ASFPM recommends to FEMA to make the following corrections, changes and clarifications to the current Elevation Certificate and its instructions:

1. **A5 – Latitude/Longitude:** 2018 Instructions increased accuracy of decimal degrees from 4 to 5 places, but did not increase D-M-S accuracy. Example in instructions uses wrong decimal accuracy as well. Revise instructions: “Use either decimal degrees (e.g., 39.50437°, −110.75852°) or degrees, minutes, seconds (e.g., 39° 30' 15.73", −110° 45' 30.67") format. If decimal degrees are used, provide coordinates to at least 5 decimal places or better. When using degrees, minutes, seconds, provide seconds to at least 2 decimal places or better.”

2. **A6 – Photographs:** Photographs are a key piece of information for the floodplain management functions of the EC. Therefore, revise instructions, “Item A6. The Elevation Certificate is being used to obtain flood insurance through the NFIP, the certifier must provide at least 2 photographs showing the front and rear of the building taken within 90 days from the date of certification.”

3. **A8 – Crawlspace/Enclosure**
   - a. The 2015 instructions changed the last sentence to, “If the crawlspace or enclosure(s) have no permanent flood openings... enter “N/A” for not applicable in Items A8.b-c.”
     The entry “N/A” is not appropriate in this case, as an answer of “0” is applicable when there is a value in A8.a. However, “N/A” would be appropriate when there is no crawlspace or enclosure.
     Revise the wording to: “If the crawlspace or enclosure(s) have no permanent flood openings, or if the openings are not within 1.0 foot above adjacent grade, enter “0” (zero) in Items A8b-c. If there is no crawlspace or enclosure, enter “N/A” in A8.a-c.”
   - b. To right of check boxes for d), add space for documenting rated area of engineered openings: “e) Total rated area of flood openings in A8.b __________________ sq ft”
   - c. Add instructions: “If d) is checked, enter the total rated area of the engineered openings. If there are both non-engineered and engineered openings, enter the sum of the net area of all non-engineered openings and the rated area of all engineered openings (e.g., 140 sq in + 400 sq ft = 540 sq ft rated area).”
   - d. Regarding attaching a copy of the certification report for engineered openings, remove the phrase, “if you have it” from the instructions. It is required, and not requiring it puts liability on the community for determining whether the openings are engineered or not.

4. **A9 – Attached garage – make same corrections as in A8**
   - a. Revise the wording to: “If the attached garage has no permanent flood openings, or if the openings are not within 1.0 foot above adjacent grade, enter “0” (zero) in Items A9.b-c. If there is no attached garage, enter “N/A” in A9.a-c.”
   - b. To right of check boxes for d), add space for documenting rated area of engineered openings: “e) Total rated area of flood openings in A9.b __________________ sq ft”
   - c. Add instructions: “If d) is checked, enter the total rated area of the engineered openings. If there are both non-engineered and engineered openings, enter the sum of the net area of all non-engineered openings and the rated area of all engineered openings (e.g., 140 sq in + 400 sq ft = 540 sq ft rated area).”
   - d. Regarding attaching a copy of the certification report for engineered openings, remove the phrase, “if you have it” from the instructions. It is required, and not requiring it puts liability on the community for determining whether the openings are engineered or not.
5. B – revise 3rd paragraph for clarity, “For a building in an area that has been mapped in one community but now exists in another community due to annexation or dissolution, enter the community name and 6-digit number of the “community” as defined below in Item B1, the name of the county or new county, if necessary, in Item B2, and the FIRM index date for the annexing community identified in B1, in Item B6.

6. B7 - “Item B7. FIRM Panel Effective/Revised Date. Enter the map effective/revised date or the map revised date shown on the FIRM panel. This will be the latest of all dates shown on the map, but should not be the date of a LOMC. The current FIRM panel effective date can be determined by visiting msc.fema.gov calling 1-800-358-9616.”

