INSURANCE SERVICES OFFICE, INC.

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May 29, 2020

Dear CRS Community:

This letter is to inform you that on January 1, 2021, the National Flood Insurance Program's (NFIP) Community Rating System (CRS) will begin implementing a new prerequisite for achieving Class 8: enforcement of a freeboard standard for residential buildings. Specifically, Section 211 of the 2017 *CRS Coordinator's Manual* will be revised to say,

In order to be a Class 8 or better…

(1) The community must meet all the Class 9 prerequisites; and

(2) The community must adopt and enforce at least a 1-foot freeboard requirement (including equipment or mechanical items) for all residential buildings, including manufactured homes, constructed, substantially improved, and/or reconstructed due to substantial damage, throughout its Special Flood Hazard Area (SFHA) where base flood elevations have been determined on the Flood Insurance Rate Map (FIRM) or in the Flood Insurance Study (FIS), except those areas that receive open space credit under Activity 420 (Open Space Preservation).

This language for the new Class 8 prerequisite will be included in the 2021 Addendum to the 2017 *CRS Coordinator's Manual*. If your community does not require freeboard for residential buildings, you will need to adopt freeboard requirements, and begin enforcing those requirements, before your first CRS verification cycle visit that occurs after January 2021. About 80 percent of CRS communities already meet the forthcoming Class 8 prerequisite, but we are asking all communities to review their community's floodplain regulations and/or building codes to ensure that freeboard for residential building is in place, and to confirm that freeboard requirements are being enforced. Note that freeboard may be required through your State- or community-adopted building code. At your community's first verification cycle visit after January 1, 2021, the Insurance Services Office, Inc. (ISO) CRS Specialist will review your ordinance and Elevation Certificates to verify that freeboard is being applied. Communities that do not implement freeboard will be limited to a CRS Class 9 rating.

We recommend that you share this information with your community CRS coordinator, your community floodplain administrator, and your building department. If you need a model ordinance or sample regulatory language for freeboard, please contact your State NFIP Coordinator, Federal Emergency Management Agency (FEMA) Regional CRS Coordinator, or ISO/CRS Specialist. Remember, your ISO/CRS Specialist is also available to do a courtesy review of your community requirements for freeboard at any time before your next verification cycle visit.
All communities that verify they implement a freeboard requirement will receive CRS credit under Activity 430 (Higher Regulatory Standards). This new CRS prerequisite also provides an opportunity for communities to consider whether a 2-foot or even 3-foot freeboard standard would be appropriate for them.

For more information, please see the February/March issue of the *NFIP/CRS Update* newsletter and visit CRSresources.org. Attached are some answers to frequently asked questions for the Class 8 freeboard prerequisite. Please remember that your ISO/CRS Specialist and your FEMA Regional CRS Coordinator are always available to answer any questions.

Sincerely,

Sherry Harper
Director, Flood Mitigation

Attachment
cc: Community CRS Coordinator
FEMA Regional CRS Coordinator
NFIP State Coordinator and/or State CRS Coordinator