

200 PROCEDURES

This series covers the procedures for applying for a Community Rating System (CRS) classification and the steps for calculating and verifying a community's CRS credit. It also covers annual recertification, modifications to the community's CRS credit, and cycle verification.

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210 REQUESTING CRS CREDIT

Summary of Section 210

211 Credit Prerequisites.

- a. **Application Prerequisites:** To become a Class 9 or better community, a community must have been in the Regular Phase of the National Flood Insurance Program (NFIP) for at least one year; and the FEMA Regional Office must confirm in writing that the community is in full compliance with the minimum requirements of the NFIP.
- b. **Class 7 Prerequisite:** To become a Class 7 or better community, a community must have received a classification of 6 or better under the Building Code Effectiveness Grading Schedule.
- c. **Class 4 Prerequisites:** To become a Class 4 or better community, a community must have received a classification of 5 or better under the Building Code Effectiveness Grading Schedule, demonstrate that it has enough CRS points to warrant the class, and demonstrate that it has taken appropriate steps to eliminate or minimize future flood losses by adopting and enforcing a freeboard requirement and by receiving a certain number of points for designated activities.
- d. **Class 1 Prerequisites:** To become a Class 1 community, a community must demonstrate that it has enough points to warrant the class; meets all the Class 4 prerequisites; has had a successful Community Assistance Visit conducted by FEMA within the previous 12 months; and demonstrate that it has (1) a “no adverse impact” approach to floodplain management; (2) a commitment to mitigate its repetitive loss problems as well as problems caused by other natural hazards; and (3) a program to address the threat to life safety and the financial impacts posed by flooding.

212 Application Documents. Application documentation is explained in the separately published *CRS Application*.

213 Application Procedures. FEMA will provide instructions on which *CRS Application* worksheet pages go to FEMA, the State NFIP Coordinator, and the ISO/CRS Specialist. The CRS classification takes effect on May 1 or October 1, whichever date follows completion of the processing of the community’s application.

214 Recertification. Each year, the community’s Chief Executive Officer must recertify that the community is continuing to implement the activities for which credit has been provided.

215 Modifications. A community may modify its application by applying for credit for new activities, dropping one or more activities, or submitting revised versions of materials the community stated it would update. Modifications are submitted on activity worksheets and are processed in the same manner as CRS applications.

216 The Effect on Participating Communities of *CRS Coordinator’s Manual* Revisions. Changes in the *CRS Coordinator’s Manual* will not alter a community’s CRS classification. However, when a community submits a modification or cycle verification, it must use the *Coordinator’s Manual* in effect at that time.

210 REQUESTING CRS CREDIT

211 Credit Prerequisites

a. Application Prerequisites:

There are four prerequisites to becoming a Class 9 or better community:

1. The community must have been in the Regular Phase of the National Flood Insurance Program (NFIP) for at least one year;
2. The community must be in full compliance with the minimum requirements of the NFIP. If a Community Rating System (CRS) community is determined at any time not to be in full compliance, it will revert to a CRS Class 10;
3. If there are one or more repetitive loss properties in the community, the community must take certain actions as specified in Sections 501–503; and
4. The community must maintain all flood insurance policies that it has been required to carry on properties owned by the community.

1. A community must have been in the Regular Phase of the NFIP for at least one year before it applies to become a Class 9 or better CRS community.
2. The application must include a letter from the Regional Office of the Department of Homeland Security’s Federal Emergency Management Agency (FEMA) stating that the community is in full compliance with the NFIP. (The Regional Offices are listed in Appendix A.) The letter must have been written no earlier than six months before the application is submitted. The Regional Office or State NFIP Coordinator may need to visit the community if they have not been there recently. If so, the application cannot be submitted until the visit is conducted and FEMA confirms the community’s full compliance.
3. Sections 501–502 explain how a community reviews and comments on FEMA’s list of repetitive loss properties and how it determines its repetitive loss category. As noted in Section 503, category B and C communities must describe the cause(s) of the repetitive flooding, map their repetitive loss areas, prepare a list of the addresses for all improved properties in those areas, and send an outreach project to those properties each year. A category C community must also prepare a plan of how it will address its repetitive flood problem.
4. The community’s Chief Executive Officer signs the cover sheet for the community’s application to the CRS. That form includes a statement that the signer certifies that the community has all the flood insurance policies that it has been required to maintain. This is discussed further in Section 212.

b. Class 7 Prerequisite:

In addition to having sufficient points, in order to be a Class 7 or better, a community must have received a classification of 6/6 or better under the Building Code Effectiveness Grading Schedule (BCEGS). Both BCEGS classifications (residential/personal and commercial) must be a class 6 or better.

The Building Code Effectiveness Grading Schedule (BCEGS) measures a community's building code adoption and enforcement as they relate to natural hazards mitigation. More information on the program and its CRS credits is provided in Section 431.m

CRS Class 8, 9, and 10 communities must meet the BCEGS prerequisite before they can become a CRS Class 7 or better. CRS Class 7 or better communities must have the necessary BCEGS classification before they can improve their CRS classification. When they submit a modification or undergo a cycle verification, these communities must meet the BCEGS prerequisite in order to remain a CRS Class 7 or better.

BCEGS classifications have not been completed in every state in the country. CRS communities of Class 7 or better that do not have a BCEGS classification have a grace period that starts when the prerequisite must be met and ends at the next cycle (see Section 234). During the grace period, these communities cannot improve beyond their current CRS class. FEMA and ISO will make every possible effort to provide BCEGS ratings to every current and applicant CRS community that desires one to meet this prerequisite.

c. Class 4 Prerequisite:

In order to be a Class 4 or better, a community **MUST**:

- Have received a classification of 5/5 or better under the BCEGS,
 - Demonstrate that it has enough points to warrant the class, and
 - Demonstrate that it has taken appropriate steps to eliminate or minimize future flood losses. To do this, a Class 4 or better community must receive credit for the following CRS activities.
1. Activity 430 (Higher Regulatory Standards): The community must show that it enforces higher regulatory standards appropriate to manage new development.
 - (a) The community must adopt and enforce a freeboard requirement that receives at least 100 points for FRB in Section 431.a, and
 - (b) The community must receive at least 250 points under the other elements of Activity 430 (including Section 430LD). For this prerequisite, the points are calculated before factoring in the impact adjustment for all elements except low density zoning.

2. Activity 450 (Stormwater Management): The community must receive the following credits for its stormwater management plan(s) (SMP) under Section 451.b:
 - (a) 80 points for meeting all of the prerequisites listed in Section 451.a (i.e., full credit for Section 451.b.1(a)),
 - (b) 25 points for managing the runoff from all storms up to and including the 100-year event (i.e., full credit for Section 451.b.1(b)), and
 - (c) An impact adjustment value of $rSMP = 0.5$ or more under Section 452.c.2. As an alternative, the community may show that the stormwater management plan(s) covers watersheds that comprise at least 50% of its growth.
3. Activity 510 (Floodplain Management Planning): The community must have adopted and be implementing a floodplain management plan that receives at least 50% of the maximum credit under Activity 510, calculated after the impact adjustment. This 50% of the maximum credit must include at least 50% of the available points in each of the planning steps 2, 5, and 8.
4. The community may propose alternative approaches to eliminate or minimize future flood losses that are more appropriate for local conditions.

