NFIP Community Rating System

Changes in the CRS: The 2021 Addendum to the 2017 CRS Coordinator’s Manual

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

CRS Webinar Series, February 2021
Overview

• Why an Addendum
• Purpose of 2021 Addendum
• 2021 Program Prerequisites
• New Credit Opportunities
• What’s Next
Community Rating System

[fema.gov/community-rating-system]
Community Rating System
fema.gov/community-rating-system

Community Rating System Coordinator’s Manual

The Coordinator’s Manual is the guidebook for the Community Rating System. The Coordinator’s Manual explains how the program operates, how credits are calculated, what documentation is required, and how class ratings are determined. It also acts as guidance for communities in enhancing their flood loss reduction and resource protection activities.

The current Coordinator’s Manual is the 2017 Edition.
- Section 100 gives general background information on the CRS.
- Section 200 explains the application and verification procedures.
- Sections 300 through 700 explain the credit points and calculations that are used to verify CRS credit.

Download the 2017 Coordinator’s Manual

2021 Addendum to the Coordinator’s Manual, 2017 Edition
In January 2021, an addendum to the Coordinator’s Manual became effective. The 2021 Addendum and the 2017 CRS Coordinator’s Manual together will constitute the official statement of CRS credits and procedures. These two documents will remain effective until a fully revised edition of the Coordinator’s Manual is issued in the future.

Download the 2021 Addendum

Frequently Asked Questions about the 2021 Addendum
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
In 2019 we said there would be a new 2021 CRS Coordinator’s Manual

- Retire elements that all communities receive credit
- Reweight—or redistribute those credits
- Class 8 Freeboard Prerequisite
- Substantial Damage
- Flood risk outside the SFHA
- Endangered Species Act (ESA)
- Simplify
2021 Addendum – A “Bridge”

- Opted to create a bridge from the 2017 Manual to a larger CRS program refresh

- 2021 Addendum effective on January 1 and is being used with the 2017 CRS Coordinator’s Manual

- Effective at community’s next cycle visit after January 2021

- Emails and letters to communities

- Guidance materials available
CRS Coordinator’s Manual (Manual)

Manual Provides:

- Activities and Credit
- Credit Criteria
- Documentation

Available at fema.gov/community-rating-system
2021 Addendum to the 2017 CRS Coordinator’s Manual (Manual)

Available at fema.gov/community-rating-system

Addendum FAQs also on fema.gov

Forward:
• What Becomes Effective
• How to Use

Each Section:
• Summary
• New or Updates
• Clarifications
Two New Requirements in the 2021 Addendum

- Class 9 prerequisite for Elevation Certificates will be changed.

  **Simplification**

- Class 8 prerequisite for residential freeboard.

  **New**
## Class 9 Prerequisite for Elevation Certificates

<table>
<thead>
<tr>
<th>2017 Manual – Section 211.a. (3)</th>
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<td>Achieve 90% accuracy on its floodplain-related construction certificates during its annual review., and</td>
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<tr>
<td></td>
<td>Receive credit for construction certificate management procedures (element CCMP) under Activity 310 (Elevation Certificates)</td>
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# Class 9 Prerequisite and Elevation Certificates

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<tr>
<th></th>
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<tr>
<td></td>
<td>Courtesy review.</td>
<td>90% accuracy required by 2&lt;sup&gt;nd&lt;/sup&gt; review every year.</td>
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<tr>
<td><strong>Verification Cycle</strong></td>
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<td>Receive credit for construction certificate</td>
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**Simplification:** ECs submitted once. Problems addressed that year.
CRS Class 9 & Activity 310 Changes

- Scott Cofoid
  ISO/CRS Technical Coordinator
- AND Webinar tomorrow, February 17th with David Holcomb

CRSresources.org/training/ for “CRS Activity 310 Changes for 2021” video
Activity 310 (Elevation Certificates)

• Elevation Certificate (EC) credit will be retired and replaced with construction certificate management procedures (CCMP) credit.

• All communities must get CCMP credit. (All communities receive 38 points. No impact adjustment for CCMP.)

• No changes in ECPO and ECPR credit.
CRS Activity 310 (Elevation Certificates)

There are 8 points that need to be covered in the CCMP. View the webinar or see the guidance.

