



FLORIDA'S CRS-CAV PILOT PROGRAM

A Pathway to Flood Resiliency through
NFIP Compliance and CRS program



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May 2018

Download a copy of the CRS-CAV Pilot Program Report at: <https://www.floridadisaster.org/dem/mitigation/floodplain/community-resources/> For further information about the CRS-CAV Pilot Program or this report please contact 850-815-4556, or floods@em.myflorida.com

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SPECIAL THANKS:

Miles Anderson, Chief, Bureau of Mitigation, was an inspiration throughout the program, providing keen insights on program management, ensuring critically needed budget support, and offering encouragement and direction that contributed significantly to the program success.

Staff of FIMA, primarily Kayed Lahkia, Deputy Director Mitigation-Risk Reduction; Rachel Sears, Director, Floodplain and Insurance Branch, FIMA; Bill Lesser, CRS Coordinator, FIMA; Bret Gates, FPM Policy & ESA Coordinator FIMA; and staff in the FEMA Region IV staff, Susan Wilson, Chief, Floodplain Management and Insurance Branch (Retired); Jason Hunter, Chief, Floodplain Management and Insurance Branch; and Janice Mitchell, Insurance Specialist.

Staff of the Insurance Services Office, William Trakimas, Director, Natural Hazards, and Sherry Harper, Planning Technical Coordinator, served a major role in offering suggestions, participating in numerous planning and coordination meetings and ensuring that eligible communities completed correct CRS information and were able to participate in the CRS Program at the earliest possible time.

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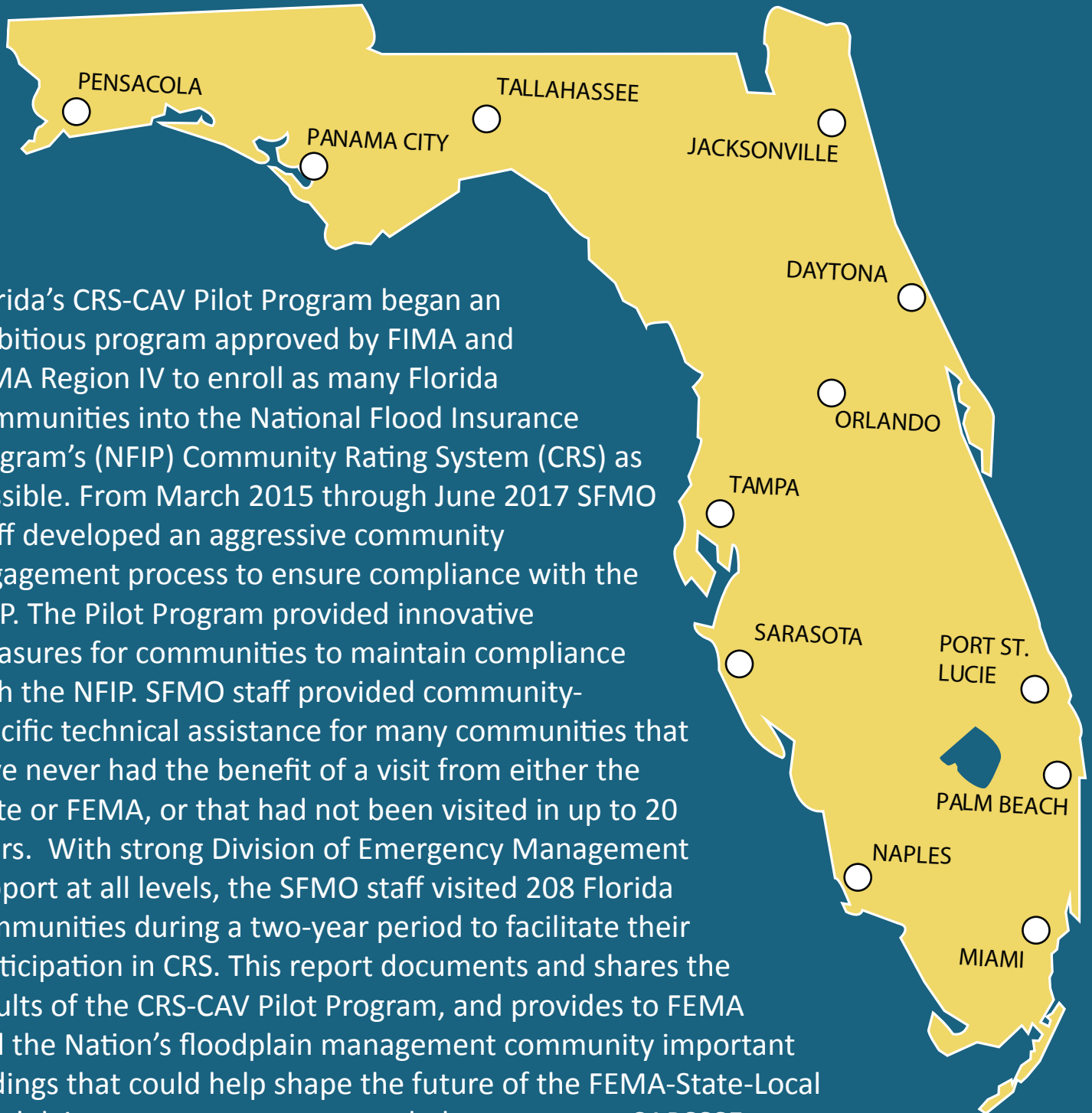
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OVERVIEW

Florida's CRS-CAV Pilot Program began an ambitious program approved by FIMA and FEMA Region IV to enroll as many Florida Communities into the National Flood Insurance Program's (NFIP) Community Rating System (CRS) as possible. From March 2015 through June 2017 SFMO Staff developed an aggressive community engagement process to ensure compliance with the NFIP. The Pilot Program provided innovative measures for communities to maintain compliance with the NFIP. SFMO staff provided community-specific technical assistance for many communities that have never had the benefit of a visit from either the State or FEMA, or that had not been visited in up to 20 years. With strong Division of Emergency Management support at all levels, the SFMO staff visited 208 Florida communities during a two-year period to facilitate their participation in CRS. This report documents and shares the results of the CRS-CAV Pilot Program, and provides to FEMA and the Nation's floodplain management community important findings that could help shape the future of the FEMA-State-Local floodplain management program, help restructure CAPSSSE funding priorities and reassess the long-standing process established by FEMA for communities to participate in the NFIP Community Rating System.





ACKNOWLEDGMENTS

Florida's State Floodplain Management Office sincerely thanks all parties participating in the CRS-CAV Pilot Program. The Florida Division of Emergency Management (FDEM) extends its appreciation to the Federal Emergency Management Agency (FEMA), Local Jurisdictional staff participating in the Pilot Program as well as contracted organizations and their staff.

Through this report, the Division shares the success and challenges for implementing the Pilot Program along with an analysis of the results. It has been FDEM's honor to further sustain the resiliency of the great State of Florida through this program, and we are excited to share all that we have learned in the process for use by other states. We hope that some of the findings in this report may be applied on a national scale.

Without the combined efforts and commitment of the individuals involved, the Pilot Program would not have experienced the success that it has.

Thank you,
FDEM, Bureau of Mitigation, State Floodplain Management Office.

For further information about the CRS-CAV Pilot Program or this report please contact 850-815-4556, or floods@em.myflorida.com

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EXECUTIVE SUMMARY

Florida is highly vulnerable to weather related impacts, particularly flooding. As the State's population continues to grow, subsequent development pressures in vulnerable areas follow. With approximately 80% of the population living or conducting business along Florida's urban coastlines, successfully managing flood risk and increasing resiliency is a growing challenge to keep people safe and to protect properties. Despite the apparent significant flood threat to "life safety" and real property, Florida's total NFIP premiums contribute more than three and a half times the amount of closed paid losses the State has received, making it among the highest State contributors to the NFIP insurance fund.

Today, 98% of Florida's communities participate in the NFIP, resulting in 1.73 million active flood insurance policies within the state. Congressional adoption of the Biggert-Waters Flood Insurance Reform Act of 2012 (BW-12) stimulated sharp increases in premiums for approximately 20% of Florida's policies consisting of about 350,000 properties. With primary economic drivers of real estate and tourism significantly impacted by changes to flood insurance rates, and the desire to improve flood resiliency in Florida communities, the Division of Emergency Management (FDEM) embraced the Community Rating System (CRS) as a tool to reduce flood risk, and help reduce premium increases caused by BW-12 and subsequent legislation. The Division specifically sought to enable more people to retain and even acquire flood insurance for the first time, achieve more flood resiliency in communities, and reduce the cost of NFIP flood insurance throughout the State. Improved flood resiliency results in faster community recovery and reduced impacts to businesses, and residents and tourists that purchase commodities and services.

FDEM leadership tasked the State Floodplain Management Office (SFMO) in 2015 with increasing CRS participation among Florida communities. The SFMO designed the "Florida CRS-CAV Pilot Program", with approval from FEMA HQ and Regional staff, as a proactive strategy to increase flood resiliency and enroll all Florida communities in the CRS. Through the pilot program, SFMO staff developed a unique three-part strategy deemed to meet the prerequisites for eligibility to participate in CRS and resolve the many log-jams that have prevented communities from being able to participate in CRS:

- **Elected officials** notified about the FCAC meetings learn that they can gain political capital by both helping make their communities more flood resilient, and helping constituents save money on NFIP flood insurance required on their property by lending institutions.
- **Communities** that have never had a visit were pleased to learn that State staff have a genuine interest in helping them conduct and improve their floodplain management program giving local staff a sense of confidence on how they can obtain the information they need, and who they can contact for technical assistance.
- **Local** management teams are pleased to learn that there is a continuum of steps that will enable them to begin receiving 5% or 10% on NFIP policy discounts through an expedited process following closure of CAV/FCAC reports. During the meetings, State staff committed to assist locals in the application, documentation of credit points, and initial scoring of credit points necessary to verify that they will be accepted into CRS and will receive points as soon as they join.

CRS/ CAV PILOT PROGRAM MAJOR MILESTONES

1 COMBINING	<p>Combining floodplain management compliance visits with opportunity for communities to learn about how to participate in the CRS increased the value and purpose of meeting with local staff. The process for resolving compliance matters was no longer the primary goal for many communities, but viewed by community staff as a critical step to achieving greater flood resiliency and lower flood insurance costs by becoming eligible to participate in CRS.</p>
2 OFFERING	<p>Offering a prescriptive “how-to” tool, the State’s <i>Seven Performance Measures</i>, provides an important resource local staff appreciate to help them enforce their floodplain regulations in a systematic way. The <i>Measures</i> also include a sample resolution that local governing boards are strongly encouraged to adopt as a means of supporting staff who are often caught between their program responsibilities and local political pressure to allow non-compliant, flood-risky development activity. Adoption of the <i>Seven Performance Measures</i> by resolution was a requirement for any community that had procedural issues, and was required for participation in CRS under the CRS-CAV Pilot Program.</p>
3 APPLYING	<p>Applying the CRS Quick Check with communities before discussing compliance issues gave an optimistic view for community staff who are committed to resolving compliance issues in order to take advantage of the CRS incentive program, resulting in communities that are more flood resilient.</p>
4 REACHING	<p>Reaching communities that under the FEMA prioritization tool, had not benefited from a visit in 10 to 20 years and which had outdated flood ordinances was a critical milestone. Further, local staff appreciated meeting State staff and receiving answers to countless questions. State staff were able to identify opportunities for future training and provided copies or access to floodplain management reference materials unknown to local staff, and information about the State’s and FEMA’s mitigation grant programs.</p>
5 INCLUDING	<p>Including elected officials in the FCAC meetings enabled them to realize that they could gain political capital by helping to make their communities more flood resilient and through participation in CRS could help their constituents save money on NFIP flood insurance required by their mortgage companies.</p>
6 ENABLING	<p>Enabling communities to resolve compliance issues occurring in the past five years, as opposed to the traditional CAV that has no constraints on the look-back period. Many local floodplain staffs that had never benefited from a SFMO visit were pleased to learn that State staffs have a genuine interest in helping them conduct and improve their floodplain management program, giving local staff a sense of confidence on how they can obtain the information they need, and who they can contact for technical assistance.</p>
7 RECEIVING	<p>Receiving discounts of 5% or 10% on NFIP policy discounts through an expedited process following closure of CAV/FCAC reports pleased local officials. During the meetings, State staff committed to assist locals in preparing Letters of Interest, application materials, the resolution to implement the <i>Seven Performance Measures</i>, adoption of the State Model flood ordinance, prepare documentation of credit points, and initial scoring of credit points necessary to verify eligibility to participate in CRS.</p>

SUMMARY OF KEY PROGRAM ACHIEVEMENTS

208 COMMUNITIES

Between March 1, 2015 and June 30, 2017, the effective period of the pilot program, SFMO staff conducted CAV/FCACs with staff of 208 NFIP communities not participating in CRS.

180 MODEL ORDINANCES

Of the 208 participants, 180 actually adopted the State model flood ordinance (Section 2.7) as a requirement before the SFMO would close the FCAC.

50 of 67 COUNTIES PARTICIPATE IN THE CRS

By the Program's completion, 50 of Florida's 67 counties participate in CRS representing 96% of all Florida properties being located in CRS communities.

SEVEN PERFORMANCES MEASURES ADOPTED

33 communities adopted the Seven Performance Measures with 10 pending adoption.

122 CLOSED FCACs

134 FCACs were closed by the deadline of this draft report, with an additional 12 ready for closure (the remaining 62 will be closed as identified issues are resolved and ordinances are adopted).

26 CRS ENTRIES

26 communities received FEMA Approval for CRS entry and have actually joined by the date of this report.



TERMS USED IN THIS REPORT

Base Flood Elevation (BFE)

The elevation of the base flood, including wave height, relative to the National Geodetic Vertical Datum (NGVD), North American Vertical Datum (NAVD) or other datum specified on the Flood Insurance Rate Map (FIRM). The base flood has a 1-percent chance of being equaled or exceeded in any given year (commonly called the “100-year flood”).

Community Assistance Contact (CAC)

A telephone call or brief visit by a FEMA staff member or staff of a State agency on behalf of FEMA for the purpose of establishing or re-establishing contact to determine if any program-related problems exist and to offer assistance. Generally, a CAC consists of preparation, community contact, documentation, and follow-up.

Community Assistance Visit (CAV)

A visit to a community by a FEMA staff member or staff of a State agency on behalf of FEMA that serves the dual purpose of providing technical assistance to the community and assuring that the community is adequately enforcing its floodplain management regulations. Generally, a CAV consists of a tour of the floodplain, an inspection of community permit files, and meetings with local appointed and elected officials.

Community Information System (CIS)

Database that is the official record of NFIP information. The CIS provides information about communities that participate in the NFIP, including

local floodplain management programs, mapping, insurance, demographics, engineering, and community specific information. FEMA Regional Office staff and NFIP State Coordinating Agency staff use the CIS to keep current local staff contacts, document the general technical assistance that is provided, track and resolve compliance problems that are identified in individual communities, and the assistance that is provided to resolve program deficiencies and remedy identified violations.

Community Rating System (CRS)

A voluntary program developed by FEMA in 1990 to provide incentives to recognize and encourage communities participating in the National Flood Insurance Program to exceed the minimum NFIP floodplain management requirements. NFIP flood insurance premiums are discounted to reflect reduced flood risk resulting from community actions.

Field Community Assistance Contacts (FCACs)

A site visit, essentially the same as a CAV, conducted by the SFMO to maintain periodic contact with communities participating in the NFIP and assesses needs for technical assistance and coordination. State staff conducted strategic surveys of floodplains to become acquainted with development issues in flood zones and to observe apparent unpermitted, non-conforming or non-compliant development. When development was observed that did not appear to be compliant, staff review permit files. The FCAC visits also provide an opportunity for assessing the effectiveness of local floodplain management ordinances and enforcement practices. Discussion of



CRS program and eligibility requirements was also a main focus of the FCAC meetings.

Flood Resiliency

The ability to withstand and recover from disruptive flooding events. Resiliency also refers to the capacity of a community to adapt to change while maintaining its vibrancy, livability, and equity. A flood resilient community is one where:

- Residents know their flood risk and how to prepare in the event of a storm;
- Property owners are able to adapt their buildings to minimize damage and disruption from flooding through strategies that also meet the community's goals for neighborhood character and a quality streetscape;
- Infrastructure systems are constructed and maintained to withstand significant flood events and offer some protection from flooding while also working for everyday conditions.

Floodplain Management

The operation of an overall program of corrective and preventive measures for reducing flood damage, including but not limited to emergency preparedness plans, flood control works and flood plain management regulations.

Floodplain Administrator (FPA)

The staff position in a community designated and charged with the administration and enforcement of local floodplain management regulations, in conjunction with the community's Building Official

who may also serve as the FPA.

General Technical Assistance (GTA)

Assistance provided to community officials and others to explain technical aspects of floodplain management regulations in support and furtherance of the National Flood Insurance Program. Assistance may be provided by phone, in emails, and during meetings.

National Flood Insurance Program (NFIP)

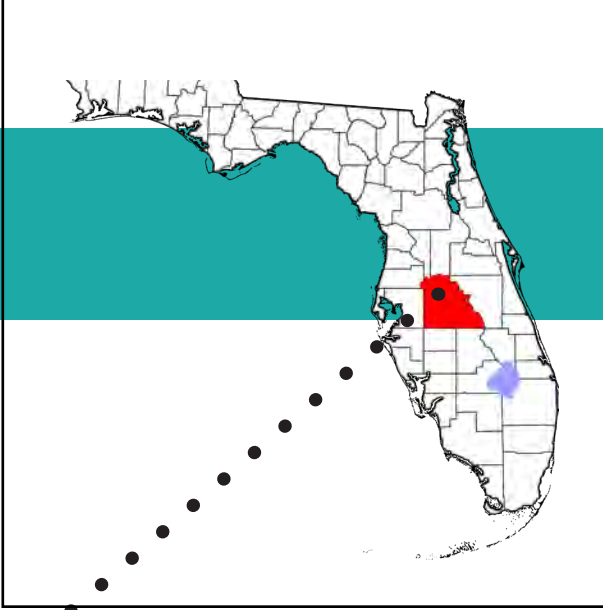
The program of flood insurance coverage and floodplain management administered under the National Flood Insurance Act and applicable Federal regulations promulgated in Title 44 of the Code of Federal Regulations, Sub chapter B. The NFIP provides flood insurance coverage, establishes minimum floodplain management regulations, and develops and publishes floodplain mapping with the objective of managing and reducing flood risk within communities. The Program offers federally backed flood insurance to citizens in participating communities that make formal commitments to implement minimum federal or higher regulations for floodplain development.

Special Flood Hazard Area (SFHA)

An area in the floodplain subject to a 1 percent or greater chance of flooding in any given year. Special flood hazard areas are shown on FIRMs as Zone A, AO, A1-A30, AE, A99, AH, V1-V30, VE or V and Coastal A Zones which became update and effective in Florida by statute on January 1, 2018



CITY HALL
1927



CASE STUDY:

THE CITY OF DAVENPORT

Located just south of Interstate 4 in an area of rapid growth, the City of Davenport is a small historic community in central Florida. The City is less than twenty miles from Downtown Orlando and minutes from Orlando's Disney World, becoming one of the area's most sought after bedroom communities. Spanning just 3.4 square miles, Davenport is home to roughly 3,000 people and frequent visitors.

Unaware of the recent accelerated growth rate, SFMO staff conducted the City of Davenport's first Field Community Assistance Visit. As a part of Florida's CRS Pilot Program, the purpose of the FCAC was to assess Davenport's floodplain management program, assess its floodplains, overall knowledge of the NFIP, and to provide Davenport staff with technical assistance on the City's floodplain management program. Having little-to-no floodplain management knowledge and an outdated flood ordinance and few regulations in place prior to the FCAC, the City of Davenport did not appear to be compliant. However, the City has since adopted the state model ordinance and improved its procedures. The community adopted by resolution the *Seven Performance Measures* to help ensure that its Floodplain management program was compliant.

On September 20, 2016 SFMO staff visited the City of Davenport. Staff found serious deficiencies in the community's floodplain management program, specifically in its administrative, its enforcement procedures, and floodplain regulations. In addition, the community was relying heavily on Polk County and Haines City for its Development Review Process.

Without an established interlocal agreement, there was clear delineation of floodplain management responsibilities among the three communities. As such, the community made no flood zone determinations nor collected building elevation data to ensure compliance with its local flood ordinance. In short, the community was unable to address the compliance and procedural issues that would enable DEM to close the CAV.

