Federal Insurance and Mitigation Administration

Risk Reduction Division		
Date:	**Suspense Date:**	2010 Community Rating System Report to Congress

Synopsis of Correspondence:

Attached is the NFIP Community Rating System (CRS) Biennial Report to Congress, 2010. The National Flood Insurance reform Act of 1994 requires that a CRS report be submitted to Congress every two years. The report reiterates underlying principals of the program and provides updated data as of the close of Fiscal Year 2010. In past years, FIMA has not received inquires or questions from Congress pertaining to the report.

2010 CRS REPORT TO CONGRESS

NOTE: THIS IS VERSION SENT TO FEMA H.Q. THIS MAY NOT BE FINAL VERSION

Originator: Bill Lesser extension 2807

Reviewers

	CONCUR	NON-CONCUR	DATE
David Stearrett, Chief, Floodplain Mgt. Branch			8/16/11
James Walke, Director, Risk Reduction Div.			8/17/11
Jhun De la Cruz, Chief, Underwriting Branch			8/16/11
Tom Hayes, Senior Actuary Specialist			8/16/11
Tim Mantz, Chief, Business Analysis Branch			8.17.11
Dennis Kuhns, Director, Risk Insurance Div.			8/17/11
Dahlia Kasperski, Engineering Mgt. Branch, RA			8/18/11
Sandra Knight, Deputy, Federal Insurance and Mitigation Administration			8/19/11
Ed Connor, Acting Federal Insurance and Mitigation Administrator			8/22/11
Courtney Fralin (tracking and dispatch)			
Louis Eswood, Legislative Affairs Division			

COMMENTS BY REVIEWERS

Reviewer: _____
Comment:

Reviewer: _____
Comment:

2010 NATIONAL FLOOD INSURANCE PROGRAM,
COMMUNITY RATING SYSTEM
REPORT TO CONGRESS
SUMMARY SHEET

PURPOSE:
The enclosed 2010 CRS Report to Congress, with accompanying transmittal letters, are for the Senate Committee on Banking, Housing and Urban Affairs and the House Committee on Financial Services.

DISCUSSION:
The CRS Report to Congress is a routine report. The 1994 National Flood Insurance Reform Act requires the report to be sent to Congress every two years. The Report provides an update on programmatic progress of the CRS. Previous versions of the CRS report to Congress have not raised attention by Senate or House Committees.

RECOMMENDATION: It is recommended that the Administrator sign the letters.

POINT OF CONTACT: Bill Lesser, (202) 646 – 2807, bill.lesser@dhs.gov

COORDINATION:

Edward L. Connor, Deputy Administrator, Insurance — Date
Federal insurance and Mitigation Administration

Office of Chief Counsel — Date

Office of Policy and Program Analysis — Date

Kristin Robinson, Advisor to the Administrator — Date

Jason McNamara, Chief of Staff — Date

Richard Serino, Deputy Administrator — Date

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472

FEMA

The Honorable Tim Johnson
Chairman
Committee on Banking, Housing and Urban Affairs
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

I am providing you with the Department of Homeland Security, Federal Emergency Management Agency (FEMA), "National Flood Insurance Program - Community Rating System (CRS) Biennial Report to Congress." This Report serves as our seventh biennial CRS Report to Congress as required by the National Flood Insurance Reform Act of 1994.

The CRS plays an important role in FEMA's integration of flood insurance, flood loss mitigation, and the implementation of the National Flood Insurance Program (NFIP). The CRS is a unique incentive program that uses flood insurance discounts to encourage communities to go beyond the minimum NFIP standards for reducing potential losses to lives and property. A cornerstone of the CRS is the requirement for communities to address their NFIP repetitively flooded buildings. In addition, the CRS has become a model for government, public, and private involvement in addressing all hazard community preparedness and mitigation.

If you have any questions, please contact me or have a member of your staff contact our Legislative Affairs Division at (202) 646-4500.

Sincerely,

W. Craig Fugate
Administrator

Enclosure

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472

FEMA

The Honorable Tim Johnson
Chairman
Committee on Banking, Housing and Urban Affairs
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Administrator

Enclosure

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472

FEMA

The Honorable Richard C. Shelby
Ranking Member
Committee on Banking, Housing and Urban Affairs
United States Senate
Washington, D.C. 20510

Dear Senator Shelby:

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Sincerely,

W. Craig Fugate
Administrator

Enclosure

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472

FEMA

The Honorable Spencer Bachus
Chairman, Committee on Financial Services
United States House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

I am providing you with the Department of Homeland Security, Federal Emergency Management Agency (FEMA), "National Flood Insurance Program - Community Rating System (CRS) Biennial Report to Congress." This Report serves as our seventh biennial CRS Report to Congress as required by the National Flood Insurance Reform Act of 1994.

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Sincerely,

W.

Craig Fugate
Administrator

Enclosure

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472

FEMA

The Honorable Barney Frank
Ranking Member
Committee on Financial Services
United States House of Representatives
Washington, D.C. 20515

Dear Representative Frank:

I am providing you with the Department of Homeland Security, Federal Emergency Management Agency (FEMA), "National Flood Insurance Program - Community Rating System (CRS) Biennial Report to Congress." This Report serves as our seventh biennial CRS Report to Congress as required by the National Flood Insurance Reform Act of 1994.

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Sincerely,

W. Craig Fugate
Administrator

Enclosure

National Flood Insurance Program Community Rating System

Biennial Report to Congress

2010

Homeland Security

Federal Emergency Management Agency

Executive Summary

The National Flood Insurance Program's (NFIP) Community Rating System (CRS) is administered by the Department of Homeland Security's Federal Emergency Management Agency (FEMA). The CRS was implemented in 1990 to recognize and encourage community floodplain management activities that exceed the minimum NFIP standards. The National Flood Insurance Reform Act of 1994 codified the CRS within the NFIP. Under the CRS, flood insurance premiums are adjusted to reflect the reduced flood risk that results from community activities that meet the three goals of the CRS: (1) reduce flood damage to insurable property; (2) strengthen and support the insurance aspects of the NFIP; and (3) encourage a comprehensive approach to floodplain management.

There are 10 CRS classes: Class 1 requires the most credit points and gives the largest premium reduction; Class 10 receives no premium reduction. The CRS recognizes 18 creditable activities, organized under four categories numbered 300 through 600: Public Information, Mapping and Regulations, Flood Damage Reduction, and Flood Preparedness.

As of October 1, 2010, there are 1,148 communities receiving flood insurance premium discounts based on their implementation of local mitigation, outreach, and educational activities that go beyond minimum NFIP requirements. Although premium discounts are one of the benefits of participation in the CRS, it is more important that these communities are carrying out activities that save lives and reduce property damage. These 1,148 communities represent a significant portion of the nation's flood risk as evidenced by the fact that more than 67% of all flood insurance policies are written in CRS communities. Communities receiving premium discounts through the CRS cover a full range of sizes from small to large, and a broad mixture of flood risks, including coastal and riverine.

