

SHIP File Documentation Part 2

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A banner for SHIP Catalyst Training. The left side features a photograph of three people (two men and one woman) in a meeting, with the SHIP logo overlaid. The right side has a teal background with white text. The SHIP logo is a green house icon with a blue cube inside, with the text 'SHIP' and 'housing a stronger Florida' below it.

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TRAINING**

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‘Past Catalyst Trainings’

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Recap of SHIP File Documentation Part 1

Proper file documentation for:

- LHAP
- Advertising
- Client files
- Specific strategies/activities
 - Purchase Assistance
 - Rehabilitation

Link to recorded webinar: <https://vimeo.com/383830966>

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Overview of Resources

- SHIP Rule
- SHIP Statute
- FHFC monitoring checklist
- FHFC SHIP policies and procedures
- SHIP Administrators Guide

Review of File Documentation Exercise

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File Documentation Exercise

- A 2006 HHRP File replacing an eligible household's mobile home with a stick build home.
- Some but not all of the file documents are provided.
- Do you see any errors?
- Based on what you have seen, what other documentation will you expect to find in the rest of the file?

Observations of the File

- A Verification of Assets is followed by a request for this verification. The request is a superfluous document—remove it.
- There is no need to include the letter of recommendation.
- Affidavit of Unemployment – best practice
 - Is the affidavit for the mom or daughter?

Documents regarding the Daughter:

- Full-time student Documentation
- Income from the Daughter? Part-time job or anything?

Other documents you should expect to see in the Complete File

- All income and asset verification
- Many details about home replacement
- SHIP Mortgage and Note

MORE Activity File Documentation

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Single Family New Construction Documents

- Procurement/RFA if required
- As built appraisal (value limit)
- Bids, if required
- Bid selection
- Construction contract
- Payments, releases, pictures
- Certificate of Occupancy
- LHAP specific requirements
 - Counseling, FTHB?
- Buyer Selection Process
- Buyer household income
- Contract for purchase
- Disclosures
- Closing Documents

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Reconstruction Documents

- Owner Eligibility
- Property Eligibility - meets substandard definition
- Structural Drawings/Plans
- As built appraisal (value limit)
- Bids, required
- Bid Selection
- Award
- LHAP specific requirements
 - Energy Efficiency, no mortgages, lender approval, relocation
- Agreements and Recorded Documents
- Payments, Inspections, pictures
- Certificate of Occupancy
- Release of lien and warranties

Disaster Assistance Required Documents

- Application
- Release of information
- Proof property affected by disaster
- Insurance benefit letter
- FEMA benefit letter
- Income eligibility
- Resident income certification
- Award letter
- Recorded documents
- Payments, pictures, releases, warranties
- Close out

Rental Assistance Required Documents

- Application
- Release of information
- Program eligibility (specific LHAP requirements)
 - 12 months of rental assistance (VLI and special needs or homeless)
- Income eligibility
- Unit eligibility
- Resident Income Certification
- Lease

Rental Developer/Sponsor Documents

- RFA
- Selection process
- Award
- Agreement and LURA
- Recorded Documents
- Payments and releases
- Certificate of Occupancy
- Tenant Selection/Advertisement
- Tenant income eligibility
- Resident income Certification
- Lease

Subrecipient Documents

- RFQ, if required
- Agreements including policies and procedures
- Payments and back up
- Beneficiary data
- monitoring
- Agreement with single audit act language - (11) Any contract or document establishing the relationship between a SHIP eligible local government and an organization that is a Sub Recipient receiving SHIP funds shall contain the standard audit language on Form DFS-A2-CL (Effective 7/05) as required by the Florida Single Audit Act, Section 215.97, F.S.

Program Compliance Documentation

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Special Needs Documentation

- 420.0004 (13)F.S. - “Person with special needs” means an adult person requiring independent living services in order to maintain housing or develop independent living skills and who has a disabling condition; a young adult formerly in foster care who is eligible for services under s. 409.1451; a survivor of domestic violence as defined in s. 741.28; or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemental Security Income (SSI) program or from veterans’ disability benefits.
- **See handout from FHFC**

Special Needs Documentation

- Young Adult aging out of foster care
- Survivor of Domestic Violence
- Veteran receiving Disability Benefits
- VA Disability Compensation
- Disabling Condition
- Persons with a Developmental Disability (DD)
- Social Security Disability Insurance (SSDI)
- Supplemental Security Income (SSI)

Long Term Affordability Requirements

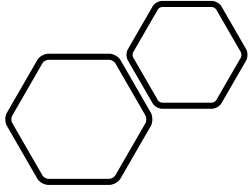
- Recorded Mortgage and Note
- Annual verification of compliance with affordability requirements
- Examples include:
 - Affidavit signed by applicant
 - Public records showing homestead
 - Insurance showing renewal
 - Inspection
 - Utility bills