Nevertheless, during the FCAC meeting, Davenport staff indicated an eagerness to quickly revise its procedures to ensure compliance with its local ordinance. Through immediate technical assistance, community staff worked with SFMO staff to move towards compliance. Following the meeting, the City of Davenport began collecting the documentation for permits and adopted the *Seven Performance Measures*. By October 2016, the City assigned all floodplain management responsibilities in house, no longer relying on other Polk County communities for compliance. The City employed a new Building Official with extensive floodplain management experience. Further, the City established a point person to direct its floodplain management activities and future development.

The culmination of such action has resulted in a new commitment to grow responsibly and protect its citizens and property from flood loss. Through immense effort, empowerment, and commitment, the City of Davenport has built a comprehensive floodplain management program and is now pursuing CRS participation.



1.0 INTRODUCTION

1.0 INTRODUCTION TO THE NFIP AND FLORIDA'S CRS-CAV PILOT PROGRAM

The U.S. National Flood Insurance Program (NFIP), administered by the Federal Emergency Management Agency (FEMA), has provided flood insurance to households and businesses for 50 years. It was established in 1968 as a voluntary partnership between the federal government and communities with the goal of reducing flood losses by encouraging communities to adopt and enforce minimum floodplain development regulations. In exchange, residents then become eligible to purchase federally-backed flood insurance policies through the program.

The public and many community officials view the NFIP primarily as an insurance program. While this recognizes one program objective, the requirement for communities to regulate development in flood zones in return for the availability of federal flood insurance overshadows the other program objectives. The long-term benefits of sound floodplain management are not well understood in communities where flooding is not perceived to be a significant risk. Benefits of floodplain management are also not fully recognized where development is discouraged in flood-prone areas, or where flooding has not occurred in many years.

Since the early years of the NFIP, State governments have had a “coordinating” role between FEMA and participating communities. A primary State function is to “guide and assist county and municipal public bodies and agencies in developing, implementing, and maintaining local floodplain management regulations.”¹ In the State of Florida, the Governor designates the Florida Division of Emergency Management (FDEM) as the state coordinating agency for the NFIP. Located in the FDEM Bureau of Mitigation, the State Floodplain Management Office (SFMO) fulfills the coordinating functions, which include monitoring local floodplain management programs and providing general technical assistance to Florida’s 468 NFIP communities and citizens. Only



Residential Flooding

seven communities, most without designated flood zones, do not participate in the NFIP.

The SMFO’s goal is to work with communities to ensure appropriate and compliant land development practices floodplains and promote the health and safety of the public, minimize loss of life, and reduce economic losses caused by flood damage. The SFMO must have qualified staff available to conduct on-site visits is critical to ascertain community compliance and to provide technical assistance that has the greatest impact.

¹ 44 CFR 50.25(b)(3)

The significance of the NFIP program is evidenced by the sheer magnitude of Florida's residents living and working in floodplains. Florida recently surpassed New York as the third largest state by population, with an estimated 20.6 million residents as of July 2016.² Approximately 80 percent of Florida's population lives or conducts business along or near its coastline. Another significant portion of the remaining citizens reside and work near many of the State's rivers and inland bodies of water that during Florida's early years of development facilitated water-borne transportation networks when roads were not available.

Significantly, 97.9 percent of all Florida's communities participate in the NFIP. As of August 31, 2017, nearly 1.73 million, of the nation's 5 million NFIP flood insurance policies, are in force in Florida, representing roughly 36 percent of total policies in effect nationwide. Florida's policies equate to more than \$422.4 billion in coverage and with a written policies covering just shy of one billion dollars³

FEMA and the NFIP's implementation of the Biggert-Wa-

“Nearly 1.73 million flood insurance policies in Florida represent roughly 36 percent of total policies in effect nationwide.”

ters Flood Insurance Reform Act of 2012 (BW-12) and the subsequent Congressionally mandated reforms required by the Homeowner Flood Insurance Affordability Act of 2014 (HFIAA) acutely impacted Florida policyholders causing cascading impacts in Florida's real estate and tourism markets. Two of the three primary economic drivers (the third is agriculture) are significantly impacted by changes to flood insurance rates. Therefore, all available available options to address the impact and provide relief are of interest to FDEM. Community Rating System (CRS) discounts are one step communities may take to counter the annual increases in rates caused by BW-12 and HFIAA.



Elevated coastal structure



Elevated structure in flood zone

2. Florida's Bottom Line. Florida Department of Financial Services, 2015, Florida's Bottom Line, www.myfloridacfo.com/floridasbottomline/docs/FBLWinter2015.pdf.

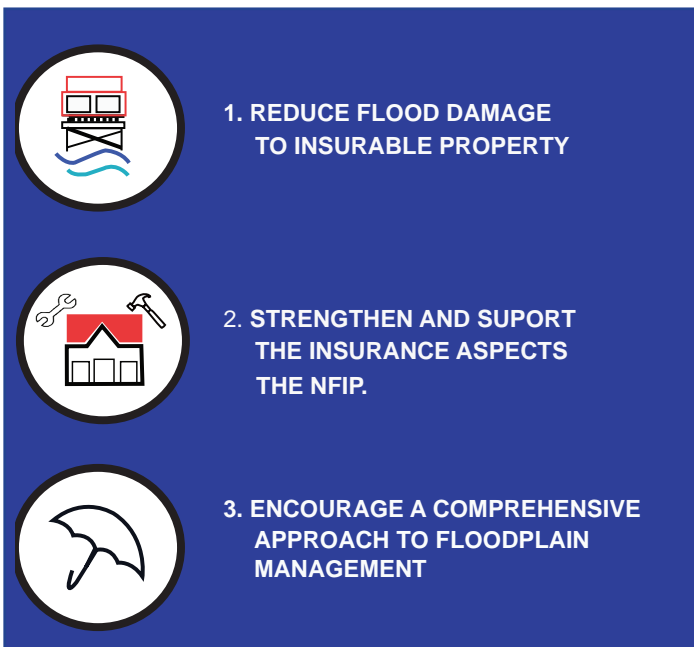
3. Policy Statistics Country-Wide. Federal Emergency Management Agency, 2017, Policy Statistics Country-Wide, bsa.nfipstat.fema.gov/reports/1011.htm.

1.1 NFIP COMMUNITY RATING SYSTEM

FEMA established the Community Rating System in 1990 to encourage community floodplain management program practices that exceed minimum NFIP standards. Although CRS communities represent only five percent of the over 22,000 communities participating in the NFIP, more than 69 percent of all flood insurance policies are maintained in CRS communities.⁴

Communities that participate in CRS must apply and provide documentation of those activities that exceed minimum NFIP standards. Flood insurance premiums are discounted to reward community actions that meet the three goals of the CRS, which are to:

The CRS establishes 19 floodplain management cate-



gories, each composed of multiple elements. Points or credits are assigned to each category a community undertakes, depending on the level of achievement of the activity. The more points, the better the community is rated (from Class 10 to Class 1, with 10 being the lowest class that receives no discounts and 1 the highest that receive 45% discounts).

Perhaps the greatest motivation for communities

to participate in the CRS is premium discounts for individual NFIP flood insurance policy holders. While some creditable activities do not require extensive staff involvement, such as the amount of public open space preserved in flood zones, many require careful documentation of activities, such as maintenance of records that must be subject to periodic verification to maintain eligibility to participate in CRS. Most if not all of the costs for communities to participate in CRS are borne by the community, while the monetary benefits accrue to individual policyholders.

Premium discounts are based on the community's CRS class and whether insured structures are located in the SFHA (Table 1-1).

Class Credit Points	Class	SFHA Discount	Non- SFHA Discount
4,500+	1	45%	10%
4,000-4,499	2	40%	10%
3,500-3,999	3	35%	10%
3,000-3,499	4	30%	10%
2,500-2,999	5	25%	10%
2,000-2,499	6	20%	10%
1,500-1,999	7	15%	5%
1,000-1,499	8	10%	5%
500-999	9	5%	5%
0-499	10	0%	0%

Figure 1-1. CRS discounts for NFIP policy premiums by class credit points and CRS class for SFHA and non-SFHA policies.

⁴ United States, Congress, U.S. Department of Homeland Security. "Community Rating System Fact Sheet." FEMA Fact Sheet, Federal Emergency Management Agency, June 2017, www.fema.gov/medialibrarydata/1507029324530082938e6607d4d9eba4004890dbad39c/NFIP_CRS_Fact_Sheet_2017_508OK.pdf

1.2 THE IMPORTANCE OF THE NFIP AND CRS IN FLORIDA

Florida is home to four metropolitan areas each with over one million residents, three of which are coastal cities: Miami, Tampa, and Jacksonville, and Orlando midway between coasts with many urban lakes. According to the University of Florida's Office of Economic and Demographic Research (2011), the population of Florida is expected to grow to a projected population of approximately 24 million people by the year 2030.

Florida's built environment has changed rapidly in the last 25 years with nearly one in ten homes in the U.S. were built in Florida (second only to Texas).⁵ The trend is even more pronounced among larger condo buildings as Florida accounts for 11.5% of new residential buildings with at least five residences, trailing only Texas' 12.7%.⁶ This continued growth trend and urbanization resulting in more impermeable surfaces have a direct impact on floodplain management, highlighting the need for strong local floodplain management programs. Due to Florida's urbanization and reliance on tourism, agriculture, and real estate, the state is especially susceptible to hazards, potentially causing instability in the economy when flood disasters occur.



In the last 25 years, nearly one in ten homes built in the U.S. were built in Florida (2nd to only to Texas).



Florida's top economic driver is tourism attracting nearly 113 million visitors in 2016.



By 2030 Florida is expected to grow to 24 million people.

As illustrated by the growing concentration of population and assets in high risk areas, combined with the contribution to the NFIP, Florida has the most to gain in terms of both public safety and potential monetary savings resulting from effective flood resilience strategies.

While the most tangible benefit of CRS participation is the annual premium discounts, research has demonstrated the success of the CRS program in reducing physical flood losses. Kousky and Michel-Kerjan (2015) examined 30 years of NFIP claims data and showed that all things being equal, communities with more CRS points have fewer claims than those with fewer points.

Residential flood insurance claims in CRS Class 9 and Class 8 communities are 13.5% lower than in communities that do not participate in the CRS (Michel-Kerjan et al. 2016). Further, a 100-point increase in CRS credit points reduces claims by about 2.5% (Kousky and Michel-Kerjan 2015). In a study performed by Brody et al. (2007), the effectiveness of the CRS program in reducing property damage was demonstrated, finding on average, an increase of one CRS class reduces flood damage by over \$300,000.

Industry research conducted post-Hurricane Irma further illustrates this point. Florida's long-term mitigation consisting of enhanced building codes and infrastructure readiness was critical to the state's ability to withstand damage and restore operations. This mitigation significantly reduced the losses from Hurricane Irma, one of U.S. history's most recent devastating storms.⁷ In 2015, 45 percent (210 communities) of Florida's NFIP communities were enrolled in the CRS, compared to 6 percent of communities nationwide.

⁵ Florida's Bottom Line. Florida Department of Financial Services, 2015, Florida's Bottom Line, www.myfloridacfo.com/floridasbottomline/docs/FBLWinter2015.pdf.

⁶ Gomez, Alan. "Hurricane Irma could be a \$300 billion catastrophe if it hits South Florida." USA Today, Gannett Satellite Information Network, 5 Sept. 2017, www.usatoday.com/story/news/2017/08/22/hurricane-cost-florida/560846001/.

⁷ U.S. MarketFlash | Florida CRE proves resilient in face of Hurricane Irma due to long-Term preparation. Research and reports, CBREUS, 22 Sept. 2017

1.3 FLORIDA'S CRS-CAV PILOT PROGRAM

Florida leads all other states in the number of CRS communities. In strong support of flood resiliency and reducing costs of flood insurance, FDEM leadership charged the State Floodplain Management Office with increasing the number of communities participating in CRS. Not only does CRS yield financial benefits for citizens with properties in flood zones who purchase NFIP flood insurance, participation yields long-term reduction in vulnerability to flood damage. **The Pilot Program's original goal was to enroll 208 more communities in the CRS, increasing participation to more than 94% of Florida's NFIP communities.**

In February 2015, the Florida Division of Emergency Management (FDEM) invited staff from FEMA (HQ and Region IV) and the Insurance Services Office, Inc. (ISO) to help the State develop a strategy titled "CRS-CAV Pilot Program." Rather than rely on individual communities to learn about CRS, the SFMO developed a proactive strategy to increase the number of communities exposed to CRS. This yields benefits of information sharing and providing one-on-one technical assistance to local officials charged with administering floodplain management regulations. Communities benefit by knowing about higher standards regardless of whether they elect to participate in CRS.

A prerequisite for acceptance in CRS is community demonstration that it meets or exceeds the minimum requirements of the NFIP. Normally this is accomplished by conducting a CAV with FEMA or the State within 12 months prior to the initial verification of a community's application to the CRS. In addition, programmatic deficiencies or non-compliant development identified during the CAV must be resolved before a community is eligible to participate in CRS.

The CRS-CAV Pilot Program contains unique elements that FEMA and ISO recognize would help ensure that communities are eligible to participate in CRS:

- 1** The Field Community Assistance Contact (FCAC), a hybrid of FEMA's standard Community Assistance Visit (CAVs) and Community Assistance Contacts (CACs)
- 2** Communities with procedural issues must adopt the *Seven Performance Measures* (described in Section 1.4).
- 3** All compliance issues in past five years must be resolved, older issues must also be resolved but by adopting *Seven Performance Measures* makes communities eligible for the CRS.

This remainder of this report documents the CRS-CAV Pilot Program, describes the materials developed and the process followed, summarizes responses to a post-FCAC survey, and summarizes analyses conducted.

Between March, 2015 and June, 2017, FDEM conducted an unprecedented 208 FCAC visits. By the effective end date of the Pilot Program, Florida has achieved this milestones:

- 169 communities transitioned to the FBC-coordinated model floodplain management ordinance (described in Section 2.7), and more are in the process of transitioning to the model ordinance, and 39 have not yet initiated work to transition to the state model.
- 26 received FEMA approval for CRS entry.
- 122 FCACs were closed, with an additional 78 ready for closure (the remaining 8 will be closed as identified issues are resolved and ordinances are adopted).
- 34 adopted the *Seven Performance Measures* with 11 pending adoption.

The SFMO continues to strongly encourage and assist communities that expressed an interest in CRS during the Pilot Program. As a result of the CRS-CAV Pilot Program, the SFMO is developing a CRS strategic plan that outlines and sets forth objectives for additional communities to participate in the CRS and to enhance the ratings of those that continue to participate in the CRS.



To help brand the CRS-CAV Pilot Program, FDEM developed and used this graphic on reports and correspondence about the program.

1.4 SEVEN PERFORMANCE MEASURES

Over the past several years, the SFMO identified several common and reoccurring programmatic deficiencies and compliance issues that needed to be addressed. To address those deficiencies SFMO developed the *Seven Performance Measures* to help communities ensure the regulatory standards of the NFIP are implemented. These *Seven Performance Measures* must be adopted by resolution approved by communities' elected officials via resolution. FEMA and ISO staff concurred with SFMO's position that adoption of the *Seven Performance Measures* is an effective tool to meet the minimum NFIP requirements.

1	Adopt a flood damage prevention ordinance based on the State model that is coordinated with the Florida Building Code.
2	Conduct annual inspections of development in SFHAs to be reported annually that addresses identified compliance issues to be resolved through enforcement and mitigation to the maximum extent possible (templates are included).
3	Administer a flood zone permit application for regulating all development in SFHAs with procedures and checklists approved by the State and Region IV (template permit applications, inspection checklists, and a worksheet for substantial improvement and substantial damage determinations are included).
4	Ensure accurate completion of all elevation certificates before vertical construction and prior to issuance of certificates of occupancy.
5	Annually disseminate letters to utility companies and service providers concerning tanks that must be elevated or anchored and new HVAC equipment that must be elevated above the BFE (template letter is included) when replaced or with substantial improvements..
6	Administer substantial improvement/damage determination procedures approved by State and Region IV staff and maintenance of permanent records of determinations (template letter to owners, list of requirements for applications, list of costs to include, template owner and contractor affidavits, and a worksheet are included).
7	Provide DFIRMs or links to DFIRMs and elevation certificates on the community's website where feasible.

A package containing detailed descriptions and templates for implementing the *Seven Performance Measures* was provided to each community during FCAC or CAV visits. The *Seven Performance Measures* are also provided in fillable PDF formats on the SFMO website for download.⁸

⁸ Florida CRS Initiative CRS-CAV Pilot Program . Bureau of Mitigation Florida Division of Emergency Management , 2015, Florida CRS Initiative CRS-CAV Pilot Program , <https://www.floridadisaster.org/dem/mitigation/floodplain/crs/>



BOAT PARKING
ONLY

FRS
PPR

BUDG 1

2.0 IMPLEMENTATION

2.1 SELECTION OF COMMUNITIES FOR THE CRS-CAV PILOT PROGRAM

For many years FEMA has used a “risk-based” process to develop an annual ranking of communities in each state that receives funding to perform CAVs and CACs. The NFIP-funded CAV Stateside Support Service Element (CAP-SSSE) provides cost-shared funding to NFIP State Coordinating Agencies to provide technical support to communities. FEMA’s risk-based selection process is described in Guidance for Conducting Community Assistance Contacts and Community Assistance Visits (FEMA F-776).

When SFMO began planning the CRS-CAV Pilot Program in January 2015, 231 of the 467 NFIP participating communities were in the Community Rating System, leaving a total of 236 non-CRS communities. In a manner similar to the process FEMA uses in the risk-based process to prioritize communities selected for traditional CAVs, SFMO initially compiled data on the non-CRS communities, such as number of flood insurance policies on properties both in and out of the SFHA and number of claims paid. Selection of priority communities was based on those with the most policies and that would achieve the highest benefit in CRS.

Of the 236 non-CRS communities, 6 participate in the NFIP even though those communities have no mapped Special Flood Hazard Areas (SFHA). Another 22 were identified by FEMA as “minimally flood prone” or had no or very few flood insurance policies. Thus, the remaining of 208 communities became the set of communities considered for the Pilot Program.

As with any effort with a target (number of communities), yet also bounded by resource constraints (personnel and funding), the next step was to evaluate the level of effort to determine the feasibility of including

all 208 communities or whether a further winnowing would be necessary. FDEM and FEMA considered the average level of effort anticipated to perform FCACs (Step 1 through Step 6, described in Section 2.3) and the number that could be performed in an average month. Anticipating completion of the visits over a two-year period yielded a target average of 9 visits per month. FDEM determined a team comprised of SFMO staff augmented with consultant support could perform at that level.

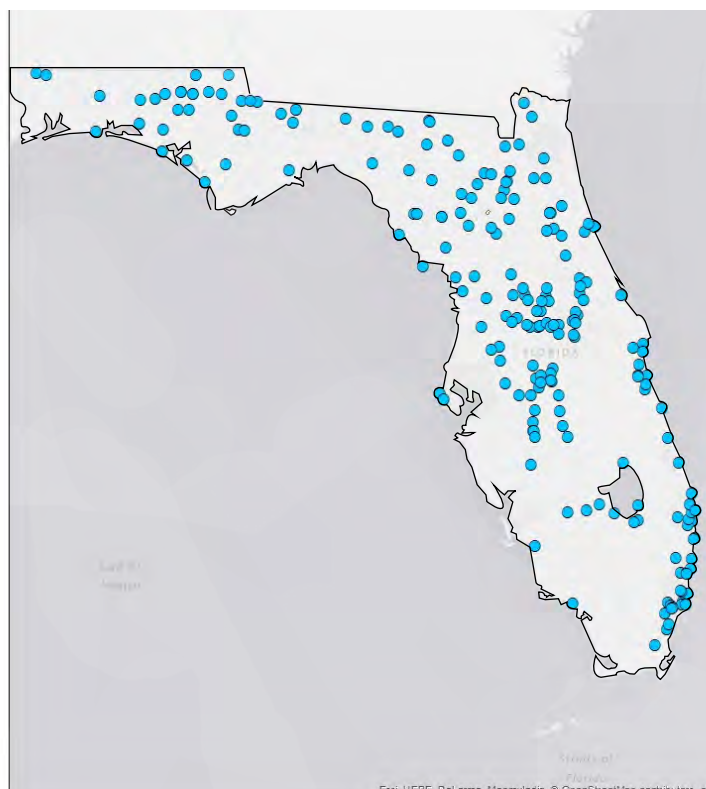


Figure 2.1 : Locations of communities participating in the Florida CRS-CAV Pilot Program

2.2 ORGANIZATIONAL MATERIALS FOR SFMO STAFF

FDEM recognized the importance of consistent program delivery undertaken by multiple personnel. To this end, a project management plan was developed, and delivery structure identified with guidance documents and templates. Regular progress update meetings were held among staff and several times with FEMA Headquarters and Region staff to discuss the current status of the Pilot Program, notable findings and resolution strategies, and any program delivery challenges.