The CRS was developed and implemented with the benefit of advice from and effort by federal, state, and local officials; professionals with expertise in floodplain management and insurance; and academics. A multidisciplinary approach led to successful implementation of the program and this same approach has been employed in reviewing and refining the CRS throughout the last 20 years.

Following this Executive Summary, Part I outlines the legislative requirements of this document. Part II of this report provides summary statistics on community participation in the CRS and on the costs of administering the program. Part III reviews how the CRS operates and how the program activities are being implemented. Part IV describes progress toward the strategic goals that were posed in prior reports.

The major highlights of this report are:

- The 1,148 participating CRS communities represent over two-thirds of all flood insurance policies.
- Participation in the CRS is well distributed across the country, although it is higher in Florida, where policy counts are greater, and in those states that are the more active leaders in floodplain management.

- In addition to the benefits of the CRS's basic approach of encouraging and crediting floodplain management activities and providing reductions on flood insurance premiums, the CRS also helps reduce disaster losses in a wide variety of ways, such as acting as a model for communities, supporting research into mitigation activities, emphasizing stronger multi-hazard building codes, and encouraging all-hazards planning.
- The program has been steadily growing over the past nine years and CRS communities are improving their floodplain management programs and receiving better CRS classifications in return.
- Over the past two years, the CRS has seen both growth in the number of participating communities, and greater performance in those already participating. This upward mobility within the program indicates the importance communities place on improving their rating within the CRS to receive additional flood insurance discounts for their residents, on enhancing their floodplain management programs, and reducing their risk of flood loss. As of October 2010, the program has one Class 1 community, two Class 2 communities, one Class 3 community, and five Class 4 communities. The six top-rated communities include three counties.
- A CRS community's flood program benefits from having an added incentive to maintain its flood mitigation programs over the years. Communities that participate in the CRS find that their floodplain management activities are better organized and more formalized. They are administered more closely and effectively and remain in operation after personnel changes.
- The costs borne by communities to implement activities credited under the CRS are justified by the benefits that ensue: enhanced public safety, a reduction in damage to property and public infrastructure, the avoidance of economic disruption and losses, reduced human suffering, and protection of the environment. These benefits accrue to all the residents, whether they have flood insurance or not. Implementing some CRS activities, such as floodplain management planning, can help a community qualify for certain federal assistance programs. Further, the CRS provides national recognition for a community's flood mitigation efforts.

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I. Legislative Requirement

This is the eighth National Flood Insurance Program Community Rating System Biennial Report to Congress. It is submitted pursuant to Section 541(4) of the National Flood Insurance Reform Act of 1994 (the Riegle Community Development and Regulatory Improvement Act of 1994), which states

> COMMUNITY RATING SYSTEM AND INCENTIVES FOR COMMUNITY FLOODPLAIN MANAGEMENT.
>
> (4) REPORTS.--Not later than 2 years after the date of enactment of the Riegle Community Development and Regulatory Improvement Act of 1994 and not less than every 2 years thereafter, the Director shall submit a report to the Congress regarding the program under this subsection. Each report shall include an analysis of the cost-effectiveness of the program, any other accomplishments or shortcomings of the program, and any recommendations of the Director for legislation regarding the program.

The Community Rating System (CRS) is part of the National Flood Insurance Program (NFIP), which is administered by the Federal Emergency Management Agency (FEMA) of the Department of Homeland Security.

This Biennial Report reviews the main activities of the past two years, how the program has made refinements to the creditable activities and points, and how the program has fared in its efforts to accomplish its strategic goals. The report is in three parts.

Part II., CRS Facts and Figures, provides a summary of the CRS, its history, current statistics on community participation, and the costs and benefits of the program.

Part III., Program Management, addresses management issues, including routine operational activities and how the scoring system is monitored and improved.

Part IV., Progress toward Goals, looks at progress toward four strategic goals:

- Implement *A Strategic Plan for the Community Rating System, 2008–2013.*
- Support FEMA's all-hazards risk management strategy and its efforts to address repetitive flood losses.
- Assist existing CRS communities in reducing flood losses, and encourage communities not in the CRS to join.
- Revise and refine CRS policies in the *CRS Coordinator's Manual.*

More details on the topics covered here are available from FEMA. Most of the publications referenced can be found at the Emergency Management Institute's Community Rating System Documents page on FEMA's website, http://training.fema.gov/EMIWeb/CRS.

II. CRS Facts and Figures

How the CRS Works

Communities that regulate new development in their floodplains are able to join the NFIP. In return, the NFIP provides federally backed flood insurance for properties in participating communities. Today over 21,000 communities are in the NFIP and there are over 5.5 million policies in effect.

The CRS is a part of the NFIP. The CRS reduces flood insurance premiums for policyholders in certain communities to reflect what the community does above and beyond the NFIP's minimum standards for floodplain management. The objective of the CRS is to reward communities for what they are doing, as well as to provide an incentive for new flood protection activities.

In order to recognize community floodplain management activities in this insurance rating system, those activities must be described, measured, and evaluated. A community receives a CRS classification based upon the credit points it receives for its activities. The criteria for CRS classification, the application procedures, and the credit points and calculations used to determine and verify CRS credit are all contained in the *CRS Coordinator's Manual.*

Classification. There are ten CRS classes: Class 1 requires the most credit points and gives the largest premium reduction; Class 10 receives no premium reduction (see Table 1). A community that does not apply for the CRS or that does not obtain the minimum number of credit points is a Class 10 community.

Community application for the CRS is voluntary. Any community that is in full compliance with the rules and regulations of the NFIP may apply for a CRS classification better than Class 10. The applicant community submits documentation demonstrating that it is doing activities recognized under the CRS.

A community's CRS classification is assigned after a field verification of the activities described in its application.

Table 1. Community Rating System Premium Discounts.

Class	Premium Discount SFHA*	Non-SFHA
1	45%	10%
2	40%	10%
3	35%	10%
4	30%	10%
5	25%	10%
6	20%	10%
7	15%	5%
8	10%	5%
9	5%	5%
10	0	0

* Special Flood Hazard Area. Non-SFHA premium reductions apply to B, C, D, X, A99, and AR Zones.

Activities Credited. The CRS recognizes 18 creditable activities, organized under four categories numbered 300 through 600 (see Table 2). The number of points a community receives for each listed activity is based upon how well an activity meets the goals of the CRS. Formulas and adjustment factors are used to calculate credit points for each activity. Communities affected by one or more of seven special hazards, such as coastal erosion, tsunamis, or ice jams, have the opportunity to earn additional credit under several activities. These credit criteria are explained in separate publications for these hazards.

