



NFIP/CRS UPDATE

August/September 2021

Public Comment Period for Improving the CRS has been Extended

Due to the devastating effects of Hurricane Ida and other recent disasters, the Federal Emergency Management Agency (FEMA) is extending the open comment period for the Community Rating System (CRS) [Request for Information \(RFI\)](#) in the Federal Register to October 22, 2021.

FEMA is seeking public feedback on a set of exploratory questions to inform improvements to the CRS. There are questions regarding the current program's strengths and challenges, and questions relating to:

- future conditions and risks,
- incentivizing communities to be more resilient,
- leveraging data and technology,
- approaches to support increased participation
- collaboration and integration with other entities or programs, and
- barriers or equity issues that create challenges for communities.

In the past, FEMA has heard from stakeholders about how highly-valued the CRS program is, and that there are opportunities for continuous improvement. One reason FEMA is seeking input from the public now is to ensure the CRS program continues to meet the needs of all stakeholders, including those in underserved communities.

You can share your insights and perspectives by visiting the [Federal eRulemaking Portal](#), using Docket ID: FEMA-2021-0021. Please follow the instructions on the page and contact the [Regulations.gov Help Desk](#) if you have technical issues. For additional information on the RFI, [visit FEMA.gov](#).

FEMA hosted three public meetings in September to provide information on the CRS RFI and hear verbal comments from members of the public. More than

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400 people attended the virtual meetings. Thanks for your support with getting the word out about the meetings and the RFI. Please let those in your networks know about the extension. We look forward to receiving your comments. ≡≡≡

How to Recertify Successfully—The Basics: Part II

In the second part of our series “How to Recertify Successfully,” we will discuss the correct documentation and publicity items needed for your recertification, annual progress reports, how documentation should be organized and submitted, along with reminders on repetitive loss requirements and Class 9 pre-requisites.

At the annual recertification, Insurance Services Office (ISO) does not need to see documentation for every activity a community receives credit for. Enclosed in the recertification packet is a list of activity statements specialized for each community based off its cycle visit score sheets. How do you know what ISO needs for its review? Activity statements that are in bold and have the words “Attached” mean the CRS Coordinator needs to include documentation. See the example below for Activity 320 (Map Information Service).

___ 320 MI 1: We are providing basic flood information to inquirers.

___ 320 MI: **Attached is a copy of the publicity for the credited elements of this service this year.**

___ 320 MI: **Attached is a copy of one page of the log, a letter, or other record that we kept on this service this year.**

A community that provides basic information for Activity 320 (Map Information Service) must submit the publicity item that is mailed out to publicize this service, along with either a flood zone information letter, or one page of a log tracking these requests. ISO does not need several pages of a log or multiple letters. Remember, depending on the activity, the publicity requirements may vary on who needs to receive a mailer at least once a year. Please refer to the [2017 CRS Coordinator’s Manual](#) to learn more about the publicity options for each activity.

Annual progress reports are also required if a community receives credit for certain plans. ISO will include templates for Activity 330 (Outreach Projects) such as Program for Public Information (PPI); or Activity 510 (Floodplain Management Planning) like a Repetitive Loss Area Analysis (RLAA) or Hazard Mitigation Plan (HMP) progress reports. There is no required report format, however the community must provide the information requested. After Action Reports or a “Lessons Learned” document are required for Activity 610 (Flood Warning and Response), Activity 620 (Levees), and Activity 630 (Dams). ISO does not have a template for these reports since they are so community specific. For the 600 Series, make sure that you also include the publicity outreach. Failure to do so will result in a loss of those activity points.

If a community has one or more repetitive loss properties and has a Repetitive Loss Area (RLA), the annual outreach letters must be sent out ahead of the recertification deadline, and a copy of one of the letters must be submitted with your recertification. This is a Class 9 pre-requisite. The [2021 Addendum](#) that became effective January 1, 2021 has a new Class 9 pre-requisite. Construction Certificates are now reviewed annually and must meet the 90% correctness threshold for a community to remain in good standing with CRS. There are two chances for Construction Certificates to reach a passing score.

Digital submissions are the most effective and efficient way to submit a recertification. If the file is too large, a file-sharing site may be a good option. Please mark in the upper, right-hand corner on each file the specific

activity number it represents, or place it in a folder marked for that activity. It's helpful if Construction Certificates are individual files titled by its address and placed in a zipped folder with the Permit List. Once submitted, a Resource Specialist will send an email notifying the CRS Coordinator that the file has been received and will be in touch upon completion of the review.

The charts below indicate which activities require additional materials to be submitted with a recertification.



* Class 9 Prerequisite.

** Class 9 Prerequisite if a Category C Rep Loss community

300 Series Documentation Required:

- 310 (CCs & Permit List)*
- 320 (MI)
- 330 (only PPI report)
- 360 (PPA/PPV/FAA)
- 370 (CP)

400 Series Documentation Required:

- Copy of amended regulations if ordinances have changed as related to CRS credit for Activities 420, 430, 440 & 450.

