

Dry Floodproofing Certificate for Non-Residential Structures: FAQ

Following are questions asked by participants during the July and August 2023 webinars on the changes to the Dry Floodproofing Certificate for Non-Residential Structures. Instructors and subject matter experts have provided a curated answer for each question.

Download the current [Dry Floodproofing Certificate for Non-Residential Structures](https://www.fema.gov/flood-insurance/find-form/underwriting) form on the FEMA website. (<https://www.fema.gov/flood-insurance/find-form/underwriting>)

Question 1:

If a State does not adopt the International Building Codes, does a non-residential building in that State still have to meet the ASCE 24 higher standards to be eligible for the insurance discount?

Answer:

Yes. Even though some States don't require adoption of the I-Codes, FEMA still recognizes this national standard as the threshold for eligibility for that flood insurance discount. Per ASCE 24-14, *Flood Resistant Design and Construction*, the minimum elevation for dry floodproofing is at least the BFE plus 1 foot.

Question 2:

NFIP Technical Bulletin 3 states that FEMA does not *recommend* dry floodproofing systems in areas that exceed certain flood depths, velocities, or moderate wave heights, but the NFIP regulations for dry floodproofing in zones beginning with the letter A do not specify limits based on flood depths, velocity, or presence of waves. Can a local official allow dry floodproofing that meets the NFIP minimums but not ASCE 24?

Answer:

Yes. 44 CFR Section 60.3(c)(4) requires that floodproofing designs be certified in the following manner:

- *“Provide that where a non-residential structure is intended to be made watertight below the base flood level, (i) a registered professional engineer or architect shall ... certify that the design and methods of construction are in accordance with the accepted standards of practice for meeting the applicable provisions of paragraphs (c)(3)(ii) or (c)(8)(ii) of this section, and (ii) a record of such certificates which includes the specific elevation (in relation*

to mean sea level) to which such structures are floodproofed shall be maintained with the official designated by the community under [44 CFR] § 59.22(a)(9)(iii)."

The NFIP minimum requires a building to be dry floodproofed to the BFE.

FEMA guidance and the Dry Floodproofing Certificate recognizes the standard in ASCE 24-14 (or equivalent) as the accepted standard of practice applicable to dry floodproofing. Guidance on the design and certification of dry floodproofing measures is provided in NFIP Technical Bulletin 3, Non-Residential Floodproofing Requirements and Certifications (2021)

ASCE 24-14 requires a building to be dry floodproofed to the BFE + 1 foot freeboard. Dry floodproofing that meets the NFIP minimum, and not this higher standard, would not be eligible for the dry floodproofing insurance credit.

Question 3:

How, by whom, and when does the annual recertification packet for the dry floodproofing discount get submitted?

Answer:

For properties that have a NFIP policy, in order to receive a discounted premium due to dry floodproofing measures, documentation must be provided to the NFIP at each policy renewal. If proper documentation is not provided, the renewal premium will not include the discount.

NFIP insurers can submit documentation annually (via email to NFIPUnderwritingMailbox@fema.dhs.gov) at least 120 days prior to the renewal effective date for all non-residential renewals receiving a floodproofing discount. The next edition of the flood insurance manual will have an update about this in the "how to renew" section, including the renewal requirements for the non-residential floodproofing discount continuation.

Question 4:

Does the local community official have any role in the annual recertification for non-residential structures seeking the continued dry floodproofing mitigation discount?

Answer:

No. The insurer must submit annually for validation by FEMA of continued eligibility for the dry-floodproofing insurance discount. There is nothing the community official needs to do on an ongoing basis.