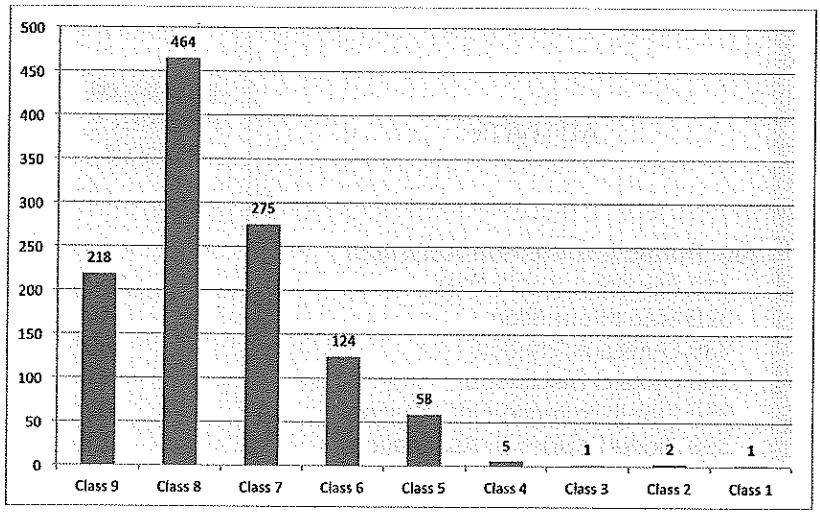
Table 2. Credit Points Awarded for CRS Activities.

ACTIVITY	MAXIMUM POSSIBLE POINTS	AVERAGE POINTS EARNED	MAXIMUM POINTS EARNED	PERCENTAGE OF COMMUNITIES CREDITED
300 Public Information Activities				
310 Elevation Certificates	162	70	162	100%
320 Map Information	140	139	140	93%
330 Outreach Projects	380	96	350	89%
340 Hazard Disclosure	81	16	81	68%
350 Flood Protection Information	102	40	102	91%
360 Flood Protection Assistance	71	50	71	47%
400 Mapping & Regulatory Activities				
410 Additional Flood Data	1,346	96	662	50%
420 Open Space Preservation	900	204	1,088	92%
430 Higher Regulatory Standards	2,740	303	1,159	97%
440 Flood Data Maintenance	239	109	282	87%
450 Stormwater Management	670	131	735	86%
500 Flood Damage Reduction Activities				
510 Floodplain Management Planning	359	121	265	40%
520 Acquisition and Relocation	3,200	225	2,820	23%
530 Flood Protection	2,800	90	1,106	10%
540 Drainage System Maintenance	330	205	345	70%
600 Flood Preparedness Activities				
610 Flood Warning Program	225	90	220	37%
620 Levee Safety	900	224	312	0.2%
630 Dam Safety	175	83	75	65%

Participating Communities

As of October 1, 2010, there are 1,148 communities in the CRS. Their class distribution is shown in Figure 1. Over 80% of all CRS communities are Class 8 or better.

Figure 1. CRS Communities by Class (as of October 1, 2010)

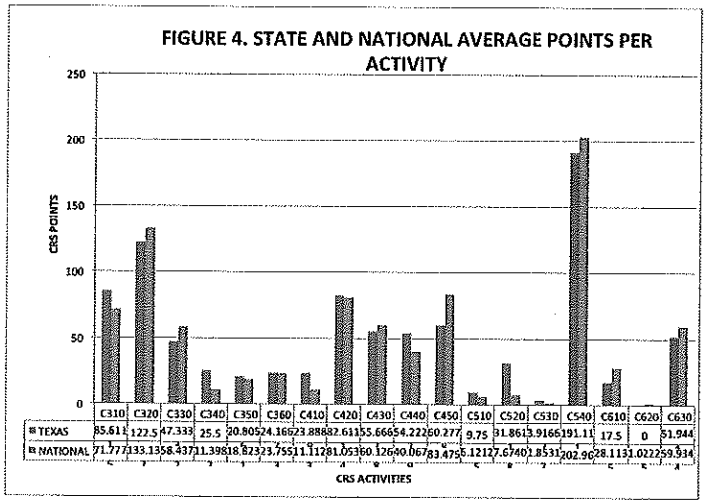


Although the 1,148 communities participating in the CRS represent just 5% of all NFIP communities, the CRS cities and counties account for 67% of all flood insurance policies written: CRS communities have the bulk of the nation's flood challenges.

The nine best-rated CRS communities in the nation are Roseville, California (Class 1, with a 45% premium discount); Tulsa, Oklahoma; and King County, Washington (both Class 2, with 40% premium discounts); Pierce County, Washington (Class 3, with a 35 % premium discount); and Fort Collins, Colorado; Skagit County, Washington; Snohomish County, Washington; Sacramento County, California; and Charleston County, South Carolina (all Class 4, with 30% premium discounts). The number of communities in these top four tiers has grown 50% over the past two years.

State Profiles. The CRS publishes State Profiles that provide a narrative and graphic summary of each state's communities' scores by activity. Readers get a quick view of which communities are participating, what scores they get for each activity, and their flood insurance premium savings. Readers can also see how their communities' scores compare to national averages (see Figure 2). This helps identify state training opportunities.

Figure 2. A Sample Graphic from a CRS State Profile



Distribution by State. The distribution of participation in the CRS is shown in the chart and map in Figure 3. Participating communities are well distributed across the country. Participation is particularly high in Florida, which has more flood insurance policies than any other state and a high awareness of its exposure to flooding. Relatively high participation rates in Florida, North Carolina, California, New Jersey, and Colorado are also due to active state programs that help promote the CRS.

Region I

CT	8	175	20%
ME	18	977	33%
MA	12	335	17%
NH	4	214	8%
RI	3	40	16%
VT	3	231	14%
	48		

Region II

NJ	52	549	50%
NY	30	1496	9%
	82		

Region III

DE	9	47	21%
MD	8	135	44%
PA	23	2463	14%
VA	19	282	33%
WV	3	272	2%
	62		

Region IV

AL	12	404	56%
FL	216	458	93%
GA	30	518	68%
KY	14	344	47%
MS	24	318	60%
NC	78	549	67%
SC	40	215	76%
TN	9	371	21%
	423		

Region V

IL	40	848	22%
IN	17	424	33%
MI	19	874	18%
MN	5	552	2%
OH	14	742	8%
WI	14	531	19%
	109		

Region VI

AR	14	401	25%
LA	39	308	79%
NM	11	94	52%
OK	12	381	27%
TX	52	1212	53%
	128		

Region VII

IA	2	558	10%
KS	7	413	7%
MO	4	628	5%
NE	4	398	30%
	17		

Region VIII

CO	47	244	55%
MT	12	130	46%
ND	2	323	33%
SD	1	214	6%
UT	10	202	18%
WY	5	81	36%
	77		

Region X

AZ	25	103	80%
CA	75	522	57%
HI	1	4	21%
NV	9	34	51%
	110		

Region X

AK	6	32	24%
ID	21	170	55%
OR	31	259	40%
WA	33	292	47%
	91		

Figure 3. CRS Participation and CRS Policies, by State and FEMA Region.

The first column of figures in each Region shows the number of CRS communities in that state; the second column shows the total number of NFIP communities in that state. The last column shows the percentage of that state's NFIP policies that are held in CRS communities.

Dollars and Cents

Administrative Costs. The annual costs for implementing the CRS program, like all other administrative expenses of the NFIP, are funded from policyholder premiums.