This prerequisite ensures that high-ranking CRS communities have programs that minimize flood losses and increases in future flooding. A community that cleared most of the buildings from its floodplain with disaster assistance funds after a flood could not be a Class 4 or better unless it had an effective regulatory program to prevent a recurrence of the problem.

Commentary on Section 211.c.1: A Class 4 or better community must receive at least 100 points for its freeboard requirement. See Section 431.a for details about ensuring that all utilities and ductwork are also protected to the freeboard level.

The community must also adopt and enforce any combination of other higher regulatory standards credited in Activity 430 in order to obtain the needed 250 points. Except for low density zoning, these points are calculated before the impact adjustment. The points for low density zoning are counted after the impact adjustment.

Example 211c-1. Someburg

- has a two-foot freeboard requirement (200 points),
- prohibits critical facilities in the 500-year floodplain (100 points),
- limits enclosures to less than 300 square feet (100 points),
- has a BCEGS classification of 4/4 (30 points), and
- has adopted all of the International Building Codes (60 points).

This arrangement produces the 100 points for freeboard and 290 points for the other elements.

Commentary on Sections 211.c.2 and 3: Communities must meet all the other credit criteria for these activities, too.

Because the credit for Stormwater Management and Floodplain Management Planning is calculated after the impact adjustment, plans that use the 25% default impact adjustment will not fulfill the prerequisite.

d. Class 1 Prerequisites:

1. In addition to having sufficient points, in order to be Class 1 a community **MUST**:
 - (a) Meet all the Class 4 prerequisites,
 - (b) Meet the minimum standards of the NFIP as determined by a Community Assistance Visit conducted by FEMA within the previous 12 months,
 - (c) Have all of its program verified through a full verification visit, and
 - (d) Demonstrate that it:
 - (1) Has a “no adverse impact” approach to floodplain management,
 - (2) Has a commitment to mitigate its repetitive loss problem as well as problems caused by other natural hazards, and
 - (3) Has a program to address the threat to life safety and the financial impact that flooding poses to the residents of the community.

A “no adverse impact” approach to floodplain management is one in which the action of one property owner or community does not adversely affect the flood risks for other properties or communities. “Adverse impact” is measured by increased flood stages, increased flood velocity, increased flows, or the increased potential for erosion and sedimentation. The “no adverse impact” concept is explained in more detail in papers published by the Association of State Floodplain Managers, which can be accessed at <http://www.floods.org>.

2. To demonstrate that it meets the three prerequisites under Section 211.d.1(d), above, a Class 1 community must meet the following:
 - (a) No adverse impact:
 - (1) All floodplains:
 - ((a)) All new and substantially improved critical facilities must be protected to the 500-year flood level. This is demonstrated by receiving credit for PCF under Section 431.e in Activity 430 (Higher Regulatory Standards) and by enforcing the regulations throughout the 500-year floodplain.

((b)) The community must be enforcing regulations that discourage development in the floodplain. This is demonstrated by receiving at least 50 points under LDC in Section 431LD.a.

((c)) The community must have mapped and be enforcing regulations appropriate for all flood-related hazards within its jurisdiction. This is demonstrated by receiving credit under Activities 410 and 430 for all special flood-related hazards that are identified in the community's hazard mitigation plan.

(2) Riverine floodplains:

((a)) Regulatory flood elevations must be provided for all Special Flood Hazard Areas (SFHAs) in the community. This is demonstrated by receiving at least 75 points for new studies (NS) for all approximate A Zones under Section 411.a.2, 3, or 4 in Activity 410 (Additional Flood Data).

((b)) The community's program must address potential increases in riverine flood elevations caused by new development. This is demonstrated by receiving the following credit:

((1)) Activity 450 (Stormwater Management): The impact adjustment value of rSMP = 0.75 or more. As an alternative, the community may show that the stormwater management plan(s) coverx watersheds that comprise at least 75% of the areas expected to develop in the future; AND

((2)) Either:

- All riverine floodplains must be mapped using future conditions hydrology and be credited under Section 411.c, OR
- All riverine floodplains must be covered by freeboard regulations sufficient to protect new construction from future increases in flood heights and credited under FRB in Section 431.a.

(3) Coastal floodplains: The community must receive credit for:

((a)) Regulating new development in coastal A Zones under CAZ in Section 431.p, and

((b)) Regulating new development in areas subject to erosion under CER in Section 431CE.a in *CRS Credit for Management of Coastal Erosion Hazards* (or demonstrate that it does not have a coastal erosion problem).

(b) Mitigation:

- (1) Section 501 (Repetitive Loss List): The community must demonstrate that at least 25% of the properties on its current FEMA repetitive loss list have been protected from repetitive flooding through acquisition, retrofitting, or structural flood control projects.

As noted in Section 211.d.2(b)(2), a community seeking to become a CRS Class 1 must prepare a plan that is approved as a multi-hazard mitigation plan. That plan should identify all natural hazards that affect the community. If the plan concludes that the community is subject to one of the special flood-related hazards listed in Section 401, then the community must have programs that receive some special hazards credit under Activities 410 and 430.

A community that has more than 25% of its at-risk buildings on the repetitive loss list cannot be a Class 1 community. Communities with higher percentages can reduce their repetitive loss exposure through acquisition, retrofitting, or structural flood control projects. The repetitive loss list is updated after such mitigation measures are in place.

- (2) Activity 510 (Floodplain Management Planning): The FEMA Regional Office must have approved the community's plan as meeting all of FEMA's current multi-hazard mitigation planning requirements outlined under 44 *CFR* 201.6.

A floodplain management plan is required in order for a community to be a Class 4 or better. Activity 510 (Floodplain Management Planning) includes the criteria for both a CRS-credited floodplain management plan and a multi-hazard mitigation plan that meets the Disaster Mitigation Act of 2002 planning requirements per 44 *CFR* 201.6. A community can either prepare a new plan that meets both programs' criteria or update its plan to include any missing items.

(c) Life safety and financial impact:

- (1) The community must cover the topics of flood warning and flood safety in EITHER:
 - ((a)) An outreach project that reaches all properties in the community that is credited under OPC in Section 331.a, OR

212 Application Documents

Application for CRS classification is voluntary. A complete application must include the appropriate worksheet pages from the *CRS Application* and the documents that must be submitted with them as noted in the Application Documentation section for each activity. No credit is given if the application is incomplete.

A complete application includes the following:

- A completed worksheet, “CRS Application Cover Page,” signed by the community’s Chief Executive Officer (CEO);
- The letter from the FEMA Regional Office stating that the community is in full compliance with the NFIP (see Section 211.a.2);
- An activity worksheet or appropriate page from the *CRS Application* for each activity for which credit is being requested; and
- The appropriate documentation for each activity.

