



NFIP/CRS UPDATE

December 2021/January 2022

Recertification Tips for Activities 320 and 360

Public Information Activities 320 (Map Information Service) and 360 (Flood Protection Assistance) both credit services offered to the public by communities. The documentation and publicity requirements for both these activities are very similar, and it can be a challenge to differentiate between the two different activities. Below is some background on these two public information activities and how to streamline efforts to maximize credits. Both activities have annual recertification documentation requirements, and communities often provide too much. Below are tips that can help.

Activity 320 (Map Information Service)

Purpose: To credit specific actions taken by communities that provide inquirers with information about the local flood hazard and flood-prone areas that need special attention/protection.

How it's accomplished: Community staff provide map information from Flood Insurance Rate Maps (FIRMs) and locally-produced maps on seven possible creditable elements such as basic FIRM information, other local flooding problems not shown on the FIRM, flood depth data, historical flood information, etc. (see the [2017 CRS Coordinator's Manual](#) for a full list of creditable elements) to inquirers either over the phone, in person, or from email/hotline requests.

Annual documentation requirements

Publicity: This service must be publicized annually to the community so citizens know it is available and who to contact. Publicity for this service must disclose all elements the community is providing information on (FIRMs, other local flooding areas, flood depth data, etc.) and tell them who to contact for assistance. The publicity must go to either:

1. All residents in the community (i.e., newsletter, utility bill insert);
2. All members of the three common users of this service physically located in the community:
 - a. Lenders (banks, credit unions);

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Please note that we did not publish an October/November 2021 "NFIP/CRS Update" newsletter.

- b. Insurance Agents; and
- c. Real Estate Agents;

3. The audience described as beneficial as part of a Program for Public Information (PPI) as credited in Activity 330.

Documentation of Service: The provision of this service must be documented annually. Examples of how to document the provision of service could include a log of the service, individual letters to inquirers, or print outs from a database that tracks inquiries/complaints/etc. The documentation must note:

1. The date of inquiry;
2. The address of location of the property in question;
3. The FIRM Zone; and
4. Whether the inquirer advised of the credited element. For example, if the community is using a log to record the service and is being credited for MI6 (historical flood information), the log should contain a column for “historical flooding information” and show when the information was offered.

If using a log, be sure a minimum of all four items under “Documentation of Service” are covered in the log and each element is clearly shown. The log should cover the entire year. The same applies to a print out from an inquiry/complaint database. If using individual letters or “determination” forms, be sure all elements are shown on the template. Only three of these need to be submitted with the recertification each year.

Activity 360 (Flood Protection Assistance)

Purpose: To credit specific action taken by communities that provide one-on-one help to inquirers who are interested in protecting their property from flooding.

How it’s accomplished: Community staff provide assistance to inquirers about flooding and/or drainage concerns on their property either over the phone, in person, or from email/hotline requests. Community staff do not need to actually protect the property, just inform residents what the cause of the problem is and the various solutions that could be employed for flood protection. Community staff can also receive credit for providing advice on the various financial assistance measures available to the property owner.

Annual documentation requirements:

Publicity: This service must be publicized annually to the community so citizens know it is available and who to contact. Publicity for this service must disclose all elements the community is providing information on (property protection from a discussion, property protection from a visit to the property in question, or financial assistance advice), and tell them who to contact for assistance. The publicity must go to either:

1. All residents in the community (i.e., newsletter, utility bill insert);
2. All floodplain residents (usually a direct mailing); or
3. The audience described as beneficial as part of a PPI as credited in Activity 330.

Documentation of Service: The provision of this service must be documented annually. Examples of how to document include a log of the service, individual letters to inquirers, memos to the file, or print outs from a database that tracks inquiries/complaints/etc. The documentation must note:

1. The date of assistance given;
2. The type of assistance given;
3. The details of the findings; and

4. recommendations given to the inquirer

If using a log, be sure a minimum of all four items under “Documentation of Service” are covered in the log and each is clearly shown. The log should cover the entire year. This also applies a print out from an inquiry/complaint database. If using only three of these, they need to be submitted with the recertification each year.

Main Points for both Activities

1. Please check the publicity requirements (audiences) for both activities. Publicity for both these activities can be sent to all residents. However, if that is not a viable option for a community, then the alternative publicity options must be used. Please understand the differences and conduct the outreach appropriately.

