

Community Rating System Newsletter



FEMA Seeking Public Comments on CRS Redesign

The Federal Emergency Management Agency (FEMA) published a Request for Information (RFI) notice in the [Federal Register](#) July 11, 2024 seeking public comment and offering public meetings on the future of the Community Rating System (CRS). The RFI includes a list of questions about the Community Rating System (CRS). Answers to the questions will assist FEMA as it considers ways to modify, streamline, and create innovative measures to improve the CRS. Public meetings will be held Aug. 21, 22 and 27, 2024, and the public comment period will be open through Sep. 9, 2024. Included below is an overview of the CRS Redesign effort and opportunities for public comment on the CRS program. Note that FEMA is seeking comments from all National Flood Insurance Program (NFIP) communities and other stakeholders (regardless of current CRS program participation).

The CRS is a voluntary incentive program that recognizes and encourages community floodplain management practices to exceed the minimum requirements of the NFIP. Continuously learning about flood, flood-risk management, and flood-risk reduction techniques, FEMA now has more information about and understanding of multi-frequency analysis, pluvial flooding, climate change, and the extent of flood risk outside of the Special Flood Hazard Area (SFHA) since the CRS program was implemented in 1990.

This new understanding has led FEMA to take a holistic look at the CRS program to determine how it can best meet FEMA and NFIP consumer needs. This effort is called “CRS Redesign.”

FEMA is seeking input on suggested alternative program features and approaches for a redesigned CRS based on public input from an August 2021 RFI (Docket ID “FEMA-2021-0021”) and recommendations from a July 2023 Government Accountability Office report (GAO-23-105977).

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CRS Redesign is a multi-year effort intended to take a comprehensive look at the CRS program, exploring incremental improvements and bold shifts in approach. FEMA is exploring the future of CRS with a focus on: (1) incentivizing communities to take measurable actions, and make sustained progress that reduces current and future flood risk; (2) embedding equity as a foundation of the CRS program; (3) incentivizing communities to promote property owners to purchase flood insurance to reduce their financial exposure to flood risk; and, (4) delivering a community participant-centered and modernized program.

The purpose of the CRS Redesign initiative is to enhance the program’s effectiveness, promote resilience, and mitigate the financial impacts of flooding on communities.

FEMA published a notice in the [Federal Register](#) July 11 seeking public comment on the CRS program. One way interested members of the public can provide feedback on the program is by [submitting a response to this notice](#). Comments can be submitted for Docket ID: FEMA-2024-0022 through the Federal eRulemaking Portal. Follow the instructions for submitting comments, which will be open from **July 11, 2024 through Sep. 9, 2024**. Stakeholders can contact the [Regulations.gov Help Desk](#) if they have technical issues.

FEMA will also hold three public meetings to gather verbal public feedback on the CRS program. The objectives of these public meetings are to:

- Provide information about this program, review and improvement effort, and explore questions included in the corresponding RFI.
- Provide information about how to access the Federal Register Notice RFI and submit written comments; and
- Provide an opportunity for interested members of the public to provide verbal feedback.

Anyone may register for these public meetings and all three meetings will cover the same content. Participants must register in advance and will be confirmed on a first-come, first-served basis. Participation is limited to 500 attendees per meeting.

The first meeting will begin at **2 p.m. ET on Wednesday, Aug. 21, 2024**. [Register here for meeting #1](#).

The second meeting will begin at **3 p.m. ET on Thursday, Aug. 22, 2024**. [Register here for meeting #2](#).

The third meeting will begin at **3 p.m. ET on Tuesday, Aug. 27, 2024**. [Register here for meeting #3](#)

To sign up for a meeting, use the provided registration links and complete the registration information. On the registration page, indicate if you have an interest in providing a verbal comment for the record during a meeting and if you would like to request an assistive accommodation.

Participants will be emailed a unique URL link to join the meeting once their registration is confirmed. Participant links are unique to each participant and should not be shared with others.

