISO will no longer distribute NFIP repetitive loss data to CRS communities. All communities must request repetitive loss data (repetitive loss lists) directly from the FEMA Regional Office.

As described in Section 501.b of the *CRS Coordinator’s Manual*, a community currently due for a CRS verification cycle visit will need a current repetitive loss property list, and new communities applying for CRS entry also will need a current list.

Before repetitive loss data can be provided by the FEMA Regional Office, communities must have an Information Sharing and Access Agreement (ISAA) in place with FEMA. The ISAA is a written form that must be fully executed before FEMA may release any NFIP data to the community. A fully executed ISAA is valid for three years, and multiple data requests may be made under the ISAA.
To begin the process of obtaining repetitive loss data, a community should coordinate with its 
FEMA Regional individuals (see below) and request a blank ISAA.

The ISAA form requests basic community information, but a community’s legal team should be 
prepared to review the form as well.

The community’s Chief Executive Officer (CEO) will need to fill out the ISAA, and it is then to be 
returned to the FEMA Regional CRS Coordinator.

The FEMA Regional Office will route the form to FEMA headquarters for processing.

FEMA headquarters will return the approved form to the Regional Office, which then can return it 
to the community’s CEO for final signature.

Once signed, the CEO will send the final signed copy to the FEMA Regional Coordinator for routing 
and processing by FEMA headquarters.

Once complete, FEMA headquarters will return the FEMA final processed document to the 
Regional Coordinator. The Regional Coordinator will then provide the document back to the 
community’s CEO.

Upon receiving the executed ISAA, a community may request repetitive loss data from the FEMA 
Regional CRS Coordinator.

When requesting repetitive loss data, it is important to know that there are two different definitions 
for repetitive loss used by FEMA—the original definition under the NFIP and the definition created by 
the Biggert-Waters Flood Insurance Reform Act of 2012 that is used for grants and planning (see next 
article). The CRS uses the original NFIP definition, and communities should be sure that repetitive loss 
data are requested using the NFIP definition. To help ensure the correct data are being provided, a 
community should let its ISO/CRS Specialist know it will be requesting data for CRS purposes. The 
ISO/CRS Specialist will help by providing a transmittal sheet to submit to FEMA that clarifies which 
data set is being requested. This important step ensures a community will receive the appropriate 
repetitive loss list.

Below are the FEMA Regional individuals to contact to request an ISAA.

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<th>Name</th>
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<tbody>
<tr>
<td>I</td>
<td>Molly Kaput</td>
<td><a href="mailto:Molly.Kaput@fema.dhs.gov">Molly.Kaput@fema.dhs.gov</a></td>
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<td>II</td>
<td>Marianne Luhrs</td>
<td><a href="mailto:Marianne.Luhrs@fema.dhs.gov">Marianne.Luhrs@fema.dhs.gov</a></td>
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<td>III</td>
<td>Richard Sobota</td>
<td><a href="mailto:Richard.Sobota@fema.dhs.gov">Richard.Sobota@fema.dhs.gov</a></td>
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<td>IV</td>
<td>Victor Geer</td>
<td><a href="mailto:Victor.Geer@fema.dhs.gov">Victor.Geer@fema.dhs.gov</a></td>
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<td>V</td>
<td>James Sink</td>
<td><a href="mailto:james.sink@fema.dhs.gov">james.sink@fema.dhs.gov</a></td>
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<td>VI</td>
<td>John Bowman</td>
<td><a href="mailto:JohnE.Bowman@fema.dhs.gov">JohnE.Bowman@fema.dhs.gov</a></td>
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<td>VII</td>
<td>Chris Parsons</td>
<td><a href="mailto:Christopher.Parsons@fema.dhs.gov">Christopher.Parsons@fema.dhs.gov</a></td>
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<tr>
<td>VIII</td>
<td>Marijo Brady</td>
<td><a href="mailto:Marijo.Brady@fema.dhs.gov">Marijo.Brady@fema.dhs.gov</a></td>
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<td>IX</td>
<td>Edie Lohmann</td>
<td><a href="mailto:Edith.Lohmann@fema.dhs.gov">Edith.Lohmann@fema.dhs.gov</a></td>
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<td>X</td>
<td>Scott Van Hoff</td>
<td><a href="mailto:Scott.VanHoff@fema.dhs.gov">Scott.VanHoff@fema.dhs.gov</a></td>
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Repetitive Loss Definitions—Correct Data Sets