2. A community can use the same log or same letter template to serve the documentation requirement for both activities; however, both activities’ required elements must be clearly identified on the document so that both can easily be verified. ≡≡≡

How the Frequency of Cycle Visits are Determined

The frequency of cycle visits for some communities changed when the [2017 CRS Coordinator’s Manual](#) became effective. As Community Rating System (CRS) communities know, a community participating in the CRS keeps its classification for three or five years after its effective date. Section 230 of the “Coordinator’s Manual” says, “Cycle verifications are conducted every five years after the original application date for most CRS communities. Communities with larger total premium discounts and/or better classes may be visited on a three-year cycle.”

In late 2016, it was announced that with the “Coordinator’s Manual,” communities receiving the top 10% of premium discount dollars, along with communities with a Class 1-4 rating, will be verified every three years. All other communities will be verified every five years. This change was phased in over the first five years after the new “Coordinator’s Manual.” Up until the 2017 edition of the “Coordinator’s Manual,” communities with a Class 9-6 rating received cycle visits every five years and Class 1-5 every three years.

This change came about as a result of the Federal Emergency Management Agency’s (FEMA) and the CRS Task Force’s work on the 2008 CRS Strategic Plan. In 2010, the CRS Task Force began considering whether the total dollar discount provided to a CRS community should be a consideration in determining the frequency of CRS credit verification. Subsequent research at East Carolina University that explored CRS verification methods recommended putting more verification emphasis on communities with larger dollar discounts. After further consideration, FEMA made the decision to implement the recommendations of the Task Force that the top 10% of CRS participating communities be verified on a three-year cycle basis. The top CRS discount community receives more than \$14 million in CRS discounts. If communities have questions when its next cycle visit will be, they should contact their ISO/CRS Specialist. ≡≡≡

Correcting Expired Elevation Certificates

After checking all of your Elevation Certificates, your review results indicate you didn’t meet the 90% correctness threshold and it’s because of an “error 1064.” The surveyor used an expired form. Which is the correct form to use? FEMA released the current Elevation Certificate form (FEMA form 086-0-33 (12/19)) on

February 20, 2020. Pursuant to a Write Your Own (WYO) Bulletin W-16040 dated June 16, 2016, no further transition periods will be provided when a new FEMA Elevation Certificate is approved. Anything signed by a surveyor on or after February 20, 2020, needs to be on the current Elevation Certificate that now expires November 30, 2022. You can find that expiration date in the upper right-hand corner of the Elevation Certificate. If the surveyor used an expired form, local floodplain management officials can correct this mistake without having to receive a new Elevation Certificate from the surveyor. Here's how:

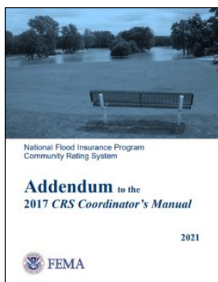
Floodproofing Certificates

Floodproofing Certificates have expiration dates on them as well. However, there is no Section or "Memo of Correction" specifically allowing corrections by the local floodplain management official. If an outdated Floodproofing form is received from an engineer or surveyor, you will have to require the certifier to submit the information on the current form.

1. Print out a copy of the current Elevation Certificate form (or use a fillable PDF if you choose), copy over only Sections A, B, and C from the original Elevation Certificate onto the new certificate.
2. Go to Section G and check Item G1 stating where it reads, "The information was taken from other documentation that has been signed and sealed by a licensed surveyor, engineer, or architect."
3. Be sure to enter, at minimum, your name and title, then sign and date Section G.
4. Include a brief comment in the Section G "Comments" box that the surveyor used an expired form and you are using the current form to correct it.
5. Attach the outdated Elevation Certificate to the new form and resubmit to ISO. Also, keep a copy for your records.
6. Share the forms with the property owner for their records as well.
7. Remind the surveyor to use the current form each time, or be sure to catch this when Finished Construction Elevation Certificates are submitted for your approval.

Some certificates are also submitted with form dates (lower left-corner of the form) and expiration dates that do not correspond to the correct forms. For instance, the correct current form has a form date of "(12/19)" and an expiration date of "November 30, 2022." Sometimes these dates on an outdated form are altered to make it look like it's the current form. Know that altering an Elevation Certificate like this will not only result in an error on your review, but altering a federal form is illegal. ≡≡≡

The 2021 "Addendum to the 2017 CRS Coordinator's Manual"



The [2021 Addendum to the 2017 CRS Coordinator's Manual](#) is now available and being used in conjunction with the current "Coordinator's Manual." It serves as a bridge between the 2017 guidance materials and the more comprehensive update that is anticipated when FEMA fully implements its National Flood Insurance Program (NFIP) transformation. Page A-4 of the "Addendum" explains, "How to Use the 2021 Addendum."