A community that applies is required to submit all the application documents needed, including application for credit under Activity 310 (Elevation Certificates). Repetitive loss communities must also meet the requirements of Sections 501 (Repetitive Loss List), 503 (Repetitive Loss Area Outreach Project), and Activity 510 (Floodplain Management Planning), if applicable.

Worksheet pages are included in the *CRS Application*. They are used by the applicant to ensure that the application is complete and to calculate credit points. See Appendix E for information on obtaining the *CRS Application*. Appendix I includes the pages from the *CRS Application* that explain the application documents.

By signing the “CRS Application Cover Page,” the CEO is certifying that the activities are being implemented as described in the application. It also certifies that the community has all the flood insurance policies it has been required to have. The CRS is not concerned with past lapses in flood insurance coverage. What counts is that NFIP insurance is in effect at the time of CRS application and is kept in the future. The CRS Coordinator should make every effort to determine the community’s legal requirement to purchase flood insurance.

Over the last several years, Congress has taken steps to encourage public agencies and private property owners to purchase flood insurance instead of relying exclusively on disaster assistance for help after a flood. Disaster assistance for a public building (and some private nonprofit buildings) will be reduced by the amount of NFIP flood insurance coverage

(structural and contents) a community should be carrying on the building (regardless of whether the community is actually carrying a policy).

In effect, disaster assistance for a public agency now has a very large deductible equal to the flood insurance policy the agency should carry. The law expects public agencies to be appropriately insured as a condition of receiving federal disaster assistance.

There have also been recent cases in which communities were underinsured. Some communities have purchased only the required amount of coverage (e.g., coverage equal to the amount of a previous federal grant). The disaster assistance rule requires that a flood-damaged community fund all repairs up to the amount of flood insurance that it could have purchased.

Whether there was a requirement to purchase and maintain flood insurance as a condition of some previous federal grant or not, the community's risk manager or other appropriate official should ensure that all community-owned buildings exposed to flooding are insured for flood damage. Many agencies find out too late that their all-risk insurance policies do not cover flooding.

Communities that have much of the information in digital form should consider providing the documentation needed for an application or verification digitally. This can greatly reduce the paper files maintained by the community and the amount of paper documentation provided to the ISO/CRS Specialist for the community's verification.

There are two primary ways to provide digital documentation:

- Ordinances, codes, regulations, plans, and other documents may be available on the community's website. In this case, the only documentation required is the Universal Record Locator (URL) for the document and a note that states where within that document the specific language is located. For example, if a community has its floodplain management ordinance on its website and wants credit for freeboard for new buildings in the floodplain, it need only provide the URL for the ordinance and identify the section of the ordinance that has the freeboard requirement.
- In other cases, the community may have a document in digital form, but not on its website. In that case, the document can be provided on compact disk (CD) or via e-mail. Again, there must be a note that explains where the appropriate language is within the digital document. Documents not posted on a website must be in Microsoft Word or Excel, Adobe Acrobat, or a common graphic format (jpg, gif, etc.).

213 Application Procedures

a. Application Submittal: A community should contact its FEMA Regional Office to find out who gets what parts of the application. A complete application (appropriate worksheet pages and all needed documentation) is always sent to the community's ISO/CRS Specialist.

All or parts of the application are sent to the FEMA Regional Office, Attn: Director, Mitigation Division, and to the State NFIP Coordinator.

The FEMA Regional offices are listed in Appendix A, the ISO/CRS Specialists are in Appendix G, and a list of the State NFIP Coordinators appears in Appendix H.

A community's application will not be processed under the following circumstances:

- The community is not in full compliance with the NFIP,
- The application is incomplete, or
- The application does not have the 500 points needed to warrant a Class 9.

b. Application Review: CRS classifications take effect on May 1 and October 1 of each year. Although a community may apply for a CRS classification at any time, it should be aware of the time needed to process and review the application.

The ISO/CRS Specialist and FEMA Regional Office will need approximately one month to conduct the application review. Once the application review confirms that a community probably has the 500 points needed for a Class 9, the ISO/CRS Specialist schedules a verification visit. This visit must be held within six months of receipt of a complete application.

During the verification visit, the ISO/CRS Specialist will review the community's activities according to the scoring criteria in the *CRS Coordinator's Manual*. For example, a random sample of elevation certificates will be checked to see if they are complete and correct. A community's credit points could increase or decrease based on these reviews and the more accurate scoring formulae in the *Coordinator's Manual*. This verification process is explained in more detail in Section 230.

After the verification visit is done and all needed documentation has been received, FEMA and ISO need several months to review, double check, and confirm the ISO/CRS Specialist's verification report. Once FEMA confirms the community's classification, it must give the insurance companies a four-month advance notice, so they can advise their agents of the

rating change before policies are renewed. Therefore, a community's classification will take effect on the May 1 or October 1 about 8–12 months after the application is submitted.

214 Recertification

Each year, a community must recertify by October 1 that it is continuing to implement the activities for which it has earned credit. Recertification is done on the recertification worksheet, AW-214, which is prepared by ISO and sent to the community each August.

The recertification worksheet, AW-214, lists community data and the activities and elements the community is implementing for CRS credit. It may be several pages long, depending on the number of credited activities. The ISO/CRS Specialist will provide instructions on which pages and documents go to the FEMA Regional Office and the State NFIP Coordinator. A complete set is sent to the ISO/CRS Specialist.

As noted in their credit documentation sections, some activities have additional requirements that must be submitted with the annual recertification. These are noted on the AW-214 that is sent to the community. The recertification may also include documentation requested by the ISO/CRS Specialist to verify continued implementation.

Any community that has received a Class 9 or better classification will revert to Class 10 on the following May 1 unless it submits the signed recertification worksheet by October 1 of each year. If the recertification does not include all the needed documentation, the community may lose enough points to cause a retrograde in its CRS classification.

An example of the first page of the recertification worksheet, AW-214, for the City of Riverview is shown in Figure 210-1. In addition to the signed worksheet, the community will need to include one or more attachments as noted on its worksheet.

A COMMUNITY THAT FAILS TO RECERTIFY WILL REVERT TO A CLASS 10. FAILURE TO SUBMIT THE LISTED ITEMS WILL RESULT IN LOSS OF CREDIT FOR THOSE ACTIVITIES. A REPETITIVE LOSS COMMUNITY THAT FAILS TO SUBMIT A COPY OF ITS ANNUAL OUTREACH PROJECT OR A CATEGORY C COMMUNITY THAT FAILS TO SUBMIT ITS ANNUAL PROGRESS REPORT AS REQUIRED BY ACTIVITY 510 (FLOODPLAIN MANAGEMENT PLANNING) WILL REVERT TO A CLASS 10.

COMMUNITY RATING SYSTEM ANNUAL RECERTIFICATION

Section 1. Community Data

If there are any changes or corrections to the information in this section, please line out the old item and write in the correction.

