

210 REQUESTING CRS CREDIT

211 Program Prerequisites

A community must meet the current *CRS Coordinator's Manual's* prerequisites at the time of each verification visit. An initial verification visit is conducted in response to a community's request to join the Community Rating System (CRS). Subsequent visits are conducted every few years on a set schedule and are called "cycle verification visits." Verification visits are explained in Section 230.

No new requirements, including annual recertification requirements, affect a participating CRS community until the ISO/CRS Specialist reviews them at the cycle verification visit conducted with the community after the new criteria take effect.

211.a. Class 9 Prerequisites

In order to become and continue to be a Class 9 or better, a community must demonstrate that it has enough points to warrant the class AND meet the following six prerequisites.

- (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. There must be correspondence from the Regional Office of the Federal Emergency Management Agency (FEMA) stating that the community is in full compliance with the NFIP. The correspondence must have been sent within six months of the initial CRS verification visit. The FEMA Regional Office or State NFIP Coordinator may need to conduct a Community Assistance Visit if neither has been in the community recently. If a community is determined at any time to be in less-than-full compliance, it will retrograde to a CRS Class 10.
- (3) The community must maintain FEMA Elevation Certificates on all new buildings and substantial improvements constructed in the Special Flood Hazard Area (SFHA) after the community applies for CRS credit. This is explained in Activity 310 (Elevation Certificates).
- (4) If there are one or more repetitive loss properties in the community, the community must take certain actions as specified in Sections 501–504. These include reviewing and updating the list of repetitive loss properties, mapping repetitive loss areas, describing the causes of the losses, and sending an outreach project to those areas each year. A community with 10 or more repetitive loss properties (a "Category C" community) must also prepare a plan for addressing its repetitive flood problem.
- (5) The community must maintain all flood insurance policies that it has been required to carry on properties owned by the community. The community's chief executive officer

(CEO) signs the verification visit cover sheet, which includes a statement that the signer certifies that the community has all the flood insurance policies that it has been required to maintain on properties owned by the community. This is discussed further in Figure 210-1.

- (6) If a coastal community receives a draft Flood Insurance Rate Map (FIRM) that delineates the Limit of Moderate Wave Action (LiMWA), the community must agree to show the LiMWA on its final published FIRM. Although showing a LiMWA on a FIRM is voluntary for non-CRS communities, it is a prerequisite for CRS participation. The LiMWA delineation is for informational purposes only. There is no CRS requirement to regulate the area differently, but the series of International Codes has special construction requirements in areas subject to breaking waves of 1.5 feet or higher. Communities are encouraged to meet the criteria for coastal A Zone credit (CAZ) in Activity 430 (Higher Regulatory Standards).

As part of the verification documentation, the community's chief executive officer must certify 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. Flood insurance must be in effect at the time of the verification visit and must be kept in the future. The CRS Coordinator should make every effort to determine the community's legal requirement to purchase flood insurance.

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. Therefore, disaster assistance for a community-owned building will be reduced by the amount of NFIP flood insurance coverage (structure and contents) the 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 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 a 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. Some communities have found out too late that their all-risk insurance policies did not cover flooding.

Figure 210-1. The CRS flood insurance prerequisite.

211.b. Class 6 Prerequisites

In order to be a Class 6 or better, a community must demonstrate that it has enough points to warrant the class AND meet the following two prerequisites.

- (1) The community must meet all the Class 9 prerequisites.
- (2) The community must have received and continue to maintain a classification of 5/5 or better under the Building Code Effectiveness Grading Schedule (BCEGS). Both BCEGS classifications (residential/ personal and commercial) must be a class 5 or better. When communities submit a modification or undergo a cycle verification, they must meet the BCEGS prerequisite in order to achieve or remain a CRS Class 6 or better.

The BCEGS program measures a community's building code adoption and enforcement as they relate to natural hazards mitigation. More information on the program can be found at www.isomitigation.com/bcegs/0000/bcegs0001. Credit is also provided for BCEGS classifications of 5/5 or better under the building code credit (BC) in Section 432.h.