- **What certificates are required**
  - Floodproofing Certs, V Zone Certs, Eng. Opening Certs

- **When certificates are required**
  - Before, During, After Construction?

- **What Dept./Office collects** the certificates

- **What Dept./Office reviews** the certificates

- **How certificates are corrected**

- **How and where certificates are maintained**

- **How certificates are made available** to inquirers

* If you also require ECs outside the SFHA, include this in your procedures
In order to be a Class 8 or better

- The community must adopt and enforce **at least a 1-foot freeboard** requirement
- ...including machinery and equipment
- for **all residential buildings** constructed, substantially improved, and/or reconstructed due to substantial damage
- throughout its Special Flood Hazard Area (SFHA) **where base flood elevations (BFEs) have been determined** on the Flood Insurance Rate Map (FIRM) or in the Flood Insurance Study (FIS),
Prerequisite

• Effective Date: January 1, 2021

• Implementation: Communities must have adopted and be implementing residential freeboard within number Zones in the SFHA

  (1) By their first CRS verification cycle visit after January 2021, or

  (2) By the next CRS Manual.

Resiliency: Reduced damage, lower insurance premium.
2021 Class 8 Prerequisite

Engagement

• Letters to community CEOs and CRS Coordinators

• Frequently Asked Questions - Updated November 2020)

• Class 8 Freeboard FAQs available on CRSresources.org/Manual
Frequently Asked Questions

- By “all residential buildings” the CRS means all single-family, multi-family or manufactured. Flood Insurance Manual definition of residential.
- Includes all manufactured homes, including replacement in pre-FIRM manufactures home parks.
- Historic buildings (as defined by 44 CRS 59.1) are not subject to the freeboard prerequisite.
Frequently Asked Questions

- Machinery and equipment (M&E) must be elevated.

- Including M&E placed within attached garages and/or within enclosures below elevated buildings, with the exception of utility meters and equipment specifically designed to withstand inundation according to the standards of the International Residential Codes and the NFIP.

A community that allows floodproofing around machinery and equipment in lieu of elevation to the freeboard level does not meet the prerequisite.
Frequently Asked Questions

- Machinery and equipment must be elevated.
- The Class 8 freeboard prerequisite will be met provided that **attached garages and enclosures** below elevated buildings meet the minimum requirements of the NFIP (elevated to the base flood elevation or having proper openings).

As noted in question 16, all machinery and equipment in attached garages or in enclosures must be elevated to the freeboard level.
Class 8 Freeboard Prerequisite

**CRS and the Class 8 Freeboard Prerequisite for Attached Garages**

- All living space at least BFE + 1'
- All machinery and equipment elevated to at least BFE + 1'

<table>
<thead>
<tr>
<th>Garage</th>
<th>Below BFE</th>
<th>Below BFE</th>
<th>At BFE</th>
<th>At BFE</th>
<th>6'' freeboard</th>
<th>6'' freeboard</th>
<th>1' Freeboard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Openings</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
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<tr>
<td>Insurance Rated</td>
<td>Minus</td>
<td>BFE+1'</td>
<td>BFE+1'</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
Class 8 Freeboard FAQs

2017 CRS Coordinator's Manual

The objective of the Community Rating System (CRS) is to provide an incentive for communities to reduce the risk of loss to their community, homes, businesses, and infrastructure due to flood damage. The CRS Coordinator’s Manual is the guidebook for the program, and it provides information on how the program operates, what is scored, and how to earn CRS credits. It also includes guidance on CRS management programs.

Helpful Resources

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

- 2021 Class 8 Freeboard Prerequisite: Frequently Asked Questions (Download .pdf)
- Master List of Elements – 2017 Coordinator’s Manual (Download .pdf)
- CRS Credits Estimator—2017 to 2013 Coordinator’s Manual (Download .pdf)
- Summary of Changes in 2017 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 Credit 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—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)
In order to be a Class 8 or better

- The community must adopt and enforce **at least a 1-foot freeboard** requirement
- …including machinery and equipment
- for **all residential buildings** constructed, substantially improved, and/or reconstructed due to substantial damage
- throughout its Special Flood Hazard Area (SFHA) **where base flood elevations (BFEs) have been determined** on the Flood Insurance Rate Map (FIRM) or in the Flood Insurance Study (FIS),