Appendix A includes the following key documents, among other documents needed through the life of the program:

1. **FCAC Steps to Completion:** in flowchart form to illustrate the actors and actions involved in each step of the process.
2. **FCAC Stages and Components:** Description of functional stages staff perform for each community, including scheduling the visit, office preparation (collection of data, etc.), floodplain tour, on-site meeting, and report preparation and compliance follow up and assurance. Estimates of hours for each stage are provided, along with estimates for travel and administrative preparation, with the totals ranging from 74 to 112 hours.
3. **10 Tips for Conducting FCACs:** Notes from experienced personnel for handling the on-site visit with community officials.
- 4 **Procedures for Field Community Assistance Contacts:** 1-page document providing a brief overview of the five steps in the FCAC process
5. **Steps for Processing FCAC Reports and Transmittal Letters:** Procedural steps and advice for personnel to prepare the final report (after the manager's review) and transmittal, with emphasis on maintaining consistency. See Addendum A-15 for closing.

2.3 FCAC PROCESS AND TEMPLATE DOCUMENTS

FDEM developed a structured process described below, along with template documents and a record keeping protocol to track progress and facilitate consistent documentation. The file structure is organized based on the steps in the FCAC process. Appendix A-1 includes detailed descriptions of each step and the template documents shown in bold. As previously discussed in the Community Selection

Process section, staff scheduled multiple communities during a week based upon proximity to ensure efficiency with FCAC field activities. The following page provides a step-by-step description of the FCAC process and important documents used.

Step 1: FCAC Preparation

- Prepare Community Contact List: Spreadsheet to identify appropriate points of contact
- Contact the community by phone to explain the purpose of the FCAC and schedule the meeting
- Send Confirmation Email including:
 - Meeting Confirmation Memorandum
 - Meeting Agenda
 - Community Questionnaire (to be completed and returned before the visit)
 - Request for a copy of the floodplain management ordinance
- Arrange staff accommodations and logistics

Step 2: Prepare for the Field Tour

- Collect, assemble and review data from Community Information System
- Complete a Virtual Tour of the SFHA using Online resources
 - Identify areas and subject properties to review during the field tour
 - Pre-populate address inspection forms, where possible
- Review the completed Community Questionnaire and flood ordinance, when returned by the community

Step 3: Conduct Field Tour

- Complete address Inspection forms to record observed characteristics
- Complete photograph Log, to document observed development

Step 4: Conduct FCAC/CAV Meeting

- Meeting Sign-In Sheet
- Meeting Agenda
 - Discuss CRS Program/CRS Quick Check
 - Community Questionnaire Revisions and Discussion
 - CIS Data Review and Discussion
 - Discussion on CRS and *Seven Performance Measures* Package
 - Complete CRS Quick-Check
 - Presentation of field tour observations and discussion
 - Review Support Documentation- Community Provided Documentation
 - Review flood ordinance with staff
 - Review Permits
- Provide CD-ROM with Guidance and Outreach Materials
- Discuss follow up action items for compliance, indication of CRS interest

Step 5: FCAC Report Development and Delivery

- Finalize meeting notes
- Draft FCAC Report
 - Routed through QAQC review process
 - Submit courtesy draft copy to community for accuracy review
- Finalize the FCAC Report
- Send transmittal Letter (to send report, identify whether the FCAC can be closed or if follow up is required to resolve ordinance or compliance issues) and determine potential eligibility for CRS.

Step 6: Support Community Resolution of Issues Identified in the Report and FCAC Closure

- Follow-up email, to pursue resolution of outstanding action items
- Follow-up Letters to increase responsiveness of communities
- FCAC Closure Letter
- Input data to the Community Information System
- Notify Community, FEMA and ISO if it's FCAC report is closed and community is eligible to participate in CRS.

2.4 PROGRESS TRACKING

Effective project management and progress tracking was critical to maintaining the schedule and ensure Pilot Program objectives were met. Additionally, progress updates were necessary for executive briefing and continuous process improvement. Three primary tracking mechanisms served these purposes: Dashboard, Community Tracking List, Master Tracking Spreadsheet, Community Contact List (See Appendix A3).

Dashboard:

Executive briefings were required throughout the life-cycle of the Pilot Program. The dashboard was a one-page executive briefing document that was updated quarterly, or as needed, to communicate the current status of the Pilot Program to senior leadership. This document was populated with data extracted and summarized from the Community Tracking List and Master Tracking Spreadsheet.

Community Tracking List:

Managed within the SMFO, the Community Tracking List maintained a comprehensive status of all 208 participating communities including but not limited to: date of FCAC visit, report, State ordinance status, and steps for CRS participation. The Community Tracking List was regularly reconciled with the Master Tracking Spreadsheet, typically monthly. A similar tracking table was utilized by SFMO staff to track the status of work on communities.

Master Tracking Spreadsheet:

To ensure visibility and effective communication, Pilot Program consultant support staff maintained the Master Tracking Spreadsheet to include a level of granularity which facilitated SFMO performance monitoring and review. The Master Tracking Spreadsheet was maintained only for those communities which were assigned to consultant support.

Community Contact List:

Community official “points of contact” changed throughout the Pilot Program. A Community Contact List was regularly updated throughout the Pilot Program and was in turn used to update the FEMA CIS web-based software tool.

2.5 COMMUNICATING ABOUT THE COMMUNITY RATING SYSTEM

CRS specialists from the SFMO supported FCAC meetings, often attending in-person, to communicate the value of CRS and the process for entry and benefits afforded by the Pilot Program. Discussion was often spurred following the presentation of CIS data and related characteristics of flood risk within the community.

SFMO CRS staff completed the CRS Quick-Check with community officials, discussing each element to determine an estimate of potential CRS Class rating. This was presented to community staff as the potential CRS entry class. The CIS “What-if” scenario was compared to the results of the CRS Quick-Check and potential flood insurance premium savings and applicability to policyholders. CRS staff discussed details of the CRS entry process, level of effort required, timeline for participation in CRS, and any questions from the community were answered. Over-all, staff encouraged each community to learn about the CRS and consider the benefits of participating.

Technical assistance was offered by CRS staff to assist interested communities through the CRS entry process and assist in developing documentation for ISO verification. This process resulted in bolstering relationships between the SFMO and communities as well as increasing the rate of CRS entry.

Communicating about the CRS also resulted in feedback related to locally perceived barriers to entry. Additional information on the community experience about the CRS-CAV Pilot Program is provided in Section 3.5.

2.6 MITIGATION GRANT INFORMATION

The SFMO is organized in FDEM's Bureau of Mitigation, along with units charged with mitigation planning and implementation of hazard mitigation grant programs. Routine communication and coordination occurs between units of the Bureau which fosters an integrated approach to mitigation.

FCAC meetings included discussion of FEMA's Hazard Mitigation Assistance grant programs available to help communities address flood risk (Flood Mitigation Assistance, Pre-Disaster Mitigation, and post-disaster Hazard Mitigation Grant Program). Accordingly, FCAC staff reviewed CIS data pertaining to the amount of flood claims. Tours of the communities' SFHAs also identified minus-related projects and particularly the number of repetitive loss structures that may significantly benefit from mitigation grants. In communities that have experienced flooding, historically, staff discussed the appropriateness of mitigation grants programs. This engagement continued throughout the FCAC process, with staff sharing information about application timelines and documentation requirements for grant application submission.

Florida's Local Mitigation Strategy (LMS) requirements, in addition to FEMA requirements, drive community participation in multi-jurisdictional planning efforts. During FCAC visits, staff determined that many community officials were familiar with the LMS and somewhat familiar with the Hazard Mitigation Grant Program because of their participation in the LMS process. Fewer community officials were familiar with the annual application cycles for the "non-disaster" grant programs (Flood Mitigation Assistance and Pre-Disaster Mitigation). Staff responded to questions about the grant programs and referred community officials to the appropriate Bureau of Mitigation points of contact. Raising awareness of these funding sources during FCAC visits may foster identification of mitigation projects and improved applications for funding. The nexus of reducing flood risk through mitigation grants and



Elevated Multi-family Structure



Elevated Residential Structure

insurance premium rating was of specific interest to community officials.

In December 2017, the SFMO reviewed HMA applications received during the CRS-CAV Pilot Program period (2015 to 2017). Of the 208 FCAC communities visited, one applied for funding. During that period, FEMA and Bureau Staff implemented two HMGP grant cycles (Hurricanes Hermine and Matthew) and two Flood Mitigation Assistance and Pre-Disaster Mitigation grant cycles. However, merely sharing information with community officials during FCAC visits on grant programs is likely not the primary reason for applying for grants. Typically, experience with actual flood damage is a more significant driver of interest in the mitigation grant programs.

2.7 FLORIDA'S MODEL FLOODPLAIN MANAGEMENT ORDINANCE REVIEW PROCESS

Since 2012, the SFMO has devoted considerable effort and resources toward transitioning communities to floodplain management ordinances that are explicitly written to rely on the Florida Building Code (FBC) for regulation of buildings and structures in SFHAs. By law, the FBC governs the design and construction of buildings. Thus, it is logical for floodplain management requirements to be incorporated into the code. The model ordinance, approved by FEMA Region IV, contains NFIP required administrative provisions and provisions for development activities that are not within the scope of the FBC.

SFMO assumes a high level of responsibility to work with communities to tailor the model ordinance to satisfy community-specific objectives, including retaining higher standards than contained in the FBC. Using a combination of State and federal funds, SFMO provides technical support to work one-on-one with



“As of October 2017, approximately 180 communities of the 208 CRS -CAV Pilot Program participants have adopted the FBC-coordinated model ordinance and another 28 are moving towards adoption...”

communities. As of October 2017 approximately 180 communities of the 208 CRS-CAV Pilot Program participants have adopted the FBC-coordinated model ordinance and another 28 are moving towards adoption (5 communities elected to retain “stand-alone” ordinances, which means they have two regulatory instruments that govern SFHA development). Out of 468 Florida communities participating in the NFIP, approximately 65 communities have not yet initiated transition to the model ordinance but are expected to do so in the coming year.

The CRS-CAV Pilot Program is a significant driver in the FBC-coordinated ordinance initiative because transitioning to the ordinance is a requirement for closing FCACs. This further underscores the Pilot Program’s return on investment to achieve better flood resiliency among Florida communities.

2.8 RESOLVING COMPLIANCE CONCERNS AND CLOSING FCACS

FCAC visits typically identify concerns about community procedures for administering local floodplain management ordinances and issuance of development permit during the preceding 5 years. The traditional CAV involves a 5-year look back period but, historically, FEMA requires all issues to be resolved before communities become eligible to participate in CRS. But, through the CRS-CAV Pilot Program, SFMO requires compliance of development approval over the past 5 years. Any community that adopts the State Model flood ordinance, and adopts by resolution the *Seven Performance Measures* is deemed eligible to participate in CRS, though the communities are still required to resolve older compliance matters.

Questions and concerns are discussed during the FCAC visits, especially questions about development observed during field tours. Concerns are described in the FCAC report, along with recommendations for their satisfactory resolution. In many cases, since the Pilot Program focused on small communities not in CRS, FCAC meetings morphed into educational

workshops where instructional dialogue ensued. All identified concerns and compliance issues must be resolved before FCACs may be closed, also referred to as having a “clean” FCAC. Further, a condition of participating in the CRS is a “clean” CAV or, for the Pilot Program, a “clean” FCAC.

SFMO focused on resolving concerns and compliance issues through robust technical assistance framed to maximize existing local resources and programmatic procedures. Consistency in the techniques and approaches to technical assistance provision was a central tenet of SFMO support in resolving identified issues. This included ensuring that the community considers all available options for corrective action that may set precedence for future enforcement actions within the community. Communities were encouraged to identify corrective actions to resolve issues independently using regulatory, guidance and technical references available to them, where possible, thereby reinforcing the spirit of local ownership of the floodplain management.



Where community staff lacked sufficient engagement or knowledge in addressing identified issues or overall unresponsiveness to the FCAC report, the SFMO employed a regular schedule of contact using

various means of communication. At times, SFMO resorted to contacting higher levels of authority when needed to attain the community's responsiveness to the NFIP requirements.

MAJOR CONCERNS WITH CLOSING CAVS:



Administrative Procedures.

Largely based on past experience with deficiencies in community procedures for administering floodplain management ordinances, the SFMO developed the *Seven Performance Measures* (see Section 1.4). Adoption of the measures and use of the templates included in the measures is a significant step toward resolution of identified procedural concerns. For communities having no interest in participating in CRS, with procedural compliance issues, the SFMO required adoption of the *Seven Performance Measures* by resolution to close the FCAC report. Only then would the SFMO advise FEMA that the community has a NFIP-compliant floodplain management program. Staff also offered advice and referenced guidance documents to address other concerns and questions raised by community officials.



Interlocal Agreements.

A number of the FCAC communities have interlocal agreements with other communities, typically with counties. Florida Statutes, Sec. 163.01, Florida Interlocal Cooperation Act of 1969, provides the authority for and the content of such agreements. Staff provided SFMO's model interlocal agreement that covers administration of floodplain management regulations. In many cases, communities that are unable to implement their floodplain management programs without assistance, FCAC closures predicated on the community developing an interlocal agreement with the jurisdictional County to ensure that a floodplain program would be implemented and the community retain its eligibility to participate in the NFIP.



FBC-Coordinated Floodplain Management Ordinances.

A key requirement for closing FCACs is adoption of local floodplain management regulations based on the Florida model ordinance that is designed to work with the Florida Building Code (see Section 2.7). Communities that had not already transitioned to this model ordinance were directed to FDEM's contracted flood ordinance technical support staff for help tailoring the model ordinance to each community's preferences for higher standards or provisions related to other sections of their code of ordinances.



Development Concerns.

Various development violations were identified and required corrective action. Common development concerns (see Section 3.2) included: non-compliant structure elevations, below BFE and non-anchored tanks and elevation of HVAC units, manufactured homes or R/Vs with permanent additions or otherwise non-compliant additions below BFE, substantial improvements for structures that were not required to comply with NFIP regulations, and floodway encroachments without encroachment analyses or no-rise engineering studies on file.



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3.0 ANALYSES PERFORMED

3.1 SFMO STAFF TIME REQUIRED TO CONDUCT AND CLOSE FCACS

Initially, SFMO staff and consultant support had different levels of experience ranging from fairly recently hired personnel to managers with years of experience related to floodplain management and the NFIP. But all Staff were required to be Certified Floodplain Managers. Staff typically worked in teams, pairing less experienced staff with more experienced staff. Some staff involved in the Pilot Program maintained records of the time necessary to implement the program for individual communities through the resolution and closures of FCAC reports. Analysis shows that an average of nearly 72 hours per community is required to conduct FCAC and write reports. While many communities visited as part of the Pilot Program had experienced little recent development in the SFHA, others had seen significant increases in construction activity during the five-year “look-back” period. Of note is the level of detail contained in the reports on a variety of subjects and performance requirements, which exceeds the content of CAV reports typically prepared by FEMA Region IV staff. SFMO deems the additional detail critical not only for documentation of the visit and findings, but to provide sufficient guidance for communities to resolve identified concerns and to properly administer their floodplain management programs.

SFMO uses additional consultant support to provide technical assistance to communities to transition to the FBC-coordinated floodplain management ordinance (see Section 2.7). For most small communities and rural counties that do not adopt higher standards or have community-specific provisions, an average of 6 hours of time is necessary to help those community complete the transition.

SFMO estimates the State NFIP Coordinator/State Floodplain Manager expends 4 to 6 hours per community to provide guidance, oversight, respond to community-specific needs, and to review and finalize reports, write and prepare transmittal letters and

upload documentation to FEMA’s CIS, and other administrative duties.

CONCLUSIONS ON STAFF TIME FOR FCACS:

The available data do not allow more detailed analyses of the full time necessary to complete an FCAC as a function of the number, scope or complexity of issued identified, nor the variable effort needed to resolve compliance issues with which resolutions were achieved. Thus, excluding time related to ordinance preparation, the time required to implement the program ranged from 82 to 84 hours. By factoring the time required to coordinate with communities to adopt flood ordinances required to close FCACs, it is conceivable that staff hours exceeds 100 hours per community. **While this estimate exceeds FEMA’s estimate of 60 hours to conduct and complete CAVs for Tier 2 communities, the two actions are not necessarily comparable. (FEMA estimates 160 hours to complete CAVs for Tier 1 communities.) SFMO concludes that FEMA underestimates the level of effort for Tier 2 communities, especially since many of those Tier 2 communities are larger than, or have more recent construction activity, than many of the Tier 1 CAV communities. In addition, level of effort may be influenced by capacity and expertise of community officials as well as the nature of current development pressures.**

3.2 COMMON ISSUES THAT AFFECT CLOSURE RATES

All identified concerns with community administrative procedures, floodplain management ordinances, and development and compliance issues must be resolved before FCACs can be closed. Based on a review of the 208 Pilot Program communities and records of identified issues that required resolution, the most common issues that affected closure rate were related to floodplain management ordinances,

elevation certificates, and non-compliant development. **The review by SFMO staff of the Seven Performance Measures and community willingness to adopt them reduced the complexity and time required to resolve most common procedural compliance issues.**

FBC-Coordinated Floodplain Management Ordinance. For SFMO to close an FCAC, communities must have implemented the first of the *Seven Performance Measures*: adoption of an ordinance based on the State model that is coordinated with the Florida Building Code (see Section 2.7). As of the time of this report, 180 of the 208 FCAC communities had transitioned to the FBC-coordinated ordinance (many did so prior to the FCAC initiative), and another 28 are in for review.

Elevation Certificate Issues. As of the time of this report, FCACs for 17 communities could not be closed because of missing or incomplete complete elevation certificates. The FEMA elevation certificate is most common form of documentation that is required to be submitted to communities by permit holders. The FBC requires submission of elevation documentation to building officials at two times during construction: when the lowest floor is set and prior to vertical construction and upon comple-

tion, prior to the final inspection and issuance of a certificate of occupancy. The NFIP, by definition, assumes buildings are in violation of the requirement to elevate in SFHAs if communities do not have documentation of elevation. In addition, communities that wish to participate in CRS must accept accurate and complete elevation certificates and retain them in perpetuity as is also required by rules of the Florida Department of State.

Non-Compliant Development. FCACs field work included complete field tours focused on developed areas of high flood risk and recent permits for structural and non-structural development in the SFHAs. The SFMO observed various instances of non-compliance of development which were included in FCAC reports with follow-up required activities by the community prior to closure of the report by SFMO staff. Corrective action and enforcement activities by community officials are on-going to address remaining issues requiring resolution to close FCACs. The deadlines initially provided in FCAC reports to resolve non-compliant development have been extended multiple times in some cases due to the complexity or level of engagement by the community. This also significantly adds to the staff time required for closure of FCAC reports. See Figure 3.1 for the nature and frequency of common non-compliant development issues.

