ASFPM REGION 1 DIRECTOR ANNUAL REPORT

Annual Conference—Grand Rapids, Michigan (2016)

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5/16/2016

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2015-2016

Connecticut, Rhode Island, Massachusetts, New Hampshire, Vermont and Maine

Introduction and Regional Overview

ASFPM chapters in Region 1 include the Rhode Island Flood Mitigation Association (RIFMA) and the Connecticut Association of Flood Managers (CAFM). These organizations hold annual conferences and sponsor training opportunities.

Region 1 Priorities

A. National Flood Insurance Program/Community Assistance Program-State Support Services Element
B. Cooperating Technical Partners
C. Community Rating System
D. Mapping
E. Mitigation
F. Training
G. ASFPM Leadership
H. Recommended Actions

A. National Flood Insurance Program/Community Assistance Program-State Support Services Element (CAP-SSSE)

- **NFIP**: Certain NFIP regulations are outdated and should be updated to reflect current conditions.
  - **Recommendation**: Update 44 CFR to match current ICC and ASCE codes and standards, as well as any other code changes post-Sandy. This should be accomplished carefully, with generous public participation throughout the process.
- **CAP-SSSE Funding**: CAP-SSSE funding has remained level-funded in Region 1 for many years and has not kept pace with annual salary and cost of living increases, fringe benefits and overhead costs. The CAP-SSSE funding needs to be adjusted annually to keep pace with cost of doing business as state's risk cutting staff due to the inability to over-match the cooperative agreement. Region 1 states routinely overmatch the program and are in dire need of additional staff. Additionally, the NFIP program is

now receiving a new influx of cash due to increased rates, fees and surcharges.

- **Recommendation**: Adjust the annual CAP-SSSE appropriation to support the additional need and provide the states a percentage of this new money to more comprehensively implement the program. Region 1 recommends ASFPM leadership broach this issue with FEMA HQ because adequate and timely CAP-SSSE funding is one of the Regions' top priorities.

- **Cycle**: The annual CAP-SSSE program continues to be "floated" for at least six months into the fiscal year. It makes states uncomfortable to have to operate on a deficit for this length of time each year.
  - **Recommendation**: Align the CAP-SSSE funding cycle with the start of the federal fiscal year.
- **Reporting**: CAP-SSSE reporting is currently not standardized amongst states.
  - **Recommendation**: Standardize all CAP-SSSE reporting nationwide so that all states and FEMA regions are using the same reporting format.
- **CIS**: The FEMA Community Information System (CIS) only captures activities directly related to a particular community. There are many other assistance related activities that are not being captured due to CIS limitations. There is no adequate place to report unless it's being reported outside of CIS, yet states are being encouraged to put "everything" in CIS.
  - **Recommendation**: Continue to improve the CIS General Technical Assistance spreadsheet and add an option/component to CIS where states can capture additional non-community specific GTA.
- **Climate Change/Adaptation:** Region 1 states often are included in efforts regarding climate change, adaptation and sea level rise. However, there is no activity task associated with these topics.
  - **Recommendation**: Include an optional task in the CAP-SSSE NOFO and SOW for participation and activities related to climate change/adaptation and if applicable, sea level rise.

B. Cooperating Technical Partners (CTP)

- **Funding:** Similar to the CAP-SSSE program the Cooperating Technical Partners (CTP) grant program has been routinely underfunded and remains relatively unstable. Without funds to support staffing levels, states are unable to meet the level of education, outreach and technical assistance necessary to support the mapping program. The small funding allocations, coupled with the need compete with higher risk states, makes this very difficult for Region 1 states to improve our many antiquated maps.

        - **Recommendation:** Increasing CTP funding allocations for states, as well as establishing a set-aside allocation to support eligible CTP work, as many rural/non-coastal states can't compete for very limited funding.
    - **Activities/Business Plans**: Very little guidance is given in regards to the CTP business plans and strengthening relationships with CTPs.
        - **Recommendation**: Increase Regional input and coordination with CTP's annual business plans and provide one-on-one assistance/guidance for CTPs on how to broaden the CTP's activities/participation in the program.
    - **Communication:** There is a lack of communication between FEMA Region I mapping staff and state staff on numerous existing and upcoming mapping projects. This communication issue negatively affects overall annual planning of program activities.
        - **Recommendation:** Increase communication between states and FEMA Region I staff in an effort to better the program and all ongoing and proposed activities.

C. Community Rating System (CRS)

- **Programmatic**: There has been a general uptick in interest in CRS due to increased insurance premiums through BW12 and HFIAA. Many Region 1 communities are seeking entrance into the program and some are seeking class upgrades. There has also been interest from regional planning organizations (RPO) on regional CRS applications. However, in many Region 1 communities policy counts are low and local resources are slim. Therefore, when communities look at the heavy load of requirements to maintain a CRS program from year to year, it may be a difficult policy decision given all the other work that a municipality needs to accomplish. The CRS program is a program of exemplary floodplain management; however this does not mean that it should be difficult for communities in good standing to participate.
    - **Recommendation:** Simplify the CRS program and manual to make joining more tangible for smaller communities with less resources. Provide assistance on how states can determine their Uniform Minimum Credit in order to fulfill at least an entry level class 9 for all communities in that state. ISO should hold annual "recertification" with states regarding uniform minimum credits and five-year "verification visits" with states to discuss uniform minimum credits and other CRS issues within the state.