7. B9 – move last sentence, “Enter the BFE to the nearest tenth of a foot (nearest tenth of a meter, in Puerto Rico)”, to the first sentence. In its current location, it is being misinterpreted as only applying to BFEs determined in Zone A areas. In addition, the FDT should not be used to determine the BFE, since these are at specific locations. The flood profile should be used instead. Revise instructions, “Item B9. Base Flood Elevation(s). Using the appropriate Flood Insurance Study (FIS) Profile, Floodway Data Table, or FIRM panel, locate the property and enter the BFE (or base flood depth) of the building site. Enter the BFE to the nearest tenth of a foot (nearest tenth of a meter, in Puerto Rico). If the building is located in more than....”

8. B10 – BFE Source
   a. Revise form, “FIS Profile” to “FIS”.
   b. Revise instructions: “Indicate the source of the BFE that you entered in Item B9. Visit msc.fema.gov to access the most current FIRM and FIS data for the community. If the BFE is from a source other than FIS or FIRM, or is not Community Determined, describe the source of the BFE, such as the state or other regulatory agency, engineering reports, LOMA or LOMR-F for Zone A, or LOMR. For Community Determined, note that per FEMA 265, Simplified Methods such as contour interpolation and data extrapolation are not acceptable for determining a BFE for B9.”

9. C2 – Elevations
   a. Comparing these elevations to the BFE to an accuracy of 0.01’ is inappropriate for floodplain management and insurance purposes, as this is well beyond the level of accuracy for the data. For instructions under C2, revise last sentence, “Enter elevations in Items C2.a–h to the nearest tenth of a foot (nearest tenth of a meter, in Puerto Rico); if data is surveyed to the nearest hundredth, round to the nearest tenth.”
   b. In order to accommodate buildings with more than two floors needing survey, such as basement and enclosure below the BFE for a split level, revise instructions, “Enter the building elevations (excluding the attached garage) indicated by the selected building diagram (Item A7) in Items C2.a–c. For buildings requiring a third floor or level to be surveyed, such as those with multiple floors below the main floor, or multi-part enclosures, enter the additional surveyed elevations and floor descriptions in the Section D comments, and clarify which floors are entered as C2.a and C2.b.”
   c. Revise C2.e to not have a prescriptive list: “Enter the lowest platform elevation of the lowest at least 1 of the following machinery and equipment items: elevators and their associated equipment, furnaces, hot water heaters, heat pumps, and air conditioners in an attached garage or enclosure or on an open utility platform that provides utility
services for the building, such as elevators and their associated equipment, furnaces, hot water heaters, heat pumps, air conditioners, etc.”

d. All elevations in C2 should be based on existing/constructed grade, even for Zone AO. To demonstrate compliance in Zone AO, if needed, Section E should be used to show heights above natural grade. Therefore, revise instructions:

“Items C2.f–g. Enter the elevation of the ground, sidewalk, or patio slab immediately next to the building. For Zone AO, use the natural grade elevation, if available. This measurement must be to the nearest tenth of a foot (nearest tenth of a meter, in Puerto Rico) if this certificate is being used to support a request for a LOMA or LOMR-F.

“Item C2.h. Enter the lowest grade elevation at the deck support or stairs. For Zone AO, use the natural grade elevation, if available. This measurement must be to the nearest tenth of a foot (nearest tenth of a meter, in Puerto Rico) if this certificate is being used to support a request for a LOMA or LOMR-F.”

10. D – Certification

a. Add sentence, “If attachments are included, check the attachments box and list the attachments in the Comments section.”

b. Add “E-mail Address” field under contact information.

c. Revise last sentence of instructions, “Use the Comments area of Section D to provide relevant and clarifying information not specified elsewhere on the certificate, including supporting information for A5. Latitude/Longitude source and datum conversion; A8/A9: LOMA, LOMR-F, and LOMR data for Section B; C2 datum conversion; C2.e machinery type and location; and any other relevant information.”

11. Correction: “Other/Source” field is not fillable for B10, B11, C2