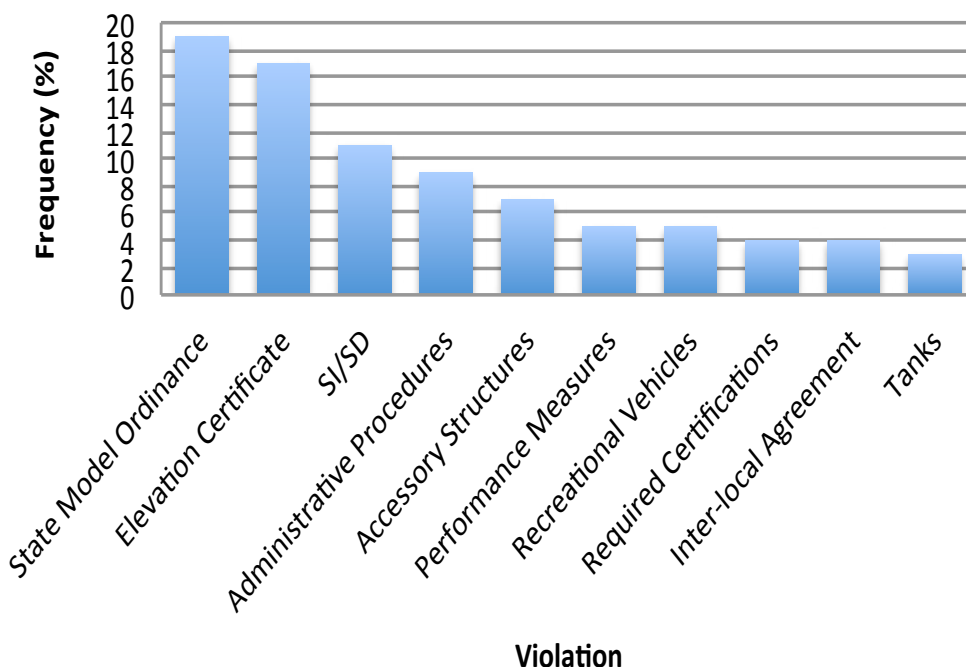


Figure 3.1 : Frequency of Violation by Category

3.3 NFIP PREMIUM SAVINGS FOR COMMUNITIES PARTICIPATING IN THE PILOT PROGRAM

As of date of the final report, of the 26 communities that FEMA approved to begin CRS application during the Pilot Program, 9 joined at a class 9 or better. The remaining 17 communities' class will be determined once detailed analysis of documentation is performed by FEMA's CRS contract manager, ISO. The cities of Sanford and Crystal River joined at Class 7; Panama City Beach, Putnam County, Hastings, Hillsboro Beach, and Palmetto Bay joined at Class 8; and Clewiston and Parkland joined at Class 9. Figure 3.2 uses data generated using the CRS "what if" function in FEMA's Community Information System to show premium savings for all CRS classes, based on the number of policies in the SFHA and the number outside the SFHA.

The SFMO provides technical support to work one-on-one with communities. The CRS-CAV Pilot Program is a significant driver in the FBC-coordinated ordinance initiative because transitioning to the ordinance is a requirement for closing FCACs. As of October 2017 approximately 180 communities of the 208 CRS-CAV Pilot Program participants have adopted the FBC-coordinated model ordinance and another 28 are moving towards adoption (5 communities elected to retain "stand-alone" ordinances, which means they have two regulatory instruments that govern SFHA development).

CONCLUSION:

Community visits during the Pilot Program documented that premium savings are one of the largest incentives for CRS participation. The CIS "what if" function is useful to help community officials quantify the benefits that accrue to policyholders in terms of lower premiums. Especially when a community is close to

qualifying for the next lower class, these estimates can help community policymakers balance the effort necessary to document or adopt new activity points with the benefits enjoyed by citizens. Communities with low policy counts periodically exhibited less interest in joining CRS however, some community officials opted to pursue CRS regardless of policy count. Implementation of CRS activities is the responsibility of community officials. Consequently, the costs of enhanced floodplain management will ultimately be borne by the community, even though individual policy holders may realize the monetary benefits of NFIP premium discounts and many of those may be local officials. However, the financial benefits of having a more flood resilient community are very significant, though difficult to quantify.

It is important to note that the timing of FCAC closure, CRS entry cycles, availability of FEMA's CRS resources influence the number of communities able to join during Pilot Program life-span. Based upon feedback from Pilot Program participants and on-going efforts, the SFMO anticipates that many more communities will enter CRS as a result of the Pilot Program but beyond the projected program time frame.

COMMUNITY	SFHA	NON-SFHA	SAVINGS
Palmetto Bay (8)	\$266,230	\$ 1,313	\$267,543.00
Crystal River (7)	\$ 256,611	\$ 784	\$257,395.00
Panama City Beach (8)	\$87,763	\$ 91,484	\$179,247.00
Putnam County (8)	\$ 68,152	\$ 3,193	\$71,345.00
Hillsboro Beach (8)	\$ 40,167	\$ 19,888	\$60,055.00
Parkland (9)	\$ 30,869	\$ 9,912	\$40,781.00
Sanford (7)	\$ 26,995	\$ 1,893	\$28,888.00
Clewiston (9)	\$ 6,406	\$ 12,130	\$18,536.00
Hastings (8)	\$4,013	\$0	\$0.00
TOTAL SAVINGS	\$787,206.00	\$140,597.00	\$927,803.00

Figure 3.2 : Premium savings for all CRS Classes, based on the number of policies in the SFHA and the number Outside the SFHA.



3.4 NFIP POLICY COUNTS IN FCAC COMMUNITIES IN THE CRS

One of the goals of the CRS is to strengthen and support the insurance aspects of the NFIP. In part, communities contribute to that goal by encouraging property owners to protect financial losses by obtaining flood insurance policies. Many factors influence which property owners acquire NFIP policies, including property sales subject to the mandatory purchase of flood insurance, recent flood experience, and property owner awareness of risk. Whether and to what degree CRS participation might enhance property owner awareness is difficult to measure with available NFIP policy statistics, even when compared to policy counts in previous years.

Figure 3.3 shows the percent change in savings between 2014 and 2017, based on the number of NFIP flood insurance policies for the FCAC communities that enrolled in the CRS at Class 9 or better.

CONCLUSION:

Given the 26 FCAC communities enrolled in the CRS between late 2016 and mid-2017, it is premature to draw conclusions regarding whether CRS activities influenced policy growth. A similar analysis conducted in one to five years, paired with some observations offered by community officials in communities with high growth, may shed some light on whether joining CRS is a strong factor. Encouraging NFIP policy purchase is a newer CRS activity which is a positive feedback for the CRS program: more insurance policies could contribute to a greater CRS credit score and better class, in turn earning greater discounts on policy premiums.

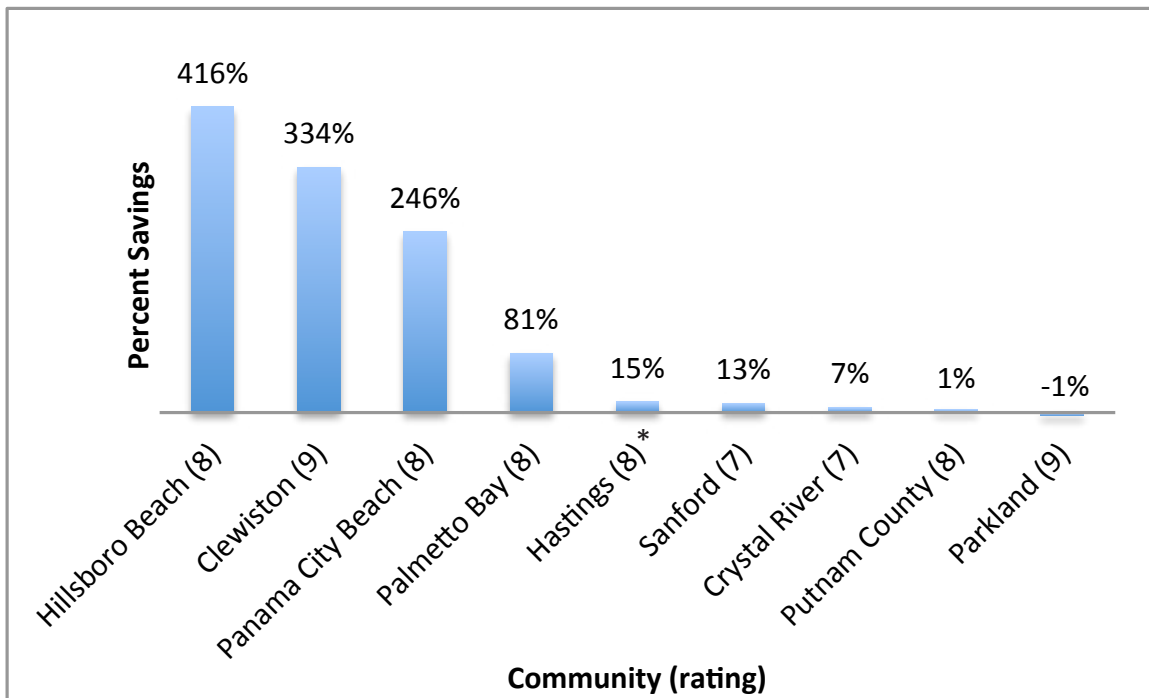


Figure 3.3. Percent change in the number of NFIP policies between 2014 and 2017 for FCAC communities enrolling at Class 9 or better. Hastings has since dissolved and the property owners are now benefitting from St. John’s County CRS Class 5.

3.5 ANALYSES OF ONLINE SURVEY RESPONSES

After the 208 FCAC field visits were completed, participants were invited to respond to an Online survey to gauge their perspectives on the FCAC experience, the CRS, and floodplain management (Appendix A). As of October 28, 2017, floodplain managers from 32 communities (14%) had taken the survey. Among other questions, the survey asked participants to:

- Rate their experience and knowledge of floodplain management practices and the CRS, before and after the FCAC visit
- Indicate if their community plans to participate in CRS in the future and the perceived challenges to entering CRS
- Identify their most frequently used resources for administering floodplain management regulations
- Specify anticipated improvements to their floodplain management programs
- Provide feedback as to how the SFMO can better assist community floodplain managers

EXPERIENCE AND KNOWLEDGE:

Of the 32 respondents, experience in administering local floodplain management requirements ranged from 4 months to 41 years, with 53% reporting having 5 years or less experience.

The majority of respondents (70%) reported having sufficient knowledge of floodplain management roles and responsibilities prior to the FCAC visit (rating a 3 or higher on a 5 point scale).

Responses to a question about respondents’ understanding of the CRS prior to the visit yielded more variation, with nearly half reporting poor to fair understanding (see Figure 3.4). However, when asked to compare that level of knowledge to their understanding of floodplain management after the FCAC visit, 94% reported improvements, with 63% indicating “Significant Improvement.”

The relationship between respondents with experience and those with a good or better understanding of CRS before the FCAC visit was not surprising, but does point out the value of continual distribution of information about the CRS:

- The 6 respondents indicating “Poor” understanding had fewer than 2.5 years of experience.
- Those indicating “Fair” and “Good” understanding of CRS were almost split evenly between having fewer than and more than 5 years of experience.
- Of the 9 respondents reporting “Very Good” or “Excellent” understanding of CRS, 7 had more than 5 years of experience, with 4 of them reporting more than 10 years of experience.
- All respondents who said they had limited knowledge of CRS indicated that the visit improved their understanding, with the majority reporting a significant improvement.

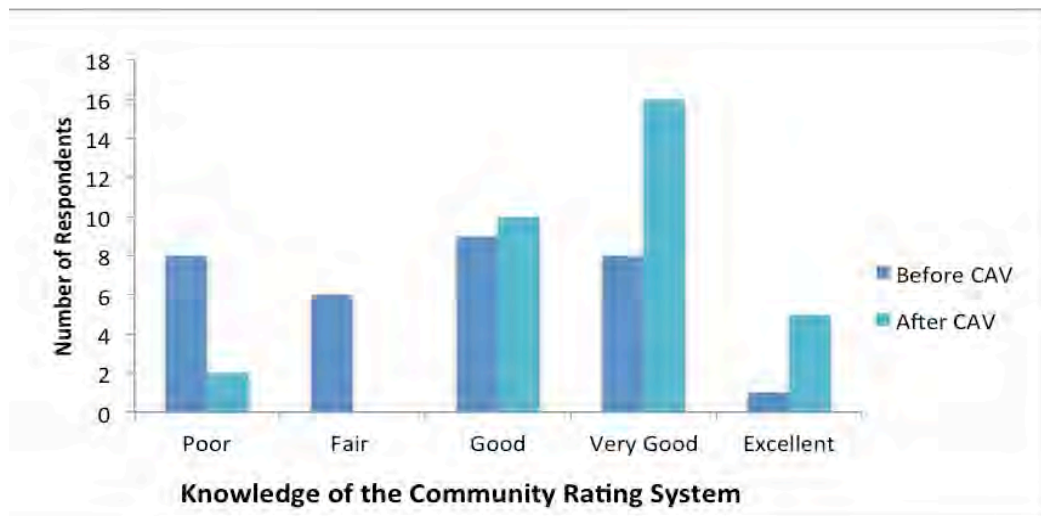


Figure 3.4. Level of understanding of the CRS before and after the FCAC visit.

INTENTION TO PARTICIPATE IN THE CRS:

When asked if their communities intend to participate in CRS in the future, 40% of respondents reported “Yes,” with 53% “Not sure” and 6% indicating “No.” Those answering “Yes” were asked to describe what they anticipated to be the greatest challenge while those responding “No” were asked to share the primary reason for not participating. Both groups cited similar challenges and barriers including:

- Lack of resources
- Staff time to dedicate to program and/or current workload
- Increased record-keeping requirements
- Inability to achieve satisfactory “compliance score”
- Incomplete knowledge of the CRS program

During FCAC visits, floodplain managers were asked about their interest in joining the CRS. Responses were not recorded for every community, although a majority expressed some level of interest. A number noted they had not yet satisfied the requirements, such as having a. FDEM staff noted those that indicated no interest cited few flood insurance policies, low community flood risk, the burden of paperwork and record keeping, and the challenge of taking on more work when current staff were already charged with many responsibilities. Contrary to the findings of research reported by Michel-Kerjan et al. (2016) shown below, no respondent indicated lack of flooding as an obstacle.

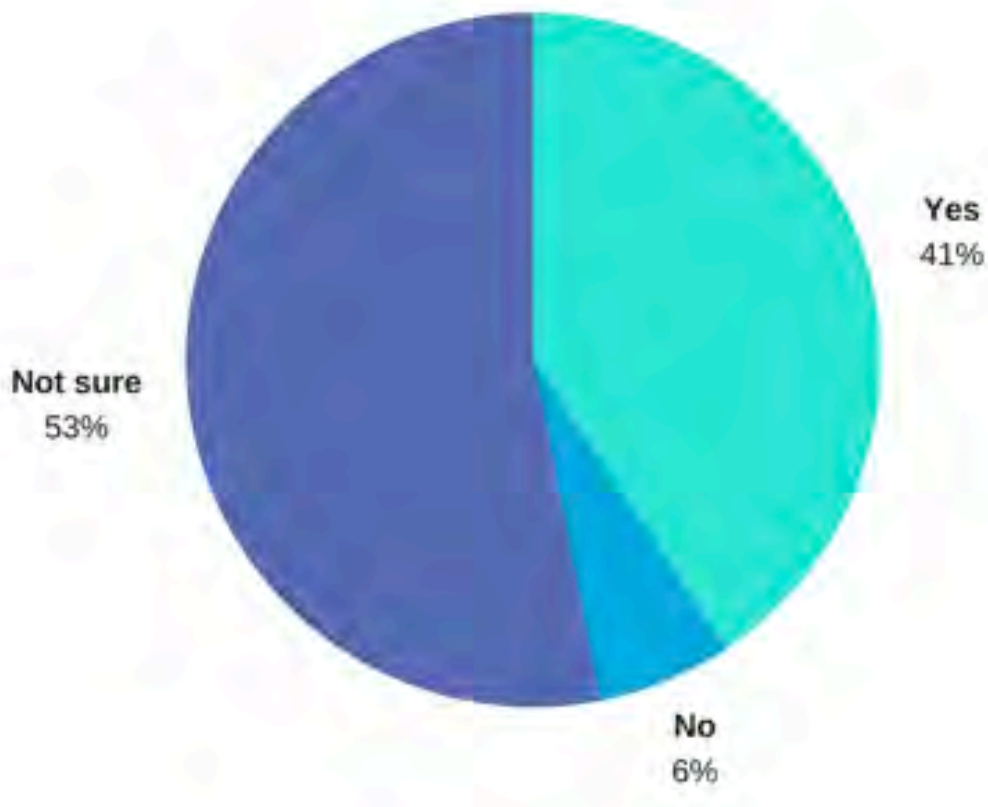


Figure 3.5. Future plans to participate in the CRS

SUMMARY OF PERSPECTIVES ON PARTICIPATING IN CRS:

Motivations	Obstacles
1. CRS helps prepare communities for flood events and reduces flood insurance premiums costs.	1. Limited funding, especially for capital improvement plans, constrains the ability to advance in CRS.
2. Flood events stimulate interest in community leadership to protect citizens and community infrastructure.	2. Convincing city management and mayors about the benefits of investing in resilience given limited budgets.
3. NFIP experience and competition among communities stimulates interest in flood resiliency and savings on flood insurance.	3. Convincing residents that never experienced a flood of the need to purchase flood insurance to participate in the CRS.
4. Recognition for risk reduction activities already in place stimulates FEMA to reduce flood insurance rates.	4. Educational challenges – not knowing what activities and how to obtain credits in CRS is overly complex.
5. To use CRS as a benchmark on how well the community is doing to advance resiliency against flooding.	5. More staff time and costs needed for procedures to document credit points.

Figure 3.6. Motivation and obstacles to becoming more active in the CRS program.

FLOODPLAIN MANAGEMENT RESOURCES ACCESSED:

Respondents were asked to identify three most frequently used sources of information about floodplain management procedures and permitting (Figure 3.7). The majority of respondents (75%) indicated that they most frequently use the State Floodplain Management Office, 56% identified other cities/counties, and 56% identified FEMA bulletins or guidance documents. These results reinforce the importance of FDEM’s accessibility to respond to questions, as well as an opportunity for the SFMO to expand ways to communicate answers to frequently asked questions.

Sources identified that are much less frequently accessed include FEMA staff, Water Management Districts, the Regional Planning Councils, and the Florida Floodplain Managers Association.

“The majority of respondents (75%) indicated that they most frequently use the State Floodplain Management Office, 56% identified other cities/counties, and 56% identified FEMA bulletins or guidance documents.”

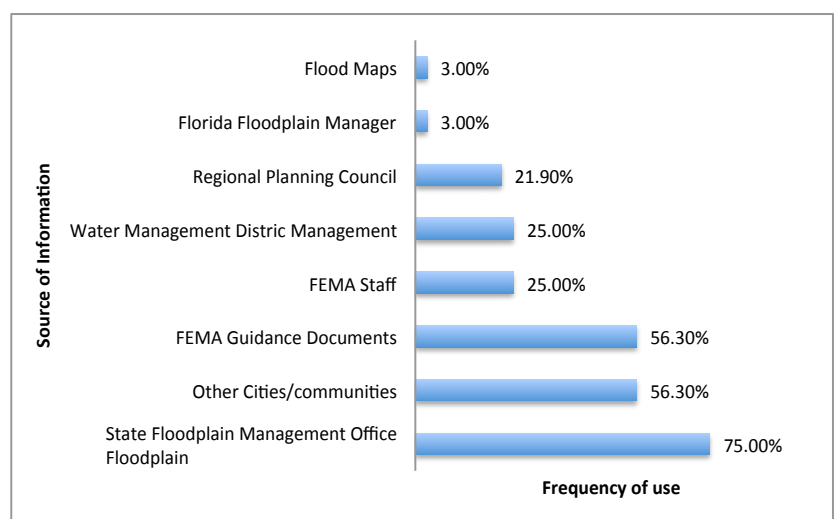


Figure 3.7. Respondents identify three most frequently used sources of information about floodplain management procedures and permitting

COMMUNITIES ANTICIPATED IMPROVEMENTS TO FLOODPLAIN MANAGEMENT PROGRAMS:

Survey participants were asked to identify up to three improvements, among a choice of five, that their communities would likely implement to reduce flood risk. More than half anticipate improvements in their inspection of fuel tanks, anchoring and elevation of heat pumps, conducting regular inspections of flood zones, and regulation of manufactured homes and accessory structures.

RECOMMENDATIONS FOR THE STATE FLOODPLAIN MANAGEMENT OFFICE:

Survey respondents were asked an open-ended question to share how they think the SFMO could more effectively assist their local floodplain program. **Many responses indicated the office has been “extremely helpful” and is “already doing a fine job,” while others made no specific recommendations. Other feedback suggested the SFMO “...continue the outreach [of the pilot program] and monitor communities adopting the *Seven Performance Measures*,” with several participants echoing that outreach, including visits, is always helpful and appreciated.**

Several respondents stated that additional resources to further education and increase awareness at the local level would be helpful, with one individual recommending the SFMO provide brochures for distribution to residents. Other suggestions included having a “point person” to respond to inquiries, offering more training and certification, providing additional technical/administrative support, and sharing of best practices from other communities.