Communities are busier than ever managing their CRS programs, applying for mitigation grants, and mitigation planning. All these activities require data and information from FEMA. For many communities, the lists are extensive, and fluctuate with the implementation of mitigation actions and occurrence of disasters. Managing the “list” can be quite challenging when the list itself is dynamic. Add to that the fact that there are two different definitions of “repetitive loss” in the mitigation environment, and communities sometimes find themselves with conflicting data. A better understanding of the FEMA repetitive loss definitions in combination with the FEMA program the repetitive loss data is used with helps sort things out.

NFIP and CRS Definition of a Repetitive Loss Property

The NFIP definition is “A Repetitive Loss (RL) property is any insurable building for which two or more claims of more than $1,000 were paid by the National Flood Insurance Program (NFIP) within any rolling 10-year period, since 1978. At least two of the claims must be more than 10 days apart but within 10 years of each other. A RL property may or may not be currently insured by the NFIP.”

The CRS program is part of the NFIP, therefore, for CRS purposes, the NFIP definition of a repetitive loss property is used. The CRS Class 9 prerequisite requires any community that has one or more repetitive loss properties must take certain actions to address its repetitive losses. The CRS also defines repetitive loss categories in Section 500 of the CRS Coordinator’s Manual. To determine which repetitive loss category a community is in, the CRS uses the NFIP repetitive loss list.

Hazard Mitigation Assistance

With the creation of FEMA hazard mitigation grant programs, another definition of a repetitive loss property emerged as “A structure covered by a contract for flood insurance made available under the NFIP that: (a) Has incurred flood-related damage on two occasions, in which the cost of the repair, on the average, equaled or exceeded 25 percent of the market value of the structure at the time of each such flood event and (b) At the time of the second incidence of flood-related damage, the contract for flood insurance contains increased cost of compliance coverage.”

This definition is often used for hazard mitigation grants, and in multi-hazard mitigation plans (the number of repetitive loss properties for communities participating in the plan). The Biggert-Waters Flood Insurance Reform Act of 2012 also cites the repetitive loss structure definition in Section 1370 of the Act. This is the definition that communities typically reference when trying to determine eligibility for Increased Cost of Compliance (ICC) when a property has sustained multiple losses that cumulatively equal or exceed 50% of the structure’s value. “For a structure to be eligible for the increased federal cost share of 90%, a property must meet the FEMA repetitive loss definition in the Biggert-Waters Flood Insurance Reform Act of 2012,” according to the Hazard Mitigation Assistance Guidance (2015). The Biggert-Waters Act also clarifies that properties that meet either repetitive loss definition are eligible for Flood Mitigation Assistance grants.

The introduction of this second definition of repetitive loss does at times create confusion when a community finds it has two differing lists. Both lists are correct, depending on the purpose for which you intend to use the information.
To ensure you receive the correct data set from FEMA when requesting repetitive loss information or data from FEMA, make sure you identify to FEMA the purpose for which you intend to use the information or data. Again, for the CRS, use the NFIP definition. If in doubt, or if needing help understanding the new data format, your ISO/CRS Specialist will be happy to assist you with your request to FEMA.

Corrections to the Repetitive Loss Update Worksheet

To accompany the new process for obtaining repetitive loss data for your community, FEMA also has a new process in place for submitting any corrections you need to make to your community’s repetitive loss list using the AW-501.

Historically, CRS communities submitted to ISO corrections to their repetitive loss properties, such as duplicate listings, address corrections, verified mitigation efforts, and incorrect community identification numbers. ISO is no longer processing these corrections, as FEMA has brought this task in house. All corrections are now to be sent directly to FEMA at NFIPUnderwritingMailbox@fema.dhs.gov. Below is guidance as outlined in the Flood Insurance Manual. Documentation required to correct or update a property’s prior loss information includes but is not limited to the following:

Invalid Loss History Association—Documentation that shows
- Incorrectly linked addresses and/or losses; or
- A second address added to a Property Locator Record.