In accordance with Section 113.d, communities may propose alternative approaches to meet the objectives of a prerequisite. For example, communities that are prohibited by state law from adopting and enforcing building codes may submit comprehensive building construction regulations and administration and inspection procedures for review to determine the equivalent BCEGS classification. Such regulations must be enforced throughout the community, not just in the floodplain.

211.c. Class 4 Prerequisites

A Class 4 or better community must demonstrate that it has programs that minimize flood losses, minimize increases in future flooding, protect natural floodplain functions, and protect people from the dangers of flooding. Even though it may have enough points, a community that cleared most of the buildings from its floodplain with disaster assistance funds after a flood cannot be a Class 4 or better if it does not have an effective regulatory program to prevent a recurrence of the problem.

In order to be a Class 4 or better, a community must demonstrate that it has enough points to warrant the class AND meet the following prerequisites.

- (1) The community must meet all the Class 6 prerequisites.
- (2) The community must have received and continue to maintain a classification of 4/4 or better under the BCEGS.
- (3) The community must 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.

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- (a) Activity 430 (Higher Regulatory Standards)—The community must show that it enforces higher regulatory standards to manage new development in the floodplain.
 - (i) The community must adopt and enforce a freeboard requirement that receives at least 100 points for FRB in Section 432.b. For this prerequisite, the value for FRB is the value before factoring in the impact adjustment.
 - (ii) The community must receive at least 700 points under the other elements of Activity 430 and under Sections 422.a, e, and f under Activity 420 (Open Space Preservation). For this prerequisite, the points are calculated after factoring in the impact adjustment.
 - (b) Activity 450 (Stormwater Management)—The community must receive the following credits for its watershed management plan(s) (WMP) under Section 451.b:
 - (i) 90 points (before the impact adjustment) for meeting all of the credit criteria for WMP,
 - (ii) 30 points (before the impact adjustment) for managing the runoff from all storms up to and including the 100-year event, and
 - (iii) An impact adjustment value of $rWMP = 0.5$ or more. Alternatively, the community may show that at least 50% of the watershed area where future is expected is covered by one or more credited watershed management plans.
 - (c) 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 planning steps 2, 5, and 8.
- (4) Obtain a minimum total credit of 100 points (after the impact adjustment) from one or a combination of the following elements that credit protecting natural floodplain functions:
- 420—Natural functions open space (NFOS),
 - 420—Natural shoreline protection (NSP),
 - 430—Prohibition of fill (DL1),
 - 440—Additional map data (AMD12) natural functions layer,
 - 450—Managing the volume of stormwater runoff (SMR, DS),
 - 450—Low impact development (LID),
 - 450—Watershed management plan (WMP), credit point items 3, 5, 6, and 7,
 - 450—Erosion and sediment control (ESC),
 - 450—Water quality (WQ), and
 - 510—Natural floodplain functions plan (NFP).

(5) Document the following life safety measures:

- (a) Obtain some credit under Activity 610 (Flood Warning and Response).
- (b) Have a map of all levees and all areas protected by levees, and an inventory of the buildings and critical facilities that would be flooded if the levees were overtopped. This is the same as activity credit criterion (3) under Activity 620 (Levees), Section 621.b.
- (c) Have a description of the dam failure threat, including a map of all areas that would be flooded by the failure of each high-hazard-potential dam that affects the community, and an inventory of the buildings and critical facilities that would be flooded. This is the same as activity credit criteria (2) under Activity 630 (Dams), Section 631.b.

In accordance with Section 113.d, the community may propose alternative approaches to these prerequisites that are more appropriate for local conditions.

211.d. Class 1 Prerequisites

In order to be a Class 1, a community must demonstrate that it has enough points to warrant the class, AND meet the following prerequisites.

- (1) Meet all the Class 4 prerequisites.
- (2) Meet the minimum standards of the NFIP as determined by a Community Assistance Visit conducted by FEMA within the previous 12 months.
- (3) Promote flood insurance as a vital way to protect residents and businesses from the financial impact of a flood. This is demonstrated by having at least 50% of the buildings in the community's SFHA covered by a flood insurance policy or obtaining at least 50% of the maximum points under Activity 370 (Flood Insurance Promotion).
- (4) Demonstrate that it has a "no adverse impact" approach to floodplain management. A no adverse impact approach 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 www.floods.org.