CONCLUSIONS BASED ON ONLINE SURVEY RESPONSES:

- Communities with few insured properties, or relatively small amounts of land in SFHAs, do not see the benefits of participating in CRS relative to the level of effort.
- On-site visits are a valuable mechanism to improve understanding of floodplain management and share resources available to help community officials administer local ordinances and programs.
- **The SFMO should develop a mechanism to regularly communicate with community officials to provide support and share lessons learned from other communities.**



4.0 CONCLUSIONS & RECOMMENDATIONS

The CRS-CAV Pilot Program was an enormously ambitious and dynamic process. The primary goal of the NFIP and the CRS is wise floodplain management to reduce losses to floods. The primary goal of FDEM's function as the NFIP State Coordinating Agency is to work with and support community officials to fulfill their commitments to the NFIP through administering local floodplain management regulations and the Florida Building Code.

Examining the experiences of personnel involved in the Pilot Program, reactions and comments offered by community officials during FCAC visits, and the responses to the Online survey lead to a number of conclusions regarding benefits and recommendations.

4.1 IMPROVED COMMUNITY OFFICIAL AWARENESS AFTER ASSISTANCE VISITS

A well-known benefit of on-site Community Assistance Visits is improved understanding and awareness. On-site assistance visits serve to gauge the level of knowledge and experience of community officials charged with enforcing floodplain management regulations. When deficiencies in knowledge are identified, staff conducting visits can address those weaknesses, recommend guidance documents, and identify training opportunities. Better informed and qualified community officials lead to better enforcement of floodplain management requirements in local ordinances and the Florida Building Code.

The FCAC visits accomplish essentially the same objectives as traditional CAVs, with the added emphasis on the Community Rating System. Thus, local officials gain knowledge and awareness of the CRS along with improved understanding of basic floodplain management requirements. The results of the Online survey

reinforce these benefits (see Section 3.5, Experience and Knowledge). By conducting 208 visits in two years, FDEM significantly broadened the reach and benefits of on-site visits over that attained during previous years in which the SFMO conducted only approximately 25 Community Assistance Visits each year (the FEMA Regional Office conducts approximately 6 TO 8 additional CAVs each year).



4.2 BENEFITS OF ADOPTING THE SEVEN PERFORMANCE MEASURES

The *Seven Performance Measures* represent a statement of intent which documents the community's political will to work towards future compliance and reinforces the original commitment made when the community joined the NFIP. The *Seven Performance Measures* were developed based upon the most common programmatic deficiencies encountered during community visits. The Pilot Program verified that the performance measures accurately address some of the common deficiencies identified during FCACs.

Through the *Seven Performance Measures*, the SFMO promotes buy-in at the local level and creates opportunity for staff to build and maintain capacity. When local elected officials adopt a resolution committing to implement the measures, it provides support to local staff empowering them to enforce the regulations. The performance measures and associated templates and forms are helpful to communities with low permit activity by establishing procedures which will endure staff turnover and build lasting institutional capacity. Community officials frequently embraced the *Seven Performance Measures* and their usefulness for local program administration. Even communities that did not adopt the *Seven Performance Measures* by resolution expressed interest in utilizing the contents to improve program administration, most frequently, the permit application form for developments in SFHAs and the SI/SD worksheets.

Prior to establishing the *Seven Performance Measures*, there was little understanding of how to address past deficiencies outside of NFIP enforcement actions taken by FEMA. The Pilot Program limited the "look-back" period to five years but through adoption of the *Seven Performance Measures* communities with older unresolved compliance issues were able to be eligible to participate in CRS.

Adoption of the *Seven Performance Measures* supported and helped resolve identified procedural compliance issues as a required corrective action to close FCACs. When adopting the resolution to implement the *Seven Performance Measures*, elected officials and executive leadership are reminded of the importance of floodplain management on the need for resiliency in their citizens' homes. Moving forward, this may influence resource allocations for maintaining or increasing local floodplain management capacity.

While an encouraging tool for communities to work towards compliance, the *Seven Performance Measures* also maintains the institutional knowledge of experienced staff. Typically, program administration largely relies on the hands of one local staff member to oversee the development, implementation, and record keeping for the entirety of the program. Considering that this position depends upon substantial local knowledge, staff turnover can make a program difficult to administer. The combination of lost floodplain management knowledge, costs for interviewing, and subsequent training, can stifle program development and organizational efficiency. A perceived lack of sufficient backing from political leaders to see that floodplain management activities get implemented may exacerbate program stagnation and employee turnover. As staff retention remains a challenge to achieving strong community floodplain management programs, the *Seven Performance Measures* achieved increased local buy-in and may improve staff retention.

In summary, the *Seven Performance Measures* combined with SFMO assistance to enter CRS increased community officials' engagement in the Pilot Program and a willingness to review and improve local floodplain management program administration.

4.3 RECOMMENDATION: ALLOW FLORIDA TO SELECT COMMUNITIES FOR ASSISTANCE VISITS

FEMA’s “risk-based community CAV selection” process (see FEMA F-776) uses force factors such as increase in floodplain development pressure, community size, number of NFIP flood insurance policies, claims data, population, and population growth factors. From a national perspective, that process may achieve a universal methodology for FEMA. However, FDEM deems it overly constraining with little flexibility to broaden the benefits of on-site assistance visits to smaller communities and rural areas that may be facing notable future development pressure. Of particular concern is that those factors tend to prioritize communities that have high policy counts but are essentially built-out with little development potential as well as lacking sufficient normalization of certain factors. The tool was also developed just prior to the downturn in the economy in 2010 which has had a continuing effect for some communities.

Floodplain management staff in communities with considerable development activity and SFHA areas tend to be well-informed because they deal with the issues on a regular basis. In contrast, many of Florida’s smaller and rural communities may not effectively cope with significant development and re-development pressures, but must still fulfill the same commitments to the NFIP when faced with SFHA development proposals. One way to address this need is to visit more of the smaller and rural communities more frequently. Indeed, **many of the 208 communities selected for the Pilot Program had not been visited by FEMA or FDEM in more than 18 years** with multiple communities never having received a visit prior to the Pilot Program.

With the completion of the Pilot Program, Florida has a unique starting point as the basis for planning future community visits under FEMA’s funding program. While FEMA’s risk-based selection data can inform decisions each year, FDEM should be allowed to select communities based largely on its factors and

“Of particular concern is that FEMA’s factors tend to prioritize communities that have high policy counts, but are essentially built-out with little development potential as well as lacking sufficient normalization of certain factors.”



findings resulting from the Pilot Program. FDEM has considered various prioritization factors and strategies for compliance which may improve resource allocation resulting in the best outcome for floodplain management compliance throughout the state.

Because of the success of the procedural toolkit, the *Seven Performance Measures*, SFMO has updated the package of procedures, re-branding it to be used with all future CAVs to ensure that communities have a readily available prescriptive, but adaptable means of helping ensure compliance with the NFIP.

4.4 RECOMMENDATION: ALLOCATE SUFFICIENT RESOURCES

FEMA uses a formula approach as the starting point for determining allocation of funding to states to perform, among other activities, CAVs and general technical assistance. One factor not used is number of NFIP flood insurance policies in force within a state. Florida has 36% of all policies in the nation, more than any other state and nearly three times the number in the next highest state (Texas, with about 13%).

Prior to the CRS-CAV Pilot Program, Florida received an average of \$359,030 over three years, which supported approximately 25 Community Assistance Visits each year and other activities. Thus, combined with the 208 communities visited during the pilot, 71% of Florida's 468 NFIP communities have been visited in the last 7 years. This forms a basis for planning future visits that is unique, and is described in the report's recommendations for Florida to select priority communities for future CAVs (see Section 2.1).

Section 3.1 summarizes the average staff time to conduct and close FCACs, which ranged from 82 to 84 hours, not including time required to assist communities with repealing and replacing their flood ordinances to be coordinated with the FBC, and administrative time required to manage the program. While costs can be assigned to the initiative (labor and expenses), a traditional evaluation of costs and benefits is not feasible because the benefits cannot be readily converted to dollars. Can a community official's improved understanding of floodplain management, which should lead to better administration, be monetized? How valid would it be to assume that some percentage of development in communities not visited in many years would be non-compliant, and thus exposed to flood damage? When communities join the CRS, the most immediate benefit that can be

measured are premium discounts, but other well documented, but less tangible financial benefits are more difficult to measure. Plus, using CRS discounts in participating communities is an inappropriate measure to gauge the lack of the discounts in communities that elect not to participate in CRS.

The SFMO proposes to increase the number of communities visited over the annual average visited prior to the Pilot Program. By visiting most communities every 5 to 8 years, the quality of local floodplain management administration and enforcement will improve. FEMA should anticipate allocating sufficient funding to Florida to take advantage of and build on the investment in the Pilot Program.

If additional funding support from CAP-SSSE, the SFMO should consider alternative approaches to provide the informational support to communities that they request when completing the questionnaire. A more knowledgeable and informed community staff will achieve a more flood resilient community with less and less concern over minor compliance issues identified during the field assessments of flood zones during traditional CAVs. **To this end, the SFMO has prepared a proposed scope of work under CAP-SSSE that would enable the State to reach more communities than the traditional CAV approach. This effort consists of a regional approach using a combination of a plenary meeting format for invited communities, floodplain tours, and one-on-one consultations with community representatives.**

4.5 RECOMMENDATION: BROADEN SFMO OUTREACH

The benefits of readily accessible technical assistance and information were clear messages heard during FCAC meetings and reinforced by responses to the On-line survey (see Section 3.5, Recommendations for the SFMO). While assistance visits serve to form a baseline of knowledge, they also create a connection between communities and the SFMO staff. This connection should lead community officials to ask for assistance when faced with questions about interpreting and enforcing floodplain management requirements.

The SFMO maintains an email address (floods@em.my-florida.com) and telephone number (850-815-4556) to receive requests for general technical assistance and answer specific questions. This allows the program manager to assign staff to monitor incoming requests and respond. These points of access have been used for years, and experience indicates the majority of questions can be handled by staff. Questions that cannot be readily answered by staff, or that require interpretation beyond guidance provided in FEMA publications, are handled by the State Floodplain Manager. SFMO staff use FEMA's Community Information System to record requests for technical assistance.

In the past several years the SFMO has not used a newsletter or "email blast" to proactively communicate with local floodplain management staff unless critical information must be disseminated. Re-instituting a periodic email distribution or twitter account would serve two purposes: convey specific information on technical topics of broad interest and maintain local awareness of the SFMO as a primary source for assistance. Technical topics can be identified based on questions received by email and phone, or by issues observed during on-site visits. The most significant challenge to implementing

this recommendation is the database of email addresses for designated floodplain administrators maintained in CIS. While any large database is difficult to maintain, this one suffers from some FEMA contractors modifying the contact information using names of local staff who are not the officially designated floodplain administrator. Like other states, Florida has resorted to maintaining a spreadsheet of contact information from which to transmit email blasts. The SFMO also has the opportunity to review and comment on the Building Officials Association of Florida's "Discussion Board," and provide comment on non-binding interpretations concerning the NFIP flood provisions in the Florida Building Code.





APPENDICES

- A-1 – Description of the FCAC Process and Steps
Procedures for FCAC Report submittal FCAC Closure
FCAC Steps to Completion
CRS Pilot Program Flow Chart
- A-2 – Contact Spreadsheet
- A-3 – Meeting Confirmation E-Mail
- A-4 – Meeting Confirmation Memorandum
- A-5 – Meeting Agenda
- A-6 – Community Questionnaire
- A-7 – Address Inspection Form
- A-8 – Photograph Log
- A-9 – Meeting Sign-In Sheet
- A-10 – Presentation
- A-11 – CD-ROM and Guidance documents
- A-12 – Draft Report
- A-13 – Transmittal Letters
- A-14 – Example Follow-up Letters to communities
- A-15 – Steps to Close an FCAC
- A-16 – Online Community Survey
- A-17 – Steps for Processing FCAC Reports and Transmittal Letters Community
- A-18 – Assistance Visit Stages and Components
- A-19 – 10 Tips for Conducting CAVs

DETAILED DESCRIPTIONS OF THE FCAC PROCESS

STEP 1.

To prepare for each FCAC, the SFMO collected contact information and data from FEMA's Community Information System (CIS). A schedule was then developed based on community proximity to cluster site visits, reduce costs and decrease staff travel times. Communities were contacted to schedule site visits, provide a floodplain management questionnaire, and begin to review flood zones within the jurisdiction.

STEP 2.

Next, to plan field tours, the SFMO prepared presentations and meeting materials, reviewed community ordinances, and conducted a virtual tour of the community's areas of high flood hazard.

STEP 3.

Representatives from the SFMO traveled to each community to conduct the field tours and meetings. Field tours followed a pre-determined route to tour new and existing development within the floodplain and document observations, which could further warrant discussion or review with community officials.

STEP 4.

Field tours were followed by meetings with the community's Floodplain Administrator (FPA) and other community officials to discuss field data collected, disseminate outreach or guidance materials, and discuss any noted potential compliance issues. Community staff were able to ask questions related to administration and interpretation of floodplain management regulations. Prior to concluding the meeting, the SFMO representatives ensured that the community had a clear understanding of floodplain management, NFIP requirements, CRS benefits, and that questions and concerns were addressed or identified for follow up. Additional documentation related to field observations and resultant discussion during the meeting was also collected to verify compliance.

FCAC REPORT DEVELOPMENT

Upon completing each site visit, staff provided a technical report to both the community and FEMA. FCAC Reports were designed to summarize the findings of the site visits, address floodplain management issues identified, and provide suggested next steps to assist communities in entering, advancing or maintaining their placement in the CRS. FCAC reports were developed to correlate with CIS reporting requirements to streamline reporting and facilitate evaluation of each community floodplain management program. The reporting process documented the types of assistance needed but also served as a tool for advancing communication between SFMO staff and the community and diagnosing issues in floodplain management.

Each report was broken down into six sections including the following:

- 1) *Section 1.0 Introduction:* Identified the purpose and structure of the FCAC within the community. The meeting schedule, purpose and attending representatives from both the SFMO and community were detailed within this section.
- 2) *Section 2.0 Findings:* Identified each floodplain management program category and indicated the level of severity of issues identified through the FCAC. The categories addressed included (1) floodplain management regulations; (2) administrative and enforcement procedures; (3) engineering, (4) flood maps and flood insurance studies; (5) other programmatic or problems identified; and, (6) violations to floodplain management regulations. Each category was then classified as serious, minor or non-existent, consistent with CIS reporting requirements. A discussion of the challenges and opportunities for each floodplain management program category was also provided.
- 3) *Section 3.0 Community Background:* A general background of the community, its history with flooding and the NFIP program was provided in this section. U.S. Census population data, accuracy of existing Flood Insurance Rate Maps (FIRMs), community Flood Insurance Study (FIS), and a description of the Floodplain Administrator were provided.
- 4) *Section 4.0 Development:* Detailed development and regulatory structures for development that had taken place within the community's floodplain. The SFMO Team detailed elements of community development which could inhibit the success of the floodplain management program and discussed best management practices and

examples which the community could use to improve development practices. The SFMO Team reviewed the development review process, Substantial Improvement/Substantial Damage (SI/SD), Accessory Structures, Historic Structures, Violations and Code Enforcement and Variances.

- 5) *Section 5.0 Mitigation:* Detailed discussion of mitigation initiatives and grant activity within the community to improve floodplain management. Mitigation initiatives included discussion of recently completed and planned mitigation initiatives for properties, critical infrastructure and flood prone areas within the community. Mitigation grant activity described current and planned actions by the community to pursue funding for mitigation initiatives. Finally, a discussion of the community's CRS assessment was provided to document interest, eligibility and necessary steps to move forward with entering the NFIP's CRS or advancing class(es).
- 6) *Section 6.0 Community Actions Required and Recommended:* Detailed community actions both recommended and required to close the FCAC and participate in CRS, if desired. The required actions listed the necessary steps and deadline for adoption and review of the state model floodplain ordinance. Resources for technical assistance to tailor the model ordinance and instructions for adoption were provided within the section. Recommended actions based on the findings of the FCAC were provided to the community including model procedures, best management practices, and the *Seven Performance Measures*. Furthermore, teams provided additional details regarding availability of State support to close the FCAC or provide additional technical assistance.

TRANSMITTAL OF DRAFT FCAC REPORT

FCAC Reports were packaged and transmitted to the community on a fixed schedule to maintain efficiency. The reports were delivered via email with a delivery receipt requested. Once the SFMO verified that the community received the report, the community had three to five business days to return the report with any comments or suggested revisions. After the comment period, a final formal report was transmitted to the community's executive leadership.

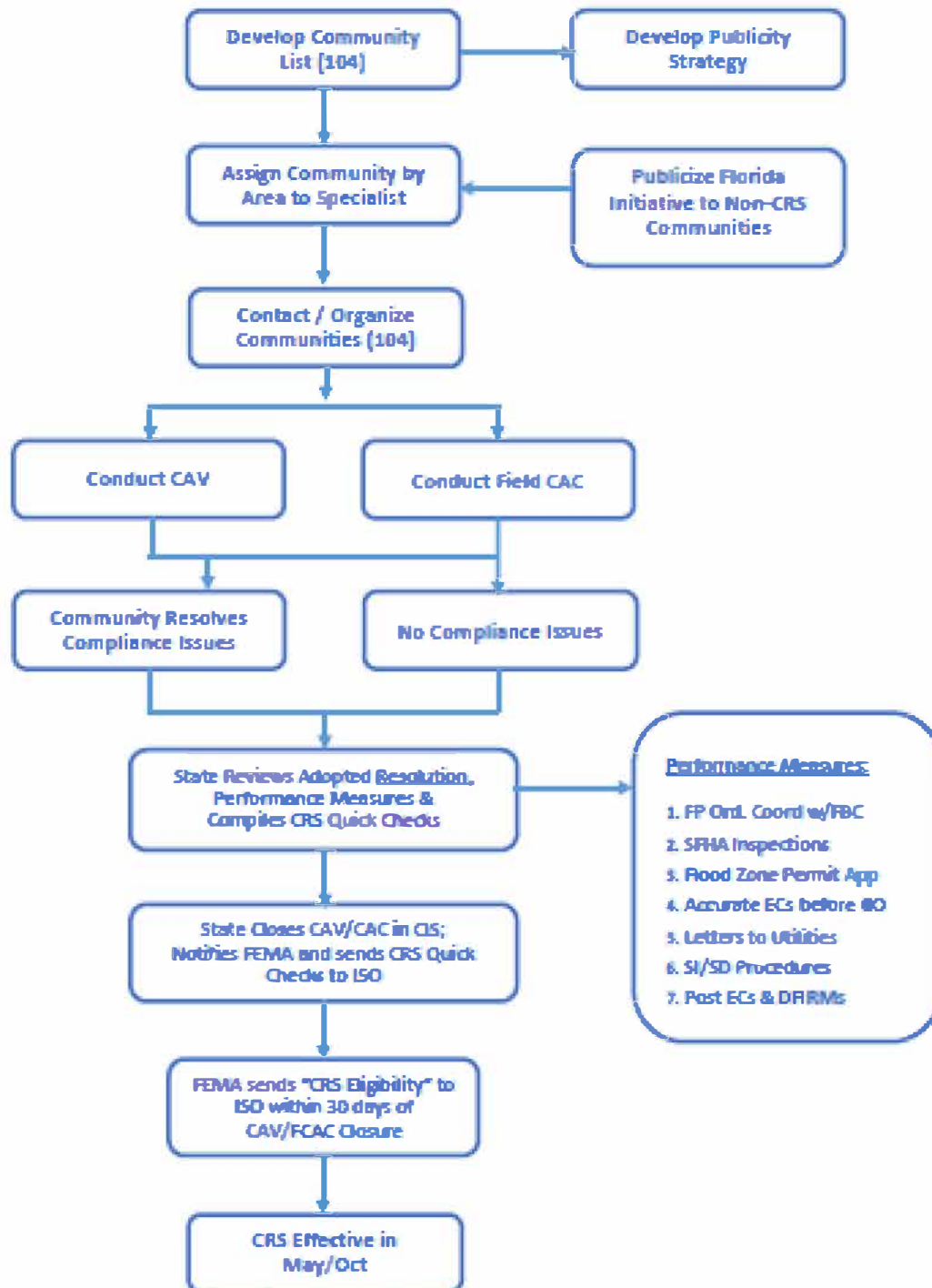
FCAC CLOSURE

Communities were required to resolve outstanding tasks identified by the final report to close the FCAC. SFMO staff worked with the community officials to address the deficiencies presented in the report, adopt the Florida Model Floodplain Management Ordinance and work to join the CRS, if desired.

To streamline and monitor closure, staff documented the actions taken to close FCACs, dates of community contacts and verification that local staff were resolving compliance issues within established timeframes detailed in the report. In cases of unresponsiveness, staff followed a set of procedures to redirect the community towards compliance or confirm the community's intent to leave identified compliance issues unresolved. Throughout implementation of the Pilot Program, staff dedicated time to individualize follow-ups and maintain correspondence with the communities to finalize each FCAC.

