


# NFIP Community Rating System

## CRS & Substantial Damage Properties Management Plans

*Molly O'Toole, P.E., CFM, Lead Consultant to the CRS*  
*Becca Fricke Croft, CFM, Host*

**CRS Webinar Series, October 14, 2020**




1

## CRS Webinar Series

### Housekeeping

- ✓ Attendees may be muted to reduce background noise
- ✓ To increase efficiency and so that we can end on time,
  - Use "Raise Hand" icon if you want to speak
  - Use "Q&A" feature to ask a question
- ✓ Please do NOT put your phone on "hold", it plays the hold music for everyone else on this call.
  - If you have to step away, mute your phone or hang up and rejoin the call later.




Visual 114-2

2

## CRS Webinar Series


### Continuing Education Credits

- ✓ For full credit (1 CEC) you must be attentive and participate in the polls and activities
- ✓ Credit eligibility is based on attendance and participation
- ✓ We report to ASFPM once per month for the previous month
- ✓ If eligible, you will receive a Certificate of Attendance via email that you can forward to other agencies



Visual 114-3

3




# NFIP Community Rating System

## CRS & Substantial Damage Properties Management Plans


*Molly O'Toole, P.E., CFM, Lead Consultant to the CRS*  
*Becca Fricke Croft, CFM, Host*

**CRS Webinar Series, October 14, 2020**



4


## CRS Coordinator's Manual (Manual)



**Manual Provides:**

- Activities and Credit
- Credit Criteria
- Documentation

Available at [FEMA.gov](http://FEMA.gov) and [CRSresources.org](http://CRSresources.org)



5



**CRS Resources**

2017 CRS Coordinator's Manual

The objective of the Community Rating System (CRS) is to recognize communities that are doing more than meeting the minimum NFIP requirements to help their citizens prevent or reduce flood losses. The CRS also provides an incentive for communities to initiate new flood risk reduction activities. The CRS Coordinator's Manual is the guidebook for the CRS and sets the criteria for CRS credit and classification. It explains how the program operates, what is credited, and how credits are calculated. Although it is primarily a reference for CRS activities and credits, it can also help guide communities that want to design or improve their floodplain management programs.

[DOWNLOAD THE 2017 COORDINATOR'S MANUAL](#)

- Master List of Elements - 2017 Coordinator's Manual
- CRS Credits Crosswalk - 2007 to 2017 Coordinator's Manual
- Summary of Changes in 2017 Coordinator's Manual

[www.CRSResources.org](http://www.CRSResources.org)


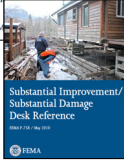



6

## CRS & Substantial Damage

### Overview

- Purpose of 2021 Addendum
- New Credit Opportunities – Activity 510 (Floodplain Management Planning)
- A Bit About CSI and LSI
- Substantial Damage Properties Management Plan (SDP) Credit
- Looking Forward


Visual 114-7



7


## Why an Addendum?

### FEMA and NFIP Priorities

- FEMA Strategic Plan
- FIMA Leadership Intent
- Risk Rating 2.0


- Endangered Species Act
- Substantial Damage
- Closing the Insurance Gap



Visual 114-8

8

## 2021 Addendum – A “Bridge”



- Addendum effective on January 1, 2021
- 2017 CRS Coordinator’s Manual will continue to be used
- In conjunction with the 2021 Addendum to the Coordinator’s Manual
- Effective at community’s next cycle visit after January 2021
- A draft will not be made available
- Guidance materials in 2020 and 2021


Visual 114-9

9

## Class 8 Freeboard FAQs

### CRS Resources

**2017 CRS Coordinator’s Manual**

The objective of the Community Rating System (CRS) is to recognize communities that are doing more than meeting the minimum NFIP requirements to help their citizens prevent or reduce flood losses. The CRS also provides an incentive for some.

Manual is the guidebook for its program operators, what it cost CRS activities and credits, its management programs.


• View the 2017 Coordinator’s Manual

---

#### Helpful Resources

The following guides, checklists, and other materials, most of them referred to in the CRS Coordinator’s Manual, are optional aids to help communities with their CRS programs.