Community: RIVERVIEW, CITY OF State: ST NFIP Number: 030123

Recertification Date: 10/01/2002

Chief Executive Officer:

Name: Mr. Patrick Kelly Title: Mayor

Address: 402 S. Main Riverview, ST 98754

CRS Coordinator:

Name: Mr. Herman Brewer Title: Director, Community Development

Address: 402 S. Main Riverview, ST 98754

Coordinator's Phone: (101) 555-~~2945~~²⁴⁶⁷ Fax: (101) 555-2370

Coordinator's e-mail: hbrewer@riverview.st.us

Section 2. Certifications

I hereby certify that this community is continuing to implement the activities noted below as credited under the Community Rating System and described in our original application and subsequent modifications.

We are maintaining, to the best of my knowledge and belief, in force all flood insurance policies that have been required of us as a condition of federal financial assistance for insurable buildings owned by us and located in the Special Flood Hazard Area shown on our Flood Insurance Rate Map.

Signed: Patrick Kelly Date: 9/24/02
Mr. Patrick Kelly, Mayor

Figure 210-1a. Page one of Riverview's recertification worksheet (AW-214-1).

COMMUNITY RATING SYSTEM ANNUAL RECERTIFICATION**Section 3. Community Activities**

Your community has been verified as receiving CRS credit for the following activities. If your community is still implementing these activities the CRS Coordinator needs to put his or her initials in the blank and attach the appropriate items. The numbers refer to the activity number, which is found in the *CRS Coordinator's Manual*.

- HB 310 We are maintaining Elevation Certificates on all new and substantially improved buildings in our Special Flood Hazard Area.
- HB 320 We are providing Flood Insurance Rate Map information and information on the flood insurance purchase requirement to inquirers.
- ___ 320 Attached is a copy of the document that told lenders, insurance agents, and real estate offices about this service this year. [HB] Initial here if the information is included in your annual outreach project to the community. Mark the attachment to Activity 330 to show where this service is publicized.]
- HB 320 Attached is a copy of one page of the log, a letter, or other record that we kept on this service this year.
- HB 330 Attached is a description of this year's annual outreach project to floodplain residents.
- HB 430 We continue to enforce the floodplain management provisions of our zoning, subdivision and building code ordinances. [_____] Initial here if you have amended your floodplain regulations. Attach a copy of the amendment.]
- HB 450 We continue to enforce the stormwater management provisions of our zoning, subdivision and building code ordinances for new developments in the watershed. [_____] Initial here if you have amended your stormwater management regulations. Attach a copy of the amendment.]
- HB 450 We continue to enforce the requirement that all new buildings must be elevated above the street or otherwise protected from drainage problems.
- HB 540 We continue to implement our drainage system maintenance program.
- HB 540 Attached is a copy of a typical inspection report and a copy of the record that shows that any needed maintenance was performed.
- HB 540 We continue to enforce our stream dumping regulations.

Figure 210-1b. Page two of Riverview's recertification worksheet (AW-214-2).

215 Modifications

- a. A community may modify its application by applying for credit for new elements or activities, dropping one or more elements or activities, or submitting revised versions of materials the community stated it would update annually. Modifications are submitted on activity worksheets, which are found in a separate publication, *CRS Activity Worksheets*, available from the CRS. The community must use the credit criteria of the *Coordinator's Manual* and the activity worksheets in effect at the time the application is submitted.

Modifications are submitted using either paper activity worksheets or a printout of activity worksheets using the CRS calculation software, "Computerized Calculations for the Community Rating System." Both can be ordered using the form in Appendix E. The *CRS Application* worksheet pages are used only for a community's first application, not for modifications.

- b. A community's CRS classification cannot change more than once a year. Therefore, modifications can only be processed after a class change has been made effective.
- c. If a community is modifying an activity previously applied for, its submittal must include both the new elements of the activity and those that were previously credited, if still being implemented. Activities not included in the modification are unchanged.
- d. If a community submits a modification, the ISO/CRS Specialist will automatically update the community's credit points for its BCEGS classification and its state dam safety program (Activity 630) to reflect the values currently in effect. If these new values affect the community's CRS classification (or the prerequisite for a CRS classification), the community will be reclassified accordingly.
- e. A community may modify to change its growth rate adjustment by submitting appropriate documentation. If this is done, the total points for all affected 400-series activities will reflect the new growth adjustment. If the community does not request a revised growth rate, modifications submitted for 400-series activities will reflect the growth rate previously used.
- f. Modifications are processed and verified in the same manner as CRS applications. The community must also have submitted a recertification by the previous October 1.
- g. If a community submits a modification that will result in a two-class increase, the community's entire program will be reverified as explained in Section 234.

- h. At any time of the year a community may submit materials to the ISO/CRS Specialist for review and comment on how they would affect its CRS classification. The ISO/CRS Specialist will provide feedback for information purposes only. Such materials will not be kept nor will they be credited to the community's application. The only way a community's credit points may be changed is by submitting a modification with enough points to result in a class change.
- i. If the community submits a modification that does not have sufficient credit points to result in a class change, the ISO/CRS Specialist will treat it as material for review under Section 215.h. The materials will be returned to the community with comments. The community's total points will not change. The materials should be submitted later with a modification that will give the community sufficient points for a class change.
- j. A community may revert to a Class 10 because it dropped or lost credit for one or more elements or activities. If such a community desires to regain a Class 9 or better classification, it must submit a complete new application according to the *Coordinator's Manual* currently in effect. It may not submit a modification just to correct the problem activities.

Communities are encouraged to submit materials at any time for the ISO/CRS Specialist to review. The courtesy review will help the community prepare its application or modification. However, such review will not affect the community's credit points nor will the ISO/CRS Specialist include the materials in the community's file. Modifications that do not apply for enough points for a class change will be treated as courtesy reviews.

Example 215-1. Someburg's CRS classification was verified as a Class 9 with 872 points. Someburg received credit under Activity 430 (Higher Regulatory Standards) for its freeboard requirement.

Later, Someburg sends its ISO/CRS Specialist a copy of a draft ordinance amendment that will add additional higher regulatory standards. The ISO/CRS Specialist provides comments as a courtesy review and sends the draft back to the community, advising that the amendments will be worth 90 more points under Activity 430. Someburg enacts the ordinance and submits it as a modification.

Someburg's activity worksheets and documentation must include both the new ordinance language and the freeboard language that was previously credited. The modification must also include additional credit points because $872 + 90$ more points does not result in a class change. If the modification does not result in the community's total points exceeding 1,000, then FEMA and the ISO/CRS Specialist will treat the submittal as another courtesy review.

216 The Effect on Participating Communities of Coordinator's Manual Revisions

From time to time, the *Coordinator's Manual* will be revised. These revisions are necessary to revise CRS credit based upon the experience of earlier applications and to clarify the program for future applicants. Revisions will be made with an eye toward minimizing any loss of credit for communities already participating in the CRS.

