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## The Case for Pursuing the Certified Floodplain Surveyor Program

**W**hile the Technical Mapping Advisory Council to the Federal Emergency Management Agency (FEMA) was in session (1996-2000), one topic of discussion was finding ways to delegate some of the activities currently performed by FEMA and its contractors. In part this topic was raised because of frustration with turnaround time for applications for certain Letters of Map Change (LOMC), and in part because of the recognition that professionals who have seen a site have a better understanding of it than those who review paperwork in an office far removed from any actual site contact.

At that time, the delegation of certain kinds of Letters of Map Amendment spawned the concept of Certified Floodplain Surveyors, people who would have the authority to finalize those documents after training and testing to prove their capabilities in this technical realm. In recognizing the three components of the National Flood Insurance Program (NFIP) – mapping, insurance, and regulation – it was clear that additional public notice beyond mere issuance of such a Letter would be necessary. Communities must be made aware of any Letters of Map Change affecting the floodplain mapping by which they regulate, and insurers must know current risk zones before issuing policies on structures. So adequate notice of map changes was one concern.

A related concern was that individual state boards of licensure and registration

would accept such work as part of the definition of professional practice within their jurisdictions. It was important that surveyors would not be reprimanded or punished for performing or offering to perform services outside of state definitions of professional practice.

As a result of these discussions, FEMA decided to pursue a pilot program to test it before expanding it elsewhere. The state of North Carolina was the first to step forward, with agree-

ment (LOMR-Fs) for properties or structures meeting certain criteria, and instead of the normal 60-day review period, the time is reduced to five business days. Currently there is annual training and testing for new CFS candidates as well as review training for those renewing their CFS status, both available as regular components of the North Carolina Educational Institute held each fall.

The program has not yet been extended beyond North Carolina, where

**Possession of this certificate can speed up the Letter of Map Change process.**

ments between FEMA and its regional office, the North Carolina Society of Surveyors (NCSS), the North Carolina Board of Examiners for Engineers and Surveyors, the North Carolina Division of Emergency Management (NCEM), and the North Carolina Geodetic Survey (NCGS). With these stakeholders in the NFIP represented in an agreement to pursue the program, creating a training program was next.

Already, trained and tested Certified Floodplain Surveyors (CFS) in North Carolina have gained the right to issue Letters of Map Amendment (LOMAs) and Letters of Map Revision Based on

FEMA still considers it a pilot program. In part, this lack of extension is due to the legwork involved in coordinating the approval of all interested parties within a state, a process that FEMA will not undertake and which should fall to the professional surveyors desiring CFS stature within their own locales. While anyone can attend the North Carolina CFS training and testing, only those licensed in North Carolina are presently able to enjoy the expedited LOMC review process – and only for sites in North Carolina. Yes, it does take work. But the return on that investment can balance the score. As of the date of this

article, no other state has come forward with its unified approval to undertake the CFS program within its boundaries.

With the implementation of FEMA's on-line Letter of Map Amendment process, e-LOMA, FEMA seems reluctant to expand the CFS program beyond North Carolina. But e-LOMA is a much more restricted program in terms of the site conditions it can accommodate, and it does not allow for applications for LOMR-Fs. Thus, it cannot always

accomplish the same reduction in 60-day reviews as the CFS program.

Why pursue CFS if e-LOMA exists? After all, e-LOMA does not require any pre-certification, although it does entail initial audit for the first on-line e-LOMA, followed by random audits. However, lack of training does extend the liability of the professional who makes such an application. It is entirely possible to have a successful first audit and later issue incorrect un-audited

e-LOMAs due to lack of understanding of technical or regulatory standards. (Similarly, many of us know at least one not-so-great surveyor who occasionally turns out a plan that we can agree with.)

While e-LOMA incorporates "automatic checks", these merely assure that all required fields are completed, and that they are completed in a manner that would lead to a LOMA being issued. Correctness of form is unrelated to the accuracy of data provided. It is far better to undergo training to assure accuracy.

Holding CFS status means that the professional has an established and recognized level of expertise. This is both marketable and a testament to credibility. A layperson relies on licensure when hiring anyone with specialized expertise, and CFS status provides another reason for the public to turn to one professional instead of another.

Even without access to the expedited approval process enjoyed by a CFS from North Carolina, the extra level of assurance that a LOMC application will be complete and correct still translates into a faster turnaround time. Eliminating intermediate reviews and submittals before the final issuance of a LOMC equates to saved time and money for the CFS and the client.

To pursue or not to pursue a CFS program, that is the question!

**Against:**

- Requires coordination of state and federal entities, which may be time consuming

**For:**

- Reduces professional liability for the trained CFS
- Promotes professional stature to the general public
- Promotes better LOMC applications, reducing multiple reviews and saving time and money
- If FEMA extends the full program beyond North Carolina, all CFS LOMC applicants will enjoy a turn-around time of five business days rather than up to 60 days.

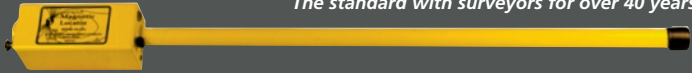
Those interested in the CFS program and how to implement it in their states should contact Curt Sumner, LS, Executive Director for the American Congress on Surveying and Mapping at [curtis.sumner@acsm.net](mailto:curtis.sumner@acsm.net) or 240-632-9716, extension 106. *AS*

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