- 2021 Class 8 Freeboard Freeboard: Frequently Asked Questions (Download .pdf) **UPDATED!**
- Master List of Elements - 2017 Coordinator’s Manual (Download .pdf)
- CRS Credits Crosswalk - 2017 to 2021 Coordinator’s Manual (Download .pdf)
- Summary of Changes in 2021 Coordinator’s Manual (Download .pdf)
- Impact Adjustment Maps—An overview and step-by-step guide to producing a map to help analyze and pinpoint the impact of floodplain management techniques. (Download .pdf)
- CRS Credits for Habitat Protection—An overview and guide to the ways communities can protect natural habitat while earning CRS credit. (Download .pdf)
- Small Communities in the CRS—A six-page fact sheet to help small communities gauge, step-by-step, their ability to participate in the CRS, along with explanation of program benefits. (Download .pdf)


Visual 114-10



10


## Why an Addendum?

### FEMA and NFIP Priorities

- FEMA Strategic Plan
- FIMA Leadership Intent
- Risk Rating 2.0

- Endangered Species Act
- Substantial Damage
- Closing the Insurance Gap


Visual 114-11

11

## Substantial Damage Mitigation & NFIP Compliance




Visual 114-12

12

### Section 500 - Repetitive Losses

**Repetitive Loss (RL)**


- 2 claims greater than \$1,000 in any 10-year period since 1978

**Severe Repetitive Loss (SRL)** is an RL property with

- Four claims greater than \$5,000, or
- Two or more claims that are greater than the building's value

**After correcting and updating the AW-501s**

- Category A: No repetitive loss properties
- Category B: 1–49 repetitive loss properties
- Category C: 50+ repetitive loss properties (FMP or RLAA)



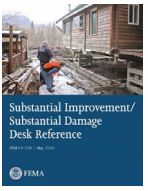

Visual 114-13

13

### 2021 Addendum to the 2017 Manual

#### Activity 510 - Substantial Damage

- New Credit in Activity 510 for Substantial Damage Properties Management Plans (SDP)
- Similar to and Repetitive Loss Area Analysis (RLAA)
- Up to 140 points
- Basic Plan Credit – Pre-flood efforts
- Additional Credit for pre-populating as Substantial Damage Estimator
- Additional credit when mitigation alternatives are considered
- New opportunities in Activity 610 (Flood Warning and Response)

Visual 114-14

14


### 2021 Addendum to the 2017 Manual


#### Activity 510 (Floodplain Management Planning)

**New Elements:**

c. **Natural floodplain functions plan (NFP):** 100 points for adopting plans that protect one or more natural functions within the community's Special Flood Hazard Area. Within NFP is credit for a floodplain species assessment and for a floodplain species plan.

d. **Substantial damage properties management plan (SDP):** Up to 140 points for a community plan to prepare for substantial damage estimates and determinations after a flood.

 **New CRS credit**



Visual 114-15

15

### Activity 510 - Substantial Damage


#### 512.d. Substantial Damage Management Plan (SDP)

The maximum credit for this element is 140 points.

A management plan for substantial damage within the community is a detailed community plan, developed before a flood or other hazardous event, that describes the community's process for evaluating damage to buildings and addressing those that have been substantially damaged, as required by the NFIP.

"Other hazardous event" may be wind, tornado, fire, earthquake, etc.

Substantial damage determinations are "required by the NFIP"



Visual 114-16

16


### Activity 510 - Substantial Damage

#### 512.d. Substantial Damage Management Plan (SDP)

The maximum credit for this element is 140 points.

A management plan for substantial damage to properties outlines

- Community responsibilities,
- Identifies available data about buildings in the SFHA,
- Describes the community's approach to damage estimation, and
- Lists the steps the community will take if buildings are determined to be substantially damaged.



Visual 114-17

17

### Substantial Damage Management Plan (SDP)

#### Credit Points for SDP

---


SDP = SDP1 + SDP2 + SDP3, up to the maximum of 140

- SDP1 = 40 points, for a substantial damage properties management plan
- SDP2 = 50 points, if FEMA's Substantial Damage Estimator is pre-populated
- SDP3 = 50 points, if pre-event mitigation alternatives are considered

---

#### Impact Adjustment for SDP

There is no impact adjustment for SDP credit.



Visual 114-18

18

## Activity 510 - Substantial Damage

**Steps to Develop a Substantial Damage Management Plan**

1. Assess vulnerability
2. Assemble a team
3. Identify post-event actions
4. Build a database
5. Identify pre-event actions
6. Plan implementation & updates

Steps 2 through 5 may be done in any order.

An annual evaluation report is required.

Visual 114-19

19

## Substantial Damage Management Plan (SDP)

**Credit Criteria for SDP**

(1) The substantial damage properties management plan must be developed using a definition of substantial damage that meets or exceeds the NFIP definition of substantial.

**Substantial damage**—As defined in 44 CFR 59.1 of the NFIP regulations, substantial damage is

Damage of any origin sustained by a building whereby the cost of restoring the building to its before-damage condition would equal or exceed 50% of the market value of the building before the damage occurred.