The program is staffed with the equivalent of 23 FTEs: 15 field staff, three office/data processors, two technical coordinators, two consultants, and one program manager. The staff are responsible for direct program management (implementation, oversight, outreach, and quality control), as well as for office and field reviews of all participating and applying communities.

Total staff and operational costs for the program are just under $5 million annually. Other direct FEMA operating expenses are about $500,000 and include program travel, assisting community and state participation at three annual CRS classes at FEMA's Emergency Management Institute; printing the *CRS Application* and *CRS Coordinator's Manual*, and other miscellaneous costs. Additional staffing and research costs for the *CRS Strategic Plan* (described below) added an additional $860,000 during 2010.

Insurance and Mitigation Savings and Benefits. The CRS strategy has been twofold: to recognize floodplain management and insurance activities that meaningfully distinguish one class of community from another; and to act as a catalyst to encourage communities to initiate new activities. Since 1996, there has been a steady increase in the number of communities in the better CRS classes. In 1990, 32% of CRS communities were Class 8 or better; in the year 2000, over 50% were so classified. Today, more than 81% of the CRS communities are rated Class 8 or better, (see Figure 5 on page 10), showing that more communities are taking an active role in decreasing their flood risks. Over the long term, this increases the benefits of the CRS and justifies the added administrative expense of having these classifications in the flood insurance rating system.

The CRS has become an important tool for mitigation as well as a mechanism for integrating mitigation with insurance. This is consistent not only with rating systems that have been successfully employed for many years in the insurance industry, but also with new industry initiatives for relating insurance premiums to community efforts to reduce losses from natural hazards. In addition, a community that implements these mitigation activities provides benefits to all its residents—insured or not—and thereby reduces the need for taxpayer-funded flood response and recovery efforts. The overwhelming responses from various surveys of local officials and floodplain residents indicate that the CRS is a strong catalyst for communities to undertake new activities (see *CRS Communities: Four at the Top*, in the sidebar).

The costs borne by communities in implementing activities credited under the CRS are justified by the reduction in losses to property and lives. These benefits accrue to all the residents, whether they have flood insurance or not, and whether they are

CRS Communities: Four at the Top

Roseville, California, was the first to reach the highest CRS rating (Class 1). Damaging floods in 1995 spurred Roseville to strengthen and broaden its floodplain management program. Today the City earns points in almost all of the CRS's creditable activities..

Comprehensive planning for floodplain management has been a key contributor to **Tulsa, Oklahoma**'s progress in reducing flood damage from the dozens of creeks within its jurisdiction. The City (Class 2) has cleared more than 900 buildings from its floodplains.

King County, Washington (Class 2), has preserved more than 100,000 acres of floodplain open space and receives additional CRS credit for maintaining it in a natural state.

Pierce County, Washington (Class 3), main-tains over 80 miles of river levees. One of its public outreach tasks is mailing informational brochures to all floodplain residents annually.

flooded or not. Those prudent enough to purchase flood insurance are directly rewarded with the premium reductions described above. This program currently saves policyholders more than $300 million nationally compared to what they would pay if their communities were not participating in the CRS.

Taken together, the above results provide evidence that the federal and community costs of implementing the CRS are more than justified by the benefits being obtained.

The best way to view the benefits of the CRS is to list how they impact communities and FEMA.

Community benefits include

- The activities credited by the CRS result in enhanced public safety, a reduction in damage to property and public infrastructure, the avoidance of economic disruption and losses, reduced human suffering, and protection of the environment.
- A community in the CRS can evaluate the effectiveness of its flood program against nationally recognized benchmarks.
- Residents save on flood insurance premiums.
- Technical assistance is available to design and implement some activities.
- A CRS community's floodplain management program benefits from having an added incentive to maintain its flood mitigation efforts. The fact that the community's CRS status could be affected by the elimination of a flood-related activity or weakening of the regulatory requirements for new development should be taken into account by the local governing body when considering such actions. A similar system used in fire insurance rating has strongly affected local government support for fire protection programs.
- Communities that participate in the CRS find that their floodplain management activities are better organized and more formalized. They are administered more effectively and remain in operation after personnel changes.
- Implementing some CRS activities, such as floodplain management planning, can help a community qualify for certain federal assistance programs.
- The public information activities build a knowledgeable constituency interested in supporting and improving flood protection measures.

FEMA and the federal taxpayers benefit from the CRS in several ways, too. These include

- Credited floodplain management activities have been shown to reduce flood losses and, therefore, flood insurance claims, disaster assistance payments, and lost tax revenue.
- Communities publicize flood insurance and help insurance agents get rating information.
- Loss reduction activities benefit all residents, insured or not. Flood insurance policy holders are the catalyst for community-wide programs that help everyone.
- The CRS provides data to FEMA on different ways to implement floodplain management activities, helping the NFIP as a whole to make more informed policy decisions. New initiatives by FEMA can be based on how communities have tried them on their own, as measured by CRS credits.

III. Program Management

Program Partners

FEMA. The CRS is administered by FEMA's Mitigation Division within the Department of Homeland Security. FEMA has ten Regional Offices that coordinate the field contacts with states and communities (see map in Figure 3).

Task Force. Because of the many disciplines required to develop and monitor the CRS, FEMA created the Community Rating System Task Force. Its members collectively represent the fields of actuarial science, engineering, floodplain management, insurance underwriting, and property insurance inspection and rating services.

Table 3. CRS Task Force Membership.

1 – Chair: retired insurance executive
6 – Federal Insurance and Mitigation Administration (FIMA)
3 – FEMA, Regional Offices
2 – Insurance industry
1 – Association of State Floodplain Managers
1 – State Emergency Management
1 – National Association of Flood and Stormwater Management Agencies
3 – Local community CRS Coordinators
1 – National Oceanic and Atmospheric Administration
1 – Corps of Engineers

The Task Force is the focal point for all discussions about the CRS and the primary advisor to FEMA on the program. Key FEMA staff are also Task Force members (see Table 3).

Insurance Companies. The companies that write flood insurance policies are responsible for explaining the CRS and its benefits to its policyholders. Their representatives on the Task Force ensure that the program's insurance aspects are manageable and provide a business perspective to operational issues.

Insurance Services Office, Inc.. ISO has an arrangement with FEMA and insurance companies to process applications and provide technical assistance to FEMA, states, and communities.

States and Communities. These entities implement the activities credited by the CRS. Most of the activities are undertaken by local governments. However, communities can receive credit for activities implemented at the state, county, or regional level. It is estimated that 10%–20% of the credited activities are implemented by a state or regional agency or because of a state or regional mandate (see the later section on Uniform Minimum Credits for more information). State and regional agencies also provide technical assistance to communities.

Program Activities

Following is a list of some of the many activities undertaken during 2010. This list demonstrates the number and breadth of projects implemented pursuant to administering the CRS.

Community Review.

- Reviewed 46 new community applications and conducted verification visits.
- Reviewed 10 modifications to existing community programs, including verification visits.

- Conducted 223 cycle verification visits (each community is reviewed every 3 to 5 years).
- Reviewed 925 community recertifications each year.

Publications and Software.