Property Value Updates—The property value is based on market value, which must be shown on one of the following documents:
- Property tax assessment; or
- Property appraisal.

Mitigation Action
- Elevation Certificate based on finished construction of the new or improved building;
- Color photographs of the building before the improvement;
- Color photographs of the building after the improvement;
- Photographs of the flood vents/openings (if applicable);
- Source of funding for the mitigation action (state, local, or individual);
- Demolition permit (if the building was demolished and rebuilt);
- Building permit (if the building was elevated or rebuilt); and
- In Zone B, C, or X, a signed statement from a community official that shows mitigation was approved by the community.
Required documents should be mailed to NFIP Bureau and Statistical Agent, Attn: Underwriting, 8400 Corporate Drive, Suite 350, Hyattsville, Maryland 20785, or sent via email to NFIPUnderwritingMailbox@fema.dhs.gov.

No Recent Repetitive Loss Data?

With changes to the way repetitive loss data is now requested from and distributed by FEMA (see article on page 4), a CRS community may not obtain its latest repetitive loss list in time to incorporate it into a current cycle verification. To ensure this obstacle does not delay the cycle verification, here are a few solutions for the following scenarios.

- If your community has not received any flooding over the past couple of years, and you are confident that you have had no changes to your repetitive loss list (please talk to your ISO/CRS Specialist about this), you can use the latest repetitive loss information you have, even if it’s from two to three years ago, for your cycle verification. ISO last sent out repetitive loss information in 2018, so you should at least have this information. If not, ask your ISO/CRS Specialist if he or she can assist you.

- If you think your existing data is too old or outdated to be reasonably correct, you have misplaced it, or you do not have anything recent, you will need to request the data from FEMA. If you have not received your data from FEMA yet, and your cycle verification is ready to be finalized, you are required to do the following to temporarily satisfy CRS cycle requirements:

  1. Use the most current data you have to determine your number of repetitive loss properties and to produce your repetitive loss area maps along with the mailing list for your CRS-required repetitive loss area outreach letter.

  2. Produce the repetitive loss outreach letter. Mail it to everyone on your mailing list, and send a copy of it to your ISO/CRS Specialist.

  3. Write a letter to your ISO/CRS Specialist stating that as soon as you have the repetitive loss data from FEMA, you will provide the necessary pieces to determine your current repetitive loss status.

As always, if you find yourself in a slightly different or unique situation and need further guidance, please contact your ISO/CRS Specialist.

More on the Changes to the Class 9 Prerequisite for Elevation Certificates and Activity 310 Credit

Changes to the Class 9 prerequisite for FEMA Elevation Certificates in the forthcoming 2021 Addendum are intended to consolidate the requirement for a community to maintain Elevation Certificates in Section 211.a. of the CRS Coordinator’s Manual and the requirement for a 90% accuracy rate in Section 311.c. Going forward, it should be clear to all communities joining the CRS that Elevation Certificates must be reviewed and corrected to stay in the program.
A sentence will be added to the current Class 9 prerequisite: “The community must achieve 90% accuracy on its Elevation Certificates during its annual review.” This means communities will provide all Elevation Certificates each year at its annual recertification. The Elevation Certificates will be reviewed, corrections will be required, and then the community will NOT resubmit those Elevation Certificates at its next cycle verification visit. Even if a community has an upcoming cycle visit, Elevation Certificates will be requested from the community’s ISO/CRS Coordinator at the regular, annual, recertification time. To reiterate, Elevation Certificates for new construction or substantial improvement or damage will no longer receive CRS credit with the 2021 Addendum. Instead, all communities will receive 38 points for written Elevation Certificate management procedures (element ECMP). The current 38 points for element Elevation Certificate will be applied for ECMP credit. There will be no prorating or impact adjustment for element ECMP.

Many communities already have Elevation Certificate management procedures in place, and the CRS will provide guidance about what is expected to meet the Class 9 prerequisite and ECMP credit. Written Elevation Certificate management procedures are viewed as valuable guidance during transitions of community staff, receipt of new maps, or future changes in Elevation Certificates requirements.