D. Mapping

- **Funding**: Increased funding for mapping at the federal level is necessary in order to update aging flood studies. Inland communities continue to pay the price for focusing solely on updating coastal maps. Region 1 has also been conducting a number discovery meetings region-wide without clear explanation of future prioritization or expectation for funding to complete studies while pre-identified areas continue to remain outdated.
  - **Recommendation:** Provide base funding allocation and technical support to revise outdated maps. This will increase public awareness of flood risk and influence future development and floodplain management decisions.
- **Unnumbered A Zones:** Zone A areas with no Base Flood Elevation (BFE) are an issue as development increases. There is a lack of funding to address these areas to develop BFEs. This lack of BFE in Zone A areas also affects insurance premiums for residents.
  - **Recommendation:** ASFPM can advocate the value of having detailed studies in flood-prone areas that have not yet received BFEs.

E. Mitigation

- **Administration:** Region 1 states continue to aggressively pursue mitigation funding opportunities, but FEMA's grant and program administration is inefficient. Following a number of federal-declared disaster and series of annual mitigation funding cycles, there is insufficient staff to review and approve sub-applications.
  - **Recommendation:** Offer states additional support to prepare and submit complete sub-applications in accordance with federal guidelines. Promote workshops designed at sub-application development to streamline the process and ensure consistency of regional reviewers in order to expedite review and minimize Requests for Information.
- **Climate Resilient Mitigation:** FEMA responded to recent Presidential directives regarding climate resilient mitigation activities by issuing four fact sheets that lightly discuss these types of flood mitigation.
  - **Recommendation:** Provide additional guidance on the "new" mitigation activities and update the FEMA Benefit Cost Analysis software to incorporate ecosystem services benefits for the full suite of eligible project types.

- **Technical Support:** There is limited assistance provided on a regional basis by FEMA. Despite requests for Region 1 specific guidance on more detailed activity types (i.e. elevation projects), no additional information has been released. This has led to a number of inconsistencies across states during site visits and closeouts.
    - **Recommendation:** Prepare best practice guides based on Region 1 expectations/review procedures for states to adhere to and provide sub-applicants. Other FEMA regional offices have accomplished this task and Region 1 would benefit significantly from firm guidance. Being proactive about expectations prior to construction will minimize compliance issues later on in the construction process.

F. Training

- **General training opportunities:** Additional training opportunities are always needed at the state and local level, as well as for design professionals, professional organizations, lenders and insurance agents.
    - **Recommendation:** Increase opportunities for floodplain management 101, elevation certificate, coastal construction, E273 Floodplain Management, CTP topics and CFM refresher courses. Other training ideas include: coastal construction for building officials and engineers, implications of floodplain regulations on development for architects, EC review techniques, Increased Cost of Compliance usage and a webinar for NFIP coordinators on the current review and approval procedures and requirements for LOMCs through eLOMA (i.e. requirements for Zone A submittals) and online LOMC tool.
- **Write Your Own (WYO):** Most WYO agents have only minimal training in the post-BW12 complexities of rating an NFIP policy.
    - **Recommendation:** Increasing mandatory training opportunities for WYO agents is critical, as well as potentially expanding requirements for WYOs to mandate multi-level training for their agents. If current politics (or old contracts) prevent enhanced training of agents, this situation must be relieved so that FEMA can move forward with a robust plan for insurance agent training.

G. ASFPM Leadership

- **CFM Refresher Course**: The CFM refresher course can be a valuable tool for professionals interested in taking the CFM exam. However the current iteration of the course is outdated. Materials should reflect the current state of the program and updated documents.

        - **Recommendation**: Update and/or overhaul the model presentation slides for CFM refresher class.
    - **Chapter Involvement**: As Connecticut Association of Flood Managers and Rhode Island Flood Mitigation Association continue to grow, there is always room for increasing participation and improvement.
        - **Recommendation:** Ask leadership to assist existing smaller chapters such as CAFM and RIFMA in understanding how other larger surrounding chapters are functioning and what outreach is being done to increase membership, promote connectedness and potential development of new Region 1 chapters.
    - **Board of Directors**: With reference to comments/recommendations made in 2015, the organization is, after all, the association of STATE floodplain managers, so it would be appropriate to maintain at least some requirement for state floodplain managers to fill the four executive board positions.
        - **Recommendation:** Consider including municipal floodplain managers as eligible members of the executive board. All in all, between the full board and the committee chairs, there is currently a good mix of expertise and passion to lead the organization.

H. Recommended Actions

Based on input from the NFIP coordinators within the region, chapter board members and various other floodplain management professionals, the following goals and recommendations are made for the upcoming year:

- Advocate for detailed mapping in all approximate Zone A areas.
- Advocate for FEMA development of DFIRM mapping for all counties in Region 1.
- Advocate for increased CAP-SSSE funding to support staff and activities.
- Advocate for the re-evaluation of the 2013 CRS Manual to be clearer for communities.
- Promote cross-training for local floodplain managers and emergency managers.
- Review overlaps between hazard mitigation planning and resiliency planning.
- Review requirements of HMA, PDM and FMA to continue to streamline these programs.
- Partner with the private insurance industry to bring experienced actuaries to the table who can direct the mapping process toward its most critically needed goals and objectives for appropriate rating.