

W-23006

July 7, 2023

MEMORANDUM FOR: Write Your Own (WYO) Principal Coordinators and the

National Flood Insurance Program (NFIP) Direct Servicing Agent

FROM: NFIP Clearinghouse

SUBJECT: Revised Elevation Certificate and Dry Floodproofing Certificate for

Non-Residential Structures Available on FEMA Website

The Office of Management and Budget (OMB) has approved the collection of information under OMB Number 1660-0008, which includes the Elevation Certificate [FEMA Form FF-206-FY-22-152 (formerly 086-0-33)] and Dry Floodproofing Certificate [FEMA Form FF-206-FY-22-153 (formerly 086-0-34)]. The new expiration date of these forms is 06/30/2026. The revised forms should be used going forward.

You may access the forms on the FEMA website at <u>National Flood Insurance Program Underwriting Forms | FEMA.gov</u>.

Highlights of the revisions to the Elevation Certificate include the following:

- A new Section H is available for use in all flood zones to determine the building's first floor height for NFIP insurance purposes. Photos must be submitted with all Elevation Certificates.
- Instructions for other sections have been revised and clarified, as needed, to ensure greater consistency and accuracy in the information provided.

Highlights of the revisions to the Dry Floodproofing Certificate include the following:

- A revised format that requires separate certification of building design, elevation, and construction.
- A new Required Documentation page.

Attachment A is updated underwriting guidance on how to use the revised EC form for first floor height. The updated guidance will appear in the next Flood Insurance Manual update.

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Attachment A: Guidance on the Elevation Certificate

cc: Vendors, IBHS, FIPNC, Government Technical Representative

Required Routing: Data Processing, Marketing, Underwriting

Attachment A

Guidance for the Revised Elevation Certificate

Revisions to 3.II.C.4, starting on page 3-21 of the October 2022 FIM

4. First Floor Height

a. General Information

The First Floor Height (FFH), or the height of the building's first lowest floor above the adjacent grade, is another rating variable critical to understanding flood risk. Generally, the higher the elevation of a building's first floor, the less flood damage it is likely to incur. **Table 14** shows what floor the NFIP uses for the FFH measurement based on the foundation type selected.

Table 14. First Floor Height Measurement by Foundation Type

Foundation Type	EC Diagram Number	Floor Used for First Floor Height Measurement
Slab on Grade (Non-Elevated)	1A, 1B, and 3	First floor of the building
Basement (Non-Elevated)	2A, 2B, and 4	First floor above the basement
Elevated without Enclosure on Posts, Piles, or Piers	5	First elevated floor, including hanging floor if applicable.

Table 14. First Floor Height Measurement by Foundation Type continued

Foundation Type	EC Diagram Number	Floor Used for First Floor Height Measurement
Elevated with Enclosure on Posts, Piles, or Piers	6	 Use the enclosure floor if: Pre-FIRM building (any zone); In a Non-Special Flood Hazard Area; or In Zone Unnumbered A, A99, AO, AR/AO or Unnumbered V. Use the elevated floor or mid-level entry: Post-FIRM building; and In Zones A1–A30, AE, AH, AR, AR/A, AR/AE, AR/AH, AR/A1–A30, V1–V30, or VE
Elevated with Enclosure Not on Posts, Piles, or Piers (Solid Foundation Walls)	7	 Use the enclosure floor if: Pre-FIRM building (any zone); In a Non-Special Flood Hazard Area; or In Zones Unnumbered A, A99, AO, AR/AO or Unnumbered V. Use the elevated floor or mid-level entry: Post-FIRM building; and In Zones A1–A30, AE, AH, AR, AR/A, AR/AE, AR/AH, AR/A1–A30, V1–V30, or VE.
Crawlspace (Elevated or Non-Elevated Subgrade Crawlspace)	8 or 9	 Use the crawlspace floor if: Pre-FIRM building (any zone); In a Non-Special Flood Hazard Area; or In Zones Unnumbered A, A99, AO, AR/AO or Unnumbered V. Use the floor above the crawlspace if: Post-FIRM building; and In Zones A1–A30, AE, AH, AR, AR/A, AR/AE, AR/AH, AR/A1–A30, V1–V30, or VE.

