

May 25, 2011

#### Procedure Memorandum No. 62

Amending the Guidelines and Standards for Flood Hazard Mapping Partners

Title: Technical Support Data Notebook (TSDN) submittal and Flood Elevation

Determination Docket (FEDD) File Review Protocol for Mapping Projects

Effective Date: August 2, 2011 - Post Preliminary mapping projects for which Letters of Final

Determination (LFD) will be issued on or after August 2, 2011.

Approval: Roy E. Wright

Acting Director, Risk Analysis Division

Federal Insurance and Mitigation Administration

**Background**: In order to support future flood study updates, FOIA requests, Congressional inquiries, and governmental policy making, mapping partners are required to submit TSDN's and FEDD Files to FEMA in a timely fashion to ensure that the technical data and official correspondence are correctly archived.

**Issues:** TSDNs and FEDD Files are submitted with inconsistent timing and quality. Further, there is a lack of clarity provided to mapping partners regarding their roles and responsibilities in mapping project documentation.

**Actions Taken:** This memorandum reemphasizes the importance of timely and complete submission of study data and assists mapping partners with a TSDN checklist. The memorandum further reiterates and clarifies mapping partner responsibilities to ensure that all TSDNs and FEDD Files are accurate and complete.

**Supersedes/Amends:** This memo does not supersede or amend existing guidance.

**Attachments:** Procedure Memorandum 62, Distribution List, TSDN Checklist, FEDD File Checklist

#### **Distribution List** (electronic distribution only):

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Director, Risk Analysis Division

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# Procedure Memorandum # 62

Technical Support Data Notebook (TSDN) submittal and Flood Elevation Determination Docket (FEDD) File Review Protocol for Mapping Projects

**FINAL** 

May 25, 2011



All policy and standards in this document have been superseded by the FEMA Policy for Flood Risk Analysis and Mapping.

However, the document contains useful guidance to support implementation of the new standards.

## **Table of Contents**

1.	Background		2
3.	Action Taken		
		FEDD File Submission	
	3.2.	Fully Digital TSDN Submission	3
		Partially Digital TSDN Submission	
			_
4.	Distribution List		5

# 1. Background

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) is mandated to manage and document flood studies for the National Flood Insurance Program. This documentation is used to support future flood study updates, amendments and revisions to effective maps, Freedom of Information Act (FOIA) requests, Congressional inquiries, and governmental policy. It is therefore, extremely important that all data associated with these studies are complete and readily accessible. To accomplish this requirement, the data are stored either on the Mapping Information Platform (MIP) (if digital) and/or at FEMA's Engineering Library.

The essential data for FEMA flood studies are contained in Technical Support Data Notebooks (TSDNs) as outlined and described in the Guidelines and Specifications for Flood Hazard Mapping Partners (G&S) dated April 2003 and the current edition of Appendix M of the G&S dated March 2009 or later. The TSDN format was developed to maintain consistency nationally and ensure that all data associated with FEMA-funded flood mapping projects is properly captured and stored.

One of the more critical components of the TSDN is the Flood Elevation Determination Docket (FEDD). In accordance with Part 67.3 of the NFIP regulations, FEMA is required to establish and maintain a FEDD file for communities affected by a newly created or updated Flood Insurance Rate Map (FIRM). The documentation in the FEDD file is evidence that FEMA has provided due process to communities impacted by new or updated flood hazard information.

#### 2. Issue

Although there are data submission requirements in the MIP and in the G&S, mapping partners are not consistently uploading or delivering all data developed during study production. In addition, other documents such as the FEDD files, final Summary of Map Actions (SOMAs), revalidation letters, etc., do not have associated data upload steps on the MIP workflow, but are important correspondence that needs to be submitted to the MIP or the FEMA Engineering Library for each study.

When the documentation in the TSDN is incomplete, FEMA and its stakeholders may be faced with recreating missing data such as missing models or collecting the data long after the FIRM effective date. Further, an incomplete FEDD file makes it difficult for FEMA to answer questions regarding whether a community has been afforded adequate due process.