- Drafted a 2010 *CRS Coordinator's Manual.*
- Published *Best Practices in Local CRS Administration.*
- Developed the *Repetitive Loss Strategy* in July of 2010.
- Developed or updated and printed technical assistance publications.
- Published the *NFIP/CRS Update* newsletter.

Community Training.

- Conducted or made presentations at nine local, state, or national workshops.
- Conducted three week-long training courses at the Emergency Management Institute. Four training courses were field deployed in Texas, Oregon, New York, and California.

Community Outreach.

- Distributed thousands of color brochures.
- Displayed a CRS booth at three national conferences of professional associations.
- Made presentations at two conferences of professional associations.

Table 4. Technical Assistance Publications of the CRS.

CRS technical assistance publications, known as "model programs," cover the following topics:

Floodplain management planning

Higher regulatory standards

Dam failure response planning

Drainage system maintenance

Flood warning programs

Outreach projects

Stormwater management

Examples of local plans.

Other technical publications cover the mapping and management of areas subject to special hazards:

- *CRS Credit for Mitigation of Tsunami Hazards*
- *CRS Credit for Management of Coastal Erosion Hazards*
- *Special Hazards Supplement to the CRS Coordinator's Manual.*

Program Improvement

FEMA and the CRS Task Force are committed to continually improving the CRS. Table 5 summarizes the progression of efforts that have been taken over the years to enhance the CRS, its operations, and its effectiveness.

Ongoing Improvements. While working to implement the large-scale changes described in the *CRS Strategic Plan* (below), the program works to continually analyze, clarify, and improve its credit criteria, scoring, and operations. Valuable feedback on needed changes and improvements is obtained through

- Feedback from communities at workshops, meetings, and verification visits;
- Feedback from states and FEMA regional staff;
- Draft policy papers that are circulated for comment, and
- "Calls for Issues" periodically sent out by FEMA.

Table 5. Community Rating System Timeline.

Year	Major Activity
1987	〈 First Community Rating System Task Force appointed by Federal Insurance Administrator.
1988	〈 Insurance Services Office tasked with a major role in developing the CRS. 〈 First *Schedule* drafted, modeled on ISO's community fire insurance rating system.
1989	〈 *CRS Commentary* expands on the *Schedule*. Field tests conducted. 〈 "Weighting Forum" sets basis for points and scoring system.
1990	〈 *CRS Coordinator's Manual* published, combining the *Schedule* and the *Commentary* in one guidebook for the local official. 〈 75 workshops held around the country. Week-long CRS courses begin at FEMA's Emergency Management Institute. 〈 *Example Plans*, first of the "model programs" series, is published to provide more guidance on how communities can implement and score their activities. 〈 *NFIP/CRS Update* initiated to provide periodic news, helpful hints to local officials. 〈 324 communities apply by December 15 deadline.
1991	〈 First verification visits conducted. 〈 293 cities and counties become Class 9 CRS communities on October 1.
1992	〈 1990 initial applicant communities' verified classes take effect on October 1. 〈 280 of the 1991 applicants become Class 9.
1993	〈 The 3- and 5-year cycle verification system is formalized.
1994	〈 The *Short Form Application* is published, providing a streamlined way for communities to apply, evolving into the *CRS Application* – a single application procedure. 〈 The *Schedule* includes new credits for protecting natural and beneficial functions and for coastal erosion programs. 〈 The National Flood Insurance Reform Act codifies the CRS.
1995	〈 FEMA begins three-year evaluation of the CRS with a Call for Issues and a survey of local CRS Coordinators.
1996	〈 Revised annual recertification format provides more information to help communities implement their activities. 〈 Single annual deadline and self-certified Class 9 approach dropped. Communities may apply at any time. Verified classifications take effect on May 1 and October 1.
1998	〈 Evaluation continues with focus groups and surveys. 〈 "Weighting Review Forum" held to tie the evaluation's conclusions to credit criteria and the scoring system.
1999	〈 New *CRS Coordinator's Manual* reflects the conclusions of the evaluation.
2002	〈 FEMA publishes revised *CRS Coordinator's Manual.*
2003	〈 FEMA introduces new CRS Resource Center website.
2004	〈 New CRS video developed to better explain and market the CRS.
2006	〈 Revised *CRS Coordinator's Manual* includes increased credit points for new and/or higher-standard maps, new credit for analyses of repetitive flood loss areas, and bonus points for acquiring or otherwise mitigating repetitive loss buildings. 〈 First Class 1 community is verified. 〈 Policy developed for applying CRS policies and requirements to communities catastrophically affected by disasters.
2007	〈 FEMA publishes revisions to the *CRS Coordinator's Manual* to incorporate lessons learned from Hurricane Katrina.
2008	〈 CRS Task Force prepares *A Strategic Plan for the CRS, 2008-2013*

A variety of concerns and suggestions are derived from these sources. CRS staff prepare memos, issue papers, and draft responses, which are sent to the Task Force for consideration at one of the three meetings it holds each year. The Task Force members, especially those who represent local, state, and FEMA Regional Offices, have their own direct sources of information.

The Task Force meetings are rotated among the ten FEMA regions in order to obtain input from experienced field personnel from different parts of the country. Each Task Force meeting is attended by representatives of the host FEMA Regional Office. State officials and local CRS Coordinators from communities in the area are invited to provide their comments on the program.

The in-stream changes that result from this ongoing process have varied from adjusting the points of an individual element in the grading schedule to major changes in the *CRS Coordinator's Manual*. All of the landmark changes listed in the CRS Timeline (see Table 5) were developed through this process.

A Strategic Plan for the Community Rating System 2008-2013

In January 2008 FEMA released the *FEMA Strategic Plan, Fiscal Years 2008–2013*. That Plan presented a vision to transform the agency into the Nation's Preeminent Emergency Management and Preparedness Agency. The Plan provides the framework for FEMA's implementation of a new vision and serves as a strategic tool for FEMA to achieve its mission.

Using the *FEMA Strategic Plan* as a guiding tool, the Federal Insurance and Mitigation Administration (FIMA) committed to the development and implementation of a similar strategic planning process for the National Flood Insurance Program's Community Rating System (CRS). With initiative and design from the CRS Task Force, *A Strategic Plan for the Community Rating System 2008–2013,* was approved for implementation in January 2009.

The *Strategic Plan for the CRS* sets forth five objectives and 15 strategies to accomplish the CRS goals and contribute to implementation of the FEMA *Strategic Plan*. The objectives and strategies are listed in Table 6. Many of the strategies are interrelated and mutually supportive. Therefore, the Task Force approved eight projects to begin implementation:

A. Activity review: in-depth evaluations of some of the activities credited by the CRS.
B. Regional Handbook: how FEMA Regional CRS Coordinators may best support the CRS.
C. CRS Compliance: initiatives to improve NFIP compliance by CRS communities.
D. Master Lists: checklists to guide the other evaluations and projects.
E. Repetitive Loss Strategy: how the CRS can help mitigate repetitive loss properties.
F. CRS Marketing Plan: a framework for encouraging communities to join the CRS and/or improve their standing.
G. Program Monitoring and Improvement: research on the losses avoided by CRS activities, a tool for communities to assess their needs, and a forum to review credit points.
H. Succession Planning Strategy: to manage replacement of personnel.