Including AO and AH Zones – all numbered Zones
214.a. Modification Criteria

(7) A community that submits a modification that would result in a class change must meet the pertinent class prerequisites in effect at the time of the modification, as listed in the Coordinator’s Manual and Addendum in effect at the time of the modification request. These prerequisites are in addition to the requirement for the additional credit points needed for a class increase.
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
Expanding attention and opportunities for floodplain species assessment and planning:

- Replace Section 116.a. for Other Program Priorities “Natural Floodplain Functions and Endangered Species”

- Activity 510 Natural Functions Plan credit for Floodplain Species Assessments and Floodplain Species Plans
2021 Addendum and ESA

Expanding attention and opportunities for floodplain species assessment and planning:

- Replace Section 116.a. for Other Program Priorities “Natural Floodplain Functions and Endangered Species”
- Activity 510 Natural Functions Plan credit for Floodplain Species Assessments and Floodplain Species Plans
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 way to get CRS credit
• Activity 510 Natural Functions Plan (NFP)

Credit Points for NFP

NFP = the total of the following, up to the maximum of 100 points:

NFP1 = 100 points, for a plan, or combination of plans, that meets credit criteria (1) and (2) and covers the entire SFHA within a community.

NFP2 = 15 x the number of plans that meet credit criterion (1), up to four plans (60 points maximum)

FSA = 15 points for preparing and circulating a floodplain species assessment

FSP = 85 points for preparing and adopting a floodplain species plan
Activity 510 Natural Functions Plan (NFP)

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2021 Addendum NFP Credit

- Activity 510 Natural Functions Plan (NFP)

  Activity 510 (Floodplain Management Planning)
  - CRS Credit for Planning Committees (Download.pdf)
  - Floodplain Management Plan (FMP Credit) Checklist (Download.xls)
  - Progress Report Template (Download.pdf)
  - Changes to the 10-step Floodplain Management Planning Process (Download.pdf)
  - Developing a Repetitive Loss Area Analysis (Download.pdf)
  - City of Savannah Final Repetitive Loss Area Analysis (Download.pdf)
  - Using Multi-Objective Management to Reduce Flood Losses in Your Watershed (Download.pdf)
  - FEMA Mitigation Planning Guides (View on FEMA website)
  - Mitigation Planning and the Community Rating System Key Topics Bulletin (View on FEMA website)
    - Preparing A Floodplain Species Assessment and A Floodplain Species Plan (Download.pdf)
      - FRESH Users Guide (Download.pdf)
      - Example Floodplain Species Assessments and Plans
        - Gloucester County and James City County, Virginia (Download.pdf)
        - Jefferson Parish, Louisiana (Download.pdf)
        - City of Monroe, Washington (Download.pdf)
  
  Activity 520 (Acquisition and Relocation)
  - FEMA Mitigation Grant Guides (View on FEMA website)
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)
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”
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.
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.
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.
Activity 370 – Flood Insurance Promotion

- More credit for Coverage Improvement Plans and Plan Implementation in Activity 370.
- Additional credit for technical assistance (element TA).
- New elements will be added to provide credit for enhanced flood insurance promotion efforts. Bonus credit for CP and CPI.
Activity 370 – Flood Insurance Promotion

e. **Flood insurance brochures (FIB):** Up to 25 points for including flood insurance information with building permits or other direct distribution.

f. **Flood insurance meeting (FIM):** Up to 40 points for a community town hall meeting or open house to promote flood insurance.

g. **State-required continuing education (SCE):** Up to 15 points for a state requirement for continuing education on flood insurance for insurance agents.
Future Conditions

- New Section 404 (Sea Level Rise Projections and the CRS)
- Updated to reflect changes in available sea level rise projections.
- Prorating formula for SLR related elements.
Activity 450 - Watershed Management

- Change the impact adjustment in Activity 450 (Stormwater Management)
- Impact adjustment based on community NOT watershed.
- Other changes in Watershed Master Planning
More NFIP/CRS Update Newsletter Articles
CRS Webinar Series
Guidance (and webinars) for:

- Section 300, Activity 310 and annual review of Elevation Certificates
- Floodplain Species Assessments
- Substantial Damage Properties Management Plans
- Additional Activity 370 (Flood Insurance Promotion) credit
- Coastal and sea level rise
- Watershed Management (Activity 450)

Addendum is effective on for all cycle visit.
Annual review of Elevation Certificates
Changes in the CRS

To learn more about the 2021 Addendum

- CRSresources.org
- NFIP/CRS Update Newsletter
- CRS Webinar Series
Webinars on the Community Rating System

The CRS Webinar Series provides both live and on-demand training to communities that are not yet participating in the Community Rating System, local government staff who are new to the CRS, and those with experience in the program. The Series includes basic introductory sessions and more advanced topics, most averaging about an hour in length.