- a. A community will keep its credit points according to the *Coordinator's Manual* in effect when it applies for a CRS classification. Except as provided in Section 216.c, below, changes in the *Coordinator's Manual* will not alter the community's CRS classification.
- b. If a community submits a modification to its application, the modified activities must be applied for based on the *Coordinator's Manual* in effect at that time. The modification must be submitted on the current year's activity worksheets. The community's total points will be based on the credit points for the unmodified activities from the original application plus the credit points for the modified activities under the current *Coordinator's Manual*, and the current credit points for its state's dam safety program (Activity 630).
- c. All of a community's activities will be reverified and the credit points will be recalculated based on the *Coordinator's Manual* currently in effect under the following two circumstances:
 1. When the community submits a modification that will improve its last complete verified CRS classification by two or more classes.
 2. When the community is due for a complete cycle verification of its activities (see Section 234).

Section 234 explains the cycle verification process. A cycle verification includes a complete review and recalculation of all of a community's activities and credit points. The CRS Coordinator should carefully examine any changes made in the *Coordinator's Manual* from year to year to see if they have a negative effect on the community's CRS credit that would cause a loss of one or more CRS classes during cycle verification. Modifications are counted cumulatively. The provisions of Section 216.c.1 apply if there is one modification for a two-class improvement or if there are two one-class modifications since the community's last verification or cycle verification.

A community's credit points may also be affected by annexations or flood control projects that change the floodplain boundaries. These changes can affect the areas or buildings credited under several activities and the impact adjustment calculations. If a project or annexation is contemplated, the CRS Coordinator should contact the ISO/CRS Specialist to review the impact on the community's credit points.

Example 216.c-1. A flood control project results in a map revision that removes 100 buildings from the regulatory floodplain. Twelve of the buildings had been retrofitted and were credited under Activity 530 (Flood Protection). Those buildings are no longer eligible for retrofitting credit because Activity 530 only credits retrofitted buildings that are in the regulatory floodplain.

Example 216.c-2. A community annexes an area that includes a large amount of undeveloped floodplain. The result doubles the size of the community's regulatory floodplain. The community will lose credit points in Activity 420 (Open Space Preservation) because the amount of open space is now a smaller portion of the total regulatory floodplain.

220 CREDIT CALCULATION

Summary of Section 220

Calculating the Community Rating System (CRS) classification for a community is done in five steps as explained in Sections 221–225, below. Four terms are used throughout the *CRS Coordinator's Manual*:

- The CRS is divided into four SERIES of activities: “Public Information,” “Mapping and Regulation,” “Damage Reduction,” and “Flood Preparedness.”
- Within each series, there are three to six ACTIVITIES.
- Within each activity, there are one or more ELEMENTS.
- For each element, there are one or more VARIABLES. These variables often include the acronym for the element. The variables are needed for the formulae that are used to calculate the credit points for each element.

221 Step 1. Element Credit Points. Each activity has a section entitled “Credit Points.” Each element has a maximum number of credit points, which can be earned if the element is being implemented to certain standards throughout the community or throughout the floodplain.

222 Step 2. Impact Adjustment. The credit points earned in Step 1 need to be adjusted to reflect the impact of the community’s activity on floodplain development and on the community’s flood insurance premium base. Step 2’s impact adjustment serves to adjust credits so that the dollar impact of premium discounts is spread over the community’s entire premium base.

223 Step 3. Credit Calculation. The last step listed for each activity is to compute its credit by multiplying the element’s credit points by the impact adjustment. The scores for each element are totaled to compute the activity’s credit points.

224 Step 4. Community Growth Adjustment. The points for the five mapping and regulatory activities in the 400 series are adjusted to reflect the community’s growth rate.

225 Step 5. Community Classification. The points for all the activities are totaled to calculate the community’s CRS classification.

220 CREDIT CALCULATION

Calculating the Community Rating System (CRS) classification for a community is done in five steps as explained in Sections 221–225 below. A community may calculate its own credit points when it fills in the blanks in the worksheets, or it will be done by the ISO/CRS Specialist. If the community uses the data entry software (see Appendix E), all calculations will be done by the computer.

Four terms are used throughout the *CRS Coordinator's Manual*: series, activity, element, and variable. The intent of these divisions is to direct applicants to the credits they qualify for, and to divide the program logically into easily understood pieces.

a. Series

The CRS activities are divided into four series: Public Information, Mapping and Regulation, Damage Reduction, and Flood Preparedness. Their titles are self-explanatory, and the credits within them follow the main objective of the titles. There is no difference in credits among the series, except that Mapping and Regulation credits are increased in growing communities, where mapping and regulations will be most effective in reducing future flood damage.

b. Activities

Each series has from three to six activities. Each activity has a title, such as “Additional Flood Data” or “Flood Warning Program.” The titles are mostly self-explanatory, but they may include components that are not specifically named in the title. At the end of the credit calculation process, the credits for all activities are added together to get the community’s total score.

c. Elements

Within the activities, there are one or more elements. These are discrete pieces of a community’s floodplain management program, and each receives a certain number of credit points.

Example 220.c-1. The elements and their acronyms in Activity 310 (Elevation Certificates) are

- EC, credit for elevation certificates since CRS application;
- ECPO, credit for post-FIRM (Flood Insurance Rate Map) elevation certificates;
- ECPR, credit for pre-FIRM elevation certificates; and
- ECCF, credit for certificates in a computer format.

Some activities, such as 320 (Map Determinations), only have one element. A community need not apply for all elements in an activity in order to receive credit for the activity.

d. Variables

For each element, there are one or more variables. These variables often include the acronym for the element.

Example 220.d-1. The variables associated with post-FIRM elevation certificates are:

- ECPO, the 56 base points;
- bPO, the number of post-FIRM buildings in the community's Special Flood Hazard Area (SFHA);
- bECPO, the number of post-FIRM buildings with elevation certificates;
- rECPO, the impact adjustment ratio for the element; and
- cECPO, the credit for the element.

221 Step 1. Element Credit Points

The first step is to review each activity proposed by the community for adequacy and completeness. Under each activity in the *CRS Schedule* is a section entitled "Credit Points." Each element has a maximum number of credit points that can be earned if the element is being implemented to certain standards throughout the community or throughout the floodplain. A community will receive less than the maximum points if its program does not include all the elements listed in the Credit Points section.

Example 221-1. Under Activity 310 (Elevation Certificates), there are five elements listed in Section 311, Credit Points: 311.a, elevation certificates for building permits issued after the date of CRS application (EC); 311.b, post-FIRM elevation certificates (ECPO); 311.c, pre-FIRM elevation certificates (ECPR); and 311.d, maintaining elevation certificates in a computerized format (ECCF); 311.e, maintaining elevation certificate data on a website (ECWS).

A community may submit alternative approaches to the listed elements, and they will be reviewed by the Department of Homeland Security's Federal Emergency Management Agency (FEMA) in order to set credit points. Where the approach is difficult to apply to the existing formulae, the applicant should demonstrate its impact on flood damage reduction. Where a state or regional approach is different, it would be appropriate for the state or regional agency to conduct a study on behalf of its communities and have the approach scored in advance of local applications.

The CRS cannot prescribe credit criteria for every possible case in the country. In many instances, the *CRS Commentary* offers examples of how to apply the criteria to different situations. The community may also make reasonable interpretations that are in line with the intent of the *Schedule* as explained in this *Commentary*.