At the beginning of 2010, the CRS Task Force had 12 committees overseeing the Plan implementation. Several external experts (mostly from universities) have been brought in to assist with analyzing and implementing *Strategic Plan for the CRS* projects and several new consultants have signed on to help the existing team. These committees became a new organizational structure

of the CRS Task Force through which various *Strategic Plan for the CRS* projects are managed and completed. Four new committees were created. Several of these committees completed their work and some folded into new follow up groups.

In June of 2011, the Task Force will oversee a weighting review session to evaluate the relative importance of CRS activities in meeting CRS goals and adjust the current CRS point weighting structure accordingly. A facilitator for this session was selected in October 2010. She is working with the weighting review committee to design a process that will objectively and efficiently fulfill the session's purpose. In the meantime, the program has been working with a team of academics to provide scientifically defensible data about which parts of the CRS best serve the program's goals. The first part of the study is scheduled to be released in the spring of 2011.

Table 6. Summary of
A STRATEGIC PLAN for the COMMUNITY RATING SYSTEM, 2008–2013.

Objectives	Strategies
1. Ensure that all CRS credits are appropriate and fully earned.	1.1. Ensure that all credited activities properly reflect the CRS goals. 1.2. Ensure that all CRS communities are fully compliant with NFIP criteria. 1.3. Improve the CRS verification process.
2. Support FEMA's initiatives to reduce repetitive flood losses.	2.1 Improve CRS incentives and opportunities to encourage communities to reduce repetitive flood losses. 2.2 Use the CRS to support other efforts to reduce repetitive flood losses.
3. Encourage communities to improve their floodplain management programs continually.	3.1. Develop a set of incentives for implementing each CRS-credited activity. 3.2. Review the CRS incentives in light of the CRS goals. 3.3. Help communities manage their CRS programs more effectively.
4. Support the CRS Strategic Plan with appropriate procedures and adequate resources.	4.1. Develop a CRS marketing plan. 4.2. Develop a method to evaluate the flood losses avoided through the CRS. 4.3. Improve partnerships with CRS stakeholders. 4.4. Improve the operations of the CRS Task Force. 4.5. Provide the tools and resources needed to implement the strategies set out in the CRS Strategic Plan.
5. Implement a knowledge management plan for the CRS.	5.1. Develop a strategy for succession planning. 5.2. Ensure that there are sufficient qualified and motivated staff members in both FEMA and Insurance Services Office.

IV. Progress toward Goals

The 2008 CRS Report to Congress identified "overall and strategic issues." It recommended that the following be pursued to "guide the CRS until the next Biennial Report to Congress."

1. Implementation of *A Strategic Plan for the Community Rating System, 2008–2013*, will commence. Early activities will include intensive evaluation of the credit points awarded for certain CRS activities (according to the schedule set out in the *Strategic Plan*) and a review of the scoring system used to assign relative values to each floodplain management and flood insurance technique credited under the CRS.
2. The CRS will continue to be closely coordinated with and be mutually supportive of FEMA's all-hazards risk management strategy and with FEMA's efforts to address repetitive flood losses. Activities in support of this strategy that are detailed in the CRS *Strategic Plan* will be implemented.
3. CRS communities will continue to be provided with assistance and encouraged to improve their floodplain management programs and thereby receive better CRS classifications. The benefits of joining the CRS will continue to be promoted. Activities in support of this dual strategy that are detailed in the CRS *Strategic Plan* will be implemented.
4. Revisions to CRS policy as published in the *CRS Coordinator's Manual* will be considered for future editions, as FEMA and the CRS Task Force continue to refine the CRS and carry out the above-mentioned strategies and address any new ones that arise.

This part reviews the progress made toward these goals since the 2008 Report to Congress.

Implementation of the *Strategic Plan for the Community Rating System*

The first goal outlined in the 2008 report was to implement the CRS *Strategic Plan*. As described above, the program continues to make progress on implementing the five objectives and 15 strategies outlined in the *Strategic Plan*. The Task Force has assembled a dozen committees and brought in outside experts to guide the implementation of the *Strategic Plan*.

Support FEMA's All-Hazards Risk Management and Repetitive Flood Loss Efforts

The second strategic goal was to coordinate with and be supportive of FEMA's all-hazards approach to managing risk and the agency's efforts to address repetitive flood losses as described in the *Strategic Plan*.

The primary purpose of all-hazards risk management is to identify and bring to bear all community policies, actions, and tools that will, over the long term, result in a reduction in both the level of risk and the potential for future losses community-wide. All-hazards risk management is most successful when it increases public and political support for planning and mitigation programs, results in actions that also support other important community goals and objectives, and influences the community's or state's decision making to include hazard reduction considerations.

The CRS is particularly helpful in doing this because it encourages communities to take a multi-faceted approach to address their hazards. Once local officials have their flood mitigation activities in operation, it becomes easier to begin to address other hazards with the same people and programs. This approach has been followed in many communities, CRS and non-CRS alike. Local officials report that the CRS program, its activities, and planning guidance gave them ideas about where to start and how to organize other risk management programs.

Promote All-Hazards Mitigation. It is frequently noted that many communities initiate all-hazards mitigation plans because of FEMA requirements. During their planning processes, communities discover the true extent of their flooding problems, learn about the CRS, and begin to take steps to reduce their losses. In addition, the CRS provides a financial and political incentive to undertake mitigation activities that reduce risk to other (non-flood) hazards or are easily adapted to address multi-hazards. CRS mitigation activity numbers and their measures include

Activities 320, 340, 410, 440—Developing and/or providing and maintaining accurate hazard information;

Activities 330, 350, 360—Advising people on mitigation measures they can take to protect their properties;

Activity 420—Preserving hazardous areas as open space;

Activities 430, 450—Enacting and enforcing higher regulatory standards for new development; and

Activity 510—Preparing and adopting comprehensive mitigation/floodplain management plans.

Often communities initiate such mitigation activities either because the CRS provides an incentive or because the CRS provides information and guidance on how to do them (or both). There are many examples of such success.

The CRS has taken the following specific actions to promote all-hazards mitigation:

- CRS staff have worked closely with FEMA all-hazards planning staff to ensure that the CRS credit criteria support all-hazards planning and to make both programs' requirements consistent. As a result, one plan document can meet the prerequisites of the CRS and all five FEMA mitigation grant programs, including the multi-hazard pre-disaster mitigation grant program.
- The Task Force is coordinating with members of FEMA's Risk MAP leadership to ensure that the two programs align their efforts and collaborate where appropriate. For example, Risk MAP builds on the earlier Map Modernization program and is multi-hazard. It includes a "discovery" stage, which provides for the exchange of information between the various stakeholders involved, and includes meeting with stakeholders to understand and finalize the project in detail. The Task Force and its partners are working to ensure that this program meshes as much as possible with the self-assessment being developed by the CRS as part of Strategy 3.1 of the *Strategic Plan for the CRS.*
- The Land Development Regulations component of the CRS encourages communities to treat flooding as one of several hazards that they must mitigate to safely guide wise development decisions.

