

ASFPM RECOMMENDED UPDATES TO THE 2023 EDITION OF THE ELEVATION CERTIFICATE FORM AND INSTRUCTIONS, WITH SUPPORTING CONTEXT

1. Document Format – Adobe Only

- a. Issue: *The form can only be completed using Adobe PDF software.*

Recommendation: *Allow form to be accessed by other PDF software programs.*

Reason: Many companies and agencies use PDF software other than Adobe, including BlueBeam. Limiting the form to Adobe software only is adding cost to individuals and companies.

- b. Issue: *The file, with form and instructions, is very large and creates storage issues.*

Recommendation: *Create a supplemental file with only the form.*

Reason: The current 7 MB file creates storage issues and quickly becomes too large to email when pictures are added.

2. A1-A4 Instructions

- a. Issue: *When a parcel has multiple buildings, the “description for the specific building” is often placed in A3, which does not populate to subsequent pages.*

Recommendation: *Clarify that the “description for the specific building” be included in A2.*

Suggested Text Edit: Items A1-A4, 1st paragraph, last sentence:

“For properties with multiple buildings, include a description for the specific building [after the street address in A2.](#)”

Reason: When the multiple building qualifier is added to A3, it is not reflected on subsequent pages. This creates confusion as to which building the survey pages correspond to.

- b. Issue: *Many buildings are mixed use (i.e., residential with commercial on bottom floor), but the instructions do not include this example.*

Recommendation: *Include mixed use in instructions example.*

Suggested Text Edit: Items A1-A4, 2nd paragraph, add new 5th sentence:

“... an accessory building (e.g., garage), or other type of structure. [For buildings that include multiple uses \(i.e., residential with non-residential on bottom floor\), indicate which portions of the building the varying uses apply to.](#) Use the Comments area of the appropriate....”

Reason: This scenario impacts the compliance documentation. Adding this text will clarify the data needs.

3. A6 Photograph Requirements

- a. Issue: *Users are misinterpreting current wording for 2 photos minimum, rather than intent of 4.*

Recommendation: Clarify that a minimum of 4 is required unless building sides are blocked.

Suggested Text Edit: Revise 6 instructions, 1st sentence:

“The certifier must provide at least ~~two and when possible~~ four photographs showing each side of the building, or at least two if access to all sides of the building is not feasible, taken within 90 days from the date of certification.”

Reason: This clarifies that the requirement is for the EC certifier.

4. A8.e/A9.e Engineered Opening Certification

- a. Issue: EC Certifiers are transferring the requirement to attach engineered opening certification to others (e.g., homeowner), by written comment.

Recommendation: Clarify that EC certifier is required to attach engineered opening certification.

Suggested Text Edit: Revise A8.e/A9.e instructions, 2nd sentence:

“The certifier must attach ~~Attach~~ a copy of the Individual Engineered Flood Openings Certification for a specific building or an Evaluation....”

Reason: This clarifies that the requirement is for the EC certifier.

Reason: This creates confusion.

5. A8.f/A9.f Instructions

- a. Issue: Requiring f) to be the sum of d) and e) when both are “>0”, but “N/A” when either is “0”, overly complicates the field.

Recommendation: Always require “d) + e) = f)”, even when one is “0” (e.g., 100+0=100, 0+200=200).

Suggested Text Edit: Eliminate last sentence in Item A8.f and Item A9.f:

~~“If either A8.d or A8.e is “0”, then enter “N/A” for A8.f.”~~

~~“If either A9.d or A9.e is “0”, then enter “N/A” for A9.f.”~~

Reason: The current instructions create confusion.

6. B9 BFE – When to Use FIS

- a. Issue: Instructions are not explicit enough about when to use FIS for BFE.

Recommendation: Revise instructions to direct the user to the FIS first, and only to use the FIRM when no data for the flood zone is included in the FIS.

Suggested Text Edit: Revise A8.e/A9.e instructions, 1st paragraph:

“Item B9. Base Flood Elevation(s) (BFE). Using the appropriate data from the Flood Insurance Study (FIS) (e.g., Profile, FIS or Data Table ~~(e.g., Transect, Floodway, etc.)~~, ~~or FIRM panel~~, locate the property and enter the BFE (or base flood depth) of the building site to the nearest tenth of a foot (nearest tenth of a meter, in Puerto Rico). Only enter the BFE from the FIRM if no BFE data for the building site is included in the FIS. If the building is located in more than one flood zone in Item B8, list all appropriate BFEs in Item B9.”

Reason: While most FEMA training and FEMA 480 explicitly refer to the FIS as the primary source for the BFE, and the FIRM as the secondary source, the EC instructions are vague.

7. B9 BFE – When to Follow FEMA 480 for BFE+0.4'

- a. Issue: FEMA 480 states that when no data is in the FIS for determining the BFE to 0.1' accuracy (usually in coastal or lacustrine scenarios), the regulatory BFE is the whole number on the FIRM+0.4'. This is usually overlooked.

Recommendation: Revise instructions to alert users to this requirement.

Suggested Text Edit: Revise B9 instructions to add a new 3rd paragraph:

"When no BFE data for the building site is included in the FIS and a whole number from the FIRM is used, FEMA 480 states the regulatory BFE is the whole number + 0.4'. Information about this requirement is available at FEMA 480: Floodplain Management Study Guide for Local Officials."