With the retirement of Elevation Certificate credit and its replacement with ECMP credit, Activity 310 will be much shorter. Much of the Elevation Certificates descriptions under Activity 310 will be moved to Section 301 of the Coordinator’s Manual.

When Do I Recertify around a Cycle Verification?

Each year, a community must recertify that it is continuing to meet the prerequisites for its CRS Class rating and to implement the activities for which it has earned credit (Section 213 of the CRS Coordinator’s Manual). Recertifications are scheduled throughout the year: February 1, May 1, August 1, and October 15, based on the community’s state. You can view the recertification schedule here. Recertifications are done every year when a community is not currently going through a cycle verification, and it can be difficult to understand when a recertification is due in a year in which a cycle is due, or seems to be right after a community goes through a cycle verification. This article will help explain and use an example.

A list of CRS communities and their CRS Classes is published each May and October. This list is prepared about six months in advance, which means the ISO verification visit and review of credit documentation was completed earlier as well. The CRS program staff is working to avoid two-year periods in which a community has neither a cycle verification nor a recertification.

As an example, a community finalizes its cycle verification on October 5, 2019, and is improving its CRS Class. Because of the timing of when ISO must present the data to FEMA for the effective date, the community’s class improvement will not take effect until May 1, 2020. If the community is due for its annual recertification May 1 each year, its new class will become effective and be due for recertification May 1, 2020. If the community’s annual recertification date was February 1, the community would not be asked to recertify in 2020.
Additionally, a community will not be asked to recertify if it is currently undergoing a cycle verification or has one scheduled for later in the same year.

**Flood-related Emergency Exercises for 2020**

Many communities are postponing or have cancelled their annual flood-related emergency exercises due to public health concerns and stay-at-home orders. Although this is understandable when emergency personnel are focused on community health, the CRS reminds everyone that hurricanes, tropical storms, dam and levee failures, and floods will continue to occur. Many emergency management programs are or have already updated their flood response Emergency Operating Procedures (EOPs) to successfully accommodate the unique aspects of this year’s focus on public health. These updates will need to be tested by either real-world events later this year or in a scheduled exercise.

Communities that receive credit under Activity 610 (Flood Warning and Response) are required to either prepare an evaluation of how their warning and response plan operated during an actual flood over the past year or, if no flooding occurred, they must conduct an exercise compliant with the National Incident Management System (NIMS) to simulate a flooding and prepare an evaluation afterwards. These evaluations must identify who participated, assess the performance of the procedures, recognize the lessons learned, and list any recommended changes. The purpose of the annual requirement is flood preparedness or readiness.

Remember, to meet the CRS requirement for an annual test, the time period is not a calendar year, but the year between annual recertifications. An exercise conducted in 2019 since the time of a community’s last recertification meets the requirement, as does an after-action report from a flood since the last recertification.

An annual evaluation is due with the next verification, whether it’s a cycle or recertification. The CRS encourages all communities to talk with the emergency management staff to find out how an exercise can be done before the next recertification or cycle visit, if it is sooner. Also, knowing how the community can respond to a flood during a period of heightened concern and focus on public health may be even more important. The timing of these exercises may have to be delayed because of the current crisis, but the community and residents will benefit from conducting them as soon as possible.

If you have questions about meeting the annual recertification requirement for Activity 610 (Flood Warning and Response) credit, please contact your CRS Resource Specialist.
Q Does the recent response to public health concerns qualify as the activation of a flood warning and response plan under Activity 610 (Flood Warning and Response)? Can it be used to replace our recently postponed flood-related exercise to satisfy our yearly requirement to conduct an evaluation of our warning and response plan?

A CRS communities are required to conduct “at least one exercise and evaluation of the flood warning and response plan each year. . . . This exercise can be for a flood, levee failure, dam failure, or hurricane” (page 610-7 of the CRS Coordinator’s Manual).