The public meetings will be delivered in English, with live translation into American Sign Language and Spanish. To request a reasonable or assistive accommodation to participate in these sessions, email FEMA-CRS-Redesign@fema.dhs.gov. Last minute requests will be accepted, but may not be possible to fill.

The type of feedback most useful to FEMA explains, with as much detail as possible, why an aspect of the CRS program should be modified, streamlined, expanded, or repealed, and provide specific suggestions of ways the agency can better achieve its objectives.

The agency is also looking for national-level data that document the costs, burdens, and benefits of potentially new requirements to the extent they are available.



Feedback could also address how FEMA can best obtain and consider accurate, objective information and data about the costs, burdens, and benefits of a redesigned CRS program, and whether there are existing sources of data that FEMA can use to evaluate the effects of the CRS program over time.

Participants could also identify specific administrative burdens, CRS program requirements, information collection burdens, waiting time, or unnecessary complexity that may impose unjustified barriers in general, or that may have adverse effects on equity for all, including those in underserved communities.

For the latest information, check out the [FEMA.gov/community-rating-system](https://www.fema.gov/community-rating-system) and [FEMA.gov/events](https://www.fema.gov/events) pages. Additionally, stakeholders can also reach out to FEMA-CRS-Redesign@fema.dhs.gov with questions

Q&A

Q: The Elevation Certificate form states that Section G is "Recommended," but I understand for CRS communities it's "Required." Which is it? Also, I've noticed that sometimes we can't edit Section G once a surveyor digitally signs it. What can a local official do in these situations?

A: The EC Form says Section G is “recommended”. It is “recommended” for every general user of the form. However, if you are in the CRS program, FEMA has set rules on which fields on the form are required for CRS communities, and this Section is REQUIRED. As the local official, you are required to fill out fields G8, G11, and then your name, title, signature and date on every EC on the new form (FEMA Form FF-206-FY-22-152). You may fill out other fields in Section G at your discretion. And remember, once you fill out any field in Section G, your name, title, signature, and date are required as well.

The most current EC form on FEMA’s website allows a surveyor to lock just Sections C and D when they digitally sign the form. They can also choose to lock the entire form. So, depending on how the certifier signs the form, you may get a form that’s completely locked or sometimes you may be able to edit Section G. Some tips to help local officials with this situation:

1. Try to let all your surveyors or property owners (permit holders) know upfront not to lock all the sections of the form before they fill it out to avoid this problem before it happens.
2. However, surveyors may not agree with this, and might feel more comfortable locking the entire form for liability concerns. If they lock the entire form, we currently have two recourses for you:
 - a. Print out Section G, fill out G8, G11, name, title, signature and date. Scan it and attach it to the digital version of the EC. Be sure the “corrected Section G page” has the proper address of the building at the top and is attached after the original Section G page. This means that the EC will have two Section Gs.
 - b. Or fill out a [Correction Memo](#) providing the information for G8 and G11 in the comments section. Remember, Correction Memos must be signed and dated to be accepted. The Correction Memo will then be utilized by CRS in the review process.



We understand these are clunky and less than ideal solutions, especially if you receive a lot of ECs, but FEMA is currently looking into providing a form that allows the surveyor to lock all Sections except Section G to help alleviate this matter. We will let everyone know if this solution becomes available.

Is Your Community’s “After Action Report” Meeting CRS Requirements?

The U.S. is experiencing more severe, extreme-weather events, particularly thunderstorms and catastrophic flooding. Summer has gotten off to a very active start. In June, southeast Florida received more than 20 inches of rain; the Upper Midwest saw devastating river flooding from historic rainfall that washed away a bridge and houses. The force of the water threatened dams, causing one to partially collapse. In July, the U.S. saw its first hurricane of the 2024 season, Beryl, slam into Texas as a category one storm. Days after landfall, nearly 900,000 people were still without power in the Houston area. This is why Activity 610 [Flood Warning and Response], is critical for protecting communities.

Of the more than 300 CRS communities that receive Activity 610 credit, the average score is 255 points. That’s half a class of CRS credit! Floodplain Managers and CRS Coordinators who currently receive points for this activity should be asking themselves, “Is our 610 After Action Report (AAR) for a flood event or the planning exercise we conduct every year not only helping prepare and improve our procedures, but are these reports being filled out properly for CRS purposes?”