Reason: Numerous communities are permitting to the whole number on the FIRM panel, resulting in non-compliant new construction.

8. B13 LiMWA – Add Coastal A reference

- a. Issue: LiMWA and Coastal A Zone regulatory connection is not explicitly mentioned.

Recommendation: Add reference to Coastal A Zone in LiMWA section.

Suggested Text Edit: Revise B13 instructions, 1st sentence:

"Indicate whether the building is located seaward of the Limit of Moderate Wave Action (LiMWA, e.g., Coastal A Zone)."

Reason: Adding this clause will help connect the commonly used phrase of Coastal A Zone to LiMWA.

9. C2.a and C2.b – Intermediate Floors

- a. Issue: Intermediate floors, including elevator pits, cause confusion for what C2.a and C2.b should be.

Recommendation: Clarify that intermediate floors, including elevator pits, should be entered in Comments if required.

Suggested Text Edit: Revise C2.a instructions, 2nd sentence:

"For buildings requiring more than two floors or levels to be surveyed, such as those with multiple floors, ~~or~~ multi-level enclosures, or elevator pits, enter the additional surveyed elevations and floor descriptions in the Section D Comments, and clarify which floors are entered as Item C2.a and C2.b."

10. C2.c – Require for all Diagram 5 and 6, and correct typo

- a. Issue: C2.c is often omitted for Diagrams 5 and 6 when not in a V Zone.

Recommendation: Add requirement for C2.c on all Diagrams 5 and 6.

Suggested Text Edit: Revise C2.c instructions:

“For floodplain management compliance, this elevation is required for all Building Diagrams 5 and 6 in V Zones, in areas seaward of the LiMWA, and in other areas regulated for coastal flooding hazards. Enter the elevation measured at the bottom of the lowest horizontal structural member of the floor indicated by the selected Building Diagram (Item A7) or the figure below. This elevation is required for all manufactured homes classified as Diagrams 5 and 6, regardless of flood zone, and should ~~can~~ be entered for Building Diagrams 5 and 6 in any flood zone, including Zones B, C, X, and D. For Building Diagrams other than 5 and 6 (if applicable), enter the C2.c elevation as indicated in the figure below. If this item does not apply to the building, enter “N/A” for not applicable.”

Reason: C2.c is needed for other buildings, including manufactured homes (i.e., bottom of frame).

11. D – Comments

- a. Issue: The Section D Comments box is often not large enough, and the instructions recommend attaching a separate sheet.

Recommendation: Use Section F Comments as overflow instead.

Suggested Text Edit: Section D Instructions, last sentence:

“~~If Attach separate sheet if~~ additional space is needed for comments, use Section F as overflow, and add a comment to Section D, “Comments continued in Section F.””

Reason: Section E/F is part of the form and should be included even when not used. By using the Section F Comments section as an overflow for Section D, it eliminates the need to attach a separate page for additional comments. Many surveyors and communities state that Section D Comments box is too small.

12. D – Sign/Seal

- a. Issue: When Section D is digitally signed/sealed, only Sections C & D are locked.

Recommendation: When Section D is digitally signed/sealed, Sections A, B, C, D, ~~E & F~~ should be locked. E & F should be included in this, especially if the “Comment overflow to Section F” request above is incorporated.

Reason: When a digitally signed/sealed EC locks only Sections C & D, leaving Sections A & B unlocked, it creates concerns from surveyors; as a solution, surveyors are locking entire form, which prevents communities from completing Section G, per CRS requirements. While the information in Sections A & B is not survey-level data, the Section D instructions specify that, “You are certifying that the information on this certificate represents your best efforts to interpret the data available and that you understand that any false statement may be punishable by fine or imprisonment under 18 U.S. Code, Section 1001.” This statement does not exclude the information in Sections A & B.

13. D – Attachments

- a. *Issue:* The form does not allow the user to attach documents, as required by the instructions and Section D Check box.

Recommendation: Allow users to attach documents to the form; this could be triggered by selecting the “Attachments” check box in Section D.

Reason: The current design of the form does not allow a user to attach a file when required (e.g., additional photographs, engineered opening certification). This option can be added, per [Adobe FAQ: Add attachments to PDFs](#), to a secured Adobe document, even when security restrictions are in place.

14. Section E5 N/A

- a. *Issue:* E5 is only relevant for unnumbered AO Zones.

Recommendation: Add “N/A” box, and updated instructions to be consistent with unnumbered A Zone instruction B9.

Suggested Form Edit: E5. Add “N/A” checkbox.

Suggested Text Edit: Section D Instructions, last sentence:

“*In Zone AO ~~For those communities~~ where this base flood depth is not ~~available~~ provided in the FIS or on the FIRM, the community will need to determine whether the top of the bottom floor is elevated in accordance with the community's floodplain management ordinance. Check “N/A” In Zone A (without BFE) or Zone AO where a base flood depth is provided in the FIS or on the FIRM.”*

Reason: E5 is often completed when it is not relevant.

15. Photograph Pages

- a. *Issue:* The note for each picture field states pictures are limited to 300 kb or smaller; however, larger files are allowed.

Recommendation: Adjust note to correctly identify picture size limits.

Reason: The note is inconsistent with the form functionality and is causing confusion.