230 VERIFICATION—Summary

231 Documentation Provided by the Community

a. **Certifications and Checklists:** Communities must certify that they have or are conducting certain credited activities and that they have complied with environmental and historic preservation requirements. Checklists are available to assist in carrying out and documenting activities.

b. **Digital Documentation:** Communities are encouraged to provide the needed documentation in digital form.

c. **Ordinances:** This section explains the criteria for submitting regulatory language.

d. **State-based Credit:** A community may receive credit for an activity that is implemented by a state or regional agency.

e. **Maps:** Several activities require a map as documentation and many activities need impact adjustment maps.

232 Verification Visit

a. **Visit Scheduling:** The ISO/CRS Specialist schedules a verification visit with the community.

b. **Cycle Scheduling:** Cycle verifications are conducted periodically after the original application date for most Community Rating System communities

c. **Conduct:** A verification visit usually takes one or two days, depending on the number of activities for which the community is requesting credit.

d. **Verification Thresholds:** If the visit reveals that any credited activities are not being fully implemented, then the credit points are adjusted.

233 Post-visit Actions

The materials collected during the visit are reviewed by the ISO/CRS Specialist, ISO/CRS Technical Reviewers, and the Insurance Services Office, Inc., (ISO) Program Coordinator before they are submitted to FEMA for approval.

230 VERIFICATION

The Community Rating System (CRS) application process is discussed in Section 212. Calculating the credit points is covered in Section 220. This section summarizes the other parts of the verification process. In order to receive credit points for its activities, a community's program must be verified. This work is done by the ISO/CRS Specialist, who

- Reviews the community's submitted documentation;

- Visits the community to review files, permit records, etc.;

- Visits field sites to review implementation on the ground;

- Determines if the class and activity prerequisites are met;

- Calculates the appropriate credit points; and

- Ensures that the community file is processed for FEMA's decision.

The names and territories of the ISO/CRS Specialists can be found at www.CRSresources.org/100.

231 Documentation Provided by the Community

The verification of applications, recertifications, and modifications requires documentation. The ISO/CRS Specialist must collect materials on the credited activities. The materials are used to prepare a file that is available for internal review and for the Federal Emergency Management Agency (FEMA).

Each activity or element has a section titled "Documentation Provided by the Community," which itemizes what is needed for verification or recertification. This section covers some standard documentation protocols.

231.a. Certifications, Checklists, and Examples

Most documents that are needed to verify CRS credits are copies of the ordinances, permit files, and records maintained by the community during its normal course of business. The CRS is designed to credit what the community is doing, so to the extent possible, locally developed documentation is preferred. However, there are a few documents that usually are not kept by a community, but are needed for the CRS or have proven useful in obtaining CRS credit.

Certifications
Certifications are statements signed by a community official, attesting that a certain thing was or will be done. An example is the Chief Executive Officer's assurance that the community will continue to implement the activities for which it has requested credit. To

facilitate local documentation and to obtain national standardization, four "Community Certifications" are provided in Appendix E:

- CC-213 Recertification
- CC-230 Verification
- CC-RL The Repetitive Loss List
- CC-530 Retrofitted Buildings.

Other certification forms document that a community's programs comply with local, state, and federal environmental laws and regulations. They are provided in Appendix F. These environmental and historic preservation (EHP) certifications are needed if the community applies for credit under the activities listed below. These are activities that could have an adverse effect on the environment or on historic properties or areas.

- Activity 520 (Acquisition and Relocation)
- Activity 530 (Flood Protection)
- Activity 540 (Drainage System Maintenance)
- Activity 620 (Levees).

All Community Certifications have been reviewed and approved by the Office of Management and Budget, in compliance with the Paperwork Reduction Act. Their use is required, although a community may prepare alternative language, subject to approval by FEMA.

Checklists

The CRS has developed checklists to help the CRS Coordinator or other local official assemble all documentation needed for CRS credit. Use of these is voluntary, but they do help both the local official and the Insurance Services Office, Inc., (ISO) reviewers ensure that all needed materials are being provided.

Checklists are not official FEMA publications and they may change over time. They are noted in the "Documentation Provided by the Community" sections and can be downloaded from the CRS website, www.CRSresources.org.

Examples

Many communities use the CRS to identify new floodplain management activities that they could be doing. These communities request guidance on how to implement the new programs. Accordingly, there are many examples provided in the *CRS Coordinator's Manual*. Cases in point are the example map information log and map information letter in Figures 320-1 and Figure 320-2. Communities are not required to use these examples. If they are used, communities are encouraged to tailor them to local conditions and circumstances.