As noted in the “CRS Manual,” “The objective of this activity is to encourage communities to ensure timely identification of impending flood threats, disseminate warnings to appropriate floodplain occupants, and coordinate flood response activities to reduce the threat to life and property. Therefore, the emergency manager should be the point of contact.” Because this activity focuses on emergency management, the Emergency Management Director should be handling the annual progress reports for this activity.

An AAR is required not only during a cycle visit, but must be submitted for annual recertifications. The report must be related to a flood, levee failure, dam failure, nor’easter, or hurricane (any kind of flooding event). If there is no flooding event where your emergency management plan is activated, an annual exercise should be conducted. Communities should be proactive in holding an annual exercise just in case a weather event ever takes place.

Five Requirements for a Successful AAR Report:

1. The report must include a description of the exercise or flood event.
2. It must evaluate the threat recognition procedures, warning dissemination, and response operations.
3. Are there any recommendations to the plan? Review and detail what went right and what areas need improvement.
4. The report must have a date of the event/exercise and be a final copy, not a draft of a report. Be sure the report falls within your annual recertification reporting period.
5. There should be an appendix page or sign-in sheet of those who participated in the event/exercise. Communities that rely on a county or parish emergency management office for support, as well as this report, need to have someone from their municipality participate in the event/exercise and sign the login sheet to ensure they continue receiving credit for this activity.

PRO TIP: The Department of Homeland Security (DHS) has a great “Exercise and Evaluation Program” report template that meets all the CRS requirements for an AAR. ISO/Verisk encourages CRS Coordinators to share that



form with their Emergency Management Directors for consideration of use. Communities that receive credit for Activity 610/620/630 have this template included with their annual recertification packet. Please contact your Resource Specialist to request a copy of this AAR template.

Highlights from ASFPM Conference



The Association of State Floodplain Managers (ASFPM) held its 48th annual conference in Salt Lake City, and the CRS program had a significant presence at the event.

In addition to Verisk/ISO exhibiting a booth at the conference where anyone could talk with program staff, more in-depth one-on-one meetings were held to discuss program specifics for interested communities. CRS staff conducted more than 10 individual one-on-one meetings with numerous local officials.

Other highlights included various workshops. Shilpa Mulik, the CRS Redesign Program Manager with FEMA, led a workshop titled, “CRS Redesign Engagement with Floodplain Managers.” Participants were asked questions relating to the possible redesign of the program. The FEMA CRS Redesign team is actively soliciting feedback from as many stakeholders as possible in an attempt to understand the needs of communities, policyholders, local officials, and the program in general as it relates to FEMA’s program approaches. Stakeholders can submit comments on the [Federal Register from July 11 to Sep. 9](#).

Becca Croft with Atkins Realis, provided a workshop on Elevation Certificates (ECs). She discussed every section of the form and how every field should be filled out, how to determine the building diagrams, what the usual errors are when filling out an EC, and the proper ways to correct ECs. She also discussed the various CRS requirements for the form.

French Wetmore with French & Associates and Charlie Baker with FEMA presented a session titled, “CRS – Tracking What’s New on the National Front”. Wetmore and Baker discussed the CRS Redesign efforts, and provided information about the National Violation Tracker (NVT). They provided an explanation of the NVT, how it works, how to get access to it, and context as it relates to the policyholder and community officials.

Another session titled, “2+ Years Later – Understanding NFIP’s Pricing Approach (Risk Rating 2.0)” provided information on how various factors that go into the insurance rating for a property get calculated and applied. For CRS purposes, John Hintermister and Naomi Ondrich, both with FEMA Underwriting, also explained how the CRS discount gets applied to flood insurance policies. Bruce Bender with Bender Consulting Services also spoke about a new Direct To Consumer (D2C) tool that will allow anyone to enter the numerous building characteristics (rating



variables) into an online tool that will display a premium immediately. He also listed seven reasons why the CRS discount may not appear “correct” on the flood insurance declaration page of a policy.