The goal of the annual exercise is to evaluate the community’s flood response. This provides an opportunity to better document new information available about warning, communication, critical facilities, and/or flood damage reduction. During activation of a state or county EOC, the personnel are implementing various tasks specific to the event. Presently, state and local EOCs nationwide are engaged in a public health response. Although it is true that many of the “players” are the same, the plans being implemented and the mission-essential tasks are not the same as those for a flood.

For example, flood response often includes closing roads, evacuating people, opening and staffing shelters, and involving additional departments such as public works, which clears debris in ditches to make room for higher water levels before the event occurs. So the answer is that the current public health responses do NOT qualify as the activation of Activity 610 (Flood Warning and Response).

Welcome, New CRS Task Force Chair

In January 2020, Jim Meyer was appointed by the Federal Insurance and Mitigation Administration (FIMA) to be the CRS Task Force Chair. Jim recently retired from Auto-Owners Insurance. He was responsible for Auto-Owners Write-Your-Own (WYO) flood program since its implementation in 1974. Auto-Owners was one of the first five companies to issue policies under the then-new WYO concept. Through the years, Jim has become well versed in mapping and zone determination issues. Auto-Owners was one of the first companies to automatically provide zone determinations on all quotes to ensure policies were being correctly quoted.

Jim was a long-term member of the Insurance Institute for Business & Home Safety (IBHS) Executive Flood Committee and served as its Chair and Co-chair, was active in a number of insurance associations and coalitions, and worked on several FEMA special projects, the latest being the NFIP Policy Rewrite Committee.

Jim believes the CRS is an excellent program and he looks forward to helping “the CRS program move to the next level.” FIMA and the CRS Task Force appreciate the range of insurance and NFIP experience that Jim brings with him, and look forward to working with him.
Resources to Promote Flood Insurance

In keeping with FEMA’s goal of doubling flood insurance nationwide by the year 2022, the CRS is encouraging participating communities to strengthen their outreach efforts in helping residents understand how flood insurance can help protect them from economic losses and recover more quickly. Below are excellent resources to earn credit under CRS Activity 330 (Outreach Projects) and Activity 370 (Flood Insurance Promotion). Learn more and find additional resources here.

Your community can draw upon these resources to supplement its public information activities or start new ones—and perhaps earn CRS credit as well.

- The FloodSmart website and its Agents page have an array of materials targeted toward consumers and insurance specialists.
- NFIP Claims Handbook (FEMA F-687) guides policyholders in filing claims for flood damage.
- Photos and other graphics lend appeal to your marketing materials. The Regional NFIP Marketing & Outreach Toolkit has a selection to choose from, and don’t forget the free materials available from FEMA’s media library.
- Sample press releases, op-eds, sample letters, sound bites, and public service announcements can be found in FEMA’s Moonshot Outreach Starter Kit.

#ASFPM2020 is Going Virtual

The Association of State Floodplain Managers was slated to host its Annual National Conference this June in Fort Worth, Texas. But due to public health safety concerns, the organization decided to offer the conference virtually. Here are a couple of panel presentations of interest to CRS communities and others.

**Wednesday, June 10, 1:30–3:30 p.m. Central time**

The CRS—A National Perspective, Moderator: Michelle Gonzales, CFM, Jefferson Parish, Louisiana

- “A CRS Program Update: 2021 Addendum to the CRS Coordinator’s Manual,” Molly O’Toole, CFM, Molly O’Toole and Associates
- “FEMA, USFWS, NMFS Partner on CRS Credit for Protecting Threatened and Endangered Species,” French Wetmore, CFM, French & Associates
- “Maximizing CRS Points for your Hazard Mitigation Plan,” Maggie Talley, CFM, Jefferson Parish, Louisiana

**Thursday, June 11, 3:30–5 p.m. Central time**

The CRS—Local Perspectives, Moderator: David Stroud, CFM, Wood.

- “The Magic CRS Activity Tracking Tool,” Lisa Foster, CFM, Pinellas County, Florida
- “CRS Activity 420: Designs for a Successful Open Space Program,” Chris Mason, CFM, Collier County, Florida
- “CRS Recommendations from Coastal Stakeholders and Viability of Regional CRS Support Positions in Virginia” Mary-Carson Stiff, CFM, Wetlands Watch.