However, it is recommended that whenever a community has trouble fitting its program into the *Schedule's* credit criteria, it contact the FEMA Regional Office or the ISO/CRS Specialist. It may be that the *Schedule* is being misunderstood or misinterpreted and that things are simpler than they first appear.

Each element has letter variables that are used in formulae to calculate the credit points. These variables are listed alphabetically in Appendix B. The variables for basic scoring elements are capitalized, as in "ECPO," the variable that represents elevation certificates for post-FIRM buildings. Variables may be modified with prefixes or suffixes in lower-case letters, as in "cECPO," which is the credit for elevation certificates for post-FIRM buildings.

Example 221-2. As shown in Section 311, the various elements of a community program to maintain elevation certificates are given separate credits. Section 312 uses variables like bPR (number of pre-FIRM buildings in the SFHA) to determine the impact of the community's program on the entire community. In this case, bPR and bECPR are used to determine the number of pre-FIRM floodplain buildings that have elevation certificates.

222 Step 2. Impact Adjustment

A community that has preserved large areas as open space should receive more credit than one that is allowing most of its floodplain to be developed. Therefore, the credit points earned in Step 1 need to be adjusted to reflect the impact of the community's activity on floodplain development.

The credit points also need to be adjusted to reflect the activity's impact on the community's flood insurance premium base, which can include more policies than are actually in the area affected by the activity. For example, 100% of the buildings in the SFHA will benefit from the CRS' insurance premium credit even if only 50% of the SFHA is subject to higher regulatory standards or other activities. Therefore, this Step 2 adjustment also serves to adjust credits so that the dollar impact of any discounts expressed as a percentage of premium are spread over the community's entire premium base.

Most of the activities have a section entitled, “Impact Adjustment.” These sections describe one or more “r” variables. In the mapping and regulatory activities, the “r” prefix represents the ratio of the area affected to the total area of the floodplain. In the flood damage reduction and flood preparedness activities, they represent the ratio of the buildings protected to the total number of buildings in the floodplain.

Sections 301 through 303 discuss the determination of impact adjustment ratios using building counts (Activities 310, 330, 520, 530, 610, 620, and 630). Sections 401 through 403 discuss the determination of impact adjustment ratios using areas (Activities 410, 420, 430, 440, and 450).

The impact adjustment ratios (“r” variables) usually have a range of 0 to 1. Depending upon the nature of the element, the impact adjustment ratios are based either upon buildings or areas affected. For an element that affects the entire floodplain or all appropriate buildings, the impact adjustment ratio is 1.0.

Example 222-1. The impact adjustment ratios for Activity 310 are established in Section 312. The variable “rECPO” represents the ratio of post-FIRM buildings with elevation certificates to all post-FIRM buildings in the SFHA. If the community has 100 post-FIRM buildings (bPO = 100), and it has elevation certificates for 37 of those buildings (bECPO = 37), rECPO = 0.37, the community receives 37% of the credit for ECPO.

Example 222-2. If the community has elevation certificates for ALL post-FIRM buildings in its SFHA, rECPO = 1.0. In this case, the community does not have to calculate the impact adjustment ratio.

Some activities have no impact adjustment section because the type of activity is assumed to cover the entire floodplain or the entire community. For example, most of the public information programs benefit all residents in the community.

223 Step 3. Credit Calculation

The last step listed for each activity in Sections 300–600 is the credit computation. This is done by means of a formula that uses the prefix “c” to represent the credit points earned at the end of each step. For example, c310 is the credit earned for Activity 310.

In some cases, a “c” variable is calculated for an element. For example, cECPO is the calculated credit for post-FIRM elevation certificates.

Where calculations involve more than one element, the element numbers are represented by the suffix “i” or “n.” Summing up the results of several elements or activities is shown in the credit calculation formulae with the mathematical symbol sigma, “ Σ .”

Example 223-1. “AFDi” represents elements AFD1, AFD2, and AFD3.

$$\Sigma(\text{AFDi}) = \text{AFD1} + \text{AFD2} + \text{AFD3}.$$

No calculations should result in more than 2 decimal places. Numbers of 0.005 or higher are rounded up to the next 100th and numbers below 0.005 are rounded down. Final credit points for each activity are rounded to the nearest whole number.

Example 223-2. If calculation of a variable results in a value of 0.134, 0.13 is entered for that variable and used in subsequent calculations. A value of 0.135 is entered as 0.14.

224 Step 4. Community Growth Adjustment

The credit points for the five mapping and regulatory activities in the 400 series are adjusted to reflect the community’s growth rate. The faster a community grows, the more important it is to regulate development to prevent flood losses. The community growth adjustment multiplier is included in the final calculations of the community’s score in Section 720. The value to enter is determined in Section 710 (Community Growth Adjustment).

225 Step 5. Community Classification

At Step 5 the points for all the activities are totaled to calculate the community CRS classification. There are 10 classes with Class 1 providing the greatest premium credit. Class 10 communities have no premium credit. All communities that do not apply for CRS classification are Class 10 communities.

FEMA determines the points for each CRS class and the insurance premium credits each year. The current premium credits are listed in Appendix C.

A community can be designated as Class 1–9 only after the verification visit.

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230 VERIFICATION

Summary of Section 230

231 Application Review.

- a. A community's Community Rating System (CRS) application must include a letter from the FEMA Regional Office confirming whether the community is in full compliance with the requirements of the National Flood Insurance Program (NFIP).
- b. The ISO/CRS Specialist reviews the application and comments received from FEMA and the State NFIP Coordinator. If the community has enough credit points to become a Class 9, then a verification visit is scheduled.
- c. If the application is incomplete or does not have enough points to warrant a Class 9, the community has 30 days to submit additional materials.

232 Verification Visit.

- a. Visit scheduling: The ISO/CRS Specialist schedules a verification visit with the community within six months of confirming that the community has enough points to become a Class 9.
- b. Verification of documentation: All needed documentation will be reviewed during the verification visit.
- c. Verification of credit: Credit is not provided for activities and elements that are not being implemented above a certain threshold. In most cases, at least 50% of an element must be verified.
- d. Field verification of credit: Some elements are verified in the field.
- e. AW-230: The community's Chief Executive Officer (CEO) is asked to certify the community's verified program by signing Activity Worksheet AW-230.

233 Post-visit Actions.

- a. The ISO/CRS Specialist sends the community a draft verification report. After an internal review, FEMA will send the community the official notice of its verified CRS classification.
- b. If the community believes that something was missed or misinterpreted during the verification visit, it may request a reconsideration of its CRS classification.

234 Cycle Verification.

Each community's program is reviewed on a periodic cycle to confirm that its credited activities are still being implemented.

- a. Cycle verifications are conducted every five years after the original application date for Class 6–9 communities. Class 1–5 communities are done on a three-year cycle.
- b. The cycle verification is based on the version of the *CRS Coordinator's Manual* currently in effect.
- c. The cycle verification is conducted by the ISO/CRS Specialist during a visit to the community.
- d. The community's CEO will be asked to certify the community's program by signing the same cover page used to certify a community's application.
- e. The ISO/CRS Specialists' cycle verification report is processed in the same manner as a verification report, described in Section 233.