### 3. Action Taken

In an effort to re-emphasize the importance of timely and complete submission of study data, and assist mapping partners with the TSDN submittal process, FEMA has established a checklist for the preparation and submittal of TSDNs. The TSDN checklist includes all the requirements specified in Appendix M and any additional data submittal requirements that are essential but not clearly defined elsewhere. Beginning with post-preliminary mapping projects for which LFDs will be issued on or after August 2, 2011, all mapping partners, including Indefinite Delivery/Indefinite Quantity (IDIQ) contractors and Cooperating Technical Partners (CTPs), are required to complete

the checklist and certify that their project documentation is complete and reflects the final products by signing the certification page on the TSDN checklist accompanying this memorandum.

This memorandum reiterates mapping partners' responsibilities to ensure that all TSDNs, including FEDD files are accurate and complete. To that end, all mapping partners must submit FEDD files to FEMA Headquarters (or its designee) for review before a study can proceed to the "issue LFD" step in the study process. Upon receipt, FEMA Headquarters (or its designee) will validate that the mapping partner has adequately addressed all due process requirements to-date and that the FEDD files are complete. In the event that there are compelling reasons for exceptions to these requirements, the FEMA Regional Office must contact FEMA Headquarters for concurrence.

**3.1.** New Procedure for FEDD File Submission: Beginning with post-preliminary mapping projects for which LFDs will be issued on or after August 2, 2011, all mapping partners must submit FEDD files to FEMA Headquarters (or its designee) for review during Quality Review 6 (60 days before the LFD is scheduled to be issued). The attached checklist titled "Flood Elevation Determination Docket (FEDD) Checklist" provides a listing of the specific documents to be included and must be completed and submitted with each FEDD file. FEMA Headquarters (or its designee) will review the submitted checklists and FEDD files for accuracy and completeness, and work with the appropriate mapping partner to obtain any missing or incomplete items, as necessary. Once the determination is made that the FEDD files are complete and all due process requirements have been met, the mapping partner will be notified by FEMA Headquarters (or its designee) that processing of the study may continue, and the LFD may be issued. This approval to proceed assumes all requirements of PM 42 have also been met.

FEMA Headquarters (or its designee) will maintain the FEDD file beginning with the issuance of the LFD and will add copies of all correspondence issued after that date. This correspondence will include the LFD, Final SOMA, Final Federal Register notice, suspension letters, Revalidation letter, and all applicable proof of receipt. The complete FEDD file for each community will be archived to the MIP by FEMA Headquarters (or its designee) no later than 60-days following the FIRM effective date.

- **3.2.** New Procedure for Fully Digital TSDN Submission: As soon as possible but no later than 30-days after the LFD has been issued, the mapping partner must complete and submit the attached TSDN Checklist and Certification form to FEMA Headquarters (or its designee). If a fully digital process has been followed and all TSDN materials have been reviewed and validated by FEMA Headquarters (or its designee) to have been successfully uploaded to the MIP by the mapping partner in accordance with the current edition of Appendix M of the G&S dated March 2009 or later, the flood study will be considered as "closed out and archived" by the mapping partner. Full close out of the study will be achieved once FEMA Headquarters (or its designee) has uploaded the final FEDD file components including LFDs, suspension letters, final Federal Register notices, etc. to the MIP in accordance with the directory structure and folder naming conventions specified in Appendix M.
- **3.3.** New Procedure for <u>Partial Digital</u> TSDN Submission: If a portion of the TSDN is not available digitally and all TSDN materials cannot be uploaded to the MIP in digital format, the mapping partner must submit the completed TSDN Checklist and Certification form along with the <u>complete</u> TSDN (including data already uploaded to the MIP) in digital format via DVD to

FEMA Headquarters (or its designee) for review and final archiving at FEMA's Engineering Library. Upon receipt, FEMA Headquarters (or its designee) will ensure that the submittal is complete and includes all data specified on the TSDN Checklist and Certification form. FEMA Headquarters (or its designee) will then prepare a DVD including all FEDD file components and make the final submission to the FEMA Engineering Library. A flood study submitted on DVD will be considered "closed out and archived" only when the TSDN has been received by the FEMA Engineering Library.

#### **Attachments**

Technical Study Data Notebook (TSDN) Inventory Checklist Flood Elevation Determination Docket (FEDD) Checklist

cc: Distribution List

#### **Distribution List** (electronic distribution only)

Office of the Acting Assistant Administrator for Flood Insurance and Mitigation

Risk Analysis Division

Risk Reduction Division

Risk Insurance Division

Regional Risk Analysis Branch Chiefs

Legislative Affairs

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