One week prior to the expiration of compliance issue deadlines, staff reached out to the community liaison by telephone or email to determine how the work was progressing and whether the communities needed assistance. In the cases of unresponsiveness, staff followed a set of procedures to redirect the community towards compliance. First, the staff member called the community's office to make sure that the community contact was still employed with the community and working to resolve compliance issues. If so, the staff member inquired to ascertain if the community needed additional technical assistance or an extension to close the FCAC. After the conversation with the community contact, staff sent a follow up email which included a synopsis of the discussion and either confirmation of the community's commitment for resolving the compliance issues or statement reflecting the community's intent not to resolve the issues. Follow-up letters were sent to community leadership when necessary.

**Florida CRS Initiative
Pilot Program to Enroll Communities in the
Community Rating System**



CONTACT LIST SPREADSHEET

Throughout the Pilot Program, the SFMO maintained a simple contact list spreadsheet to ensure accurate and appropriate community points of contact were readily available. Each sheet of the excel file represented a specific community participating in the Pilot Program.

COMMUNITY/COUNTY:					
TITLE	NAME	TELEPHONE	EMAIL	CAV/CAC DATES	NOTES
FPA/FPM					
BLDG O					
CMNTY DEV DIR					
DIR ZONING					
PLNG DIR					
MAYOR					
MANAGER					
DEPUTY EXEC DIR					
ADMIN ASST					

MEETING CONFIRMATION E-MAIL

From: [Staff conducting meeting E-Mail]
To: [Community Contact E-Mail] (i.e. JaneDoe@community.gov)
CC: [other staff CFM staff participating on visit, FEMA Staff email]
Subject: State Floodplain Management Office Field Community Assistance Visit.
Date:

Good morning [community contact],

Thank you for speaking with me regarding floodplain management activities in [Community Name]. Per our conversation, I have attached a memo to confirm that we will be meeting at [time, date, and location]. A copy of the meeting agenda is attached for your review, as well as a questionnaire to be completed prior to the meeting. If there is anything else that you would like to discuss that is not on the agenda, please let me know. In addition, we request that you please email your current floodplain management ordinance at your earliest convenience. Please do not hesitate to contact me with questions or concerns. Our team looks forward to working with you!

Sincerely,

[Assistance Visit Contact], CFM
[Title]
[Email Address]
[Phone Number]

Attachments (3): [Meeting Confirmation Memorandum]
[Meeting Agenda]
[Community Questionnaire]

MEETING CONFIRMATION MEMORANDUM

STATE OF [Insert Name]
DIVISION OF EMERGENCY MANAGEMENT LETTERHEAD

[Date to be Sent]

[Community Contact Name and Title] (i.e. Jane Doe, Town Manager)

[Name of Jurisdiction]

[Address]

[City, State ZIP]

Re: National Flood Insurance Program Field Community Assistance Contact

Dear [Name]:

A Field Community Assistance Contact has been scheduled with you to discuss [Community Name]'s participation in the National Flood Insurance Program (NFIP), and to address any questions the community may have about its NFIP responsibilities. This meeting is scheduled for [Time on Day of Week, Month XX, 201X], to be held at [Meeting Location].

The State Floodplain Management Office conducts these visits to maintain periodic contact with communities participating in the NFIP and to assess needs for technical assistance and coordination. In addition, these visits provide an opportunity for assessing the effectiveness of local floodplain management ordinances and enforcement practices. Community officials involved in floodplain management, development review and permitting should be present during the meeting or available for questions. In this regard, we ask that appropriate staff be available to:

1. Summarize the process the community uses to review proposed development in designated Special Flood Hazard Areas including new buildings and other structures, new and replacement manufactured homes, improvements to existing buildings and structures, and development other than buildings such as dredging, filling, grading, paving, excavation or drilling operations, and stream or channel alterations and maintenance;
2. Describe the process for reviewing new development projects and subdivision proposals, including manufactured home parks and subdivisions, in designated Special Flood Hazard Areas;
3. Discuss the community's enforcement procedures including variance procedures and on-site inspection of construction in designated Special Flood Hazard Areas;

4. Discuss the community's flood damage prevention ordinance adopted pursuant to Title 44 CFR, Sections 60.1, 60.2 and 60.3;
5. Discuss any questions or concerns pertaining to the community's Flood Insurance Rate Maps and Flood Insurance Study, including the accuracy, completeness or need for other data; and
6. Provide access to:
 - Permit records for certain development activities in the designated Special Flood Hazard Areas;
 - Records of elevation certificates for new construction completed in designated Special Flood Hazard Areas to ascertain if development complies with applicable floodplain management regulations; and
 - Records of variances, if any, that were requested (denied or approved) for structures in designated Special Flood Hazard Areas.

Recently, FEMA approved Florida's Community Rating System Pilot Program that encourages communities to participate in the NFIP's Community Rating System (CRS). CRS helps communities achieve improved flood resiliency and enables property owners to receive discounts on their flood insurance premiums. We will discuss the community's compliance with the NFIP and lay the groundwork for a streamlined way for qualifying communities to participate in the CRS program.

To prepare for the meeting, we ask that you send by email your community's adopted floodplain ordinance to the address below by [Day of Week, Month XX, 201X]. Attached is a questionnaire that will be discussed during the meeting, and we ask that you complete as much of it as possible before the meeting, and send a copy, if possible.

Should you have any questions regarding the Field Community Assistance Contact, please contact me [Phone Number] or by email at [Email Address].

Sincerely,

Staff Name
Floodplain Management Specialist
State Floodplain Management Office

cc: [Staff Name], State Floodplain Manager, State Floodplain Management Office
[Staff Name], CRS Specialist, State Floodplain Management Office

MEETING AGENDA



STATE FLOODPLAIN MANAGEMENT OFFICE

2016-17 FIELD COMMUNITY ASSISTANCE CONTACT

AGENDA

- 1 GENERAL DISCUSSION OF COMMUNITY'S FLOODPLAIN MANAGEMENT PROGRAM
 - HIGHLIGHTS OF THE COMMUNITY'S PROGRAM
 - PROGRAM CHALLENGES AND OPPORTUNITIES
- 2 BENEFITS AND PROVISIONS OF THE COMMUNITY RATING SYSTEM (CRS)
- 3 DISCUSSION OF THE COMMUNITY'S FLOODPLAIN MANAGEMENT ORDINANCE
- 4 INTERVIEW REGARDING FLOODPLAIN MANAGEMENT PROGRAM
- 5 BREAK
- 6 DISCUSSION OF FIELD TOUR OBSERVATIONS
- 7 SUMMARY OF FOLLOW UP ACTIONS
- 8 REVIEW OF PERMIT FILES
- 9 MEETING WRAP UP

COMMUNITY QUESTIONNAIRE



STATE FLOODPLAIN MANAGEMENT OFFICE

2016-17 COMMUNITY ASSISTANCE CONTACT

QUESTIONNAIRE

Date of CAC:

Conducted By:

COMMUNITY INFORMATION

Community:

Floodplain Administrator
(FPA)

Name/Title:
Address:
Phone Number:
Email Address:

Chief Executive Officer
(CEO)

Name/Title:
Address:
Phone Number:
Email Address:

ATTENDEES

Name/Title:

FLOODPLAIN ADMINISTRATOR

How long have you been the designated FPA?

Are you a CFM? If so, how many years have you been certified?

HISTORIC FLOODING

Historically, have there been any significant floods and has your community experienced flooding within the last year?

If so, what was the source and location?

Briefly describe the damage:

How many structures were affected?

COMMUNITY DETAILS

Dynamics of Water Features (Rivers, Lakes, Etc.):

ORDINANCE

When was the last time your community updated its ordinance? Ask about the Model Ordinance that is coordinated with the FBC.

Does your ordinance have any higher regulatory standards?

MAPPING

Have the boundaries of the community been modified since the effective date? If so, has FEMA been notified?

Do you feel there are engineering or modeling inaccuracies with the FIRMs or FIS?

Are you aware of the process for seeking map changes?

PERMITTING

What tools do you use to determine if a property is in a flood zone and when is this determination made?

Approximately how many permits, in SFHAs, have you issued in the past five years?

What are your community's regulations for enclosures below the base flood elevation?

How does your community regulate accessory structures?

How does your community regulate critical facilities?

DEVELOPMENT

How does your community handle proposals for alteration or renovation to designated historic structures?

What is your community's process for non-structural development activities, including mining, dredging, filling, grading, paving, excavation or drilling?

Are there any flood control projects planned, ones under construction currently, or ones that have been completed since the date of the last CAC or CAV?

How does your community handle approximate A-Zones? Do you or the applicant determine finished floor height requirement?

CERTIFICATES AND CERTIFICATIONS

How does your community obtain the following certifications?

- 1) Flood proofed Non-Residential Structures
- 2) Openings for Enclosed Areas Below the Lowest Floor
- 3) Floodway No Rise
- 4) V-Zone pile and column foundation and structural anchoring
- 5) V-Zone Breakaway Walls

SUBSTANTIAL IMPROVEMENT/SUBSTANTIAL DAMAGE

How many substantial improvement or substantial damage determinations have you issued in the past five years?

Describe your process for making substantial damage determinations?

VARIANCES

Does your community grant variances from the floodplain regulations, and if so, what procedures are used?

MANUFACTURED HOME PARKS

Does your community currently have manufactured home parks or subdivisions in the SFHA and, if so, how many units?

What is your community's elevation requirements for new installations and replacements?

VIOLATIONS AND ENFORCEMENT

Does your community conduct periodic inspections for compliance in the SFHAs? (Note: the FBC now requires the bottom of the floor to be at or above the BFE.)

What procedures are in place for remedying any violations?

Are there any enforcement/compliance actions currently underway in your community?

MITIGATION

Has your community initiated mitigation projects to enhance the community's flood resiliency?

Does your community systematically advise FEMA about storm water or flood protection measures that could affect future flood mapping? If so, please explain how you do so.

ADDRESS INSPECTION FORM

STATE OF [INSERT NAME] / LOCAL GOVERNMENT
FLOODPLAIN MANAGEMENT PROGRAM

ADDRESS INSPECTION FORM

Property Information		
Date:	Community Name:	Community ID:
Address:		Type of Development:
Visual Description of Property:		
Flood Zone:	FIRM Map Date:	FIRM Panel#:

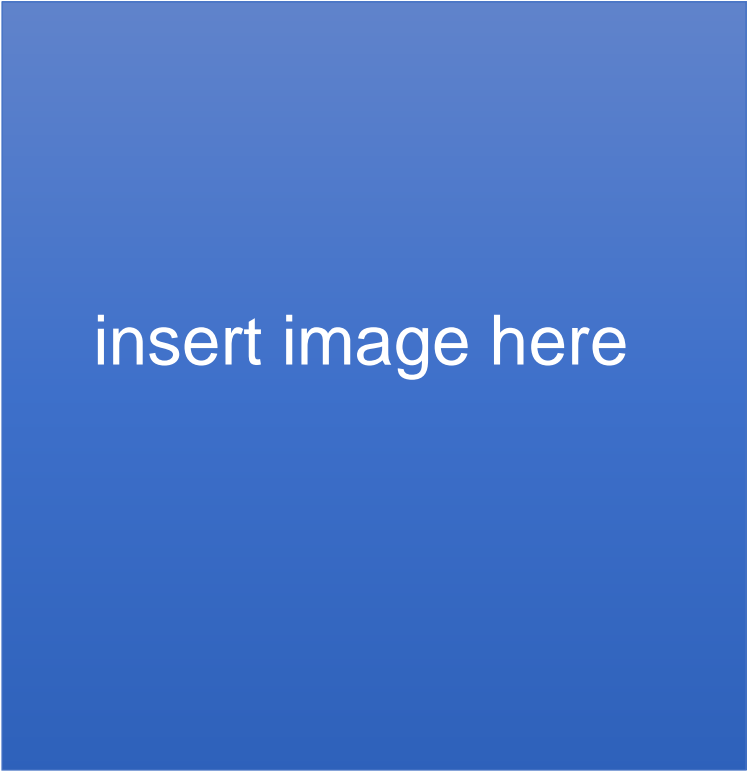
Requirement	<u>Yes</u>	<u>No</u>	<u>N/A</u>
Approx. A-ZONE: Is the foundation 2' above lowest adjacent grades?			
AE-ZONE: Is the lowest floor elevated, or is non-residential or historic structures Flood proofed to or above the BFE?			
Regulatory Floodway: If structures are located in floodway, check permit files for No-Rise Determinations			
Are electrical and mechanical equipment above BFE?			
Are there flood openings no more than 1' above lowest adjacent grades?			
Are there enclosed areas below the BFE?			
Are areas below the BFE used solely for parking, access, or storage?			
Is there an attached garage below residential finished floor with flood openings no more than 1' above lowest adjacent grade?			
Was fill used to elevate home in A or AE zones?			
NON-RESIDENTIAL: Is the structure flood proofed?			
V-ZONE: Is the bottom of the lowest horizontal structural member of the lowest floor above the BFE?			
V-ZONE: Are enclosures below the lowest floor constructed with breakaway walls or left open?			

Notes:

Photos taken: Y N Number _____

PHOTOGRAPH LOG

For each community participating in the pilot program, the State Floodplain Management Office conducted comprehensive tours of the floodplain. Tours were planned in advance of the FCAC visit and meeting. Photos of field tour observations were included and represented a variety of subject matter including commercial and residential structures, potential sources of flooding, accessory structures (such as HVAC/air conditioning units), natural gas or other storage structures, or potential flood vulnerabilities.

PHOTOGRAPH LOG	
Project Name: City of [Name] Floodplain Tour	
Site Location:	
Location of Photo:	
Direction of Photo:	
Photo No: 01	Date:
Description:	
	

Presentation

During each community visit, SFMO staff met with community officials and stakeholders to discuss the characteristics of flood risk within the community and observations made during the field tour. As each community exhibited varied risks, staff developed different presentations based on the areas of concern or positive examples of floodplain management documented during the field tour. Below is a template for the presentation; a title slide featuring the community's name and date of visit, subsequent slides with pictures documenting each violation or notable observation, and a closing slide, allowing participants to ask questions.

[City/Town Name] FCAC Meeting

[Date]





Questions?



CD-ROM WITH GUIDANCE AND OUTREACH MATERIALS

OUTREACH MATERIALS

Outreach and guidance materials were assembled to provide communities with technical assistance. This information served as a centralized reference for NFIP regulations, guidance, or technical bulletins on best management practices. There were three folders on the CD-ROM. The first folder had documents related to the CRS, the second folder housed NFIP-related documents, and the third folder provides NFIP documents. These contents were periodically updated to reflect changes in guidance and best management practice. The contents of the CD are included in detail below:

CRS Documents

- CRS Flow chart
- CRS-CAV Performance Measures
- Elevation Certificate Checklist
- Florida CRS Initiative Community Overview
- Overview of Florida CRS Pilot Program
- Florida CRS Resolution of Intent

NFIP Documents

- NFIP General Information
- NFIP in Florida
- SISD Lateral Addition Matrix
- Anchoring Fuel Tanks Brochure
- Comparison of Premium Rates Flyer
- FEMA Elevation Certificate Fact Sheet
- Notice to Air Conditioner Installers Example
- Floodplain Development Permit Application Example
- FEMA Publication Catalog
- Floodway diagram
- FEMA program factsheet
- FEMA Grant Application Process
- Copy of Homeowners Insurance Affordability Act (HFIAA) from the ASFPM
- HFIAA Fact sheet
- HFIAA FEMA Overview
- HMGP Application Process
- Insurance Rates with different Base Flood Elevations
- Manufactured Homes Anchoring Diagram
- Manufactured Homes Elevation Diagram
- Building Types Reference Tool

- Letters of Map Change Reference Tool
- FEMA Flood Map Service Center Fact Sheet

Performance Measures Packet

DRAFT REPORT



2017 Field Community Assistance Contact

[Name of Community] Field Community Assistance Contact Report

[Date Report to be Delivered]

State Floodplain Management Office
[State Department/Agency]

1. INTRODUCTION

1.1. General

On [FCAC Date], the [State Name] Division of Emergency Management, State Floodplain Management Office (SFMO) conducted a Field Community Assistance Contact (FCAC) with the [Community Jurisdiction Name] in accordance with the procedures set forth in the Federal Emergency Management Agency (FEMA) Community Assistance Program.

1.2. Purpose

The FCAC assesses the Town's floodplain management program and overall knowledge of the National Flood Insurance Program (NFIP), and provides [Community Name] staff with any technical assistance in general or specifically relating to identified program deficiencies. SFMO staff conducted the FCAC to verify compliance with the NFIP and discuss the community's interest in and benefits of the Community Rating System (CRS) program. FCACs also provide an opportunity to establish or re-establish working relationships between the SFMO and NFIP-participating communities to support greater awareness of the NFIP and its requirements.

1.3. FCAC Structure

The FCAC entailed a floodplain tour and meeting with [Community Name] representatives to discuss the Town's floodplain management program. Prior to the field tour and meeting, SFMO staff reviewed digital flood maps to ascertain the presence and location of key flood prone areas for review. Once in the community, SFMO staff conducted a windshield survey of these selected areas and assessed whether observed development activities appear compliant, non-conforming, or non-compliant. SFMO staff took digital photographs of any development activities that stimulated questions for discussion during the FCAC meeting and possible follow-up action. The FCAC meeting included detailed discussion of flood history and characteristics throughout [Community Name] as well as floodplain management activities, development activity observations, and the State's CRS-Community Assistance Visit (CAV) Pilot Program. The SFMO designed this program to enable communities to streamline CRS entry, if the community meets certain criteria.

1.4. Participants

[Name of Attendee] (Title, i.e. Town Manager) and [Additional Attendee] (Title, i.e. Building Official) attended the FCAC meeting representing the Town of [Community Name]. [Staff Name], CFM (Floodplain Management Specialist) and [Staff Name], CFM (Floodplain Management Specialist) attended representing the SFMO.

1.5. Community Contact Information

Floodplain Administrator (FPA): [Name, Title]
[Community Name]
[Address]
[City, State ZIP]
[Phone Number]
[Email Address]

Chief Executive Officer: [Name, Title] (i.e. Mayor)
[Community Name]
[Address]
[City, State ZIP]
[Phone Number]
[Email Address]

2. FINDINGS

2.1. Are there problems with the community's floodplain management regulations?

Choose an item. **Select: "None." "Minor." or "Serious."** Description of the process and/or issues in detail.

i.e. **"Serious.** Prior to the FCAC meeting, SFMO staff reviewed the Town's Flood Damage Prevention Ordinance (FDPO) to determine the presence of any substantive deficiencies. The FDPO needs revision to meet current NFIP and [State Name] Building Code provisions. Communities in [State Name] must repeal and replace, or revise, their existing FDPO to ensure compliance with the NFIP and coordination with the [State's specific building code current edition], and subsequent editions. The SFMO developed a model FDPO for use by communities that FEMA Region [Insert Respective Region] formally approved. The [City Official Title] stated in the meeting that the community plans to update its ordinance before FEMA issues Flood Insurance Rate Maps (FIRMs); FEMA issued Preliminary FIRMs in January 2016. See Section 6.1 for required actions."

2.2. Are there problems with the community's administrative and enforcement procedures?

Choose an item. **Select: "None." "Minor." or "Serious."** Description of the process and/or issues in detail.

i.e. **"Serious.** The Town of [Community Name] relies heavily on [County Name] for building code enforcement, permitting, and inspection services, although the community has limited development in the flood zone. The [Town Manager] reviews development proposals for local planning and zoning compliance before the applicant approaches [County Name] for a flood zone

determination and permitting. [Community Name] requires all development to undergo a zoning review; however, building permits are not required for accessory structures less than 300 square feet. During the FCAC meeting, SMFO staff provided technical assistance to the community, noting that all development in the flood zone requires a floodplain review and flood zone designation. Consequently, the existing procedure may result in noncompliant development activities in the flood zone as the flood zone designation occurs during the building permit review process. SFMO staff identified no accessory units in [Community Name] which appeared noncompliant with NFIP regulations. Nevertheless, the SFMO strongly advises that [Community Name] and [County Name] execute an Interlocal Agreement specific to floodplain management responsibilities to ensure that division of responsibilities remains clear in the future and does not result in procedural deficiencies. The SFMO has available a model Interlocal Agreement that specifies the duties of the parties to the agreement and may be downloaded from the SFMO website (link provided).