Examples are not official FEMA publications and may change over time. All of the examples in the *Coordinator's Manual* can be found on the CRS website, www.CRSresources.org, in Microsoft Word® or Excel®. The website also has examples that have been or are being used by CRS communities.

231.b. Digital Documentation

Communities are encouraged to provide documentation in digital form. 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:

(1) 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 would provide the ISO/CRS Specialist with the URL for the ordinance and identify the section(s) of the ordinance containing the freeboard requirement(s).

(2) 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 to the ISO/CRS Specialist on a USB drive, a compact disk (CD), via e-mail, or by posting it on a File Transfer Protocol (FTP) site. Again, there must be a note that explains where the appropriate language is within the digital document.

Digital documents not directly viewable on a website must be provided in common file formats. Acceptable file types include PDFs, normal graphic formats (jpg, gif, png, etc.), and those viewable in Microsoft Word and Excel. Files that require other software, such as GIS files, cannot be used. Therefore, due to map scales and viewing limitations, hard copy maps may still be necessary.

231.c. Ordinances

Ordinances, by-laws, and regulations are documented as follows.

(1) The regulatory language must have the force of law and be in a document adopted by the community's governing body.

(2) The language must clearly explain what is required. The following are not acceptable:

- Statements of purpose and other discussions that are not specific regulatory requirements;

- Plans and other documents that do not have final regulatory authority over development; and

- Language that does not have a clear and consistent requirement, such as "to the extent practical," "unless exempted by the City Engineer," or "the building official may require . . ."

(3) In addition to the regulatory language submitted for credit, the submittal needs to include related sections on enforcement, such as where the regulation applies and any exemptions that may be allowed.

(4) If the legal authority for the regulatory language is not clear, the ISO/CRS Specialist may request a letter from the community's legal counsel that confirms that he/she will defend the regulation in court should there be a challenge.

(5) For CRS credit, the regulatory language must be adopted and in full force at the time of the verification visit.

(6) Regulations adopted by a county, regional agency, or state that are enforced within the community can be credited. Their implementation is verified in the same manner as a community regulation and it is expected that the community will assist in that verification. See also Section 231.d on state-based credit.

(7) A photocopy of the appropriate page(s) of the ordinance is sufficient. It must be marked to show where the regulatory provision appears (e.g., with the credit's acronym in the margin). An alternative to a photocopy is a digital copy (see Section 231.b). If a digital copy is submitted, the community must identify the specific section number(s) where the qualifying language appears.

(8) No separate certification of the ordinance copy is needed. The community's chief executive officer's (CEO's) certification that the community is implementing the activities (Section 212.b(4)) is considered certification that the ordinance has been adopted and is being enforced.

231.d. State-based Credit

A community may receive credit for an activity that is implemented by a state or regional agency. For example, a state law may require the disclosure of a flood hazard before the sale of real estate.

"State-based credit" can be provided to the affected communities. "State-based" means that all communities in the affected area receive the same credit (minimum credit), as verified by a state agency or through ISO, but if a community does additional work or has a higher regulatory standard in all or part of the affected area, the community can document that it deserves higher credit.

A summary of state-based credits is published for each state and can be found at www.CRSresources.org/200. The publication may include credits that are automatic for all communities (such as a state-enforced statute on real estate disclosure) or credits that need additional materials to document that the activity is being implemented in the community (such as a state required freeboard—the ISO/CRS Specialist would still need copies of Elevation Certificates to verify that it is being enforced locally).

In some cases, the ISO/CRS Specialist can work with the state or regional agency to collect the needed documentation. In others, it is expected that the community will obtain the additional documentation that may be needed.

231.e. Maps

Several activities require a map as documentation and many activities need impact adjustment maps. Maps must meet the following criteria:

(1) They need to be drawn or printed to scale, have a "north" arrow, and include a legend.

(2) Areas affected by an activity or element need to be clearly labeled. The element's acronym is acceptable labeling.

(3) Digital maps are encouraged, but they must be in a common graphic format (pdf, jpg, gif, etc.). Files that require other software, such as GIS files, cannot be used.

232 Verification Visit

232.a. Visit Scheduling

After the application review concludes that the community could receive at least a Class 9 classification, and approval has been received from the FEMA Regional Office, the ISO/CRS Specialist schedules a verification visit with the community. After a date is agreed upon, the ISO/CRS Specialist sends correspondence confirming the date and describing what will happen during the visit. If a community is unable to participate in the verification visit, it will remain a Class 10.