The "Addendum" includes two new prerequisite requirements, several new CRS credit opportunities, and some updates and modifications aimed at simplifying credit and reporting requirements. A collection of [frequently asked questions about the Addendum](#) is also available.

Webinars in the [CRS Webinar Series](#) and recordings of CRS webinars will continue to focus on the "Addendum."

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Success with CRS

A snapshot of the numerous floodplain management and CRS activities being carried out in Peoria County, Illinois. For more details, see the [county's website](#). For more stories, see the [Success with CRS](#) website.

Being in the CRS makes County's Program Even Broader

"We were doing a lot of floodplain management work before joining the Community Rating System," says Andrew Braun, Planner for unincorporated Peoria County, Illinois. "Now we are adding a step or two to many of those things to get maximum benefit from the CRS."

The county's 630 square miles are situated in north-central Illinois and are subject to flooding mostly from the Illinois River and Kickapoo Creek. It joined the CRS in 1993 and is now a Class 5, realizing a 25% discount on premiums for its 338 National Flood Insurance Program policy holders—a total of around \$70,000 annually.

Awareness and Outreach

"Without a doubt, the biggest benefit of joining the CRS has been the attention it has brought to floodplain management in our county," said Braun. "Residents, elected officials, county workers, bankers, insurance agents, and others are now more aware of the flood hazard, and they realize that the more effective our program is, the safer our citizens will be. And also, homeowners with NFIP policies will realize a huge reduction in their premiums."

To earn CRS outreach credit, the county started a flood information page on its website that is constantly being updated. All of the elevation certificates are on that site and can be accessed by the public. A mapping website identifies properties that have elevation certificates. "Potential property buyers, citizens, agents, lenders, and others now have access to all this information as well and it was the CRS that provided the incentive," Braun explains.

To further reach out to the citizens, the county uses annual mailings and participates in expositions and trade shows. "We teach floodplain management classes at the local community college and at county workshops," Braun said. The county's flood hazard maps, mitigation plan, and publications from FEMA all are available locally and online. "We have a much better-informed public because of our outreach efforts and they grew out of the CRS," said Braun.

Recordkeeping and Staying up to Date

"I'd say the second-biggest benefit of being in the CRS is that it forced us to keep better records," Braun said. Although the county implemented a range of activities before joining the CRS, "it helped us organize our system and keep track of what we are doing. That alone made a big difference," he said. The county also benefits from having five of its Planning & Zoning Office staff as Certified Floodplain Managers, also credited under the CRS.

Enforcing the most current buildings codes helps communities ensure that their standards are the best possible. "Needing to maintain our CRS credit has forced us to continually update our building codes and to keep our rating through the Building Code Effectiveness Grading Schedule (BCEGS)," said Braun. That help improve the safety of buildings throughout the county.

Reducing Vulnerability to Flood Damage

Since 1988, the county has acquired more than 125 floodplain properties, and in 2015 received two Hazard Mitigation Grant Program grants for a total of \$3 million. Those funds are targeted to remove another 40 flood-

prone structures from the floodplain. “Being a Class 5 in the CRS brought us credibility that helped us secure these grants,” said Braun.

Striving for higher CRS credit points under Activity 510 (Floodplain Management Planning) pushed the county to develop a county-wide mitigation plan. “We have a plan we can be proud of, while being a state and regional leader in mitigation planning. Without the CRS, the motivation just was not there,” Braun said

It is always hard to quantify what flood losses have been avoided. In June 2015, Peoria County saw its eighth-worst flood in over a century. Braun said, “We should have had tremendous damage. But because of the higher regulatory standards, mitigation activities, and education—all inspired by the CRS—the damage was much less than it would have been.”

CRS Users Group

The CRS Users Groups have been very helpful to Peoria County, according to Braun. The county is a part of the Illinois’ Users Group. “But,” Braun explains, “it is centered in Chicago and has most of its focus on urban flooding issues.” So, the county led the way in starting a “downstate” CRS Users Group that focuses on rural, riverine conditions. “We deal more with natural features instead of a concrete environment, and it’s easier for other downstate communities to get to meetings outside of Chicago,” he says. The Chicago group meets three or four times a year and the downstate group meets another one or two times during the year. “It’s all about helping each other and helping communities feel that they do not have to go it alone,” he said.