NFIP/CRS Update - 11 - April/May 2020
Ottawa, Illinois, Reduces Flood Losses with CRS

“The City of Ottawa truly has benefited from the Community Rating System,” said Mike Sutfin, Building and Zoning Official and Floodplain Manager for the city. Of the potential flood losses in the community, he estimates that 40% are prevented because of Ottawa’s participation in the CRS. “The things in the CRS really do work,” he said.

The 12-square-mile community lies in north-central Illinois at the confluence of the Illinois and Fox Rivers, and has a population of around 18,500. The confluence of the two rivers within a large (12,000 square-mile) watershed results in periodic flooding that can last for weeks or even months.

In 2007 the city experienced a 100-year flood that overwhelmed the stormwater system and inundated a major subdivision. The resultant public outcry over the causes of the flooding and how it could have been prevented built a resolve not to let it happen again. The community met with the Illinois NFIP Coordinator, reviewing the Flood Damage Prevention Ordinance requirements the city had previously adopted. The discussion concluded with the suggestion that Ottawa consider joining the CRS.

The very next year, the flood of record occurred, spurring the city to take the next steps quickly.

“Everything we did in flood-loss reduction from that point on was tied to floodplain management and the CRS, and also led to the formation of our city flood commission,” said Sutfin.

In the early 2000s Ottawa had undertaken a large buyout program in which 80 repetitive loss and other buildings and accompanying infrastructure were removed from the floodplain, especially from a low-lying area known as “The Flats.” Using FEMA Hazard Mitigation Grant Program (HMGP) funds, buildings were cleared, and the area has been converted to the Fox River Park, a large recreation-based open space with playgrounds, picnic areas, and a boat launch.

The removal of so many flood-prone buildings was eligible for a good deal of CRS credit, and helped the city enter the CRS as a Class 5 community in 2010, earning a reduction in flood insurance premiums of up to 25% for policyholders. For the next two years Ottawa focused on more CRS activities.

For additional CRS credit, in 2013 the city produced its Flood Threat and Recognition Plan. Ten days later, there was another record flood, 1.5 feet higher than the one in 2008. But the warning system—including automated calling and tracking of houses in need of door-to-door notification—saved lives and minimized property damage. “That plan and the things we put in place for CRS credit saved us,” Sutfin said.
During that event, a local school received severe flood damage. A vigorous debate ensued over whether the school should be repaired in place or rebuilt out of the floodplain. Eventually Ottawa was able to secure a grant from the Federal Emergency Management Agency which, along with other funding, allowed a new school to be constructed out of the floodplain. “Being a CRS Class 5 community gave us higher creditability with FEMA and state officials that administer the grants, and this helped secure the funding. You gain that competitive edge from a higher CRS classification,” Sutfin said.

Since Ottawa joined the CRS, Sutfin has been tireless at keeping the City Council informed about ways to minimize flood risk and the Council, in turn, has supported numerous floodplain management measures that have enhanced safety, property protection, insurance coverage, and preparedness. In recognition of his efforts, Sutfin received the CRS Award for Excellence in 2013.

“If you’re not a CRS community,” he tells people, “you should join for your citizens … to protect them and their property.”

Over the past few years, area flooding has increasingly been approached on a more effective, regional scale, with the formation of the Illinois River Coalition. This grew in part out of the flood-loss reduction success achieved by the city of Ottawa and the broader vision of floodplain management that the CRS brought. Now Ottawa and neighboring communities realize that flood mitigation is a river basin issue as well as a local one. Sutfin said, “Another benefit of this approach is that because it’s regional in scale, it garnishes greater political support. We’ve had so many successes due to the CRS, we just hope the word spreads.”

Keep Your Contact Information Current

If there are any staff changes (i.e., a new CRS Coordinator) or contact information updates in your community, please let your ISO/CRS Specialist know so we can update our files. If we cannot get in touch with the right person at cycle or recertification time, it creates unnecessary delays and difficulty with maintaining your classification.
Remember Your Recertification Schedule

The table (below) is another reminder of when your annual recertification is due. Each quarter, communities are notified 45 days ahead of the deadline and given the recertification packet to sign and return. If you do not receive a recertification packet, you can assume you were not required to recertify that year. This happens when you recently went through your cycle verification, are currently going through your cycle verification, or have a cycle verification scheduled for later in the year. Please pay attention to the emails you receive about this.

