

MEMORANDUM



Date: 1/20/17

To: Paul Huang, FEMA

From: Chad Berginnis, ASFPM

RE: Elevation Certificate Issues

Paul,

2016 was a busy year in the world of flood, especially for FIMA, and it looks like 2017 will continue that trend! ASFPM looks forward to working with FIMA as the program heads towards reauthorization and faces other possible legislative and weather-related impacts.

In looking back, there was an action item at the October FIPNC meeting we wanted to follow up on. As you know, the updating of the Elevation Certificate (EC) was probably not as smooth of a process as FIMA had wanted. But when the corrected final EC was issued, one issue was quickly noted: incorrect “rounding” of numbers inputted with 2 decimal places in C2a-h and Section E; e.g., 2.06 became 2.6. When asked at the October FIPNC meeting for an update on fixing this, you and Jhun de-la-Cruz offered to get back to the group soon regarding when it would be fixed. We had not heard anything and are receiving questions from our members.

Meanwhile, our Insurance Committee has gathered additional issues identified with the Elevation Certificate. Those are attached. We don’t know if you have received these from other groups or not, but wanted to share them in hopes that as you update the “rounding” issue, that you can incorporate these fixes as well. You will note at the end that we have included two additional recommendations for future forms, as these are not current problems, but instead would provide additional clarification.

After reviewing this list (on the next page), could you let us know by mid-February or so when the Elevation Certificate will reflect the correction and then also what other of the suggested “fixes” will be made? In addition, while ASFPM did weigh in on the very initial draft update of the EC, we would strongly encourage in 2017 and onward, that FIMA work more closely with ASFPM and other industry-related organizations through the entire form updating process (including the final “test driving”).

As always, ASFPM truly values the strong working relationship with FIMA and looks forward to continuing that into 2017 and onward.

Thank you in advanced for your attention to our comments!

Cc: ASFPM Insurance Committee

ISSUES IDENTIFIED WITH THE ELEVATION CERTIFICATE

1. A8/A9 do not allow alpha characters. Need to be able to enter both "N/A" for when there is no enclosure/garage, and a number with an asterisk (i.e., A8.c, 79*) for when you want to reemphasize to the policy reviewer that they should refer to the comments for the rated area of an engineered opening. The "check box" should be sufficient, but the asterisk is a "belts and suspenders" approach.
2. For B6/B7, when you paste a date into the field, it doesn't always "connect" to the calendar pull down.
3. In B12, if a user mistakenly checks either the CBRS or OPA box, they can't uncheck them... they can only switch which one is checked.
4. In Section C2a-h and Section E, if you enter a number with a leading zero, such as "06", after the decimal (e.g., 3.06), the form drops the zero, making it ".6". (Big difference.) This field should at least be changed to an "alpha" box, to avoid significant potential errors. This way also if it was not applicable, it would allow for "N/A".
5. The seal doesn't have a space to indicate the expiration date, which is required in some states. There should be a box to put that. The workaround is to combine the stamp and expiration date into a single image before inserting into the form; however, this may not be accepted by some states.
6. Once inserted, photos cannot be removed, only replaced with a new one.
7. Copy/paste does not always work. The data appears to be in the field, but when you print the form, the data does not show up. It requires manual typing to resolve this issue. Unfortunately, there is no set pattern or specific places where this seems to occur.
8. Some users are having trouble printing the forms. It may be related to the version of Adobe. They have had to export the file to an ".apx" file in order to print.
9. In future iterations, FEMA should consider adding "N/A" boxes like at A8, A9, B12, and portions of C2.
10. In future iterations, FEMA should consider adding a data field "Total rated area of flood openings _____ sq ft" in A8(d) and A9(d) after Yes/No.
11. Provide the EC in Word format, like FEMA has done previously.