

FREQUENTLY ASKED SHIP QUESTIONS

State Housing Initiatives Partnership Program



BY MICHAEL CHANEY

Q. Is it a SHIP requirement to note the social security number of each member of an applicant's household or to obtain a copy of each social security card?

A. Section 119.071(5)(a)2.a., (I) and (II), Florida Statutes, states that an agency may NOT collect an individual's social security number (SSN) unless the agency has stated in writing the purpose for its collection and unless it is imperative for the performance of that agency's duties and responsibilities as prescribed by law. Section 119.071(5)(a)2.b., Florida Statutes, provides that an agency shall identify in writing the specific Federal or State law governing the collection, use, or release of SSNs for each purpose for which the agency collects the SSN, including any authorized exceptions that apply to such collection, use, or release and that each agency shall ensure that the collection, use, or release of SSNs complies with the specific applicable Federal or State law. Additionally, Section 119.071(5)(a)3., Florida Statutes, provides that SSNs collected by an agency may not be used by that agency for any purpose other than the purpose provided in the written statement. In the absence of establishing an imperative need for the use of SSNs, the local governments should comply with the Florida Statutes by establishing another identifier for applicants.

Q. The 13/14 funds were provided with a shorter deadline. What details and guidance can you provide about how to plan for this deadline?

A. There is less than a year before your 13/14 allocation must be expended. The legislative language for these funds states that "entities to which funds are appropriated pursuant to this act may expend such funds through the 2014-2015 fiscal year. Any funds that are encumbered by June 30, 2015, must be disbursed (expended) by September 30, 2015."

This is an exception to the normal three-year deadline on SHIP funds. Not only is the expenditure timeframe shorter, there is also none of the normal recourse for requesting an extension. The legislative language continues by addressing this: "On September 30, 2015, any funds that remain undisbursed must be transferred to the State Housing Trust Fund within the Department of Economic Opportunity. There is no provision for an expenditure extension."

The 13/14 policy is 'Use It or Lose It', and Florida Housing will provide guidance to unfortunate communities that must repay unspent funds at the end of September. Do not let this happen to your community.

Now is the time to:

- **Estimate when your 13/14 allocation will be fully committed and then expended.**
- **Form a contingency plan if some funds are anticipated to be expended in July or later and might possibly be delayed past the end of September. Commit and plan to expend more than enough SHIP funds to meet the deadline.**
- **Confirm you have at least 20 percent of your allocation committed or already spent to assist Special Needs applicants.**
- **Estimate the monthly amount of SHIP funds you have expended recently and multiply it by the number of months until the September deadline. If it looks like you are behind, contact the Florida Housing Coalition to help you consider alternative ways to get the money spent on time.**

Remember that another deadline is even closer. June 30, 2015 is the expenditure deadline for 12/13 funds. While most communities received small 12/13 allocations and many have already spent the funds, it is important to recog-

nize that two different expenditure deadlines are soon approaching in quick succession.

Although every dollar of your 13/14 allocation must be expended by the end of September, other sources of 13/14 SHIP revenue have a different deadline. SHIP revenue received during the 13/14 state fiscal year from bank interest, repayments, other program income and recaptured funds follows the regular three year deadline, and so must be expended by June 30, 2016.

Q: (Follow Up) My focus is the September 30, 2015 deadline for expending the 13/14 Allocation, but what other deadlines and SHIP responsibilities should I be aware of between now and the end of September?

A. The following reminders include a mixture of statutory deadlines and important dates related to your SHIP work.

- **May 1, 2015**—Update your Local Housing Assistance Plan (LHAP): Check your current LHAP to see if this statutory deadline pertains to your community. If your LHAP ends with the 14/15 allocation, your city or county commission has until May to approve an updated LHAP for 15/16, 16/17, and 17/18 funds and to send it to Florida Housing for review and approval.
- **May to December, 2015**—AHAC Report: If your LHAP ends with the 15/16 allocation and your current SHIP allocation is more than \$350,000, then your community’s affordable housing advisory committee (AHAC) report is due this year. AHAC members are required by statute to review an assortment of housing incentives and consider making recommendations for adding to or changing the housing incentives currently listed in the LHAP. Detailed guidance is provided in Section 420.9076 of the SHIP Statute, and the Florida Housing Coalition can provide assistance to get you started.
- **May 1, 2015**—Advertise New Funds: As a best practice, you may advertise the availability of new funds in May. By May, Florida Housing will inform you of your jurisdiction’s estimated SHIP allocation if the Florida Legislature has allocated funds. Since you must advertise funding availability 30 days prior to taking applications, you may do this in May in anticipation of receiving funds at the beginning of July. Note that advertising is not required for any SHIP strategy for which funds were previously not available due to a waiting list.
- **August 1, 2015**—Begin Annual Report: Complete a semi-annual meeting with the finance department to confirm that the general ledger fully reflects the details of your SHIP tracking spreadsheet. It is a statutory requirement that reports must be completed on or before September 15th. Completing reports entails providing updated expenses and commitments for three SHIP allocations, submitting two signed certification forms, and presenting the reports to your city or county commission. Get an early start, since researching expenses, demographics and more might take longer than you anticipate.
- **September 30, 2015**— Monitor Your Partners: Complete an annual monitoring visit for any SHIP subrecipient organizations that assist you in implementing SHIP strategies. If applicable, also complete an annual review of rental housing in which SHIP money is invested, which is a statutory requirement. Confirm that tenants are still SHIP income eligible, rents are affordable, and the physical condition of the property is adequate and maintained. You may complete these tasks on this September date or any other annual anniversary date that you choose and consistently follow. [HNN](#)



DO YOU HAVE A QUESTION ABOUT THE SHIP PROGRAM?

Free telephone technical assistance is available to help you successfully implement your SHIP funded work. Call the Florida Housing Coalition’s SHIP hotline at (800) 677-4548, M-F 8:30-5:00.