Another session with a CRS focus was titled, “Planning for the Future: Mobilizing Data and Technology for Floodplain Management.” Various staff from Forerunner highlighted successful applications of data and tracking tools that helped multiple cities organize and understand floodplain management throughout their communities better, and also improved their CRS classifications and overall effectiveness for their residents.

A session titled, “CRS Success – Local Lessons Learned” was presented by representatives from Dewberry, WSP USA, and Jefferson Parish, Louisiana. Dewberry staff discussed how to tie a Program for Public Information (PPI) to a floodplain management plan and make both easier and more effective for CRS purposes. A WSP employee showed how smaller communities achieved Class 3 status and how they can leverage county and other data to their benefit. The Jefferson Parish representative showed everyone how they accomplished the mapping of their repetitive loss areas and made it work for CRS Activity 510 credit.

An early-bird session on the NFIP Pricing Approach was presented by Bender, Hintermister, and Tom Little from Floodproofing.com. They explained how insurance works, how mitigation discounts and the CRS discounts are applied, showed some examples of structures and their ratings under the new pricing approach versus the old pricing approach, and ultimately took various questions from the audience on insurance matters.



FEMA Elevation Certificate & Floodproofing Certificate News

On July 7, 2023, the new FEMA Elevation Certificate (EC) and Dry-Floodproofing Certificate for Non-Residential Structures (Floodproofing) forms became available. On Aug. 9, 2023, FEMA released the Write Your Own (WYO) Company [Bulletin w-23007](#), which extends the use of the previous EC and Floodproofing forms until Nov. 1, 2023.

For CRS communities and CRS annual requirements, this means that any EC or Non-Residential Floodproofing Certificate signed and certified on or after Nov. 1, 2023, must be on the latest FEMA form. It is an error for CRS purposes if a previous form is submitted with a date on or past Nov. 1, 2023.

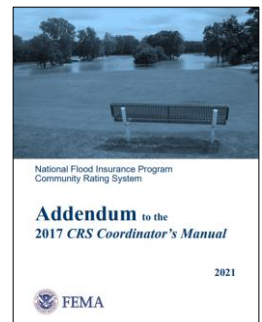
If you have any questions about the new forms, please contact the ISO Resource Specialist that handles your annual recertifications and construction certificate reviews, or your ISO/CRS Specialist who handles your cycle verifications.

The 2021 “Addendum to the 2017 CRS Coordinator’s Manual”

The [2021 “Addendum to the 2017 CRS Coordinator’s Manual”](#) is available and being used in conjunction with the current CRS [“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.

Also available is [“A Supplement to CRS Credit,”](#) which is a guide Community CRS Coordinators may refer when their program does not exactly match the scoring criteria in the “Coordinator’s Manual” and/or the “Addendum,” and partial credit is made available. Nothing in this document constitutes a change in the CRS or a change to any current scoring policies or procedures. Its goal is to help ensure that all possible CRS credit, including partial credit, is provided to communities



FEMA CRS Regional Coordinators

Each FEMA region designates a FEMA CRS Regional Coordinator to assist NFIP communities that participate in the CRS or are interested in joining the CRS. Below is the current list with contact information. For future reference, the [CRS website](#) maintains any updates to the list.

- Region I:** John Grace, (857) 205-2839, john.grace@fema.dhs.gov
- Region II:** Jonathan Smith, (202) 285-9235, jonathan.smith@fema.dhs.gov
- Region III:** Bobby Cobelli, (202) 674-9244, bobby.cobelli@fema.dhs.gov
- Region IV:** Roy McClure, (770) 220-8835, roy.mcClure@fema.dhs.gov
- Region V:** Eric W. Kuklewski, (312) 408-5230, eric.kuklewski@fema.dhs.gov
- Region VI:** Gilbert Giron, (940) 383-7253, gilbert.giron@fema.dhs.gov
- Region VII:** Todd Tucker, (816) 283-7515, todd.tucker@fema.dhs.gov
- Region VIII:** Marijo Brady, (303) 241-5278, marijo.brady@fema.dhs.gov
- Region IX:** Antoinette Stein, (202) 288-1697, antoinette.stein@fema.dhs.gov
- Region X:** Michelle Parke, (202) 717-0067, michelle.parke@fema.dhs.gov