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 and it appeared that flood warnings were not disseminated or there are a large number of new "submit for rating" flood insurance policies on buildings that do not appear to be properly elevated.

Visits may also be conducted to verify a modification that will change the community's class (see Section 214).

232.b. Cycle Scheduling

A community keeps its classification for three or five years after its effective date. Cycle verifications are conducted every five years after the original application date for most CRS communities. Communities with larger total premium discounts and/or better classes may be visited on a three-year cycle.

The year before its classification lapses, the ISO/CRS Specialist will contact the community to schedule a cycle verification visit. Cooperation by the community in scheduling and conducting the visit is vital in order to process the cycle verification in time.

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 or the last cycle 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 there has been a major flood or other disaster,

- When there is reason to believe that the community is no longer implementing all of its credited activities, and

- If time and costs can be substantially saved by combining the cycle verification visit with visits to neighboring communities.

232.c. Conduct of Verification Visit

A verification visit involves a detailed review of all credited activities and may be a multi-day event. More time is spent with the communities that have very large flood insurance premium discounts or large numbers of credited activities. Representatives from the FEMA Regional Office and/or the State NFIP Coordinator's office may also attend the verification visit.

During the visit, the ISO/CRS Specialist reviews changes in the *Coordinator's Manual* since the last visit. The community's activities and the class prerequisites are reviewed and documented. New activities and elements are explained and may be verified.

The CRS Coordinator needs to be present for the entire visit. The Coordinator and the ISO/CRS Specialist can agree on a schedule that minimizes the amount of time that other community staff need to be present.

Preparation

The documentation that is needed for the verification visit is listed in the "Documentation Provided by the Community" section for each element or activity. The ISO/CRS Specialist will send a list of typical documentation with the meeting confirmation letter.

Also before the visit, the ISO/CRS Specialist will request copies of all Elevation Certificates (required for Activity 310 credit) collected since the last visit and other documentation that needs to be reviewed before the visit. These are reviewed before the visit and the findings are discussed at the visit. Other documentation is collected during the visit and either reviewed then or taken by the ISO/CRS Specialist to review later.

Office Review

The ISO/CRS Specialist will discuss office procedures and similar topics with the appropriate staff. Samples of records, such as permits, map information logs, and inspection papers are reviewed.

If the required documentation is missing or otherwise deficient, credit cannot be verified for that element. However, the community will be allowed time after the visit to assemble other material necessary to verify the activities for which credit was requested.

New Activities

A community can receive credit for any activity that is verified at the visit, even if it was not included with the application or the activity was not implemented at the time of the last visit, provided that the credit criteria and documentation requirements are met.

Credit cannot be provided for activities that were STARTED AFTER the verification visit. For example, credit is not provided for an ordinance provision that was not adopted or officially approved by the local governing body before the verification visit.

Field Verification

For some elements, the ISO/CRS Specialist verifies credit in the field. The CRS Coordinator and/or other community staff members are encouraged to accompany the ISO/CRS Specialist on the field verification. What might look like a problem to the ISO/CRS Specialist may be easy to explain by someone familiar with the situation.

Exit Interview

When the visit is completed, the ISO/CRS Specialist will offer to speak to the CEO, or the highest ranking person available, to discuss the results, the approximate points, the community's expected CRS Class, and the need to keep implementing the credited activities. It is recommended that the CRS Coordinator take advantage of this opportunity to brief his or her superiors on the program.

The community's CEO is asked to certify the community's verified program by signing Community Certification CC-230. If the CEO cannot sign the CC-230 during the visit, a signed copy must be submitted to the ISO/CRS Specialist within 30 days of the visit. An example of a completed CC-230 is in Figure 230-1.

232.d. Verification Thresholds

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 implementation of an element has fallen below a certain threshold, credit is not provided for that element. Activities vital to good floodplain management and for National Flood Insurance Program compliance have higher thresholds. The thresholds are

- Activity 310 (Elevation Certificates): 90%;

- Floodplain and stormwater management regulations in the 400 series: 80%; and

- All others: 50%.

> **Example 232.d-1.**
>
> In an office review of inspection records to verify channel debris removal (CDR) under Activity 540 (Drainage System Maintenance), the ISO/CRS Specialist finds that 72% of the sites appear to be inspected annually, but 28% are not. The community's verified credit will be 72% of the credit for the element. If fewer than 50% of the sites had been properly maintained, the community would have received no credit for CDR.