In conclusion, Braun sums it up: “The Community Rating System puts us in an excellent position to succeed at implementing sound and effective floodplain management in our community. It is the blueprint that we follow.” ≡≡≡

Updates on CRS Training

The CRS Webinar Series is continuing throughout 2022. Please visit the [Training & Videos](#) page of the CRS Resources website for updates to the schedule. The 4-day, field-deployed CRS courses and 2-day CRS courses are being rescheduled, as needed. See Training Opportunities on page 8. ≡≡≡

Resources to Promote Flood Insurance

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. There are free materials available from [FEMA’s media library](#). ≡≡≡



Keep Your Contact Information Current

If there are any staff changes (such as 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 ISO/CRS Resource Specialist who contacts you for your recertification or Elevation Certificate review. We now have four ISO/CRS Resource Specialists responsible for processing annual recertifications and reviewing Elevation Certificates. They will be happy to help you. ≡≡≡

CRS Annual Recertification Schedule			
CC-213 Recertification and Required Documentation Due to ISO By:			
1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
February 1	May 1	August 1	October 15
Alaska Connecticut Florida: Miami-Dade County Florida: Monroe County Illinois Indiana Iowa Kansas Maine Michigan Minnesota Mississippi New Hampshire New York North Dakota Ohio Pennsylvania Rhode Island South Dakota Vermont Wisconsin	Colorado Delaware Florida: All Others Kentucky Massachusetts Missouri Nebraska Puerto Rico West Virginia	Arkansas California Idaho Louisiana Montana North Carolina South Carolina Utah Virginia Wyoming	Alabama Arizona Georgia Hawaii Maryland Nevada New Jersey New Mexico Oklahoma Oregon Tennessee Texas Washington
Annual Recertification Information Distributed to Community By:			
December 15	March 15	June 15	September 1

Online Resources

If you cannot find information about the CRS or a document you need, please notify your ISO/CRS Specialist or NFIPCRS@iso.com. Below are helpful guidance documents and general information that can be found on the CRS Resources website.



[Making Corrections to the Repetitive Loss List](#) is a one-page CRS handout that describes the new procedure communities submit to FEMA corrections to the repetitive loss list, using the Repetitive Loss Update Worksheet, also known as the AW-501.

[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—This is posted on the [Training & Videos page](#) of the CRS Resources website.

The most recent issue of the “NFIP/CRS Update” newsletter, in case you missed it, along with all other past issues, [can be found here](#).

[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

CRS offers 1-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](#). All webinars begin at 1 p.m. Eastern/10 a.m. Pacific.

- February 15..... Preparing a Verification Visit
- February 16.....CRS & Substantial Damage Properties Management Plans
- March 15..... Introduction to the CRS
- March 16..... CRS & Higher Regulatory Standards
- April 19Preparing an Annual Recertification
- April 20CRS & Floodplain Species Assessment

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 L0278)
February 28-March 3, 2022; August 22-25, 2022

This is the all-purpose training course for the CRS. It is taught at FEMA’s Emergency Management Institute (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 *CRS 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)**
April 4-7, 2022

E0273 is also field deployed periodically. Contact your [State NFIP Coordinator](#) for more information.

- **Unified Hazard Mitigation Assistance—Developing Quality Application Elements (E0212)**
April 11–14, 2022
- **Unified Hazard Mitigation Assistance—Application Review and Evaluation (E0213)**
July 18-19, 2022
- **Unified Hazard Mitigation Assistance Project Implementation & Program Closeout (E0214)** July 20-21, 2022
- **Advanced Floodplain Management Concepts I (E0194)**
None at this time
- **Advanced Floodplain Management Concepts III (E0284)**
None at this time
- **Retrofitting Flood-prone Residential Building (E0279)**
May 9-12, 2022
- **Fundamentals of Building Science (E0312)**
July 11-14, 2022
- **Residential Coastal Construction (E0386)**
April 25-28, 2022

CRS communities can receive CRS credit points after their staff members complete certain training sessions. Under Section 432.o, regulations administration (element 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). ≡≡≡

About the Emergency Management Institute

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 [EMI Welcome Package page](#) for details. The Welcome Package also includes on-campus health and safety requirements. The application to attend can be found [on this page on the EMI website](#), or call EMI at (800) 238-3358 or (301) 447-1035. Signed applications should be submitted through the state's Emergency Management Training Officer. ≡≡≡

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](#)). ≡≡≡

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](#).