**Substantial improvement** is

Any reconstruction, rehabilitation, addition, or other improvement to a building, the cost of which equals or exceeds 50% of the market value of the building before the start of construction of the improvement.

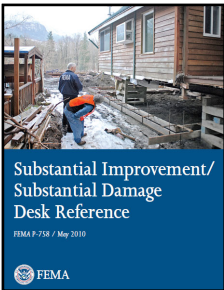
*NOTE: Some ordinances may include the repair of flood damage as an "improvement" (reconstruction) to the building.*

SD = Substantial Damage  
SI = Substantial Improvement

Visual 114-20

20

## FEMA Publications



**Substantial Improvement/Substantial Damage Desk Reference**

**FEMA P-758**

**May 2010**

Visual 114-21

21

## Substantial Damage Management Plan (SDP)

**Credit Criteria for SDP**

(1) The substantial damage properties management plan must be developed using a definition of substantial damage that meets or exceeds the NFIP definition of substantial.

(2) If a community is receiving credit for cumulative substantial improvement (element CSI) under Activity 430 (Higher Regulatory Standards), then the substantial damage management plan must reference the community's cumulative substantial damage definition credited under CSI and describe the community's process for tracking cumulative substantial improvements. If a community is receiving credit for having a lower threshold for substantial improvement (element LSI), then the definition of lower substantial improvement must be referenced.

Visual 114-22

22

## Activity 430 (Higher Regulatory Standards)

**432.d. Cumulative substantial improvements (CSI)**

(2) At each verification visit,

(a) A list of all permits for building improvements or repairs in the regulatory floodplain that have been issued since the last visit. The list must include both substantial improvements and permitted projects that were not substantial improvements.

The ISO/CRS Specialist will review permit records that document how the regulation has been applied. The records need to track permits by parcel number or address, so that the history of improvements or repairs to a particular structure is checked before the next permit is issued.

Visual 114-23

23

## Activity 430 (Higher Regulatory Standards)

**432.d. Cumulative substantial improvements (CSI)**

CSI = the total of the following points, not to exceed 90 points

(1) **Improvements** are counted cumulatively for at least

- (a) 10 years (40 points)
- (b) 5 years (20 points)

(2) **Reconstruction and repairs** are counted cumulatively for at least

- (a) 10 years (40 points)
- (b) 5 years (20 points)

(3) Regulatory language that qualifies properties for ICC insurance coverage for **repetitive losses** (20 points).

(4) Regulations require that **any addition be protected** to the BFE (20 points).

Visual 114-24

24


### Activity 430 (Higher Regulatory Standards)

**432.e. Lower substantial improvements threshold (LSI)**

(2) At each verification visit,

(a) A list of all permits for building improvements or repairs in the regulatory floodplain that have been issued since the last visit. The list must include both substantial improvements and permitted projects that were not substantial improvements.

The ISO/CRS Specialist will review permit records that document how the regulation has been applied.



Visual 114-25

25

### Activity 430 (Higher Regulatory Standards)

**432.e. Lower substantial improvements threshold (LSI)**

LSI = EITHER:


(1) 20 points, if the regulatory threshold for determining if a building is **substantially improved or substantially damaged is less than 50%**

OR

(2) 10 points, if EITHER

(a) The regulatory threshold is no more than 25% of the square footage of the building's lowest floor, OR

(b) The regulatory threshold applies to either improvements, modifications, and additions or reconstruction and repairs, but not both





Visual 114-26

26

### Substantial Damage & CRS

Dropping CSI or LSI, and/or not implementing SDP can impact a community's CRS Class.

Visual 114-27

27


### Substantial Damage Management Plan (SDP)

**Credit Criteria for SDP**

(1) The substantial damage properties management plan must be developed using a definition of substantial damage that meets or exceeds the NFIP definition of substantial damage (see box at right).

(2) If a community is receiving credit for cumulative substantial improvement (element CSI) under Activity 430 (Higher Regulatory Standards), then the substantial damage management plan must reference the community's cumulative substantial damage definition credited under CSI and describe the community's process for tracking cumulative substantial improvements. If a community is receiving credit for having a lower threshold for substantial improvement (element LSI), then the definition of lower substantial improvement must be referenced.

(3) The plan must be the outcome of the following six-step planning process. All steps are required, but 2-5 do not have to be done in the order listed.



Visual 114-28

28


### Activity 510 - Substantial Damage

**Steps to Develop a Substantial Damage Management Plan**

1. Assess vulnerability
2. Assemble a team
3. Identify post-event actions
4. Build a database
5. Identify pre-event actions
6. Plan implementation & updates

Steps 2 through 5 may be done in any order Poll

An annual evaluation report is required.