This prerequisite is demonstrated by receiving credit under the following:

(a) For all of the floodplains in the community:

- (i) The community must be enforcing regulations that discourage development in the floodplain. This is demonstrated by receiving a combined total of at least 150 points under open space incentives (OSI) in Section 422.e and development limitations (DL) in Section 432.a.
- (ii) All new critical facilities must be protected to the 500-year flood level. This is demonstrated by receiving credit under protecting critical facilities (PCF) in Section 432.f in Activity 430 (Higher Regulatory Standards) and by enforcing the regulations throughout the 500-year floodplain.
- (iii) 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 floodplain management or hazard mitigation plan credited under Activity 510 (Floodplain Management Planning).

(b) In the community's riverine floodplains:

- (i) Regulatory flood elevations must be provided for all SFHAs in the community. This is demonstrated by receiving at least 80 points for new studies (NS) in all approximate A Zones under Section 412.a in Activity 410 (Additional Flood Data). For this prerequisite, the value for NS is the value before factoring in the impact adjustment.
- (ii) The community's program must address potential increases in riverine flood elevations caused by new development. This is demonstrated by receiving the following credits:
 - ((1)) Activity 450 (Stormwater Management)—an impact adjustment value of $rWMP = 0.75$ or more. As an alternative, the community may show that at least 75% of the watershed area where future growth is expected is covered by one or more credited watershed management plans; AND
 - ((2)) All riverine floodplains must be mapped using future conditions hydrology as credited under the higher study standard credit (HSS) in Section 412.d.

(c) In the community's coastal floodplains:

- (i) The community must receive credit for regulating new development in coastal A Zones under CAZ in Section 432.k.
- (ii) The community must receive credit for using regulatory flood elevations in the V Zones and coastal A Zones that reflect future conditions, including sea level rise. This is demonstrated by receiving credit for future-conditions hydrology under the higher study standard credit (HSS) in Section 412.d.

- (iii) The community must receive credit for regulating new development in areas subject to erosion under CER in Section 432CE.a in *Coastal Erosion Hazard: A Special Flood-related Hazards Supplement to the CRS Coordinator's Manual* (or demonstrate that it does not have a coastal erosion problem).
- (5) Have a commitment to mitigate its repetitive loss problem as well as problems caused by other natural hazards.
 - (a) 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 damage from repetitive flooding through acquisition, retrofitting, or structural flood control projects.
 - (b) Activity 510 (Floodplain Management Planning): The community must have a multi-hazard mitigation plan that has been approved by FEMA as meeting all of the requirements outlined under 44 CFR §201.6.
- (6) Protect natural floodplain functions. This is demonstrated by having a total credit of at least 150 points (after the impact adjustment) from one or a combination of the elements listed under the Class 4 prerequisite in Section 211.c(4).
- (7) Have a program to address the threat to life safety that flooding poses to the residents of the community. This is demonstrated by receiving the following credits:
 - (a) The community must obtain some credit under all the elements in Activity 620 (Levees) for all levees mapped and identified in the inventory prepared for the Class 4 prerequisite in Section 211.c(5)(b).
 - (b) The community must obtain some credit under all the local elements in Activity 630 (Dams) for all areas mapped and identified as subject to dam failure flooding in the inventory prepared for the Class 4 prerequisite in Section 211.c(5)(c). The credit for the state's program (SDS) is not counted toward this prerequisite.

In accordance with Section 113.d, the community may propose alternative approaches to these prerequisites that are more appropriate for local conditions.

212 Application Procedures

212.a. Application Request

Application for a CRS classification is voluntary. A community can request a CRS classification at any time.

A community can request a CRS classification for any activities and elements, provided that

- The credit points add up to at least 500 points, enough to become a Class 9; and
- The community can meet all of the Class 9 prerequisites (Section 211.a).