Encourage Strong Building Codes. Building codes ensure the health and safety of citizens in the built environment. Communities with adequate codes and adequate code enforcement have survived

far better and recovered far more quickly than communities without adequate building codes. With the rise of disaster costs in the United States, communities cannot afford to continue business as usual when it is within their power to be more disaster resistant. The cornerstone of mitigation is community adoption and enforcement of strong building codes.

For these reasons, FEMA fully supports building codes such as the model International Code Series (I-Codes) that address most natural hazards on a consistent, rational basis, and allows mitigation of the effects of those natural hazards that are found within each jurisdiction's boundaries. Because of these advantages, the CRS program encourages community adoption of the I-Codes (or like codes) through provision of increased credit points (Activity 430).

However, adoption of building codes is not enough. The CRS has also tied credits to updating and enforcing a building code. The CRS relies on ISO to provide community classifications under the insurance industry's Building Code Effectiveness Grading Schedule (BCEGS) program. The better the BCEGS class, the more CRS points the community receives (Activity 430).

Further, a community cannot progress beyond a CRS Class 8 without a good BCEGS class or beyond a CRS Class 5 without a better one. This has encouraged several communities to adopt their first building codes and other communities to improve their building codes and administration so they can improve their CRS classes.

Provide Mitigation Research. The CRS provides a wealth of information on the communities with flood problems and the floodplain management activities they are implementing to reduce those problems. The data and local materials collected have helped many research projects.

Reduce Repetitive Flood Losses. Repetitively flooded properties make up 1% of the NFIP policies but account for over 30% of the claims payments. Addressing these repetitive losses has been a FEMA priority for years, but the programs did not have the ability to mitigate enough properties to reverse the trend. However, the Bunning-Bereuter-Blumenauer Flood Insurance Reform Act of 2004 created expanded program authority and grants to make significant inroads toward reducing repetitive loss structures through individual and community projects that acquire, relocate, elevate, or floodproof these repeatedly flooded properties.

The CRS takes seriously its role in helping encourage communities to reduce repetitive losses. Strategies 2.1 and 2.2 in the *Strategic Plan for the CRS* directly address repetitive losses by committing to working to encourage communities to reduce losses and to programmatically support other (non CRS) efforts to reduce repetitive flood losses.

The CRS works to meet these strategies in two ways. First, every CRS community is required to research its repetitive losses, identify the causes of the problem(s), and distribute flood protection information to property owners in repetitive loss areas. The CRS-managed Repetitive Loss Update Center refines the database by working with communities who provide additional mitigation information on each property, thereby helping FEMA get a better handle on the extent of the problem.

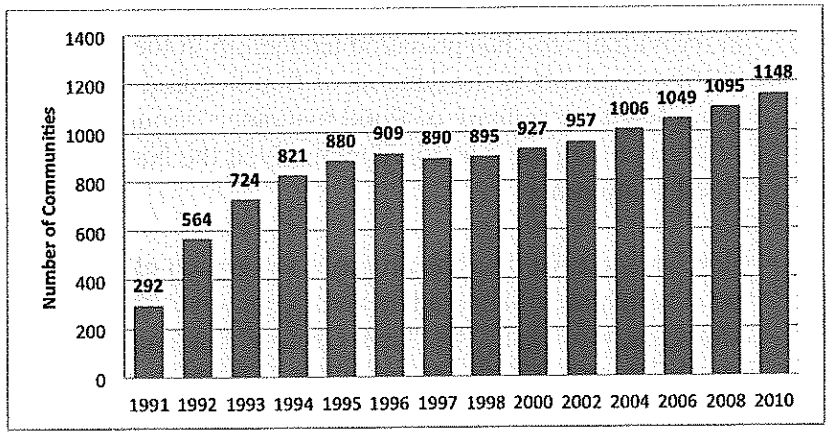
The second way the CRS supports FEMA's efforts to reduce repetitive losses is through the mitigation measures that communities undertake for CRS credit. For instance, repetitive loss properties acquired, retrofitted, or relocated outside the special flood hazard areas now receive credit, and those within the floodplain receive double credit.

Encourage and Support Participation in CRS and Class Improvement

The third strategic goal in the 2008 Report to Congress was to help communities not already in the CRS to join, and to help those already in the program to improve their class.

Increasing Program Participation. CRS participation increased greatly during the first five years of the program when the most active communities applied. Growth leveled off from 1996 to 1999, when communities received their first "cycle" visit leading to a number of communities' dropping out voluntarily or being removed because they no longer met the program requirements. However, various marketing and technical assistance efforts have resulted in moderate growth in the CRS since 1999, as shown in Figure 4.

Figure 4. CRS Community Participation



Participation Activities. As with class improvement, FEMA and its partners are actively encouraging and assisting communities to both join and remain in the CRS. Because of these efforts, total participation increased by 53 communities since 2008. Annual increases have doubled from 10 per year to more than 25. Over the last two years, activities to encourage more participation have included

- Promoting the CRS to people participating in the in the ongoing FEMA's "Rethinking the NFIP" initiative.
- Simplifying the documentation needed and removing other impediments to applying;
- Providing color brochures that explain the CRS to non-participating communities;
- Putting CRS information and publications on FEMA's website;
- Conducting training programs on applying to the CRS;
- Making presentations about the CRS at local officials' workshops;
- Experimenting with new approaches for state officials and others to complete the applications for smaller communities;
- Promoting uniform minimum credit and master applications in states and counties that administer their own programs with higher standards (see sidebar: *Higher State Standards: Uniform Minimum Credits*)
- Including articles on the benefits of the CRS in newsletters of professional organizations and local officials' associations; and
- Showing the CRS video that showcases community success stories.

Encouraging Class Improvement. The CRS continues to encourage and assist communities already part of the CRS to improve their programs and apply for additional CRS credit. One way the program helps is by publicly recognizing participating communities through the web, presentations, and the *CRS Update* newsletter. The program also works to recognize individuals who best reflect NFIP and CRS goals, most publically through the CRS Award for Excellence. This new award recognizes an individual who has provided leadership in the area of alerting residents to the dangers of flooding and promoting the purchase of flood insurance through the NFIP. Its recipient is honored annually at the National Flood Conference.

Higher State Standards: Uniform Minimum Credits

When a state takes steps to ensure that its communities surpass minimum NFIP standards—for example, requiring that all construction is elevated to at least a foot above the base flood elevation—the CRS rewards all CRS communities within that state with the points they would have been awarded had they taken the action themselves. In this example, each community in the state would qualify for credit for elevating structures.

In 2008, the Task Force began to aggregate and review CRS-creditable activities each state was taking so communities could more easily get the proper CRS credit. The number of uniform points they found in some states were substantial: in Michigan, communities may be eligible for enough points to move up two and a half classes.