Visual 114-29

29


### Substantial Damage Management Plan (SDP)

**Step 1.** Assess the community's vulnerability to substantial damage. This step requires the review of all buildings in the SFHA to determine those that are likely to be substantially damaged. Must include:

(a) Your community's definition of substantial damage and substantial improvement, including CSI and LSI.

(b) Description of previous SD and SI determinations

- Means that this section may be updated in annual evaluation reports or in plan updates.
- Previous floods or other hazardous events



Visual 114-30


30

### Substantial Damage Management Plan (SDP)

**Step 1. Assess the community's vulnerability to substantial damage... Must include:**

(c) A list and map of SFHA properties with buildings that have the potential to be substantially damaged.

- Could be all buildings in the SFHA.
- Buildings that are (or suspected to be) below the BFE.
- Buildings within a repetitive loss area.
- Properties for which substantial damage estimates have previously been provided to the community after a federally declared disaster.
- Any buildings that could meet the cumulative substantial improvement definition, if applicable.


Visual 114-31

31

### Substantial Damage Management Plan (SDP)

**Step 1. Assess the community's vulnerability to substantial damage... Must include:**


(d) A description of other building or flood factors that the community considered during the assessment.

- This could be an adopted procedure for tracking cumulative damage and/or improvements, or
- a community-determined flood zone not depicted on the FIRM.

(e) A general description of buildings on the potential substantial damage list

- Such as the proportion of residential and non-residential.
- Other information should be included, such as type of structure (single family, manufactured home, multi-family, etc.).

The list of properties that could be substantially damaged can be included in a document that is separate from the management plan (e.g., spreadsheet or database developed for Step 4).


Visual 114-32

32

### Substantial Damage Management Plan (SDP)

**Step 2. Identify the community's team for the management of substantial damage to properties.**


A committee is not required for the development of the management plan, but a team would be helpful for all the steps. ←

Although the community floodplain administrator is responsible, other personnel may need to be involved with post-event efforts. In addition to the community floodplain administrator, the community should build a team that includes

- (a) Department or office responsible for issuing permits (and that tracks CSI).
- (b) Additional personnel for the substantial damage work effort after a major flood or other event.
- (c) Consider other personnel resources, such as the State NFIP Coordinator and/or FEMA post-disaster resources.

Note that the post-event work effort may be reduced depending on the pre-event work in Step 4.

"Floods and other hazardous events."


Visual 114-33


33

### Substantial Damage Management Plan (SDP)


**Step 2. Identify the community's team for the management of substantial damage to properties.**

(c) Consider other personnel resources, such as the State NFIP Coordinator and/or FEMA post-disaster resources.


**Illinois Association for Floodplain and Stormwater Management (IAFSM)**



Rapid Assistance Flood Team (RAFT) Guidance  
February 2017



Includes Information On:  
RAFT Identification and Response Procedures  
RAFT and Community Expectations  
RAFT Member Contact Data  
Community Report Source Data


Visual 114-34

34


### Substantial Damage Management Plan (SDP)

**Step 3. Identify the post-event efforts related to substantial damage.**

Contact the State NFIP Coordinator to obtain any substantial damage guides or templates that have been developed by the state for communities.

The community plan must include

- (a) Post-event coordination and communication efforts,
- (b) Damage estimate and substantial damage determination procedures, and
- (c) Post-substantial damage determination procedures for compliance


Visual 114-35

35


### Substantial Damage Management Plan (SDP)

**Step 3. Identify the post-event efforts related to substantial damage.**

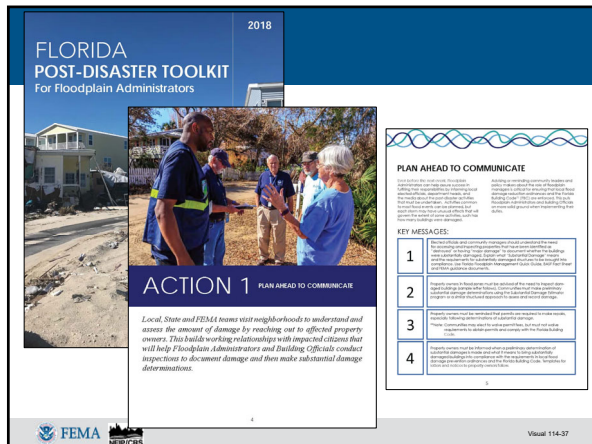
Contact the State NFIP Coordinator to obtain any substantial damage guides or templates that have been developed by the state for communities.

