

FREQUENTLY ASKED SHIP QUESTIONS

State Housing Initiatives Partnership Program

QUESTION: May I use SHIP disaster strategy assistance after the end of the Governor’s Executive Order (EO)? Or is it the case that I am allowed to spend available unencumbered funds on disaster assistance only during the period of the executive order?

ANSWER: The Governor’s Executive Order was originally effective through early November, but he has extended it two times. It is now scheduled to time out on February 27, 2018. The EO allows you to implement the disaster strategy to assist eligible households who submit their applications before the end of the executive order. Even once the EO times out, you may continue to respond to disaster-related requests for assistance, but they should be funded by your regular strategies, rather than the disaster strategy. This means that shorter-term help like temporary rental assistance and debris removal will no longer be available if the local housing assistance plan (LHAP) only offers this help in the disaster strategy. Any unencumbered funds left after the disaster strategy assistance will be available to fund the LHAP’s regular strategies. In addition, SHIP staff may use 17/18 funds for disaster recovery.



QUESTION: When SHIP pays for a homeowner’s deductible, does this count as a rehabilitation activity? Are tarps rehabilitation also?

ANSWER: Yes, these are rehabilitation activities, so long as they are provided only after confirming a household’s SHIP eligibility. The cost of a tarp is an eligible repair expense that prevents future damage. Paying a homeowner’s property insurance deductible is paying the portion of home repairs for which the property insurance company will not pay.

It is especially important to confirm that deductibles and tarps are rehabilitation expenses because of the set-aside

requirements. Rehabilitation assistance of these types help your SHIP office achieve compliance with the Construction/Rehabilitation set-aside, which requires that 75 percent of a SHIP jurisdiction’s allocation must be expended on new construction or rehabilitation of housing. Additionally, these types of assistance also comply with the 65 percent Home Ownership set-aside.

Paying deductibles is a recognition that many homeowners have more resources than just SHIP to help pay for recovery. Track the disaster assistance that a homeowner is awarded from

FEMA, insurance, charitable donations and more to avoid a duplication of benefits. While this applies to the relatively low-costs for a tarp or payment of deductibles, it is even more relevant when larger SHIP awards are invested in repairs, replacement, temporary rent assistance, and other forms of help.

QUESTION: May I use a self-certification form for my Hurricane Irma disaster assistance recipients?

ANSWER: No. For the most part, self-certification is not warranted for Irma assistance because third party verification is available. At times, however, SHIP staff may document

a disaster applicant’s eligibility with whatever information is available. This may involve applicants completing a self-certification form in circumstances when third party verification is unavailable. This is permissible based on the details about disaster strategies in Section 67-37.005 (1)(g) of the SHIP Rule:

“Documentation required for SHIP income qualification may be waived if unavailable. The county or eligible municipality shall make every effort reasonable to ensure that the recipients of SHIP funds are income qualified.”

Self-certification might be necessary for the type of disasters in which businesses are closed, telephone communication is

limited, and employers are unavailable. Such circumstances were generally not present at the time when applicants were applying for Hurricane Irma SHIP assistance. Therefore, SHIP staff must use the regular process of obtaining third party verification of income and assets.

QUESTION: Has the Florida Housing Coalition created any forms to assist SHIP staff with disaster response?

ANSWER: Yes, the Florida Housing Coalition provided new forms and webinar guidance ten days after Hurricane Irma. This training included SHIP forms designed for Hurricane Irma response, which are available at www.flhousing.org under "Past Catalyst Trainings" listed as "Hurricane Irma SHIP Response." The first form is a SHIP application designed to document hurricane-related assistance needs. It is paired with the second form, a disaster assistance written agreement in which applicants agree to reimburse SHIP if they receive duplicative recovery assistance from FEMA, insurance, charitable donations or other sources.

The Coalition also created a form for contracting out disaster assistance to a sub-recipient organization. Sub-recipients are

often non-profits that can help implement one or more SHIP strategies. Selecting and contracting with a sub-recipient that will provide disaster assistance is a local matter that must be in compliance with processes established by the local procurement office. Research and assess how quickly the SHIP office may select a sub-recipient according to the procurement process. If necessary, request an exception to expedite the process. Once a sub-recipient is selected, use the newly created Disaster Sub Recipient Agreement as the written agreement between a local government and the SHIP sub-recipient. It specifically mentions Hurricane Irma and contains many details and requirements, including:

- The requirement to avoid Duplication of Benefits (DOB) by tracking disaster assistance provided by FEMA, insurance, charitable donations and other sources.
- Options for payment: whether the local government will advance SHIP funds to the sub-recipient to spend or will reimburse the non-profit as assistance is completed.
- Audit requirements: If the sub-recipient expends a \$750,000 or more in any fiscal year, a State single or project-specific audit should be completed

MORE GUIDANCE IN TECHNICAL BULLETINS | Florida Housing Finance Corporation provides SHIP-specific written guidance in Technical Bulletins. Some of the most recent bulletins have addressed the subjects of record retention, NOFA advertisements, and SHIP audit and monitoring requirements. You may access the bulletins on Florida Housing's website, www.floridahousing.org. Find SHIP by selecting Programs and then Special Programs from the pull-down menu. [HNN](#)



MICHAEL CHANEY

Michael Chaney is a Technical Advisor for the Florida Housing Coalition. Chaney's responsibilities include providing training and technical assistance through workshops, on-site visits, and telephone consultation on a variety of affordable housing topics, including capacity building for housing nonprofits; financial tracking of housing funds; fair housing; compliance with housing program requirements (SHIP, HOME, CDBG); operational/administrative procedures, housing rehabilitation strategies, and energy efficiency topics. He has also served as an adjunct faculty member of the housing department at Florida State University.



QUESTIONS 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, Mon.-Fri. 8:30-5:00.