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

Schedule

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<td>February 16</td>
<td>Changes in the CRS: The 2021 Addendum to the CRS Manual</td>
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<tr>
<td>February 17</td>
<td>Changes to Activity 310 Elevation Certificates</td>
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<td>March 16</td>
<td>Preparing an Verification Visit</td>
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<td>CRS &amp; Floodplain Species Assessment</td>
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<td>April 13</td>
<td>Preparing an Annual Recertification</td>
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<td>April 14</td>
<td>Watershed Master Planning</td>
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<td>May 18</td>
<td>Introduction to the CRS</td>
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<td>May 19</td>
<td>CRS &amp; Substantial Damage Properties Management Plans</td>
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<td>June 15</td>
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Other Documents To Be Updated

CRS Activities and Elements

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<td>b ECP Elevation Certificate on post-FIRM buildings</td>
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<tr>
<td>c ECPK Elevation Certificate on pre-FIRM buildings</td>
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<td>b MI2 LIMIWA/floodway info/CBRS area</td>
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<td>c MI3 Other flood problems not shown on FIRM</td>
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<td>d MI4 Flood depth data</td>
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<td>e MI5 Special flood-related hazards</td>
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<td>320-13</td>
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<td>f MI6 Historical/repetitive flood information</td>
<td>20</td>
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<td>g MI7 Natural floodplain functions</td>
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<td>a OP Outreach projects</td>
<td>200</td>
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<td>c PPI Program for Public information function</td>
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<td>d STK Stakeholder bonus</td>
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<td>a DFH Real estate agent disclosure of SFHA</td>
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<td>b ODR Other disclosure requirements</td>
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<td>c RED Real estate brochure</td>
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<td>d DOH Disclosure of other hazards</td>
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<td>a LIB Library</td>
<td>10</td>
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<tr>
<td>b LPD Locally pertinent documents in the library</td>
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<td>350-5</td>
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<tr>
<td>c WEB Website</td>
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<td>a PPA Property protection advice</td>
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<td>b PPAV Advice after site visit</td>
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<td>c FAA Financial assistance advice</td>
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<td>d TNG Training</td>
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<td>b CP</td>
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<td>c CPI</td>
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<th>410 (Floodplain Mapping)</th>
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<tr>
<td>a NS New study</td>
<td>290</td>
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<td>b LEV Leverage</td>
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<td>c SR State review</td>
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<td>d HSIS Higher study standards</td>
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<td>e FWS Floodway standard</td>
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<td>f MAPSH Special hazards mapping</td>
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<td>g CTP Cooperating Technical Partner</td>
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<td>a OSP Preserved open space</td>
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<td>b DR Deed restriction</td>
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<td>c NFOS Natural functions open space</td>
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<td>f LZ Low density zoning</td>
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<td>g NSF Natural shoreline protection</td>
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<th>430 (Higher Regulatory Standards)</th>
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<td>a DL Development limitations</td>
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<td>b FRS Freeboard</td>
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<td>c FDN Foundation protection</td>
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<td>d OSI Cumulative substantial improvements</td>
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<td>e LSI Lower substantial improvements</td>
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<td>f POF Protection of critical facilities</td>
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<td>g ENL Enclosure limits</td>
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<td>h BC Building code</td>
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<td>k CAC Coastal A Zone regulations</td>
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<td>l SHR Special hazards regulations</td>
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<td>m OMS Other higher standards</td>
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<td>o RAR Regulations administration</td>
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Changes in the CRS

Summary

➢ Why the 2021 Addendum
➢ About the 2021 Addendum
➢ Next for the CRS

➢ Visit CRSresources.org to receive the NFIP/CRS Update Newsletter and for training information.
Community Rating System
fema.gov/community-rating-system
Changes in the CRS

Questions?

Thank you

Poll