Community Rating System (CRS) - Repetitive Loss





Community Rating System (CRS) - Repetitive Loss

Activity 500 - Repetitive Flood Losses

Understand why the CRS requires a community to address its repetitive loss properties, and how to determine and describe repetitive loss areas

Understand the criteria, become familiar with the documentation needed

Understand the Privacy Act when using NFIP data

Activity 510 – Floodplain Management Planning

Understand planning committees and requirements for CRS Credit



Repetitive Losses

Repetitive loss:

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

Severe repetitive loss (SRL): Repetitive loss property with

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

See Coordinator's Manual, page 500-3



502. Repetitive Loss Category

After correcting and updating the AW-501s

Category A: No repetitive loss properties

Category B: 1–49 repetitive loss properties

Category C: 50+ repetitive loss properties

See Coordinator's Manual, page 500-8



The Repetitive Loss List

The Repetitive Loss List (CRS Coordinators Manual 501.b)
Repetitive Loss Property Information

CRS Specialist no longer provides this information

Community must contact FEMA to obtain this data:



James G. Sink
Regional Flood Insurance Liaison
Department of Homeland Security – FEMA Region 5
Floodplain Management and Insurance Branch
312-408-4421

james.sink@fema.dhs.gov



Repetitive Loss List & Areas

The Privacy Act

- ✓ Flood insurance data, including repetitive loss data, has personally identifiable information, such as the addresses of insured properties
- ✓ Personally identifiable information is protected under the Privacy Act
- ✓ Information Sharing and Access Agreements or Routine Use Letter Required





Repetitive Loss List & Areas

The Privacy Act

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

However....

✓ Tabular insurance data that is included with the repetitive loss data. (Names and/or addresses) can not be made public

See Coordinator's Manual, page 500-10



The Repetitive Loss List

- ✓ The repetitive loss list has personally identifiable information protected under the Privacy Act.
- ✓ Mark or label flood insurance and personally identifiable information data:

"For internal use only.

Protected by the Privacy Act of 1974."

- ✓ Keep in a drawer (locked if possible)
- ✓ Use a password to access digital files

See Coordinator's Manual, page 500-10 - 501.b



Updating the List

Review each property for

- ✓ Correct address
- ✓ In your community
- ✓ Actually 2 floods
- ✓ Removed or otherwise mitigated
- ✓ Minimum: at application and cycle

A sample AW-501 can be found on page 500-5 of the CRS Coordinator's Manual



See Coordinator's Manual, page 500-4 - 501.c



Updating the List

If changes to the repetitive loss list

- Signed CC-RL
- Corrected or updated AW-501s
- Signed transmittal sheet

If no changes to the repetitive loss list

Signed CC-RL

The CC-RL can be found in Appendix E and page 500-7 of the CRS Coordinator's Manual.



See Coordinator's Manual, page 500-4



502. Repetitive Loss Category

After correcting and updating the AW-501s

Category B: (1-49 repetitive loss properties)

- ✓ Prepare a map of the repetitive loss area(s);
- ✓ Review and describe the repetitive loss problem;
- ✓ Prepare a list of the addresses of all properties with insurable buildings in those areas; and
- ✓ Undertake an annual outreach project to those addresses.

Category C (50+ repetitive loss propertis)

- ✓ All Category B and;
- ✓ Activity 510 RLAA or FMP

See Coordinator's Manual, page 500-8



The Map

The "Mapping Repetitive Loss Areas" guidance can be found on the <u>CRS</u> Resources website.

500 Series - Helpful Resources

Mapping Repetitive Loss Areas

To participate in the Community Rating System, a community with one or more repetitive loss properties must take certain actions that address those properties. Communities in the CRS or applying to join are given a file with the addresses of its repetitive loss properties and the dates of the flood insurance claims. The community must review the list for accuracy and other items as explained in Section 501 of the CRS Coordinator's Manual.

The community's repetitive loss category is based on the list after it has been updated to reflect the review's findings. This is explained in Section 502 of the Coordinator's Monaul. Category B and C communities have one or more repetitive loss properties after the update. They must:

- (a) Prepare a map of the repetitive loss area(s),
- (b) Review and describe their repetitive loss problems,
- (c) Prepare a list of the addresses of all properties with insurable buildings in those AREAS,
- (d) Undertake an annual outreach project to those addresses.

In addition, Category C communities (those with 10 or more repetitive loss properties) must prepare plans or area analyses for their repetitive loss AREAS.

Repetitive Loss Areas: Note the stress on repetitive loss "AREAS." Many communities want to address only the individual properties on the updated list. It is important to note that the only reason a property appears on EPAA's list is because the structure had flood insurance and received two or more claims of at least \$1,000 during any given 10-year period. These

properties are merely representative of the community's repetitive flooding problem, and indicate the location of most, but perhaps not all, of its repetitively flooded areas.