2.3. Are there engineering or other problems with the maps or flood insurance study?

Choose an item. **Select: "None." "Minor." or "Serious."** Description of the process and/or issues in detail.

i.e. **"Minor.** The Town's current FIRMs became effective September 2006. During the FCAC meeting, Town representatives stated that the maps are generally an accurate representation of local flood risk, although flooding does occur in areas that are not in effective or proposed flood zones.

2.4. Are there other problems in the community's floodplain management program?

Choose an item. **Select: "None." "Minor." or "Serious."** Description of the process and/or issues in detail.

i.e. **"Minor.** The [County Name] Building Official also serves as the Code Enforcement Officer for [Community Name]. The [County Name] Building Official relies on citizen complaints and regularly scheduled inspections of permitted activities to identify violations in [Community Name], largely due to limited internal capacity to conduct routine field tours in the community. During the FCAC meeting, community representatives discussed the prevalence of unpermitted accessory units and other development throughout the Town, nonspecific to the flood zone that exists because of this practice. SFMO staff shared *Performance Measure 2* (conduct annual inspections in the flood zone) with the community to demonstrate best management practices for code enforcement in the flood zone, and strongly encourages [Community Name] to conduct a regular tour of its flood zones to ensure that all development is permitted and compliant with current FDPO regulations.

2.5. Are there programmatic issues or problems identified?

Choose an item. **"Yes." or "No."**

i.e. “No. Neither the SFMO or [Community Name] representatives identified any other programmatic issues or problems.”

2.6. Are there potential violations of the community’s floodplain management regulations?

Choose an item. “Yes.” or “No.”

i.e. “No. During the floodplain tour, SFMO staff identified a residence in the flood zone which appeared new or recently renovated. The community provided a FEMA Elevation Certificate (EC) for the property which substantiated compliance with the local FDPO. The SFMO identified no other potential violations in [Community Name].”

3. COMMUNITY BACKGROUND

3.1. Geography, Population, and History of Flooding

[Jurisdiction Name] is a [size in square miles] community located in the heart of [Name of County], [State]. The U.S. Census Bureau estimates the Town’s population at [population size] as of [year]. Additional community-specific information included. i.e. “During the FCAC meeting, [Community Name] representatives noted that while the community has not experienced widespread flooding, there are a few creeks throughout the Town as well as low areas prone to ponding during heavy rain events. [Community’s] FIRMs reflects this, although the FPA indicated that water also periodically accumulates in areas outside of the AH zones. Most recently, ponding from Hurricane Hermine compromised road access for two days, and the community purchased pumps to mitigate flooding in future similar events. According to Town representatives, flooding does not affect structures or cause damage in [Community Name], but access to roads and structures becomes problematic.

3.2. Community Assistance Visit / Community Assistance Contact History

According to FEMA’s Community Information System (CIS), the State conducted the [Town of Name’s] latest Community Assistance Visit (CAV) in February of 1991. FEMA conducted the community’s latest CAC in June 2012. CIS provided no details regarding the outcome of the CAV or the CAC.

3.3. Floodplain Administrator

[Name, Title] administers [Town’s] floodplain management program. [Mr. or Ms. Name] has served as the Town’s FPA for [number of months/years]. Community-specific information detailed. i.e. “[Town’s FPA Name] delegates all floodplain management responsibilities to [County Name]. The two jurisdictions do not have an Interlocal Agreement specifically for floodplain management responsibilities. [County Name] is responsible for making the flood zone determination for development proposals and ensuring that proposed construction within [Town’s] flood zones complies with the local FDPO. The [County Name] representative is not a

Certified Floodplain Manager (CFM), but expressed a sound understanding of floodplain management responsibilities.”

3.4. Flood Insurance Statistics

According to CIS, as of [Month XX, 201X], the Town of [Community Name] has [Number of Total Policies] NFIP policies that generate [Premium Total \$X,XXX] in annual premiums, with insurance coverage of [Coverage Total \$X,XXX,XXX]. Community-specific policy details provided. i.e. “Nine of these policies are for Pre-FIRM properties (six in A and AH zones, and three in the B, C, and X zone), and six policies are for Post-FIRM structures (four in the AH Zone, and two in the B, C, and X zone). The community has no minus-rated policies (properties with the lowest floor one foot or more below the base flood elevation), four closed paid losses totaling [amount \$X,XXX], and one repetitive loss structure.”

4. DEVELOPMENT

4.1. Development Review Process

As described in Section 2.2, [Community Name] relies on [County Name] for building official, permitting, inspection, and code enforcement services. The Town must review all development proposals to ensure compliance with planning and zoning regulations before an applicant proceeds to [County] for a building permit. Once [County] receives a development proposal, the Building Official makes a flood zone designation using the interactive mapping platform on FEMA’s Map Service Center, and ensures that development is compliant with the FBC and local floodplain management regulations. [County Name] collects proposed floor elevations and project cost estimates to perform its review, and requires FEMA ECs before vertical construction and prior to issuing a Certificate of Occupancy. This process applies to all proposed construction except for accessory structures; [Community Name] must review all proposed accessory unit installations for zoning compliance, but [County] does not require building permits for accessory units less than 300 square feet. The SFMO strongly recommends the two jurisdictions review [Town’s] development review procedures to ensure that any structures proposed within the City’s flood zones are compliant with the local FDPO.

4.2. Substantial Improvement/Substantial Damage

During the FCAC meeting, [Community Name] representatives demonstrated awareness of SI/SD requirements and appropriate application of procedures. The community documents determinations by keeping evidence of the cost estimate, structure market value (either County Property Appraiser information or certified appraisal), and FEMA EC with the permit file. The SFMO reviewed *Performance Measure 6* (SI/SD determination procedures) with [Community] representatives to demonstrate the types of templates and samples available to the community that may assist them in documenting SI/SD determinations. The Town has reviewed no SI/SD determinations in the past five years.

4.3. Accessory Structures

[Community Name] requires all accessory units to acquire a zoning review, but only those over 300 square feet receive a flood zone designation and a compliance review for the local FDPO. The SFMO advised the community that all development in the flood zone requires a floodplain review and must comply with NFIP regulations. During the FCAC meeting, [Community] representatives stated that accessory structures over 300 square feet in the flood zone must be elevated above the base flood elevation or firmly anchored with flood openings and built with flood damage resistant materials, if the installed structure is below the base flood elevation.

4.4. Historic Structures

[Community Name] has no structures listed on the National Register of Historic Places or locally designated as historic. As such, the Town has not reviewed or issued variances for historic structures in the last five years. Article 6, Section F of the local flood damage prevention ordinance exempts historic structures from NFIP and FBC compliance.

4.5. Violations and Enforcement

The [County Name] Building Official serves as the primary enforcer of local codes and regulations in [Community City], including those related to the flood zone. As referenced in Section 2.4, the Building Official has limited capacity to conduct regular field tours throughout the community to identify violations and unpermitted activities. Rather, the Building Official relies on citizen complaints and regularly scheduled inspections of permitted activities to identify violations. [Community] representatives noted the abundance of unpermitted activities conducted throughout the Town due to this procedure. SFMO staff shared *Performance Measure 2* (conduct annual inspections in the flood zone) with the community to demonstrate best management practices for code enforcement in the flood zone, and strongly encourages [Community] to conduct a tour of its flood zones to ensure that all development is permitted and compliant with current FDPO regulations.

When the Building Official observes violations, he discusses remedial action with the property owner or sends a letter with a deadline to remedy the violation. If violations persist, the Code Enforcement Officer issues a notice of violation. The Town was not pursuing any violations related to the FDPO at the time of the FCAC meeting.

4.6. Variances

The Town of [City Name] has issued no floodplain management variances in the past five years. The Town Manager and County Building Official review requests for variances and appeals and the Town Council makes a final decision; Article 6 of the local FDPO describes these procedures.

5. MITIGATION

5.1. Mitigation Initiatives

[Community Name] representatives recently purchased pumps to alleviate important intersections of nuisance flooding during heavy rain events. There are no plans to mitigate other properties throughout the community that also experience nuisance flooding, although [Community] representatives are interested in obtaining more information about its repetitive loss property and grant opportunities for mitigation.

5.2. Mitigation Grant Activity

There are no currently known, active federal mitigation grant projects underway in [Community Name] at this time. During and as a follow up to the FCAC meeting, SFMO staff provided information on FEMA grants available to communities and discussed the benefits of pursuing these grants.

5.3. Initial Community Rating System Assessment

During the FCAC meeting, City and SFMO staff discussed the potential improved flood resiliency and NFIP premium discount benefits resulting from participation in the CRS program if the community. SFMO staff did not assess the community's potential CRS class rating due to the low policy count (15) within the town. [Community Name] was not interested in pursuing CRS at the time of the FCAC meeting, but stated that the community would review the CRS materials presented at the meeting and consider future participation. Should the community wish to join the CRS in the future, State CRS staff will meet with [Community] staff to apply the Insurance Service Office's CRS assessment spreadsheet used to determine a potential entry class level and potential premium discounts that will be available for policy holders with structures in flood zones. Should the community wish to become eligible to participate in CRS under the State's streamlined CRS/CAV Pilot Program, it must first adopt by resolution the *Seven Performance Measures* developed by the SFMO and provided to the community during the FCAC meeting.

6. COMMUNITY ACTIONS REQUIRED AND RECOMMENDED

6.1. Community Action Required on Flood Ordinance by July 3, 2017

SFMO staff requested one permit file to review for compliance, which was resolved immediately following the meeting. Nevertheless, [Community Name] must adopt the FEMA-approved State model FDPO by [Month XX, 201X] to ensure compliance with the NFIP and coordination with the FBC. The Town must have a compliant ordinance for the State to close the FCAC and advise FEMA that the Town is considered eligible to continue to participate in the NFIP, and it is a pre-requisite for the community to participate in the CRS. State technical staff will help tailor the state model ordinance to the needs of the community, should it wish to incorporate higher regulatory standards. The Town can reach the State's

extended technical staff by email at: [flood ordinance email address] The State's model ordinance and instructions for adopting the ordinance are available at the SFMO's website: [website provided], should the community wish to review the model ordinance.

6.2. Community Actions Recommended

Notwithstanding [Community's] lack of development in the flood zone, procedural issues identified during the FCAC meeting and discussed in Sections 2.2, 2.4, 4.1, and 4.5 cause the SFMO to strongly advise the Town to adopt by resolution the *Seven Performance Measures*. Adopting the *Seven Performance Measures* demonstrates commitment and understanding of NFIP implementation and associated procedures to help ensure future compliance with the NFIP. The *Seven Performance Measures* are available in hard copy and/or fillable PDF formats on the SFMO's website: <http://www.floridadisaster.org/mitigation/CRS-CAV-pilotprogram/>.

[Community Name] depends wholly upon the [County Name] Building Department to administer floodplain management responsibilities throughout the community. As such, the SFMO strongly advises the two jurisdictions to incorporate floodplain management into an interlocal agreement to appropriately delegate and assign floodplain management responsibilities. The SFMO has developed a model interlocal agreement which covers floodplain management, and the agreement may be found at: http://www.floridadisaster.org/Mitigation/Documents/Interlocal%20Agreement%20Model_020911.pdf.

6.3. State Support

The SFMO will provide technical assistance to help [Community] adopt a flood ordinance based on the FEMA-approved, FBC-coordinated State model flood ordinance, if requested. The SFMO is also glad to assist the community in adopting a resolution committing to implement the *Seven Performance Measures*, or in drafting an Interlocal Agreement to delineate floodplain management responsibilities. Once the Town has adopted a flood ordinance coordinated with the FBC as discussed in Section 6.1, the SFMO will close the FCAC and advise FEMA that the community has a compliant floodplain management program and is eligible to continue participation in the NFIP. The SFMO will also continue to provide information on the availability of mitigation grants and training opportunities related to floodplain management. If the Town is interested in pursuing CRS once the SFMO closes the FCAC, Town staff should contact the State CRS staff so it may administer the CRS assessment tool that will determine the amount of NFIP premium savings that policyholders with structures in [State]

TRANSMITTAL LETTERS: EXAMPLE LETTERS (2) INCLUDED FOR BOTH CLOSURE AND WITHOUT CLOSURE.

Transmittal Letter For Closure:

STATE OF [Insert Name]
DIVISION OF EMERGENCY MANAGEMENT LETTERHEAD

[Date to be Sent]

[Community Contact Name and Title] (i.e. The Honorable John Doe, Mayor)
[Name of Jurisdiction]
[Address]

RE: National Flood Insurance Program Field Community Assistance Contact

Dear [Name]:

We appreciated the cooperation and interest by yourself, [insert name(s) of additional community attendees from Meeting Sign-in Sheet] during the Field Community Assistance Contact (FCAC) meeting held on [Month XX, 201X]. The [State Name] Division of Emergency Management, State Floodplain Management Office, conducts such meetings periodically with communities to discuss their floodplain management programs, participation in the National Flood Insurance Program (NFIP), and staff activities concerning development in floodplains. The visit also gives us an opportunity to assess enforcement of the local ordinance that was adopted to meet the requirements for participation in the NFIP and to determine whether additional technical assistance is needed.

Our assessment finds that the [Community Name] is appropriately and effectively implementing its floodplain management program. It is our pleasure to close the FCAC report and to advise the community that we find it eligible to participate in the Community Rating System (CRS). The [Community] has already adopted by resolution the Seven Performance Measures which are the mainstay of the CRS-CAV Pilot Program. This will allow the [Community] to enjoy the benefits of enrolling in the CRS sooner, through the aforementioned Program.

Attached is the FCAC report describing the findings of our visit. The report has been provided to FEMA for its records. Should you have any questions regarding the Field Community Assistance Contact, please contact me, at [Phone Number] or by email at [Email Address].

Sincerely,

[Staff Name], CFM
NFIP Coordinator and State Floodplain Manager
Bureau of Mitigation

SM/

Attachment: Field Community Assistance Contact Report
cc: [Staff Name], Chief, Bureau of Mitigation

cc/attach: [Staff Name], State CRS Coordinator
[Name, Title of Community Official secondary contact]
[Name, Title], FEMA Region Specialist

Transmittal Letter Without Closure:

STATE OF [Insert Name]
DIVISION OF EMERGENCY MANAGEMENT LETTERHEAD

[Date to be sent]

[Community Contact Name and Title] (i.e. The Honorable John Doe, Mayor)
[Name of Jurisdiction]
[Address]

RE: National Flood Insurance Program Field Community Assistance Contact

Dear [Name]:

We appreciate the cooperation and interest by yourself and [insert name(s) of additional community attendees from Meeting Sign-in Sheet] during the Field Community Assistance Contact (FCAC) on [Month XX, 201X]. The [State] DEM's State Floodplain Management Office, conducts such meetings periodically with communities to discuss their NFIP floodplain management programs, and staff activities concerning development in floodplains. The visit also gives us an opportunity to assess enforcement of the local ordinance that was adopted to meet the requirements for participation in the NFIP and to determine whether additional technical assistance is needed.

Our assessment finds that the [Community Name] generally implements its floodplain management program. The attached report identifies some compliance issues that must be resolved. The [City] must repeal and replace its flood ordinance based on the State model flood ordinance to be coordinated with the [State] Building Code 5th Edition. As described in the attached report, the State strongly encourages the [City] to participate in the CRS program and to do so, it will need to adopt a resolution committing to enforce Seven Performance Measures, and submit CRS documentation in order for the SFMO to close the FCAC report and advise FEMA that the community is deemed eligible to join CRS. If desired by the community, the State CRS staff will complete a draft CRS Verification Report that verifies that the Community has earned points for a rating in CRS, and FEMA will have 30 days to verify the community's eligibility to join CRS.

Attached is the FCAC report describing the findings of our visit. The report has been provided to FEMA for its records. Should you have any questions regarding the Field Community Assistance Contact, please contact me, at [Phone Number] or by email at [Email Address].

Sincerely,

[Staff Name], CFM
NFIP Coordinator and State Floodplain Manager

SM/

Attachment: Field Community Assistance Contact Report
cc: [Staff Name], Chief, Bureau of Mitigation
[Staff Name], State CRS Coordinator
cc/attach: [Name, Title of Community Official secondary contact]
[Name, Title], FEMA Region Specialist

EXAMPLE LETTERS AND FOLLOW-UP TO COMMUNITIES

FCAC reports and transmittal letters were submitted to local jurisdictions by the SFMO via email and hardcopy mail. The email transmission included a summary of the contents (example provided below). Also provided in this section are other examples of the types of follow-up that the State conducted via email.

STATE OF [Insert Name]
DIVISION OF EMERGENCY MANAGEMENT LETTERHEAD

[Date to be Sent]

[Community Contact Name and Title] (i.e. The Honorable John Doe, Mayor)
[Name of Jurisdiction]
[Address]

Subject: The Town of [Community Name] Transmittal of Advanced FCAC Report

Dear [CEO Contact],

Attached for your information and files is an advanced electronic copy of the State Floodplain Management Office's (SFMO) FCAC Report and transmittal letter that are being sent by hardcopy to you and [additional recipients]. The attached report identifies that the Town must adopt the FEMA-approved State model FDPO to ensure compliance with the NFIP and coordination with the [State Name] Building Code. Once completed, the SFMO may close the FCAC report and advise FEMA that the Town has a compliant floodplain management program and is eligible to continue to participate in the National Flood Insurance Program. We ask that the Town begin work to resolve this matter by [Month XX, 201X].

The SFMO strongly encourages [Community Name] to participate in the Community Rating System which will help improve flood resiliency and reduce the cost of NFIP flood insurance for policy holders. To participate in the CRS, the Town should contact a CRS Specialist and adopt by resolution the Seven Performance Measures that were discussed during the meeting, and are referenced in the attached report.

As usual, the State will be glad to provide any technical assistance to support the resolution of the above matter as further discussed in the attached report. Should you have any questions regarding the FCAC report, please contact [Staff Name] at [Phone Number] or by email at [Email Address]. Thank you for working with the State to successfully conduct and conclude the Field Community Assistance Visit.

Thank you,

[Staff Name], CFM

State Floodplain Management Office
[State] Division of Emergency Management
[Phone Number]

ORDINANCE UPDATE LETTER:

[Staff Name], CFM
State Floodplain Management Office
[State] Division of Emergency Management
[Phone Number]

Subject: [City Name] Flood Damage Prevention Ordinance Update

Good afternoon [Community Contact],

Per our community visit last week, you expressed interest updating the local flood damage prevention ordinance using the State of [State Name]'s Model Ordinance. I would like to introduce you to [Staff Contact] who can provide assistance with this process. She can be reached at [Flood Ordinance Contact Email Address].

[Staff Contact Name], [Community Contact] is the [Title] (i.e. City Manager). S/He can be reached at the above email address or via phone at [number provided].

Kindest regards,

[Assistance Visit Contact], CFM
[Title]
[Email Address]
[Phone Number]

REQUEST FOR RESOLUTION OF CONCERNS FOLLOW-UP LETTER

STATE OF [Insert Name]
DIVISION OF EMERGENCY MANAGEMENT LETTERHEAD

[Date to be Sent]

[Community Contact Name and Title] (i.e. The Honorable John Doe, Mayor)
[Name of Jurisdiction]
[Address]

[Date]

Mr./Ms. (or The Honorable) Name, Title
Name of Community
Street Address 1
Street Address 2
Community, State, Zip

RE: Request for Resolution of Concerns for National Flood Insurance Program (NFIP), Field
Community Assistance Contact (FCAC) Report

Dear Mr./Ms. Chief Executive Officer:

The State Floodplain Management Office (SFMO) recently sent your office an FCAC report that reviews the procedures, regulations, and observed properties that together provide a basis for accessing the community's program for managing its floodplains. While the community strives to conduct a viable floodplain management program, we identified some concerns or questions that must be resolved before the SFMO may advise FEMA that the community is compliant with the NFIP program. The deadlines established in the report have not been met for one or more of the concerns and we ask for your follow up within 30 days of the date of this letter.

If the identified concerns are not resolved, FEMA may be required to take enforcement action that could result in the community being placed on probation or suspended from the NFIP program -- a measure that the community and State would find unfortunate. The SFMO may provide technical assistance to help the community close the report.

As described in the dated Month day, year FCAC report, the community must provide the requested documentation to demonstrate that it has resolved the issues and has the ability to effectively administer its floodplain program. We respectfully ask that your community address the concerns identified in the report and that are summarized below:

- Provide a status update for those renovations at (Flood Zone A). This must include a building permit with a substantial improvement determination or notice of violation.