> **Example 232.d-2.**
>
> The ISO/CRS Specialist reviews a number of Elevation Certificates to verify freeboard and finds that only 72% of them show the building elevated to or above the freeboard level. Because the results are below the 80% threshold for floodplain management regulations in the 400 series, the community will receive no credit for freeboard.

Credit for any element is prorated if the sampling finds instances in which the element is not fully implemented. It does not matter why it is not fully implemented. For example, if the lack of freeboard in the previous example was due to legally-issued variances, the credit is still prorated (or denied if the verification threshold is not met).

OMB No. xxxxxxxxx
Expires: xxxxxxxxxxxx

Community *West Bay*   State *MS*   CID *280252*

CC-230 Verification

Date of visit *11/13/2012*		FIRM Effective Date *6/15/78*	
Population *9,000*		Current FIRM Date *6/16/09*	
County *Harrison*		ISO/CRS Specialist *J. Smith*	

Coordinator's Manual Year   *2012*

	Chief Executive Officer	CRS Coordinator
Name	*Rachel Isler*	*Abigail Heng-Chen*
Title	*Mayor*	*Planner*
Address	*Municipal Building 412 Maple Street West Bay, MS 39536*	*Municipal Building 412 Maple Street West Bay, MS 39536*
Phone	*228/555-1234*	*228/555-9876*
E-mail	*mayor@westbay.ms.gov*	*ahengchen@westbay.ms.gov*

I hereby certify that *the town of West Bay* [community name] is implementing the
following activities [check the ones that apply]. 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's verification visit and will submit the documentation and
annual recertification needed to validate our program.

   ✔ 310 (Elevation Certificates)   ✔ 440 (Flood Data Maintenance)
   ✔ 320 (Map Information Service)   450 (Stormwater Management)
   ✔ 330 (Outreach Projects)   ✔ (Repetitive Loss Requirements)
      340 (Hazard Disclosure)   ✔ 510 (Floodplain Management Planning)
   ✔ 350 (Flood Protection Information)   520 (Acquisition and Relocation)
      360 (Flood Protection Assistance)   530 (Flood Protection)
      370 (Flood Insurance Promotion)   ✔ 540 (Drainage System Maintenance)
      410 (Floodplain Mapping)   ✔ 610 (Flood Warning and Response)
   ✔ 420 (Open Space Preservation)   620 (Levees)
   ✔ 430 (Higher Regulatory Standards)   630 (Dams)

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 any community-owned building
located in the Special Flood Hazard Area is reduced by the amount of National Flood Insurance
Program flood insurance coverage (structural and contents) that a community should be carrying on
the building, regardless of whether the community is carrying a policy.

Signed *Rachel Isler* _____ (Chief Executive Officer)

Figure 230-1. An example of a completed verification cover page (CC-230).

233 Post-visit Actions

Technical Reviews
For some activities, the verification reviews are performed by ISO/CRS Technical Reviewers other than the ISO/CRS Specialist. For example, the documentation for Activities 410 (Flood Hazard Mapping) and 450 (Stormwater Management) are sent to engineers for review.

Technical review activities may have separate checklists for the community's CRS Coordinator to give to the staff person responsible for that activity. The checklists include contact information for that person, so the ISO/CRS Technical Reviewer can talk directly to the local expert if more information is needed.

Verification Review
Once the ISO/CRS Specialist has all the materials from the community and the technical review findings, the community file is sent to an ISO Program Coordinator for a second review. Technical reviews may get a second review from another ISO/CRS Technical Reviewer at this time as well.

When the ISO Program Coordinator confirms all credits for the community are correct, the ISO/CRS Specialist prepares a verification report. This report summarizes the findings, the status of class prerequisites, and the points for each activity. The report is then sent to the community with a note that it is a draft and still subject to FEMA approval. The community should be aware that the verification report may be revised later.

Once all credits and the appropriate classification are confirmed, the information is given to FEMA. This is done twice per year. FEMA reviews the recommendations and sends the community the official notice of its verified CRS classification and a copy of the final verification report.

Reconsideration
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 reviewed at the verification visit. The request must include a description of how the community would credit the activity and must reference the sections of the *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 granted.

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 verification visit or if the ISO/CRS Specialist was not made aware of them at the visit. Such activities 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.

Recertification

A community must recertify each year that it is continuing to meet the prerequisites for its class and continuing to implement the activities for which it has earned credit. Recertification is discussed in Section 213.