500 Series Documentation Required:

- 502 (Rep Loss letter)*
- 510 (RLAA or HMP report)**
- 540 (CDR, SDR, SBM)

600 Series Documentation Required:

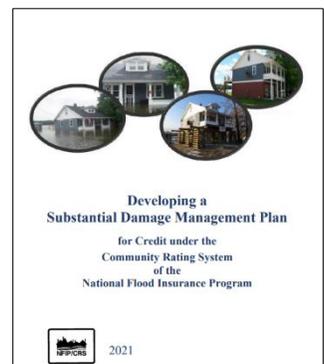
- 610 (FTR/EWD/FRO/CFP)
- 620 (LM)
- 630 (DFR)

New Resources Available for Substantial Damage Plan (SDP)

Doing substantial damage determinations (SDP), especially in the chaos after an event, is not an easy task. But the work must be done. Failure means residents will be flooded again and damage will occur again. Having a plan and following a strategy will make the job easier and recovery quicker. The perfect time to develop a plan for substantial damage is before a flood or other natural hazard event occurs.

Six new resource documents are now available to help communities with the SDP process. These resources include:

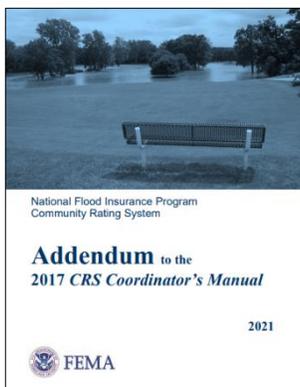
- [Preparing a Substantial Damage Management Plan](#)
- [Substantial Damage Management Plan Template](#)
- [Checklist for a Substantial Damage Management Plan](#)
- [Annual Evaluation Report Template](#)



- [Guidance for importing data into FEMA’s Substantial Damage Estimator Tool](#)
- [Substantial Damage Estimator \(SDE\) Tool Data Field Template](#)

In addition, 38 states have now developed post flood guidance documents. These state-specific resource documents are valuable tools to help develop local SDPs. Contact your [State NFIP Coordinator](#) for your state’s guidance. ≡≡≡

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 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.” ≡≡≡

Candidates Wanted for 2021 CRS Award for Excellence

Nominations Deadline Extended to December 15, 2021

Nominations are now being accepted for the 2021 CRS Award for Excellence. The deadline for receiving nomination forms has been extended to December 15, 2021.

A nominee could be an insurance agent, real estate professional, local official, floodplain manager, or other community leader—someone who has provided leadership in raising awareness about the dangers of flooding, implementing floodplain management programs, and promoting the purchase of flood insurance through the CRS and the NFIP. Other individuals may be nominated, but it must be clearly shown how they have affected the CRS or a CRS community.

All nomination forms should clearly describe how the nominee meets the criteria listed below. Clear and detailed information will enable the review panel to do a thorough evaluation of the nominee. The criteria for evaluating nominees are listed below:

- Active involvement in a CRS community and knowledge of the risk of local flooding
- Demonstrated promotion of using flood insurance as a key tool for helping individuals prepare for the contingency of flood damage to their properties
- Activities to encourage community leaders to continually improve the community’s safety and resilience to flooding and other disasters
- Noteworthy achievements in the area of alerting residents and businesses to potential flood dangers and promoting the purchase of flood insurance

Please read the [2021 award announcement letter](#), and download either a [PDF](#) or [Word version](#) of the 2021 nomination form.

Previous CRS Award for Excellence Recipients

2020	To be announced.		
2019	Shannon Hulst	Floodplain Specialist	Barnstable County, Massachusetts
2018	Sean Lanier	City Engineer	Ocala, Florida
2017	Lisa Foster	Floodplain Administrator	Pinellas County, Florida
2016	Ken Evans	Insurance Agent	Gloucester County, Virginia
2015	Joseph Gies	Floodplain Administrator	Shelby, Ohio
2014	Steven Dodd	Building and Zoning Official	Dorchester County, Maryland
2013	Mike Sutfin	Building and Zoning Official	Ottawa, Illinois
2012	Romin Khavari	City Engineer	Grand Prairie, Texas
2011	Beverly Collins	Building and Zoning Official	Grand Forks, North Dakota
2010	Bill White	Insurance Agent	Freeport, New York

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Obtaining Repetitive Loss Data for the CRS

FEMA’s protocols for repetitive loss data have changed. The ISO no longer distributes NFIP repetitive loss data to CRS communities. All community requests for repetitive loss data (repetitive loss lists) must be directed to FEMA. FEMA is currently redesigning how the agency shares NFIP data and how the data is securely returned to each requester. We recommend that requests for repetitive loss data be submitted to FEMA after November 1, 2021.

If your community has a verification cycle visit in 2021, please use the most recent repetitive loss data that has been provided. Section 501.b of the 2017 CRS “Coordinator’s Manual” states that “a community currently due for a CRS cycle visit will need a current repetitive loss property list.” However, for the time being, the most recent list will be considered to be the current list. For new communities applying for CRS entry, ISO/CRS Specialists will review most recent data or aggregate repetitive loss numbers with the community.