The community plan must include:

- (a) Post-event coordination and communication efforts. For example,
  - Meetings of the substantial damage management team and training for all team members;
  - Assigned areas of responsibility for team members (for any or all steps);
  - Determinations of whether interim permit procedures are needed;
  - Communication with elected officials; and
  - Communication with property owners.


Visual 114-36

36



37

### Substantial Damage Management Plan (SDP)

**Step 3. Identify the post-event efforts related to substantial damage.**  
 Contact the State NFIP Coordinator to obtain any substantial damage guides or templates that have been developed by the state for communities.  
 The community plan must include:

- (b) Damage estimate and substantial damage determination procedures, such as:
  - o The conduct of damage inspections of floodplain buildings;
  - o Making damage estimates for each damaged floodplain building;
  - o Establishing a market value for each damaged floodplain building;
  - o Making substantial damage determinations;
  - o Making substantial improvement determinations;
  - o Establishing an appeal process for SD/SI determinations; and
  - o Issuing damage determination letters.

38



39

### Substantial Damage Management Plan (SDP)

**Step 3. Identify the post-event efforts related to substantial damage.**  
 Contact the State NFIP Coordinator to obtain any substantial damage guides or templates that have been developed by the state for communities.  
 The community plan must include:

- (c) Post-substantial damage determination procedures for compliance, such as
  - o Enforcing permitting for repairs and mitigation compliance; and
  - o Providing periodic updates to the State NFIP Coordinator and the FEMA Regional Office (or disaster office).

40

### Substantial Damage Management Plan (SDP)

**Step 4. Build a property database for substantial damage estimates.**

- In Step 1, a list of properties that could be substantially damaged was prepared.
- This step requires the developing a database for that list that includes the building, building value, and flood information.

(a) A basic substantial damage property database is required for SDP credit.

- o Property identification number,
- o Building type (residential/non-residential)
- o Foundation type, and the number of stories
- o Fair market value of the building (assessed value)
- o If available, lowest floor and/or first floor elevation
- o If CSI, then CSI information

NFIP or FEMA data is not to be included.

41

### Substantial Damage Management Plan (SDP)

**Step 4. Build a property database for substantial damage estimates.**

- In Step 1, a list of properties that could be substantially damaged was prepared.
- This step requires the developing a database for that list that includes the building, building value, and flood information.

(a) A basic substantial damage property database is required for SDP credit.

(b) [Optional and for SDP2 credit] Pre-populate the FEMA Substantial Damage Estimator database.

(b) Is optional and for SDP credit

42

### Substantial Damage Management Plan (SDP)

**Step 5. Identify actions the community can take to address potential substantial damage.**

(a) The substantial damage properties management plan must include at least one action the community will take to educate the community about substantial damage/substantial improvement and the requirements of the NFIP or the CRS. **Required**

Examples:

- o Annual SD training for team members;
- o SD/SI public information (newsletters, social media, information at kiosks);
- o Handouts for property owners; and
- o Communication with elected officials about community responsibilities regarding substantial damage, and if applicable about CSI. (This may be sharing the annual evaluation report with the elected officials.)

FEMA NFPICRS Visual 114-43

43

### Substantial Damage Management Plan (SDP)

**Step 5. Identify actions the community can take to address potential substantial damage.**

(b) Consider mitigation alternatives for areas of the community in which buildings have the potential to be substantially damaged.

- The best option for properties with a high risk of flooding are mitigation actions taken before the next flood (buyout, elevation, floodproofing).
- The second-best approach is taking mitigation steps after the next flood.

Optional and for SDP3 credit

FEMA NFPICRS Visual 114-44

44

### Substantial Damage Management Plan (SDP)

**Step 5. Identify actions the community can take to address potential substantial damage.**

- o SDP3 credit is provided when each appropriate mitigation alternative is identified for each
  - neighborhood,
  - area, or
  - other segment of the list of properties identified in Step 1.
- o This is beyond the level of detail included in multi-hazard mitigation plans.
- o The plan must review alternative approaches and determine whether any property protection measures are feasible and appropriate.

FEMA NFPICRS Visual 114-45

45

### Substantial Damage Management Plan (SDP)

**Step 5. Identify actions the community can take to address potential substantial damage.**

Such as:

- o Relocation,
- o Acquisition,
- o Building elevation, and
- o Retrofitting.

Optional and for SDP3 credit

A review that looks only at drainage or structural flood control project alternatives is not sufficient.

For each neighborhood, area, or subset, the review must also consider potential local, state, and federal funding sources.