- Provide a status update for those renovations at [location of violation] (Flood Zone A). This must include a building permit with a substantial improvement determination or notice of violation.
- Adopt by resolution the Seven Performance Measures.
- Submit development review and records retention procedures based on the Seven Performance Measures that delineate clear processes and meet NFIP requirements.

Our visits with communities are also intended to encourage communities to participate in Florida's CRS-CAV Pilot Program that enables compliant communities to become eligible to participate in the NFIP's Community Rating System (CRS). The NFIP's CRS program awards communities that implement a compliant program and conduct enhanced floodplain management practices to achieve more flood resilient neighborhoods. In exchange, the NFIP offers discounts of up to 45% on NFIP flood insurance premiums for all homes and businesses located in flood zones. We strongly encourage your community to participate in this very important program.

In summary, to close the FCAC report, the community must (adopt the State model ordinance that is coordinated with the Florida Building Code) and (resolve compliance concerns) before the State may advise FEMA that the community has a compliant program.

In order to participate in CRS and achieve NFIP policy premium discounts for properties located in flood zones, the community must adopt by resolution the CRS-CAV Pilot Program's *Seven Performance Measures* that have been previously provided to staff, submit a simple letter asking FEMA to accept the community into the CRS program, and provide basic CRS documentation materials. The State's CRS staff will work closely with the community staff to verify credit points earned will result in a CRS Class rating which will determine the discounts available to property owners.

We are pleased to assist community staff in working to close the FCAC report so that we can advise FEMA that the community is compliant with the NFIP and deemed eligible to participate in CRS.

Thank you,

[Staff Name], CFM
State Floodplain Management Office

FCAC Closure Letter

STATE OF [Insert Name]
DIVISION OF EMERGENCY MANAGEMENT LETTERHEAD

[date to be sent]

[Community Contact Name and Title] (i.e. Mr. John Doe, City Manager)

[Name of Jurisdiction]

[Address]

[City, State ZIP]

RE: Closure of National Flood Insurance Program Field Community Assistance Visit Report

Dear [Name]:

The City successfully adopted an updated flood damage prevention ordinance that is coordinated with the [State] Building Code on [Month XX, 201X]. This completed the needed information required to close the FCAC, therefore, the SFMO finds that the City of [Community Name] is appropriately and effectively implementing its floodplain management program in accordance with the NFIP. The SFMO is therefore closing the FCAC Report, transmitted on [Date FCAC Report delivered], and by copy of this letter advising FEMA that the City has a compliant floodplain program and is eligible for continued participation in the National Flood Insurance Program.

As discussed in the FCAC Report, the State strongly encourages the community to participate in the Community Rating System (CRS) program. To do so, the City must adopt a resolution committing to implement the *Seven Performance Measures* referenced in the report, and submit CRS documentation. This will enable the SFMO to advise FEMA that the City is eligible to join CRS under the CRS-CAV Pilot Program.

Should you have any questions regarding community participation in the NFIP, closure of the FCAC Report, or participation in CRS, please contact us, at [Phone Number] or by email at [Email Address].

Sincerely,

[Staff Name], CFM
NFIP Coordinator and State Floodplain Manager
Bureau of Mitigation

SM/

Attachment: Field Community Assistance Contact Report

cc: [Staff Name], Chief, Bureau of Mitigation
[Staff Name], State CRS Coordinator

cc/attach: [Name, Title of Community Official secondary contact]
[Name, Title], FEMA Region Specialist

COUNTY:

CID:

SCANNED:

Steps for Closing FCACs/CAVs and Submission of CRS Documentation

Community Name:

Date:

- Quickly skim FCAC Report to verify consistency between sections, focus on Floodplain Ordinance info and Review Community Actions Required to ensure that language is correct and describes procedures for: ordinance adoption for State Model, potential violations must be resolved to close FCAC. Time frames are appropriate (1 month for paperwork such as SI/SD documentation, ECs, or procedures for review of permits, 3-6 months for ordinance adoption, etc.). Verify that the report date is the date of the report not the FCAC meeting date.
- Look in CIS to ensure that State Model flood ordinance was or was not adopted (look for FBC in Whereas clauses). Verify language regarding ordinance in FCAC report is correct.
- Review FCAC CEO transmittal letter. Verify with FCAC Report that key summary language (1-2 sentences) referencing “community actions” required is included in the letter, and that correct cc:s are listed for FEMA and verify that community’s correct FPA is shown. Also verify that correct salutation is used “The Honorable” for elected officials, Mr./Ms. for city, town or county administrator. Verify date of letter is shown and correct.
- Copy CEO and FPA addresses from FCAC Report into a Word document for printing envelopes/labels. Print labels or envelopes (if CEO and FPA are at same address, one envelope to CEO is okay).
- Make two hard copies of FCAC report, one for CEO, one for FPA.
- Sign CEO letter, scan and upload the signed copy and FCAC report into the J- Drive/ Community folder.
- Mail hardcopies** make copy for FPA (highlight his/her name at cc:s).
- Email FCAC transmittal letter and FCAC report to FPA for heads up and to verify he/she receives the email with the Outlook Option “Delivery Receipt Requested”, cc: Danny, Liz, and staff present.
- Upload FCAC report into CIS with sections of report in proper designated pages/sections in CIS. On Info page/ Contacts, verify FPA and CEO names/contact information is correct and update if necessary.
- Once deadline notification is received from CIS, forward it to lead staff person and ask them to draft a CEO follow up letter within 48 hours. The letter should have 30-day deadline. Check letter for consistency, print, sign, scan, mail, upload to J Drive.
- For FCACs that are being closed, copy Janice Mitchell on closure email (with FCAC Closure Letter to CEO attached) Note, community should have sent a LOI to Janice by this time or soon thereafter, because she will request a new or updated letter. Copy Danny, Liz, Sherry Harper (ISO) and Susan Wilson (FEMA Region IV).

DATE OF VISIT:

SFMO Staff Present

Community Staff Present

Lead: _____

FPA: _____

Does Community have compliant ordinance?

Does the community have compliance issues?

ONLINE SURVEY

In the last two years, staff with the State Floodplain Management Office (SFMO) visited your community to conduct an assistance visit as part of our responsibilities for coordination of the National Flood Insurance Program (NFIP). During that visit we reviewed your floodplain management program, answered questions, and talked about a pathway to participate in the Community Rating System and the Seven Performance Measures (access link below). We very much appreciate your taking a few minutes to answer just 13 questions pertaining to your experience with our program. Your answers are confidential. A summary of this survey will be part of the SFMO's report to FEMA. Thank you for helping us better serve your community and all other communities in Florida.

www.floridadisaster.org/mitigation/CRS-CAV-pilotprogram

* Required

Survey of Communities Visited

1. How long have you administered floodplain management requirements in your county/city/town? (months/years) *
2. What sources of information about floodplain management procedures or permitting do you most frequently use? (please check your top THREE most frequently used sources): *

Check all that apply.

- Other cities/counties
- Regional Planning Council
- Water Management District
- State Floodplain Management Office
- FEMA staff
- FEMA bulletins or guidance documents
- Other:

3. Prior to the assistance visit, how would you rate your knowledge of floodplain management roles and responsibilities on a scale of 1 to 5 with 5 being very informed? *
Mark only one oval.

1 2 3 4 5

Uninformed

Very Informed

4. What did you find most informative about the assistance visit? Please RANK how helpful you found each aspect of the experience, with 1 for not very helpful and 6 for most helpful: *

Mark only one oval per row.

1 2 3 4 5 6

Pre-meeting materials sent by the SFMO

Discussion of the questionnaire

Discussion of the Seven Performance Measures

Discussion of Community Rating System

Resolving compliance issues

Review of FCAC report

5. Rate your level of understanding of the Community Rating System (CRS) before you participated in the assistance visit. *

Mark only one oval.

1 2 3 4 5

Poor

Excellent

a. If you answered Poor (1), Fair (2) or Good (3), did the visit improve your understanding of CRS?

Mark only one oval.

1 2 3 4 5

Did not improve

Significantly improved

6. Does your community plan to participate in CRS in the future? *

Mark only one oval.

- Yes
- No

- Not sure

a. If yes, what do you think will be the greatest challenge?

b. If no, what is the primary reason for not participating in CRS?

7. To what extent did Hurricane Irma impact buildings in your community? *
Mark only one oval.

- Severely
- Moderately
- Insignificantly

a. If Severely or Moderately impacted, what do you think will be your biggest floodplain management program challenge during recovery?

8. What improvements to your floodplain management program would your community most likely implement (select only the top three priorities) to reduce future flood damage? *

Check all that apply.

- Adopt more restrictive floodplain regulations
- More carefully regulate manufactured homes and accessory structures
- Prepare a storm water management plan
- Conduct regular inspections of flood zones
- More carefully inspect anchoring of fuel tanks and elevation of HVAC/air conditioning equipment
- Other:

9. Before Hurricane Irma, has your community experienced flooding that damaged buildings in the previous 10 years? *

Mark only one oval.

- Yes
- No

10. Please characterize your community by checking all that apply: *
Check all that apply.

- Coastal high hazard areas (Zone V)
- Coastal A Zones
- Coastal Construction Control Lines
- Regulatory floodways
- Approximate A Zones
- Utilizes Mitigation Grant Program Funds
- Flood maps (FIRMs) updated in the past 5 years

11. Which Water Management District serves your area? *
Mark only one oval.

- South Florida Water Management District
- Southwest Florida Water Management District
- St. Johns River Water Management District
- Suwanee River Water Management District
- Northwest Florida Water Management District

12. Compared to before the assistance visit, how do you rate your knowledge of floodplain management? *
Mark only one oval.

1 2 3 4 5

About the same

Significantly more informed

13. How do you think the State Floodplain Management Office can more effectively assist your local floodplain management program? *

Contact Information

This survey is completely anonymous. However, if you are willing to be contacted for follow-up, please provide your contact information below. If you wish to remain anonymous, please feel free to skip this section. For further information or questions, contact the SFMO consultants at frank@fcmccolm.com.

Your name

Phone number

E-mail

Preferred contact method

Check all that apply.

- Phone
- Email

Steps for Processing FCAC Reports and Transmittal Letters

1. Quickly skim FCAC Report to verify consistency between sections, focus on Floodplain Ordinance info and Review Community Actions Required to ensure that language is correct and describes procedures for: ordinance adoption or State Model, potential violations must be resolved, resolution to adopt Performance Measures, and Missing Documents must be provided, and that time frames are appropriate (1 month for all paperwork such as SI/SD documentation, ECs, or procedures for review of permits, etc. Verify that the report date is the date of the report not the FCAC meeting date.)
2. Look in CIS to ensure that State Model Flood Ordinance was or was not adopted. Verify language referencing ordinance in FCAC report is correct.
3. Review FCAC transmittal letter. Verify with FCAC Report that key summary language (1-2 sentences) referencing “community actions” required is included in the letter, and that correct cc:s are listed for FEMA (if FCAC is Closed – Janice Mitchell, or “FEMA Region IV” if not closed and not ready for CRS), and verify that the community’s correct FPA is shown. Also verify that correct salutation is used “The Honorable” for elected officials, Mr./Ms. For city, town or county administrator. Verify date of letter is shown and correct.
4. Copy CEO and FPA addressed into a Word document for printing envelopes/labels. Print labels or envelopes (if CEO and FPA are at same address, one envelope to CEO is okay).
5. Make two hard copies of FCAC report, one for CEO, one for FPA.
6. Sign CEO letter, make copy for FPA (highlight his/her name at cc:s), scan and upload the signed copy and FCAC report into the J-D Drive/Community folder.
7. Upload FCAC report into CIS with sections of report in proper designated pages/sections in CIS. On Info page/Contacts, verify FPA and CEO names/contact information is correct and update if necessary.
8. Email FCAC transmittal letter and FCAC report to FPA for heads up and to verify he/she receives the email with the Outlook Option “Delivery Receipt Requested”, cc: Danny, Liz, (and RCQ if community is working to adopt the State Model Flood Ordinance).
9. For FCACs that are being closed after FCAC was sent to CEO with compliance issues, send email to Janice Mitchell (with FCAC Closure Letter to CEO attached) advising her that the State has closed the FCAC and deems the community is eligible to participate in CRS. Note, community should have sent a LOI to Janice by this time or soon thereafter, because she will request a new or updated letter. Copy Danny, Sherry and Susan.
10. 10. Take a deep breath, and do the next one!

Community Assistance Visit Stages and Components

Stage 1 – CAV Scheduling – 4-8 Hours

- Make initial contact with a preselected community through phone, and confirm CIS information is up-to-date; obtain all contact information for CEO, FPA and others whom the FPA indicates should be part of the CAV meeting.
- Schedule a date, time, and location for the meeting.
- Send the FPA and CEO CAV Confirmation Letters in hard copy, which is followed by an email that transmits the electronic copy of the letters to the FPA.
- With the letter sent to the FPA, send the questionnaire and the request for development list and flood damage prevention ordinance. Sometimes floodplain management regulations are split between different ordinances within a community, or within multiple chapters of a land development code. (Note, do not rely solely on the “floodplain ordinance” in MuniCode)

Stage 2 – CAV Preparation – 8-12 Hours

- Make sure to check hotel rental early depending on the time of year and location. Also make sure car rental is confirmed for the dates.
- After acquiring the development list, begin virtual floodplain tour of the community.
- Select locations for the floodplain tour that are easily accessible, visible, and that could be of interest or concern.
- Once properties of interest have been selected, the floodplain tour is mapped using ARC Collector. Make sure to include address, flood zone, and BFE. If possible include the date of construction.
- Review floodplain ordinance for compliance if not the State Model Ordinance based on FBC.
- Collect all deliverables and handouts for the community including agenda and sign-in sheet. Each community is unique, which dictates which sources of information are relevant and usable.
- Make sure the CAV Binder has been created and the CIS information that is incorporated is up-to-date. Pack information such as Quick Guide, Historic Structures Bulletin FEMA P-467-2 for communities with historic districts, etc.
- Speak with Helen Johnson about potential open mitigation projects within the community, and confirm the repetitive loss and severe repetitive loss data on the community.
- Contact the community to check in and confirm the meeting is still good to go.

Stage 3 – Floodplain Tour – 8-16 Hours

- Visit and document each location that was itemized on the virtual tour for a site visit.
- Also make sure to keep an eye out on all other development within the SFHA if possible (especially mobile and manufactured homes).

- Each location needs photographs, a CAV tour property checklist, and notes specifying and analyzing visual inspection. During permit file review, complete copy of CAV Development Review Worksheet. For the CAV Tour Checklist, it may be useful to type address info on the form before going to the field, but it is critical to have lots of extra copies.
- Things to keep in mind – Look at public facilities, specifically state-owned structure. Example being public restrooms in local and state parks.

Stage 4 – CAV Meeting – 10-12 Hours

- At the end of each day, but no later than the night before the CAV meeting save all photos to a backup disk. Select photos of all of the structures of concern for discussion during the meeting. This includes any and all potential violations as well as good examples of construction. Have all of the photographs named by address, but retain the order of photos with a numeric prefix consecutively before the address. Make sure to have looked over the community's flood damage prevention ordinance at least by the night before. Also make sure to look over the questionnaire the night before and look for any potentially incomplete answers for follow up during the meeting. Save all of the photographs of unresolved concerns to a CD to provide to the community and save those photos in a separate file on a hard drive so you have a copy of what you gave the community for future follow up. Provide a generic transmittal memo for the photos of address concerns.
- Follow the 10 Steps to a Successful CAV meeting created by Steve.
- Make sure to have the questionnaire fully answered during the meeting.
- When necessary and possible, have all of the permit and construction documents provided at the meeting for properties of interest. This is mainly looking at ECs, and to complete the Development Review Worksheet for each property file reviewed, especially for communities wishing to join CRS.

Stage 5 – Report Generation and Compliance Assurance – 40 Hours

- Start drafting the CAV report utilizing the report template and/or based on the structure in CIS. Make sure to review past relevant examples of other CAV reports to understand the necessary information and overall style of the report.
- After the meeting ask for any documentation that could not be provided at the CAV meeting.
- Create a follow up email that summarizes and addressed some of the main talking points that surfaced during the CAV meetings. (This could be providing Danny Hinson's contact information for CRS purposes or providing information on mitigation grants or technical bulleting, etc.).
- As time passes and with update information provided by the community, incorporate all issues identified during the CAV meeting into the report.
- Work with the community to address all issues identified within the CAV meeting and floodplain tour (GTAs).

- After a draft has been created, send it to Steve for review and editing.
- After final edits, and after all issues have been identified or addressed, send the final report to the community with a report transmittal letter that is sent to the FPA and the CEO.
- Send a final CAV closure letter only after all of the issues have been addressed to the most feasible extent possible.

Supporting and Operations of Continuity – 4-24 Hours

- Travel time
- Miscellaneous administrative preparation

*Often times, the overall process of a CAV is a back-and-forth conversation between the Floodplain Specialist and the Community. This aspect has been taken into consideration.

10 Tips for Conducting CAVs
(Suggested review before each CAV meeting)

1. Thank the local government staff for taking time to participate in the CAV meeting. Explain the reason for the meeting – to discuss floodplain management procedures as a means of monitoring how communities are implementing their NFIP program responsibilities and the need to review permit files for certain properties to verify accuracy of information and to confirm sufficient record retention.
2. Beginning of meeting:
 - a. Distribute sign-in sheet that includes space for: name, title, email address and phone number.
 - b. Distribute the agenda and plan to stick to it unless it is agreed to deviate to meet participant schedule needs.
 - c. Briefly go through the agenda to familiarize the schedule and find out if it needs to be amended to accommodate participants.
3. Ask FPA to share her/his thoughts on the nature of flooding when it occurs in the community, and challenges and opportunities in the floodplain management program. Specifically ask them to talk about recent trends and what they would like to accomplish with the program in the near future. (This serves as a means to break the ice, open up dialogue and talk about things that might have some important connections later in the meeting (that may explain political or ethical pressures of the job)).
4. Review the reference notebook content; particularly discussing various sheets from CIS that indicate the statistics on the community's participation in NFIP, and the insurance statistics, including overview, losses, and policies per flood zone type for relevant or unusual findings.
5. Discuss the questions on the questionnaire, or if completed or partially completed, ensure that you understand the responses and request elaboration to ensure that your understanding is accurate and complete. Particular attention should be made to enforcement procedures especially where you know that the floodplain tour identified some major potential violations.
6. Do not read the CAV questionnaire, familiarize yourself with it as much as you can and ask the questions more generally, so local staff are not on edge to provide an expected answer as opposed to finding out more generally what they do. Recommend not typing answers on a laptop because this creates a barrier between participants and appears that you are recording their comments verbatim which may cause them to hold back information.
7. Skip questions that would be repetitive where local staff has already answered the question with their earlier remarks. If you ask the same question more than once, it will seem like

you weren't paying attention, and local staff may feel offended. Move through the questions as quickly so not to belabor, but encourage sidebar explanations (from them) so long as this does not consume too much time.

Take a mandatory 15-minutes break around 10:30-11:00 a.m. or as agreed by the group.

8. Present photos in a PowerPoint or as separate images and name them by consecutive number followed by the location address in order to have a logical presentation of photos. Be prepared to burn the photos to a CD that requires follow up by the community and agree to a reasonable timeframe for resolution. It is important to save the photo files in a folder on your computer for future reference. Discuss the time required for ordinance revision if this is needed.
9. After the photo review, provide a list of addresses for someone (not necessarily involved in the meeting) who can pull permit files/elevation certificates to save everyone time later. Local staff not needed to assist in the review of permit files can be released from the meeting.
10. Explain the sequence of steps involved with closing the CAV, e.g. we prepare a draft summary report about the community's floodplain management program (not just what was discussed) including any observed potential violations that the community will resolve within 30-45 days. When the draft report is sent, we will request verification (or corrections) of any inaccuracies and request comments within a week. Once comments are received, the report is completed; DEM officially transmits it to community management and FEMA. CAV closeout will follow once all matters are resolved within a specified timeframe. Note that any unclosed CAV report may affect future CRS cycle visits.

After lunch, carefully review permit files to help resolve questions on addresses, and to verify accuracy and completeness of ECs. Make copies of any documents that may require follow up by the community.

Lastly, thank them enthusiastically, and ask them to give you a call if they think of anything that they would like you to add to the report, clarify, or for updates on anything that they agreed to follow up with. Adjourn the meeting.

With all of the incentives provided by the NFIP and the CRS for flood resiliency, property owners will often go to great lengths to ensure their homes will survive a great flood or the threat of sea level rise (Horseshoe Beach, Florida).

