

Considerations for Community Rating System (CRS) Coordinators after a Major Flood

Major Flooding Brings Change to CRS Communities and the Duties of a CRS Coordinator

Any community CRS Coordinator that has experienced a major flood knows first-hand about the all-consuming reorientation of community priorities as the community responds to the immediate needs of its residents, helps in recovery, and undertakes mitigation opportunities. The CRS program recognizes the demands upon the CRS Coordinator during these times. This fact sheet highlights common CRS themes that arise during the recovery after a major flood.

The CRS Contractor Can Help

All CRS communities have been assigned a CRS Specialist (CRS Contractor) to work with the community CRS Coordinators on an ongoing basis. If the demands of flood response and recovery are expected to interfere with a community's ability to prepare for a CRS cycle visit or annual recertification, or assemble any other CRS related documentation, the CRS Coordinator should simply contact its CRS Specialist to discuss the situation.

Together, they can agree to postpone those deadlines. This has been a regular post-disaster practice of the CRS for many years. The CRS understands that community priorities have to change in response to flooding and is more than willing to reschedule verification efforts to support a community's recovery and mitigation efforts.

Soon after a significant flood, the CRS Contractor will most likely be in touch with the CRS Coordinator to discuss whether to reschedule a cycle visit or postpone the annual recertification. The CRS Contractor can also discuss the need for a courtesy visit to address questions or concerns that may have arisen as a result of the flooding.

The National Flood Insurance Program (NFIP) Community Rating System (CRS) was implemented in 1990 as a voluntary program for recognizing and encouraging community floodplain management activities exceeding the minimum NFIP standards. Any community in full compliance with the minimum NFIP floodplain management requirements may apply to join the CRS. Each community that participates in the CRS designates a community CRS Coordinator.



Major Floods Change Community Floodplain Management Priorities

A community's floodplain management program priorities could look very different after a major flood, compared to how they looked before. Significant flooding brings enormous challenges as well as opportunities. It may be more challenging to implement higher regulatory standards when their impacts are realized after a major flood. Whether to re-examine regulatory standards is an individual community's decision. CRS communities have faced these challenges since the earliest days of the CRS.

CRS Coordinators' Checklist for CRS Recovery Actions

- Contact your CRS Specialist to discuss any scheduling problems or questions about CRS credits.
- Recognize that CRS community priorities may change. To explore the implications of this for your community's current program, have a discussion with your CRS Specialist, the Regional CRS Coordinator at the FEMA Regional Office, or your NFIP State Coordinator.
- A major flood brings heightened awareness of a community's risk. Be prepared to consider new floodplain management practices that would be suitable for your community.
- Collaborate with other CRS professionals to explore opportunities to organize training, hold webinars, and leverage CRS Users Groups to improve your CRS program.

Major flooding typically also brings renewed focus and resolve in CRS communities. CRS communities regularly use the experience of recent flooding to bolster their floodplain management program by adding new protective standards and mitigating damaged properties. Many of the most advanced communities that participate in the CRS – the CRS Class 4 and better communities – have experienced repeated, severe floods. That history has played an important role in building public support for improving floodplain management programs, which are then recognized by the CRS. In addition, because of these community efforts, when that same level of flooding recurs, it yields significantly fewer losses.

What if my community no longer implements some CRS activities?

If a community discontinues implementing some CRS activities, then the community will no longer receive CRS credit for them. For example, if a higher regulatory standard is repealed by a community after a flood, or is simply not implemented, then credit for that standard can no longer be provided. CRS credit will be adjusted either at the community's next annual recertification or at its next CRS cycle verification visit. Note that the loss of CRS credit for any given activity does not necessarily mean the loss of a CRS Class, although CRS Class prerequisites must always be met.

On the other hand, if the community begins carrying out new creditable activities in the aftermath of a flood, these can be reviewed, documented, and receive CRS credit. CRS Coordinators are encouraged to contact their CRS Specialist to clarify any questions about their changing programs.

How - and when - do I know what changes will affect my community's CRS credit or CRS Class?

Under most conditions, changes in a community's floodplain management program are reviewed at the next scheduled cycle visit. However, if a community is no longer implementing certain CRS activities, this must be indicated when the community submits its next annual CRS recertification.

Conversely, if a community adopts or implements new CRS activities or elements, it can ask its CRS Specialist for a CRS "modification review" at any time, even before its regularly scheduled cycle visit. This is especially recommended if the community anticipates receiving CRS credit for new activities that could result in an improved CRS Class.

Use of newly available FEMA Flood Insurance Study Data

When a CRS community experiences a major flooding event at a time when a FEMA NFIP Flood Insurance Study (FIS) is near completion, using this new flood data for a community's regulatory purposes could have several advantages – but there are also some risks. If the new data show higher base flood elevations (BFEs) in comparison to the older data, that would provide an important new platform of data to manage the repair and rebuilding process so that future flood losses are minimized. The new higher BFE data could be adopted and enforced for substantial damage compliance. This would result in lower flood insurance premiums for those buildings that are required to meet substantial damage requirements.

If new BFEs are lower, they cannot be used for substantial damage compliance until after the new Flood Insurance Rate Map (FIRM) has become effective. Otherwise, such repairs could be regarded as non-compliant and flood insurance premiums would be very high.

How best to use new data must be carefully assessed. The CRS Specialist can provide specific advice on how a CRS community could best integrate the availability of new FEMA-provided FIS data.

Enhancing a CRS Program and Planning for a Resilient Future

As a CRS community pulls through its response to a major flooding event and is fully engaged in long-term recovery and mitigation, a CRS Coordinator may feel the need for a comprehensive re-think of the community's approach to floodplain management and want to consider additional CRS opportunities. Very likely, floodplain managers from other communities subject to regional flooding may be going through the same thought process.

The CRS can provide multi-day CRS training designed specifically for these needs, whether they be aimed toward protecting natural floodplain areas, building community resiliency, establishing higher regulatory standards, or other forward-looking measures.

Although FEMA's Emergency Management Institute's four-day CRS class (E0278) sometimes has been deployed after major flooding in previous years, other shorter options are available. CRS Coordinators and floodplain managers should work with the CRS Contractor, its local CRS users groups, or the FEMA Regional Office CRS Coordinator to plan for a training event that best suits their needs.

For More Information

A list of resources is available at the [CRS page of the FEMA website](#).

A list of the CRS Specialists for each state and the FEMA Regional CRS Coordinators can be found at the [CRS resource page](#).

The post-flood successes of some CRS communities are relayed on the [Success with CRS website](#).

For more information about the CRS email the Community Rating System team at fema-crs@fema.dhs.gov or nfipcrs@iso.com.