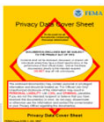
FEMA NFPICRS Visual 114-46

46

### Substantial Damage Management Plan (SDP)

**Step 6. Determine implementation steps and procedures for updating the plan.** The plan must

- Provide for an annual evaluation report. The SDP document must describe who will prepare the annual evaluation and when (credit criterion 4).
- Be shared with the elected officials, along with the evaluation reports. (See credit criterion 5).
- Propose an update process for the substantial damage management plan and/or schedule.
- Note, in the implementation section, any steps that must be taken to adhere to the Privacy Act or any state or community privacy requirements.

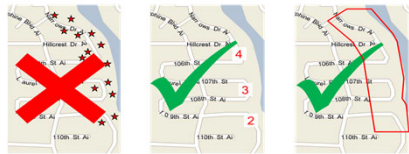


FEMA NFPICRS

47

### NFIP Data, Repetitive Loss Areas and The Privacy Act

✓ General or aggregated information not connected to a particular property may be made public.



See Coordinator's Manual, page 500-3

FEMA NFPICRS Visual 114-48

48



### Substantial Damage Management Plan (SDP)


Credit Criteria – continued

(4) The community must prepare an annual evaluation report for its substantial damage management plan. The report must

- review the pre-event action items,
- describe what was implemented (or not implemented), and
- recommend changes to the action items as appropriate.

It should highlight any flood damage that occurred since the development of the plan or since the previous annual evaluation. Updated substantial damage management plans can meet the annual evaluation requirement.

The annual evaluation report or an updated SDP should note any changes to the community’s regulations that affect SD, SI, CSI or LSI.



Visual 114-49

49

### Substantial Damage Management Plan (SDP)

- (5) The substantial damage management plan and the annual evaluation report must be submitted to the community’s governing body. If private or sensitive information (such as names or street addresses) is included in the report, then a summary report(s) must be prepared for the governing body, committees, media, and the public.
- (6) The community must provide its latest update or revision to its substantial damage management plan in time for each CRS cycle verification visit. The update or revision must include a review of each of the six planning steps.
- (7) The substantial damage management plan must be made available to the State NFIP Coordinator or the FEMA Regional Office, if requested.

When updates are made to the SDP is up to the community, however annual evaluation reports are required in years that the SDP is not updated.


Visual 114-50


50

### Substantial Damage Management Plan (SDP)

**Documentation for SDP Provided by the Community**

(1) At each verification visit,

- (a) A copy of the substantial damage management plan (see Section 512.d) or, if the community is already receiving credit for a plan, a copy of the latest update or revision to the plan (see Step 6).
- (b) A description of when and how the substantial damage management plan was shared with local officials.


Visual 114-51

51


### Substantial Damage Management Plan (SDP)

**Documentation for SDP Provided by the Community**

(2) With the annual recertification,

- (a) A copy of the annual evaluation report (or updated substantial damage management plan) and the date that it was shared with the elected officials.

*NOTE: Failure to submit the evaluation report for the substantial damage management plan with the annual recertification or the update at the next cycle verification visit will result in loss of the credit (i.e., SDP = 0).*


Visual 114-52

52


## Activity 510 - Substantial Damage

**Steps to Develop a Substantial Damage Management Plan**

1. Assess vulnerability
2. Assemble a team
3. Identify post-event actions
4. Build a database
5. Identify pre-event actions
6. Plan implementation & updates

Steps 2 through 5 may be done in any order.

An annual evaluation report is required.


Visual 114-53

53

### Substantial Damage Management Plan (SDP)

**Credit Points for SDP**

SDP = SDP1 + SDP2 + SDP3, up to the maximum of 140


SDP1 = 40 points, for a substantial damage properties management plan

SDP2 = 50 points, if FEMA’s Substantial Damage Estimator is pre-populated

SDP3 = 50 points, if pre-considered

Poll


**Impact Adjustment for SDP**  
There is no impact adjustment for SDP credit.



Visual 114-54

54

### SUBSTANTIAL DAMAGE & CRS

- NFIP compliance is a CRS Class 9 prerequisite
- So remember, after a Flood or Other Disaster
  - Act quickly before rebuilding begins.
  - Usually target potential substantial damage: Pre-disaster planning focuses efforts.
  - If needed, obtain help performing substantial damage surveys.
  - Ask FEMA or State FPM staff to provide training.






Visual 114-55


55

### Substantially Damaged Structures

- ✓ Repair / rebuilding:
  - Automatically becomes a substantial improvement.
  - Must meet current design requirements of the local ordinance.
  - Must meet other applicable requirements.
- ✓ Structures in the SFHA damaged by fire, tornado, or any other cause are subject to substantial damage ordinance provisions.