Direct any questions to the CRS Resource Specialist that contacts you for your recertification or Elevation Certificate review. We now have three CRS Resource Specialists responsible for processing annual recertifications and reviewing Elevation Certificates. They will be happy to help you.

<table>
<thead>
<tr>
<th>CRS Annual Recertification Schedule</th>
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<tr>
<td>CC-213 Recertification and Required Documentation Due to ISO By:</td>
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<tr>
<td>1st Quarter</td>
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<td>February 1</td>
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<td>Alaska</td>
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<td>Connecticut</td>
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<td>Florida: Miami-Dade County</td>
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<td>Florida: Monroe County</td>
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<td>South Dakota</td>
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<td>Vermont</td>
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<td>Wisconsin</td>
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Annual Recertification Information Distributed to Community By:

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<th>December 15</th>
<th>March 15</th>
<th>June 15</th>
<th>September 1</th>
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Online Resources

Check the CRS Resources website regularly to see what’s been added. All documents referred to in the Coordinator’s Manual are posted here as soon as they are available. If you cannot find information or a document, please notify your ISO/CRS Specialist or NFIPCRS@iso.com. Here are some helpful posts on the website.

- **CRS Credit for Stormwater Management** is a full guide, including examples, to help communities tailor their stormwater management and watershed management programs in ways that reduce flood losses, protect natural processes, and earn CRS credit. This 2020 edition provides background on the creditable management techniques, discusses the legal aspects of such management, and describes various ways to document the creditable activities.

- **Webinar Schedule**—A schedule for the remainder of 2019 is posted under the Training & Videos page of the CRS Resources website. This link has registration information. Also, see the webinar schedule below.

- The most recent issue of the NFIP/CRS Update newsletter, in case you missed it, along with all other past issues, can be found under the 100s page of the CRS Resources website.

- **Success with CRS** is a website with articles about the many ways communities have found their own types of success through the CRS.

Training Opportunities

**CRS Webinars**

The CRS offers one-hour webinars to help communities understand and meet their CRS requirements. Many will be recorded, so they can be accessed later. Registration is free but required, as space is limited. Some courses provide continuing education credits for certified floodplain managers (CFMs). See all of the CRS webinar trainings available on the CRS Resources website. All webinars begin at 1 p.m. Eastern/10 a.m. Pacific.

- **Introduction to the CRS**—June 16, 2020
- **CRS and Coastal Hazards**—June 17, 2020
- **Preparing an Annual Recertification**—July 21, 2020
- **Changes to Activity 310 Elevation Certificates**—July 22, 2020
- **The Role of the CRS Community Coordinator**—August 18, 2020
- **Activity 450 Watershed Management**—August 19, 2020
- **Preparing an Annual Recertification**—September 15, 2020
- **Changes to Activity 310 Elevation Certificates**—September 16, 2020
- **Changes in the CRS: The 2021 Addendum to the CRS Manual**—October 13, 2020
- **CRS & Substantial Damage Properties Management Plans**—October 14, 2020
- **Changes in the CRS: The 2021 Addendum to the CRS Manual**—November 17, 2020
- **Activity 370 (Flood Insurance Promotion)**—November 18, 2020
- **Changes in the CRS: The 2021 Addendum to the CRS Manual**—December 15, 2020
- **CRS & Substantial Damage Properties Management Plans**—December 16, 2020
If you’d like to have a webinar on the FEMA Elevation Certificate, or a particular CRS activity, contact your ISO/CRS Specialist. For more on the CRS webinars, go to the Training tab of the CRS Resources website. If you have questions about or suggestions for the CRS Webinar Series, contact Becca.Croft@atkinsglobal.com.

Workshops and Training related to the CRS

— The Community Rating System (E0278) (field-deployed course is E0278)

    July 27–30, 2020 (CANCELLED)
    October 5–10, 2020

This is the all-purpose training course for the CRS. It is taught at EMI (see below) and at sites throughout the country at the request of interested communities, groups, or states, pending available funding.