230 VERIFICATION

A community's application undergoes two verification reviews after it is submitted:

1. Application review: The community's application papers are reviewed by the ISO/CRS Specialist, the Department of Homeland Security's Federal Emergency Management Agency (FEMA), and, often, the state.
2. Verification visit: If the application is shown to have enough credit points to qualify for a Class 9 classification, then the ISO/CRS Specialist schedules a verification visit. The documentation required during the visit is reviewed and field verification is conducted for some activities. If the community has enough verified points, it is recommended for a CRS classification of Class 9 or better.

231 Application Review

- a. A community's application must include a letter from the FEMA Regional Office confirming that the community is in full compliance with the National Flood Insurance Program (NFIP). If the letter is not included or if the community is not in full compliance with the minimum requirements of the NFIP, the application is returned.
- b. Once it is confirmed that the community is in full compliance with the NFIP and meets the other prerequisites, the ISO/CRS Specialist examines the documentation for each element and the comments of the state and regional agencies that received the notice of application. If the application shows the community should have enough credit points to become a Class 9, then a verification visit is scheduled.
- c. If the community's application is incomplete or does not have enough credit points to warrant a Class 9, the ISO/CRS Specialist contacts the community CRS Coordinator by telephone and letter, describing the deficiencies and giving the community 30 days to provide what is needed. If the deficiencies are not corrected within 30 days, the community remains a Class 10 community until it submits an application with adequate documentation.

Most of the 18 CRS activities require some documentation with the application. If this documentation is missing or inadequate, the application credit is not given. The CRS Coordinator may be called upon to clarify certain aspects of the application or provide missing documentation.

For some activities, the application review is performed by a technical specialist other than the ISO/CRS Specialist. The CRS Coordinator may be contacted about missing or otherwise deficient documentation by one or more of these technical specialists.

If the community cannot meet the documentation requirements or if it cannot receive enough points to warrant a Class 9, further processing of the application by the ISO/CRS Specialist is suspended, and the community remains a Class 10. The number of points needed for each class is listed in Appendix C.

If the community needs more than 30 days to provide the missing documentation, then a complete new application is needed, prepared in accordance with the *CRS Coordinator's Manual* then in effect.

Example 231.b-1. The City of North Shore's first application was for 700 points, 300 points coming from Activity 540 (Drainage System Maintenance). An application for Activity 540 must include a copy of the community's drainage system maintenance procedures. Without those procedures, North Shore will not have enough credit points to become a Class 9. The ISO/CRS Specialist tells North Shore's CRS Coordinator that she must provide the procedures within 30 days or submit a new application later when all the documentation is ready.

232 Verification Visit

- a. Visit scheduling: After the application review concludes that the community could receive at least a Class 9 classification, the ISO/CRS Specialist schedules a verification visit with the community. Representatives from the FEMA Regional Office and/or the State NFIP Coordinator's office may also attend this meeting. If a community is unable to participate in the verification visit, it will remain a Class 10.

The ISO/CRS Specialist calls the CRS Coordinator to schedule the visit within six months of being assured that the community should be at least a Class 9. After they have agreed upon a date, the ISO/CRS Specialist writes a letter confirming the date and describing what will happen during the visit.

- b. Verification of documentation: During the verification visit, the ISO/CRS Specialist reviews all documentation that is required during the verification visit. If any of the required documentation is missing or otherwise deficient, credit cannot be verified for that element.

Many CRS elements list documentation that the community must make available during the verification visit. If this documentation is not available, no credit is given for that element.

Example 232.c-1. After North Shore submits the needed documentation, the ISO/CRS Specialist schedules a verification visit. To verify Activity 540 (Drainage System Maintenance), the Specialist reviews the inspection reports and maintenance records that the city's drainage maintenance procedures state will be kept. If the city cannot produce the reports and records, the ISO/CRS Specialist zeroes out the credit.

- c. Verification of Credit: If the visit reveals that any credited activities are not being fully implemented, then the credit points are adjusted. If the ISO/CRS Specialist finds that an element is being implemented below a certain threshold, credit is not provided for that element.
- d. Field Verification of Credit: For some elements, the ISO/CRS Specialist verifies credit in the field. If the ISO/CRS Specialist finds that an element is being implemented less than a certain threshold, credit is not provided for that element.

The CRS Coordinator and/or other community staff members are encouraged to accompany the ISO/CRS Specialist on the field visit. For most activities, the ISO/CRS Specialist must verify that at least 50% of each element is being implemented according to the procedures credited. Failure to reach that threshold will result in loss of all credit for that element.

Example 232.d-1. Credit for channel and basin debris removal (CDR) in Activity 540 (Drainage System Maintenance) is verified in the field. The ISO/CRS Specialist selects sites in North Shore's drainage system and inspects them for maintenance as specified in the city's procedures. If the Specialist finds that more than 50% of the sites have debris, sizable trees, and other growth within the channel that demonstrate that the drainage system has not been maintained according to the community's procedures, then the credit for CDR is not verified.

During the verification visit, the community's CRS Coordinator is advised of mathematical errors in the application and other problems that may have been found during the application review and verification visit. There is also an "exit interview" at the end of the visit, when the ISO/CRS Specialist reviews the tentative findings. It is recommended that the exit interview be held with the community's Chief Executive Officer as well as the CRS Coordinator.

- e. AW-230: The community's Chief Executive Officer (CEO) is asked to certify the community's verified program by signing Activity Worksheet AW-230.

The verification visit may result in new activities or elements being credited, so the Application Cover Page signed by the CEO may be outdated. If the CEO cannot sign the AW-230 during the visit, a signed copy must be submitted to the ISO/CRS Specialist within 30 days of the visit. A completed example of AW-230 is in Figure 230-1.

230 MODIFICATION/CYCLE COVER PAGE

1. Community Name: FLOODVILLE State: ST BCEGS: 4 / 5
 NFIP Number: 12345 FIRM Effective Date: MAY 15, 1980
 Population: 11,000 Current FIRM Date: MAY 15, 1980
 Modification/Cycle Date: MARCH 15, 2002 County: ISLER

2. Chief Executive Officer: _____ CRS Coordinator: _____
 Name: JOHN JONES _____ JANE DOE _____
 Title: MAYOR _____ ASS'T CITY MANAGER _____
 Address: 3900 HUNTER _____ 3900 HUNTER _____
FLOODVILLE, ST 98765 _____ FLOODVILLE, ST 98765 _____
 Coordinator's Telephone: 101/555-1234 _____ Fax: 101/555-1201 _____
 Coordinator's email: jdoe@floodville.ci.us _____

3. I hereby certify that THE CITY OF FLOODVILLE [community name] is implementing the following activities (check the ones that apply). We are modifying or adding activities that have an "m" for modifying, "a" for addition, or "d" for dropping in the blank and have attached new activity worksheets and documentation. We will continue to implement these activities and will advise FEMA if any of them are not being conducted in accordance with this certification. We will cooperate with the ISO/CRS Specialist verification visit and will submit the documentation and annual recertification needed to validate our program.