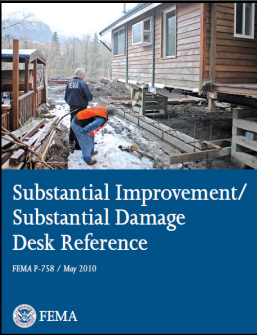


Substantial Improvement/  
Substantial Damage  
Desk Reference  
FEMA P-758 / May 2010  




Visual 114-56


56

### FEMA Publications



**Substantial Improvement/Substantial Damage Desk Reference**  
**FEMA P-758**  
**May 2010**




Visual 114-57

57

### Substantial Damage Estimator (SDE) User Manual and Field Workbook





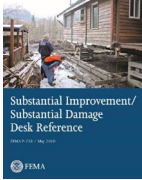
Visual 114-58


58

### 2021 Addendum to the 2017 Manual

#### Activity 510 - Substantial Damage

- New Credit in Activity 510 for Substantial Damage Properties Management Plans (SDP)
- Up to 140 points
- Basic Plan Credit – Pre-flood efforts
- Additional Credit for pre-populating as Substantial Damage Estimator
- Additional credit when mitigation alternatives are considered
- New opportunities in Activity 610 (Flood Warning and Response)





Visual 114-59


59

### Changes in the CRS

#### Summary

- About the 2021 Addendum
- SDP Credit
- Next for the CRS 2021 Addendum
- Visit [CRSresources.org](http://CRSresources.org) to receive the NFIP/CRS Update Newsletter and for training information.




Visual 114-60

60

## Changes in the CRS

**NFIP/CRS UPDATE**  
April 2020

**CRS Program Adjustments**

**Frequently Asked Questions**

**To learn more about the 2021 Addendum**

- CRSresources.org
- NFIP/CRS Update Newsletter
- CRS Webinar Series

Visual 114-61

61

## CRS Resources

**CRS Resources Home**

*This is the temporary location of the CRS Resources website. This site is provided for Community Rating System (CRS) coordinators, webinar participants, and users groups to obtain reference materials related to the CRS. Here you will find CRS documents, worksheets, and tools relevant to the activities credited under the CRS Coordinator's Manual. Other information regarding the National Flood Insurance Program's CRS program can be found on the CRS page at the FEMA.gov website.*

Website:  
CRSresources.org

62

## CRS Resources

All classes 1:00 pm Eastern/10:00 am Pacific

DATE	TOPIC
October 13	Changes in the CRS: The 2021 Addendum to the CRS Manual
October 14	CRS & Substantial Damage Properties Management Plans
November 17	Changes in the CRS: The 2021 Addendum to the CRS Manual
November 18	Activity 370 (Flood Insurance Promotion)
December 15	Changes in the CRS: The 2021 Addendum to the CRS Manual
December 16	CRS & Floodplain Species Assessment Credit

Visual 114-61

63

## Other Documents To Be Updated

CRS Activities and Elements		Max	Min	400 Series	Mapping and Regulations	Max	Min
<b>300 Series: Public Information Activities</b>							
a	EC: Elevation Certificates after CRS application	38	310-11	a	NS: Home study	290	410-8
b	ECPR: Elevation Certificate on pre-FIRM buildings	68	310-13	b	LEV: Leverage	164	410-14
c	ECPR: Elevation Certificate on pre-FIRM buildings	30	310-15	c	SR: State review	60	410-16
<b>310 (Map Information Services)</b>							
a	M1: Providing insurance information from FIRMS	30	320-7	a	FVCS: Floodway standard	110	410-21
b	M2: LHMVA floodway into CRIS area	20	320-8	f	MHEM: Expert hazards mapping	165	410-24
c	M3: Other flood problems not shown on FIRMS	20	320-11	g	CTP: Cooperating Technical Partner	132	410-25
d	M4: Flood plain data	20	320-12	a2	Open Space Preservation	300	420-13
e	M5: Special Flood Hazard information	20	320-13	a	OSP: Open space	1,400	420-3
f	M6: Historic/resilient flood information	20	320-14	a	DR: Dred navigation	30	420-11
g	M7: Natural Floodplain functions	20	320-15	c	NFOG: Natural functions open space	300	420-13
<b>320 (Outreach Projects)</b>							
a	OP: Outreach projects	200	330-6	a	OS: Open space incentives	200	420-20
b	FPF: Flood response operations	50	330-9	f	LE: Low density zoning	800	420-28
c	PP: Program for Public Information bonus	80	330-12	g	NIP: Natural shoreline protection	120	420-28
d	STR: Stakeholder forum	60	330-17	<b>400 (Higher Regulatory Standards)</b>			
<b>340 (Hazard Disclosures)</b>							
a	DFP: Flood return agent disclosure of SFHA	35	340-3	a	DL: Development limitations	1,300	430-8
b	ODR: Other disclosure requirements	25	340-5	c	FMS: Floodway	300	430-10
c	REB: Flood return procedure	12	340-7	c	FDN: Foundation protection	80	430-16
d	DDM: Disclosure of other hazards	8	340-10	e	CS: Cumulative substantial improvements	60	430-17
<b>360 (Flood Protection Information)</b>							
a	LB: Library	10	360-3	g	LSI: Lower substantial improvements	200	430-19
b	LFC: Locally pertinent documents in the library	10	360-4	f	PCF: Protection of critical facilities	60	430-21
c	WED: Wetlands	105	360-6	i	BNL: Building limits	240	430-23
<b>380 (Flood Protection Assistance)</b>							
a	PPA: Property protection advice	40	380-4	k	CAZ: Coastal A Zone regulations	800	430-32
b	PPA: Advice after a new visit	48	380-5	j	SHR: Special hazard regulations	100	430-33
c	FAA: Financial assistance advice	15	380-7	m	OHS: Other higher standards	100	430-37
d	TWD: Training	10	380-10	a	SMS: State-mandated standards	20	430-38
<b>390 (Flood Insurance Promotion)</b>							
a	FA: Flood insurance assessment	15	390-3	a	RA: Regulations administration	67	430-40
b	CP: Flood insurance assessment	10	390-4				
c	CP: Flood insurance assessment	60	390-5				
d	TA: Flood insurance assessment	20	390-11				