Remember Your Recertification Schedule

A recertification is a yearly check-in to confirm that your community is performing the annual requirements pursuant to the current “Coordinator’s Manual” and “Addendum.” This normally includes annual outreach requirements, publicizing and tracking services, preparing progress reports for plans, and records showing proper maintenance of your drainage system. Recertifications take place every year except for the year of your cycle verification visit.

The table below lists 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 Construction Certificate review. We now have [four ISO/CRS Resource Specialists](#) responsible for processing annual recertifications and reviewing Construction 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
Feb. 1	May 1	Aug. 1	Oct. 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:			
Dec. 15	March 15	June 15	Sep. 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.

Webinar Schedule—This is posted on the [Training & Videos page](#) of the CRS Resources website. All classes begin at 1 p.m. Eastern/10 a.m. Pacific.

- Aug. 20 CRS and Natural Floodplain Functions
- Aug. 21 Watershed Master Planning
- Sep. 17 Annual CRS Requirements
- Sep. 18 Repetitive Loss Properties and the CRS
- Oct. 15 Introduction to the CRS
- Oct. 16 CRS and Higher Regulatory Standards
- Nov. 19 Preparing a Verification Visit
- Nov. 20 Developing a Flood Insurance Assessment

[Making Corrections to the Repetitive Loss List](#) is a one-page CRS handout that describes the new procedure by which 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.

Issues of the “NFIP/CRS Update” newsletter (and now the “Community Rating System Newsletter,” can be found [here](#). The new newsletter will be posted on FEMA.gov soon.

[Success with CRS](#) is a website with articles about the many ways communities have found their own types of success through the CRS.

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.

About the Emergency Management Institute

FEMA's Emergency Management Agency (EMI) in Emmitsburg, Maryland, offers training on topics related to floodplain management, mitigation, and construction, including the basic Community Rating System course (E0278). These courses 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, which includes an 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.

Workshops and Training related to the CRS

Community Rating System (E0278) (Field-deployed course is L0278)

This is the all-purpose training course for the Community Rating System. It is taught at FEMA's Emergency Management Institute (EMI) 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. No more than two persons per community may attend at one time. Two CRS courses are anticipated to be offered at EMI between Oct. 1, 2024 and Sep. 30, 2025, however the dates have not been determined. The FY25 course schedule for EMI will be available soon.

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.

Prerequisite: To enroll in the Community Rating System course, you must be a Certified Floodplain Manager, have completed the National Flood Insurance Program course (E0273), or be a full-time floodplain manager with more than two years of floodplain management experience.

Earn CRS credit points: 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 the following 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).

Managing Floodplain Development through the NFIP (E0273)

- Sep. 9-12, 2024; Dec. 9-12, 2024

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

Unified Hazard Mitigation Assistance—Developing Quality Application Elements (E0212)

- July 22-25, 2024, June 23-26, 2025

Unified Hazard Mitigation Assistance—Application Review and Evaluation (E0213)

- July 21-23, 2025

NFIP/Community Rating System (E0278)

- Jan. 13-16, 2025; July 28-31, 2025

Unified Hazard Mitigation Assistance Project Implementation & Program Closeout (E0214)

- Sep. 9-11, 2025

Fundamentals of Building Science (E0312)

- Aug. 5-8, 2024

There are no classes scheduled at this time for the following:

- Advanced Floodplain Management Concepts I (E0194)
- Retrofitting Flood-prone Residential Building (E0279)
- Residential Coastal Construction (E0386)
- Advanced Floodplain Management Concepts III (E0284)

Statement of Purpose

The “Community Rating System Newsletter” 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 “Community Rating System Newsletter” 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 “Community Rating System Newsletter” 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.