- | | |
|--|--|
| <input checked="" type="checkbox"/> 310 Elevation Certificates | <input checked="" type="checkbox"/> 440 Flood Data Maintenance |
| <input checked="" type="checkbox"/> 320 Map Information Service | <input type="checkbox"/> 450 Stormwater Management |
| <input checked="" type="checkbox"/> 330 Outreach Projects | <input checked="" type="checkbox"/> Repetitive Loss Requirements |
| <input checked="" type="checkbox"/> 340 Hazard Disclosure | <input checked="" type="checkbox"/> 510 Floodplain Management Planning |
| <input checked="" type="checkbox"/> 350 Flood Protection Information | <input checked="" type="checkbox"/> 520 Acquisition and Relocation |
| <input checked="" type="checkbox"/> 360 Flood Protection Assistance | <input checked="" type="checkbox"/> 530 Flood Protection |
| <input checked="" type="checkbox"/> 410 Additional Flood Data | <input checked="" type="checkbox"/> 540 Drainage System Maintenance |
| <input checked="" type="checkbox"/> 420 Open Space Preservation | <input type="checkbox"/> 610 Flood Warning Program |
| <input checked="" type="checkbox"/> 430 Higher Regulatory Standards | <input type="checkbox"/> 620 Levee Safety |
| <input type="checkbox"/> 430LD Land Development Criteria | <input type="checkbox"/> 630 Dam Safety |

4. I hereby certify that to the best of my knowledge and belief, we are maintaining in force all flood insurance policies that have been required of us as a condition of federal financial assistance for insurable buildings owned by us and located in the Special Flood Hazard Area shown on our Flood Insurance Rate Map. I further understand that disaster assistance for flooded public buildings in the Special Flood Hazard Area will be reduced by the amount of flood insurance available from the National Flood Insurance Program for the buildings, even if we do not have a policy.

5. Signed:  (Chief Executive Officer)

Figure 230-1. Floodville's completed verification cover page (AW-230-1).

233 Post-visit Actions

- a. The ISO/CRS Specialist sends a draft verification report to the community's CRS Coordinator, the FEMA Regional Office, and the State NFIP Coordinator. The report and the community's file are reviewed internally by ISO and a recommended classification is submitted to FEMA. FEMA reviews the recommendation and sends the community the official notice of its verified CRS classification and a copy of the final verification report.

A draft verification report is provided to the community's CRS Coordinator soon after the visit. It is then reviewed by ISO, technical advisors, and FEMA. Therefore, the community should be aware that the report may be revised later. The final verification report is sent to the community by FEMA. The verification report includes the verified scores for each activity and a short explanation of the scores.

Visits can also be conducted when FEMA learns of problems in a community that shed doubt on whether it is fully implementing its activities. For example, if there was a flood that damaged areas protected by a credited levee or it appeared that flood warnings were not disseminated, then FEMA may want to review the community's program. Visits may also be conducted to verify a modification that will change the community class (see Section 215) and during cycle verification (see Section 234).

- b. If the community believes that something was missed or misinterpreted during the verification visit, it may request a reconsideration of its CRS classification. A request for reconsideration must be submitted to the FEMA Regional Office, Attn: Director, Mitigation Division, within 30 days of receipt of the final verification report from FEMA.

A request for reconsideration must be based upon the activities included in the community's application. The request must include a description of how the community would credit the activity and must reference the sections of the *CRS Coordinator's Manual* that support the community's position. A request to change a community's credit points that does not contain sufficient points to change its CRS classification will not be accepted.

See Appendix A for the addresses of FEMA Regional Offices. The 30-day deadline ensures that the classification is determined as quickly as possible. FEMA will review requests for reconsideration and discuss them with the ISO/CRS Specialist. A meeting may be held, depending upon the need for additional communication. FEMA will provide a written response to the community.

Reconsideration does not include activities implemented after the CRS application or otherwise not included in the application. Activities that were not applied for may be

included as a modification in a succeeding year. If the community feels that there is an error that does not result in a change in CRS classification, it should include its evidence with its next recertification. Corrections will be made during the next verification visit.

Example 233.b-1. The ISO/CRS Specialist verified North Shore's credit points as 711. The CRS Coordinator feels that the ISO/CRS Specialist misread a portion of North Shore's floodplain management ordinance, and that it should receive an additional 75 points. Because the credit in question would not change the city's CRS classification, the reconsideration is disallowed.

234 Cycle Verification

Each community's program is reviewed based on a periodic cycle to confirm that its credited activities are still being implemented.

- a. Cycle verifications are conducted every five years after the original application date for Class 6–9 communities. Class 1–5 communities are done on a three-year cycle. The ISO/CRS Specialist may vary from this timetable when there is reason to believe that the community is no longer implementing all of its credited activities, or to combine the cycle verification with visits to nearby communities.
- b. The cycle verification is based on the version of the *CRS Coordinator's Manual* currently in effect, not the one used for the original application.
- c. The cycle verification is conducted by the ISO/CRS Specialist, who schedules a cycle verification visit. At that visit, the ISO/CRS Specialist reviews the community's program, verifies that the activities are being implemented, requests appropriate documentation, fills out the activity worksheets, and calculates the verified credit points in the same way as for a verification visit described in Section 232.
- d. The community's CEO will be asked to certify the community's program by signing Activity Worksheet AW-230. If this cannot be done during the visit, it must be submitted to the ISO/CRS Specialist within 30 days of the visit.
- e. The ISO/CRS Specialist's cycle verification report is processed in the same manner as a verification report in accordance with the procedures in Section 233.

Depending on its CRS class, a community keeps its classification for three or five years after it took effect. One year before its classification lapses, the ISO/CRS Specialist will contact the community to schedule a cycle verification visit.

The cycle verification visit may be scheduled before or after the three- or five-year cycle. Some reasons for variation from this cycle include:

- if the community has a new CRS Coordinator,
- if the community requests an earlier visit to allow time to make corrections to its program before the verified class expires,
- if the community would improve by at least one class due to a *Schedule* change, and
- if time and costs can be substantially saved by combining the cycle verification visit with visits to neighboring communities. Such visits would be scheduled no more than one year earlier or later than the normal cycle visit and will be coordinated well in advance with all communities affected.

Cooperation by the community in scheduling and conducting the visit is vital in order to process the cycle verification in time. Delays and inadequate documentation may mean that the community's CRS classification will not be renewed in time.

During the visit, the ISO/CRS Specialist reviews changes in the *Coordinator's Manual* since the last visit. The community's activities are reviewed, documented, and scored. New activities and elements may be added. All activities are verified in accordance with the procedures in Section 232. The ISO/CRS Specialist reviews the findings at the exit interview.

The ISO/CRS Specialist collects all needed documentation that is available. Once the cycle verification papers are complete, the ISO/CRS Specialist forwards the cycle verification report for ISO review and submittal to FEMA.