Other structures near the ones listed by FEMA may have been uninsured during the floods, may have had single flood insurance claims, or may have had multiple claims under different policies that the system did not recognize as being the same repetitively flooded address.

From a community perspective, it is not fair to single out those properties that happen to be on FEMA's list. All properties with the same exposure to repeated flood damage should be addressed. Therefore, the CRS requirement is for the community to map its repetitive loss AEEAS.

A repetitive loss property is a property for which two or more flood insurance claims of more than \$1,000 have been paid by the NFIP within any 10- year period since 1978.

A sever repetitive loss property, as defined by Congress in the Flood Insurance Reform Act of 2004, is a 1–4 family properly that has had four or more claims of more than \$5,000 or two to three claims that cumulatively exceed the building's value. For the CRS, non-residential buildings that meet those same criteria are also considered severe repetitive loss properties.

A repetitive loss area is a portion (or portions) of a community that includes buildings on FEMA's list of repetitive losses and also any nearby properties that are subject to the same or similar flooding conditions

Mapping Repetitive Loss Areas

- 1

July 22, 201

See Mapping Repetitive Loss Areas, 503.a.



The Privacy Act of 1974

Flood insurance data about private property, including repetitive loss properties, are protected under the Privacy Act. Personally identifiable Information such as the names or addresses of specific properties, whether they are covered by flood insurance or not, whether they have received flood insurance claims, or the amounts of such claims MAY NOT be released outside of local government agencies or to the public or used for solicitation or other purposes.

Such information should be marked "For internal use only. Protected by the Privacy Act of 1974." FEMA has a cover sheet that is helpful in reminding users about how to handle this sensitive information.

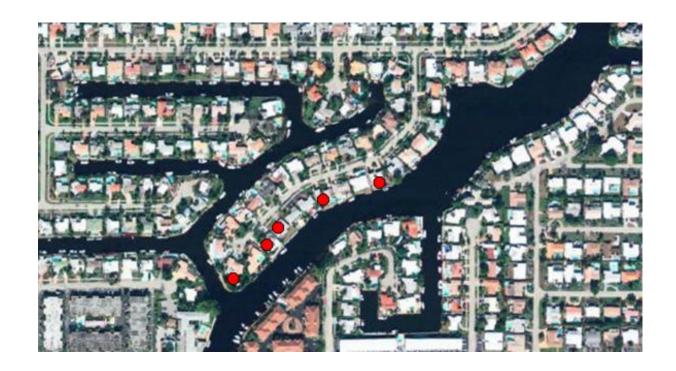
General or aggregated information, such as total claims paid for a community or an area, or data not connected to a particular property MAY be made public. For example, a community may publish a map showing a repetitive loss area or a list of addresses in that area, provided that it does not show which individual addresses or parcels received flood insurance claim payments.

See Mapping Repetitive Loss Areas, page 2



Repetitive Loss Area - Map

1. Locate the properties on the *updated* rep loss list



See Mapping Repetitive Loss Areas, page 2



2. Locate nearby properties that received one insurance claim.

These are found listed in the "historical claims" Excel® file

See Mapping Repetitive Loss Areas, page 2



2. Locate nearby properties that received 1 insurance claim



See Mapping Repetitive Loss Areas, page 2



- 3. If you have the capability, overlay a topographic map layer (in a GIS) to identify any low areas or known flooding source
- 4. Draw lines around those areas with similarly situated properties:
 - Same low elevation
 - History of flood insurance claims

See Mapping Repetitive Loss Areas, page 3



4. Draw lines around those areas with similarly situated properties



See Mapping Repetitive Loss Areas, page 3



5. A visit to the site helps confirm that the boundary makes sense



See Mapping Repetitive Loss Areas, page 3



5. A visit to the site helps confirm that the boundary makes sense



See Mapping Repetitive Loss Areas, page 3



If there is only one building in an area, document explaining why and use a large dot for the public's map



See Mapping Repetitive Loss Areas, page 3



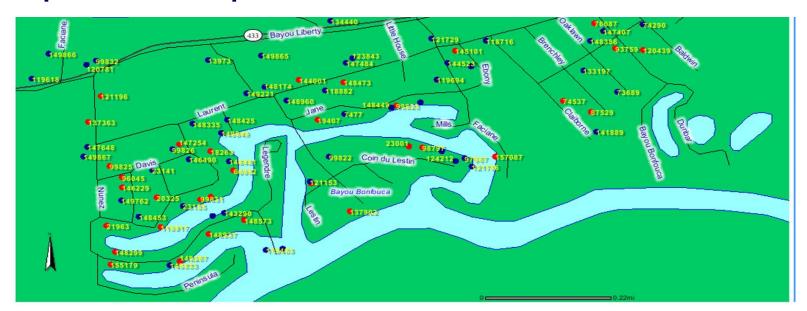








6. If a lot of repetitive losses spread throughout your community or floodplain, you can declare your entire community or floodplain to be a repetitive loss area.