The FFH is determined by FEMA, or the policyholder has the option to provide an EC. If the policyholder provides an EC, FEMA's system compares the premium using elevation information from the EC with the premium using FEMA-sourced elevation data. After this comparison, FEMA returns the lowest premium for the policyholder. Providing EC information will not increase a premium.

b. FEMA Determined FFH

FEMA will determine a FFH value using application information and various datasets.

c. Elevation Certificate/Land Survey Determined First Floor Height

The policyholder can optionally provide an EC (or land survey completed by a licensed engineer) to provide data for a FFH value by using Sections C, E or H of the NFIP EC form. Tables 15 and 16 show the steps to take when completing the FFH Determination portion of the Application Form as well as how to determine the elevations to use when calculating the FFH. All ECs and land surveys must be certified and accompanied by photographs. See Subsection 4.d.i Documentation Required below for additional documentation requirements.

i. Using Section C of the NFIP EC Form to Determine First Floor Height

A policyholder may provide an EC with Section C completed by a licensed surveyor, architect, or engineer.

- NFIP requires the LAG and diagram number for all new business.
- Conversion of elevation datums is not required for rating purposes.
- The policyholder or policyholder's representative must return the EC to the surveyor, engineer, architect, or community official completing the form to provide missing information in any part of Section A or C of the EC.
- The building elevation information contained in Section C (Survey Required) appears in feet, except in Puerto Rico, where it appears in meters.
 Before calculating the elevation difference, convert all metric elevation measurements to feet (1m = 3.28084 ft.)
- Item C2.a of the EC may remain blank if the surveyor, engineer, or architect cannot gain access to the crawlspace to obtain the elevation of the crawlspace floor. Preparers should enter the estimated measurements in the comments area of Section D.

Table 15 shows the elevation in Section C of the NFIP EC form (see Appendix B: Forms) to report as the Lowest Floor Elevation (LFE). The building's FFH is the difference between the reported LFE and the Lowest Adjacent Grade (LAG).

Table 15. Completing the Application Form Using Section C of the Elevation Certificate (EC)

STEP	GUIDANCE	
1.	Enter the EC date	
2.	Enter the Building Diagram Number (Item A7 of the EC)	
3.	Enter the LAG (Item C2.f of the EC)	
4.	Enter the LFE. See below for guidance.	
	Determine the Lowest Floor Elevation (LFE) Using Section C of the EC	
	EC Diagram Number and Scenario	Elevation to Report as the LFE
	EC Diagram Number: 1A, 1B, 3 or 5	C2.a = LFE
	Scenario: Non-elevated building on slab or elevated without an enclosure.	If C2.a is not provided C2.c can be used: Add 1 foot to C2.c (for both residential and
		non-residential buildings)

Table 15. Completing the Application Form Using Section C of the Elevation Certificate (EC) continued

STEP	GUIDANCE	
	EC Diagram Number: 2, 2B, or 4	C2.b = LFE
	Scenario: Non-elevated building with basement.	If C2.b is not provided 8 feet can be added to C2.a: Add 8 feet to C2.a
		C2.a + 8 = LFE
	EC Diagram Number: 6, 7, 8 or 9	C2.a = LFE
	Scenario: Elevated building with an enclosure or building with a crawlspace (elevated or non-elevated subgrade crawlspace) and	If C2.a is not provided C2.c can be used: Add 1 foot to C2.c (for both residential and non-residential buildings)
	 Is Pre-FIRM (in any zone); or 	C2.c + 1 = LFE
	 In a Non-Special Flood Hazard Area; or 	
	 In Zone Unnumbered A, A99, A0, AR/A0 or Unnumbered V. 	

Determine the Lowest Floor Elevation (LFE) Using Section C of the EC	
EC Diagram Number and Scenario	Elevation to Report as the LFE
EC Diagram Number: 6, 7, 8 or 9	C2.b = LFE
Scenario: Elevated building with an enclosure or building with a crawlspace (elevated or non-elevated subgrade crawlspace) and	If C2.b is not provided C2.c can be used: Add 1 foot to C2c (for both residential and non- residential buildings). C2.c + 1 = LFE
 Is Post-FIRM; and 	C2.C + I = LFE
 In Zone A1–A30, AE, AH, AR, AR/A, AR/AE, AR/AH, AR/A1–A30, V1–V30, or VE. 	