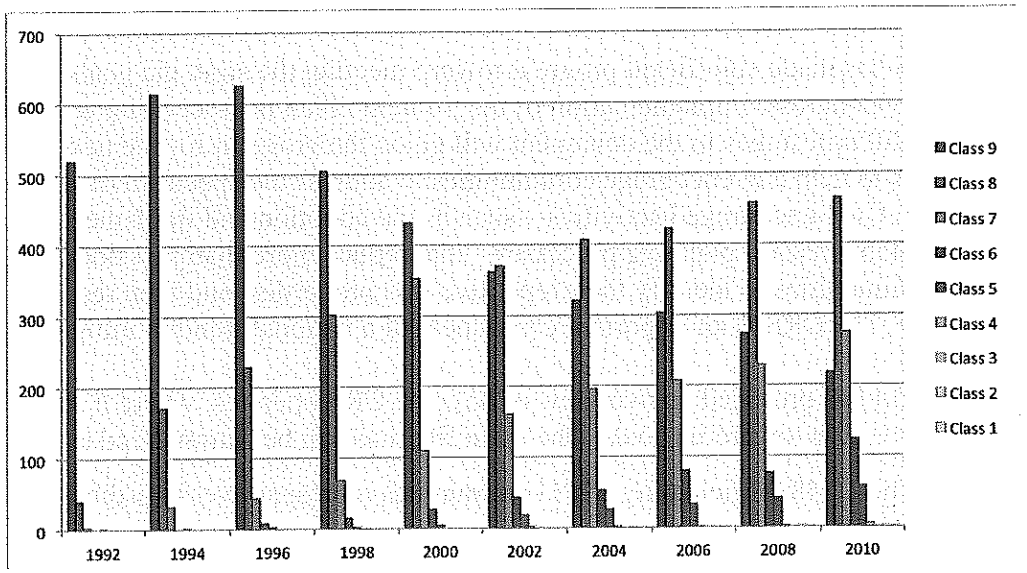
The resulting report, scheduled to be released in early 2011, will decrease the documentation requirements for participating communities and help new communities get into the program by providing them with "a leg up" towards their first class.

More remarkable than the program's outreach efforts are those which members themselves create. Over the past two years, informal CRS "User Groups" made up of people interested in the program have started to appear around the country. There are now at least seven county or regional users groups: Palm Beach, Broward, Dade, and Pinellas counties, Florida; along the Mississippi coast (C-HOST – Coastal Hazards Outreach Strategy Team found at http://chost.stormsmart.org/); in the Houston area (FAST – Floodplain Awareness Success in Texas, found at http://www.h-gac.com/go/fast); and in Dallas, Texas. Three state professional associations have CRS Committees that act as users groups: the Illinois Association for Floodplain and Stormwater Management; the Colorado Association of Stormwater and Floodplain Managers; (18 communities in the Denver – Colorado Springs area), and the Floodplain Management Association (California, Nevada, and Hawaii). Membership is not necessarily limited to any particular profession, and the groups have members representing public and private entities. For more information on User Groups, see the February 2010 *NFIP/CRS Update*: (http://www.fema.gov/library/viewRecord.do?id=4116)

Results. As a result of this work (and the basic desire of communities to do better), there has been a steady improvement in community classifications. A pattern has been seen—first a community does just enough to join as a Class 9. Then during verification visits, help is provided to local officials to show them how they could start new activities or improve existing ones. The local officials receive newsletters, publications, and other information or attend workshops on CRS activities and they become motivated to do more.

This pattern is shown in Figure 5. Over the last 12 years, the number of "entry-level" (Class 9) CRS communities has decreased and more and more communities have moved up to the better classifications. Although they are too small to show up on the graph, the number of Class 4 communities has more than doubled since the last report to Congress as Snohomish County, Washington, Sacramento County, California, and Charleston County, South Carolina earned that rating. The CRS now has one community in Class 1, two communities in Class 2, one in Class 3, and five in Class 4.

Figure 5. CRS Classes Over Time



Revise CRS Policy and Documents as Needed

As noted above, the Task Force continues to work to refine the CRS. Major programmatic revisions (including the next version of the *Coordinators Manual*) are being postponed to ensure they reflect the ongoing research brought about by the *Strategic Plan*—in particular its comprehensive evaluation of the program's activities. The new *Coordinators Manual* is schedule to be released in 2012.

V. Conclusions

The CRS has made significant progress toward meeting the strategic goals set out in the 2008 Report to Congress. Implementation of the Strategic Plan is proceeding at a rapid rate, and solid, meaningful milestones in the document will guide the program for the next several years. The CRS continues to help and encourage communities to address the spectrum of natural hazards risks they face with CRS-encouraged activities—such as the adoption and implementation of building codes and adaptable hazard planning processes—that reduce more than just flood risks. The program helps communities to identify their repetitive loss properties, and then requires them to take them seriously. The CRS is an important component of a national trend in mitigation.

This report has provided an overview of how the CRS operates, where it stands now, and how well it is progressing toward its goals. The main findings can be summarized as follows:

- The 1,148 participating CRS communities represent over two-thirds of all flood insurance policies.
- Participation in the CRS is well distributed across the country. It is higher in Florida, North Carolina, California, and other states where policy counts are greater and in those states that are more active leaders in floodplain management, but every state and region participate.
- In addition to the benefits of the CRS's basic approach of encouraging and crediting floodplain management activities, the CRS also helps reduce disaster losses in a wide variety of ways, such as acting as a model for FEMA's all-hazards risk approach for communities, supporting research into mitigation activities, emphasizing stronger multi-hazard building codes, and encouraging all-hazards planning.
- The program has been steadily growing over the past decade and CRS communities are improving their floodplain management programs and receiving better CRS classifications in return.
- The costs borne by communities in implementing activities credited under the CRS are justified by the benefits that ensue: enhanced public safety, a reduction in damage to property and public infrastructure, the avoidance of economic disruption and losses, reduced human suffering, and protection of the environment. These benefits accrue to all the residents, whether they have flood insurance or not. Implementing some CRS activities, such as floodplain management planning, can help a community qualify for certain federal assistance programs. Further, the CRS provides national recognition for a community's flood mitigation efforts.

The following strategies will be implemented by FEMA to guide the CRS until the next Biennial Report to Congress:

1. Implementation of *A Strategic Plan for the Community Rating System, 2008–2013*, will continue. In addition to continuing ongoing projects described above, the CRS will begin new programs, including the implementation and evaluation of a marketing plan and a more comprehensive push to reduce repetitive flood losses.
2. The CRS will continue to be closely coordinated with and be mutually supportive of FEMA's all-hazards risk management strategy and with FEMA's efforts to address

repetitive flood losses. Activities in support of this strategy that are detailed in the CRS *Strategic Plan* will be implemented.

3. CRS communities will continue to be provided with assistance and encouraged to improve their floodplain management programs and thereby receive better CRS classifications. The benefits of joining the CRS will continue to be promoted. Activities in support of this dual strategy that are detailed in the CRS *Strategic Plan* will be implemented.

4. Revisions to CRS policy as published in the *CRS Coordinator's Manual* will be considered for future editions, as FEMA and the CRS Task Force continue to refine the CRS and carry out the above-mentioned strategies and address any new ones that arise.