The CRS will continue to provide updated information on obtaining repetitive loss data in future editions of the NFIP/CRS Update for both the request process and expected timing. ≡≡≡

Success with CRS

A snapshot of the numerous floodplain management and CRS activities being carried out in Las Vegas, Nevada. For more details, see the [city's website](#). For more stories, see the [Success with CRS](#) website.

Stormwater Management: Where it all begins for Las Vegas



The population of Las Vegas, Nevada, is more than 630,000 people—and in the past it has almost doubled every 10 years. “Explosive growth is a fact of life that is critical to planning and protecting our community from flood hazards. It points to the challenge we face in keeping our flood hazard maps up to date and avoiding problems from drainage runoff,” said Peter Jackson, Senior Engineering Associate and CRS Coordinator for the city.

The city covers more than 150 square miles of desert basin surrounded by mountains with steep, dry slopes. The sole outlet is Las Vegas Wash, which flows through the metropolitan area and empties into Lake Mead. Heavy rainfall can cause flooding and flash flooding, not only on the wash, but also on its tributary washes and in the streets, highways, and underpasses.

Because of its fairly unusual geographic situation and fast growth, Las Vegas’ program for addressing its flood hazards is “based almost entirely on stormwater management and related regulations,” said Jackson. Through those techniques, it aims to:

- Regulate growth in the floodplain to reduce flooding impacts;
- Confine flood zones to channels and basins, and have no properties in the Special Flood Hazard Area;
- Use detention basins for flood storage, and include them as recreational open space whenever possible; and
- Facilitate stormwater drainage through regular drainage system maintenance.

Las Vegas had a vigorous stormwater management program before it joined the CRS. “Once we got into the CRS program, we realized that if we started documenting what we were already doing, and gave a little more attention to the stormwater activities that would get us more points, we could improve our rating,” said Jackson. “We could further reduce our flooding while also providing bigger premium discounts for our residents.” Las Vegas improved its rating to a Class 5. “This is a huge (25%) savings on National Flood Insurance Program (NFIP) premiums for these homeowners,” he said.

Not surprisingly, Las Vegas earns a lot of its CRS credit from this complex and extensive stormwater management effort and related maintenance of the drainage system. “We spend from \$3 to \$6 million every year on maintenance alone,” said Jackson.

When the valley suffered major flash floods in the mid-1980s, the Clark County Regional Flood Control District was created to coordinate flood mitigation on a regional scale. The District has taxing authority and has spent more than \$1.8 billion on infrastructure development for stormwater control and maintenance of these structures. It works in cooperation with the City of Las Vegas and other cities and towns in the area, guided by a region-wide master drainage plan based on fully-developed watersheds.

Strong Regulations and Open Spaces

There are 694 parcels of land still in the Special Flood Hazard Area, with 367 parcels having structures on them. “That’s down from several thousand some years ago,” said Jackson. As a condition of development, the city

requires a technical drainage study of every parcel in the SFHA, as well as for development larger than two acres. The city also has freeboard requirements and a stronger substantial damage threshold. Las Vegas' network of 17 detention basins, 500 miles of storm drainage infrastructure, and application of higher regulatory standards has combined to reduce the flood risk, and that is reflected by the smaller number of properties that are shown in flood zones when the areas are re-mapped.

Those higher regulatory standards also earn CRS credit for the city.

"As much as possible, we try to keep our washes and basins open to store flood water, and to provide recreational places in dry times," said Jackson. The city's CRS credit for open space preservation is a product of this strategy.

Raising Public Awareness

Las Vegas continues to receive CRS credit through the Clark County Flood Control District's aggressive outreach programs, which in one recent year included:

- Visiting 52 schools with flood program information;
- Developing a television program that illustrated some of the city's CRS-credited activities;
- Putting up an extensive billboard campaign; and
- Holding a contest to design a mock vanity license plate that would send a flood safety message, to be used on billboards.

The public outreach program from the Clark County Flood Control District provides valley-wide coverage that benefits all communities within Clark County. "It is truly a cooperative effort," said Jackson. The District's Public Outreach Program focuses on educating the public about the dangers of flash flooding, informing the community about the progress of flood control in Clark County, and the quality of water that drains to Lake Mead.

A Blueprint

Jackson said, "The CRS helped us a lot in developing a written procedure to account for everything that we do. And it also gives us a better handle on what we need to do. The CRS showed us how to put it all together in a comprehensive way, so that everyone benefits." ≡≡≡

Updates on CRS Training

The CRS Webinar Series is continuing throughout 2021. 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 9. ≡≡≡

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. 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 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](#) on the CRS Resources website. All webinars begin at 1 p.m. Eastern/10 a.m. Pacific.

- October 12..... Introduction to the CRS
- October 13..... Floodplain Management Planning (Activity 510)
- November 16.....CRS & Substantial Damage Properties Management Plans
- November 17..... Watershed Master Planning

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)**

November 29-December 2, 2021;

January 10-13, 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 CRS “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

Note that on-campus training at EMI has been suspended, and enrolled students will be notified in advance concerning the status of their on-campus course offering.

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 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](#).