5. Enter the FFH in feet. The FFH is the difference between the LAG and LFE.

ii. Using Section E or H of the NFIP EC Form to Determine First Floor Height

Prior to the addition of the new Section H to the EC, guidance allowed the use of Section E for FFH. However, if using the new NFIP EC form, FEMA recommends using the new EC Section H for FFH for all flood zones. Use Section E if the building is located in Zone AO, Zone AR/AO or Zone A (without BFE) and the Certificate is being completed to document compliance with local floodplain management requirements, or it may still be used to determine the FFH using older ECs. These sections can be completed by the property owner, owner's authorized representative, or local floodplain management official.

Table 16 provides guidance on how to use Section E or H to determine FFH.

Table 16. Completing the Application Form Using Section E or H of the Elevation Certificate (EC)

STEP	GUIDANCE	
1.	Enter the EC date.	
2.	Enter the Building Diagram Number (Item A7 of the EC).	
3.	Enter the FFH. See below for guidance.	
	Determine the FFH Using Section I	E or H of the EC
	EC Diagram Number and Scenario	Field to Report as the FFH
	EC Diagram Number: 1A, 1B, 3 or 5 Scenario: Non-elevated building on slab or elevated without an enclosure.	Section E: E1.b = FFH Section H: H1.a = FFH
	EC Diagram Number and Scenario	Field to Report as the FFH
	EC Diagram Number: 2, 2B, or 4 Scenario: Non-elevated building with basement.	Section E: E2 = FFH Section H: H2.b = FFH
	 EC Diagram Number: 6, 7, 8 or 9 Scenario: Elevated building with an enclosure or building with a crawlspace (elevated or non-elevated subgrade crawlspace) and Is Pre-FIRM (in any zone); In a Non-Special Flood Hazard Area; or In Zone Unnumbered A, A99, AO, AR/AO or Unnumbered V. 	Section E: E2 = FFH Section H: H1.a = FFH
	EC Diagram Number: 6, 7, 8 or 9 Scenario: Elevated building with an enclosure or building with a crawlspace (elevated or non-elevated subgrade crawlspace) and Is Post-FIRM; and In Zone A1–A30, AE, AH, AR, AR/A, AR/AE, AR/AH, AR/A1–A30, V1–V30, or VE.	Section E: E2 = FFH Section H: H1.b = FFH

d. Additional Information on Elevation Certificates or Land Surveys

i. Documentation Required

- EC or survey signed by a licensed surveyor.
 - The surveyor, engineer, or architect must sign and include their identification number or seal in Section D or on the land survey.
 - A building official, a property owner, or an owner's representative may provide the EC for Zone AO, Zone AR/AO, and Zone A (without Base Flood Elevation) by completing Section E. The property owner or owner's representative must complete Section F when they prepare the EC.

- A building official, a property owner, or an owner's representative may provide the EC for all flood zones by completing Section H. The property owner or owner's representative must complete Section I when they prepare the EC.
- Photographs that show the front and rear of the building, including the building foundation type.
 - Photograph Requirements:
 - > A minimum of two clear/legible photographs that show the front and back of the building.
 - > Photographs must confirm the current building description as described on the policy.
 - > Color photographs are preferred.
 - Building under construction:
 - > Photographs are not required when the building is under construction.
 - > A revised EC or survey based on finished construction elevations with photographs is required when the construction is complete.

ii. Other Elevation Information

- Existing documentation containing elevation information (for example, an older EC form, or surveyor letterhead) may transfer to Section C or H of the EC.
 - If Section C is completed, only a local official authorized by law or ordinance to administer the community's floodplain management ordinance may complete this transaction.
 - The official must certify the information and provide a statement documenting the transfer of information in Section G of the EC.
- In CRS communities, building elevation information and certificates may be available through the community.
- Fields not applicable to the surveyed property should be marked as N/A (not applicable).
- The building elevation information on the EC generally appears in feet, except in Puerto Rico, where it appears in meters. Before calculating the elevation difference, convert all metric elevation measurements to feet (1m = 3.28084 ft.)

e. First Floor Height Used

The final two fields of the FFH Determination portion of the Application Form are completed by FEMA's system when the quote is returned to the insurer.

- FFH Used (In Feet). FEMA's system will recognize the more favorable value between the FEMA Determined FFH and the EC FFH, enter it in this field, and use that value for rating purposes.
- Method Used to Determine FFH. FEMA's system will enter either FEMA
 Determined or Elevation Certificate depending on which returned the more
 favorable value.

Note: When EC information is provided, FEMA's system compares the premium using elevation information from the EC with the premium using FEMA-sourced elevation data. After this comparison, FEMA returns the lowest premium for the policyholder. Providing EC information will not increase a premium.