

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 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 50 or more repetitive loss properties (a "Category C" community) must also prepare a repetitive loss area analysis or floodplain management plan that addresses 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.