   - Attendees of E0278 CRS courses based on previous Coordinator’s Manuals may want to repeat this course. Therefore, restrictions on repeat attendance have been waived.
   - For continuing education credit (CECs) for certified floodplain managers (CFMs), the Association of State Floodplain Managers (ASFPM) will award CECs earned at the E0278 CRS course.
   - No more than two persons per community may attend at one time.

Prerequisite: To enroll in the CRS course, you must be a CFM, have completed the NFIP course (E0273), or be a full-time floodplain manager with more than two years of floodplain management experience.

— Managing Floodplain Development through the NFIP (E0273)

    August 10–13, 2020; August 31–September 23, 2020;
    November 30–December 3, 2020

E0273 is also field deployed periodically. Contact your State NFIP Coordinator for more information.

— Unified Hazard Mitigation Assistance—
    Developing Quality Application Elements (E0212) April 19–22, 2021

— Unified Hazard Mitigation Assistance—
    Application Review and Evaluation (E0213) September 27–28, 2021

— Unified Hazard Mitigation Assistance
    Project Implementation & Program Closeout (E0214) September 29–30, 2021

— Advanced Floodplain Management Concepts I (E0194) November 2–5, 2020


— Advanced Floodplain Management Concepts III (E0284) August 2–5, 2021

— Retrofitting Floodprone
    Residential Buildings (E0279) August 17–20, 2020; June 14–17, 2021

— Fundamentals of Building Science (E0312) September 14–17, 2020

— Residential Coastal Construction (E0386) October 26–29, 2020
CRS communities can receive CRS credit points after their staff members complete certain training sessions. Under Section 432.o, regulations administration (RA) of the Coordinator’s Manual, five points are provided for each member of a community’s floodplain permit staff who graduates from courses E0194, E0273, E0278, E0282, E0284, or E0386 (up to 25 points). Graduating from E0279 is worth up to five points under Activity 360 (Flood Protection Assistance).

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About the Emergency Management Institute

*Note that on-campus training at EMI has been suspended until August 1, 2020.*

FEMA’s EMI in Emmitsburg, Maryland, offers training on topics related to floodplain management, mitigation, and construction, including the basic CRS course (E0278). These are oriented to local building, zoning, planning, and engineering officials. Tuition is free for state and local government officials, travel stipends are available, and on-campus lodging is free. Free transportation is provided from the airport to the campus and back to the airport. The only out-of-pocket expense is a meal ticket—all-you-can-eat breakfast, lunch and dinner. Go to the welcome page of the [welcome page of the EMI website](https://www.emi.noaa.gov/) for details. The application to attend can be found [on this page on the EMI website](https://www.emi.noaa.gov/), or call EMI at (800) 238-3358 or (301) 447-1035. Signed applications should be submitted through the state’s Emergency Management Training Officer.

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Bring the CRS to Your Home Town

The CRS conducts the field-deployed CRS course (L0278, the same as EMI’s E0278) throughout the year, depending on funding availability. A state, CRS Users Group or organization that would like to host a course or discuss CRS training opportunities should contact its FEMA Regional CRS Coordinator (see the [CRS Resources website](https://www.emi.noaa.gov/)).

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**Statement of Purpose**

The *NFIP/CRS Update* is a publication of the National Flood Insurance Program’s Community Rating System. It provides local officials and others interested in the CRS with news they can use.

The *NFIP/CRS Update* is produced in alternate months by the Insurance Services Office, Inc. (ISO), which is the Lead Service Provider to the Federal Emergency Management Agency for the CRS. The newsletter is distributed electronically, at no cost, to local and state officials, consultants, and other interested persons. Communities are encouraged to copy and/or circulate the *NFIP/CRS Update* and to reprint its articles in their own local, state, or regional newsletters. No special permission is needed.

To become a subscriber or to suggest a topic that you would like addressed, contact NFIPCRS@iso.com. You can also sign up for the newsletter at the [CRS Resources website](https://www.emi.noaa.gov/).