See Mapping Repetitive Loss Areas, page 3



The map the public sees must not show any individual properties on FEMA's repetitive loss list

Prepare a list of the addresses of all improved parcels in the designated areas (private)

Improved parcel = insurable building

See Mapping Repetitive Loss Areas, page 3



504. Repetitive Loss Area Outreach Project

Category B or C community must send out a notice that

- (1) Says the property is in or near an area subject to flooding.
- (2) Explains property protection measures
- (3) Covers sources of financial assistance
- (4) Includes basic facts about flood insurance
- ✓ Send to ALL properties in rep loss AREAS
- ✓ Can be a targeted project or a PPI project
- ✓ Copy included with annual recertification

See Coordinator's Manual, page 500-11



Excerpt from sample outreach

Dear Resident:

You have received this letter because your property is in an area that has been flooded several times. Our community is concerned about repetitive flooding and has an active program to help you protect yourself and your property from future flooding, but here are some things you can do:

Check with the Building Department on the extent of past flooding in your area. Department staff can tell you about the causes of repetitive flooding, what the City is doing about it, and what would be an appropriate flood protection level. The staff can visit your property to discuss flood protection alternatives.

1. Prepare for flooding by doing the following:

Know how to shut off the electricity and gas to your house when a flood comes.

Make a list of emergency numbers and identify a safe place to go.

Make a household inventory, especially of basement contents.

Put insurance policies, valuable papers, medicine, etc., in a safe place.

Collect and put cleaning supplies, camera, waterproof boots, etc., in a handy place.

Develop a disaster response plan. See the Red Cross's website at www.redcross.org for information about preparing your home and family for a disaster.

Get a copy of Repairing Your Flooded Home. We have copies at the Public Works Department or it can be found on the Red Cross' website, too.

2. Consider some permanent flood protection measures.

Mark your fuse or breaker box to show the circuits to the floodable areas. Turning off the power to the basement before a flood can reduce property damage and save lives. Consider elevating your house above flood levels.

See Coordinator's Manual, pages 500-12 - 13



505. Repetitive Loss Mitigation Activities – Examples of Financial Assistance

- √ Hazard Mitigation Grant Program (HMGP)
- **✓ Flood Mitigation Assistance (FMA)**
- ✓ Pre-Disaster Mitigation (PDM)
- ✓Increased Cost of Compliance (ICC)
- √Small Business Administration (SBA)

See Coordinator's Manual, pages 500-13 - 14

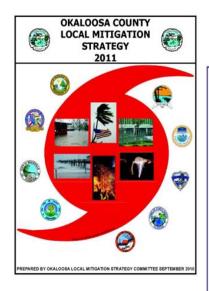


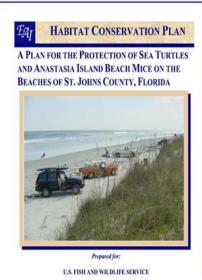
Summary

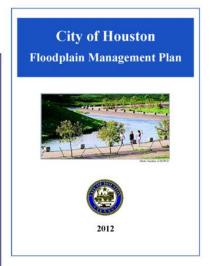
- ✓ Repetitive loss property information is private and not for public distribution
- ✓ Map the repetitive loss area(s), do not show the individual properties
- ✓ Description of the flooding at each repetitive loss area
- ✓ Outreach must be sent to the repetitive loss area(s) annually (list of addresses)

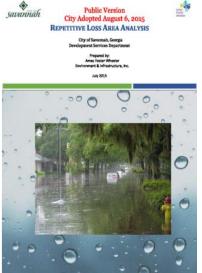


510. Floodplain Management Planning



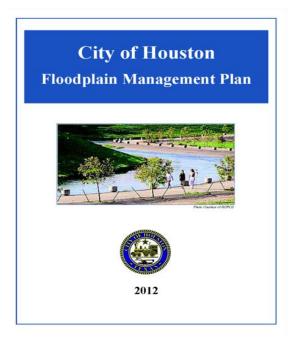


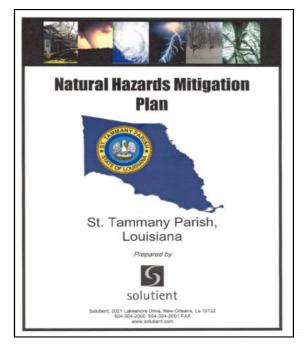






Can be a floodplain management plan or a multi-hazard mitigation plan





See Coordinator's Manual, pages 510-2-3



512.a. Floodplain management planning (FMP)