Visual 114-61

64

## Changes in the CRS

Double Coverage by 2022

Questions?

THANK YOU

POLL

Visual 114-65

65

### Substantial Improvement Tracking:

Here's one example:

Improvement value divided by building value = percent improvement. Percent improvement value accumulates over life of building. When percent improvement totals 50%, building must be brought into conformance with flood ordinance.

I.E.: \$20,000 / \$100,000 = 20% improvement in 1990  
 \$10,000 / \$120,000 = 8% improvement in 1991  
 \$28,000 / \$130,000 = 22% improvement in 1999

50% cumulative improvement (Building must be brought up to (flood) code)

### New Construction and Additions / Improvements to existing structures:

Here's the method:

**Example A:** A Pre-FIRM structure (with lowest floor below BFE), valued at \$100,000.00 is improved with an addition worth \$20,000.00. Only the addition is required to be elevated above the BFE (less than 50% of market value).

**Example B:** Same structure as above is improved with an addition worth \$55,000.00 or more. The entire structure must be elevated above the BFE (50% or more of the market value).

Visual 114-66

66

### Repetitive Loss Definitions

**NIP:**

"A Repetitive Loss (RL) property is any insurable building for which two or more claims of more than \$1,000 were paid by the National Flood Insurance Program (NFIP) within any rolling ten-year period, since 1978. At least two of the claims must be more than 10 years apart from claims on other properties of each other. A RL property may or may not be currently covered by the NFIP."

2006: \$1,500      2013: \$4,000  
10 years

**Not a Repetitive Loss:**

1999: \$20,000      2013: \$50,000  
Greater than 10 years

**Repetitive Loss Assistance - FMA:**

"A repetitive loss property is a structure covered by a contract for flood insurance made available under the FMA that:

- The total of flood-related damage in 2 consecutive years exceeds the sum of the repair, on the average, equal or exceeded 25 percent of the market value of the structure at the time of each such flood event; and
- At the time of the second incidence of flood-related damage, the contract for flood insurance contains increased cost of compliance coverage."

Market Value = \$500,000  
25% = \$125,000  
Qualifies as a Repetitive Loss under FMA

2000: \$200,000      2010: \$300,000  
Greater than 10 years

**Increased Cost of Compliance (ICC) Eligibility:**

Does not qualify for ICC under the Repetitive Loss clause because losses did not occur within 10 years of each other.

"A building covered by flood insurance incurred flood-related damage two times over a period of 10 years, and the cost of the repairs was, on the average, at least 25 percent of the market value of the building before the damage occurred each time. This applies only if the community has adopted a repetitive loss criterion in the local floodplain management ordinance, and a flood insurance claim must have been paid in both cases. The combined damage total must be 25 percent of the value of the building before the damage occurred, but it need not be evenly distributed. So, if the damage was 10 percent of the value of the building in the first event and 15 percent of the value of the building in the second event, the property would qualify for ICC coverage."

Visual 114-67