- ✓ Must receive credit under each of the 10 steps
- ✓ If one step is missing, no credit
- ✓ If one step is missing, a FEMA-approved mitigation plan may receive credit, but FMP credit is limited to 50 points
- ✓ If two steps are missing, there is no credit for a FEMA-approved mitigation plan
- ✓ Repetitive loss Category B and C communities must include repetitive loss areas in the problem assessment for credit under Step 5(c)

See Coordinator's Manual, page 510-4



Step 1. Organize

- (a) Planning office actively involved
- (b) Committee of affected departments
- (c) Formal creation by governing body



See Coordinator's Manual, pages 510-6-8



Multi-jurisdictional Plan

- ✓ Each community must have at least two representatives
- ✓ Half of the representatives must attend all meetings



See Coordinator's Manual, page 510-7



Step 2. Involve the public

Public = "stakeholders"
residents
tenants
businesses
civic groups,
developers, academia
school district
levee district
state agency
federal agency



See Coordinator's Manual, pages 510-8-11

etc.



Step 2. Involve the public

- (a) Planning committee
 - 1. more than 50% public/stakeholders
 - 2. Meet enough times
- (b) Public meetings at the beginning
- (c) Public meetings at the end
- (d) Other ways to get public input

Guidance at the CRS Resources website



See Coordinator's Manual, pages 510-8-11





CRS Credit for Planning Committees

- A Handout for the National Flood Insurance Program Community Rating System -

The CRS strongly encourages locally designed programs to prevent and reduce flood losses. Three CRS activities specifically credit local planning committees that design such programs and periodically evaluate their effectiveness:

Activity 330 (Outreach Projects) credits a committee that develops and evaluates a Program for Public Information (PPI).

Activity 370 (Flood Insurance Promotion) credits a committee that helps develop and evaluate a flood insurance coverage improvement plan (CI).

Activity 510 (Floodplain Management Planning) has two credits for a committee that helps draft a floodplain management or a hazard mitigation plan. The Step 1 committee consists of staff with expertise in different areas and the Step 2 committee is designed to involve the public in the planning process. Members of the public may be part of the planning committee created under Step 1 or they may be organized as a separate committee.

Three of the committees have similar membership criteria. In fact, it is recommended that a community have only one committee, charged with work on all three activities. The committee could be one that already exists, such as a mitigation planning committee or advisory board, or a subcommittee of an existing group, as long as it meets the membership criteria.

Membership. The number of participants and their identities are determined by the community, but the committee's membership must meet the following CRS criteria.

Activity 330 Program for Public Information (PPI) Committee

- o There must be at least five people on the committee.
- o At least half of the members must be from outside the local government ("stakeholders").
- There must be representation from the community's floodplain management office and public information office (if there is one).

Activity 370 Committee for the Flood Insurance Coverage Improvement Plan

- o Same three criteria as for the 330 PPI committee, plus
- o There must be representation from a local insurance agency and a local bank or lender.

Activity 510 Step 1 Floodplain Management Plan Staff Committee

 The members are staff members from those community departments that implement or have expertise in the activities that will be reviewed in Step 7. Credit is based on how many of the six categories are represented by the offices.

Activity 510 Step 2 Public Planning Committee

- o Staff members from the Step 1 staff committee, plus
- o For full credit, at least half of the members must be from outside the local government ("stakeholders").

Credit can be prorated if less than half of the members are stakeholders.

Step 7 Categories

- o Preventive measures (e.g., codes)
- o Property protection (e.g., elevation)
- Natural resource protection
- Emergency services
- Structural flood control projects
 Public Information

CRS Handout-Credit for Planning Committees

-1-

April 2013

Available on the CRS Resources Website 500 Series Helpful Resources



A <u>510 Floodplain Management Planning checklist</u> is available. The checklist includes all the steps and where the information can be found in the plan. It also includes required items that don't need to be in the plan, such as committee membership and meetings.

The checklist is available for download from the <u>CRS resources website</u>.



See Coordinator's Manual, pages 510-28-29



512.b. Repetitive loss area analysis (RLAA)

Credit Criteria

- (1) Must have at least one repetitive loss area
- (2) Follow the five step process
- (3) Adopted by governing body and available to the public*
- (4) Annual evaluation report
- (5) Update by each CRS cycle visit
- * Privacy Act applies. Summary report may be needed.

See Coordinator's Manual, pages 510-29-34



Summary

Floodplain management planning (FMP)

- Review 10 steps before planning effort is underway
- Create the planning committee and involve the public
- Full credit for Step 5(c) for Category C communities

Repetitive loss area analysis (RLAA)

- All repetitive loss areas need an RLAA for Category C communities
- Remember Privacy Act requirements



Activity 500 / 510

Questions?