Rental Monitoring Required Documents

- Written Agreement
- Monitoring Letter
- Documents showing files monitored
- Letter identifying deficiencies
- Documents showing deficiencies corrected/addressed
- Monitoring closeout letter

Documenting Administrative Costs

- Administrative expenditures
 - General management, monitoring, and coordination
 - Eligible travel costs
 - Advertising/LHAP/Annual Reports
- Project delivery costs
 - Costs directly related to carrying out a project as per LHAP
- Timesheets – pro-rated share between programs
- Payroll records



SHIP Tracking and Reporting & Financial Records



SHIP Tracking

The SHIP rule (67-37.005) requires the following:

(a) There is an established procedure for the tracking and expenditure of program income and Recaptured Funds from loan repayments, reimbursements, Foreclosures or other repayments, and interest earnings on the local housing distribution funds.

Program Tracking and Reconciliation with Finance Department

- Tracking spreadsheet
- Proof of reconciliation with Finance Department
- Documentation on program income received by type
 - Program Income (Interest)
 - Program Income (Payments)
 - Recaptured Funds
 - Disaster Funds
 - Other Funds
- Limit on administrative expenses for distribution and PI
- Documentation on carry forward funds

Tracking spreadsheets

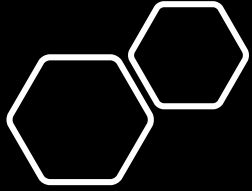
- Use the old tracking spreadsheet rather than the upload form to track set-asides
- Have a system where finance can confirm file expenses at closeout by fiscal year
- Best Practices:
 - Use a purchase order to track expenses on each case
 - Fund cases from one fiscal year
 - Update tracking sheet on a regular basis

Data to collect for the SHIP Annual Report

- Expenditures (different than 'spent money' for an incomplete project)
- Encumbrances
- Set-aside compliant expenses
- Demographic information
- Dates (for tracking Deadlines)
- Leveraging with other funds (public funds, private funds, owner contribution)

Annual Report Required documents

- Proof of Public comment period
- Resolution
- Certification
- AHAC public hearing
- AHAC report submission to FHFC and Commission
- AR submission and approval by FHFC
- Final submission to FHFC



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- Set-aside compliance
- Budgeting
- Tracking expenditures
- Source documentation
- Program Income
- Reconciliation

Tampa Handout #1: SHIP Summary

SHIP Summary for FY2016 to FY2019

SHIP 16/17 12300			Total Clients	454	SHIP 18/19 12300			Total Clients	0
Administration	301,000	8%	H/C	4	Administration	49,868	5%	H	498,688
Disaster Mitigation	32,625	1%			Down Payment/Closing Costs Assistance	355,001	35%		
Down Payment/Closing Costs Assistance	821,917	21%			Owner Occupied Rehab (OOR)	607,303	60%		
New Construction Single Family Homes	496,668	13%			Grand Total	1,012,172	100%	Entitle	513,484
Owner Occupied Rehab (OOR)	926,792	23%						PI	
Chinese Drywall Remediation Project 16	35,000	1%	H/C	1				Difference	
Security Deposit Program 17	650,000	16%	H/C	308	20% Special Needs	99,738	Subtotal		
Special Needs 17	636,294	16%	H/C	18	65% Homeownership	324,147		638,157	
Home Ownership Counseling	50,883	1%			75% Construction/Rehab	374,016		607,303	233,287
Grand Total	3,951,180	100%			30% Very Low	303,652			

20% Special Needs	457,095	Subtotal	Difference
65% Homeownership	1,485,560	2,949,297	1,463,737
75% Construction/Rehab	1,714,108	2,127,379	413,272
30% Very Low	1,185,354		
30% Low	1,185,354	2,370,708	Low/VL

1,580,472
(301,000) Admin
(50,883) Counseling
(1,211,210) Mod DPA

SHIP 16/17 17,379 Left Mod

SHIP 17/18 12300			Total Clients	0
Administration	182,710	9%	H	1,564,122
Down Payment/Closing Costs Assistance	91,445	4%		
Owner Occupied Rehab (OOR)	803,011	38%		
New Construction Single Family Homes	1,013,333	48%	H	
Grand Total	2,090,500	100%	Entitle	526,378

20% Special Needs	312,824	Subtotal	Difference
65% Homeownership	1,016,679	1,907,790	891,110
75% Construction/Rehab	1,173,092	1,816,344	643,253
30% Very Low	627,150		
30% Low	627,150	1,254,300	Low/VL

836,200 Remaining
(182,710) Admin
(844,779) Mod DPA
(191,289) Left Mod

SHIP 17/18

SHIP 19/20 12300			Total Clients	0
Administration	52,289	5%	H/C	522,890
Down Payment/Closing Costs Assistance	356,867	35%	H	
Owner Occupied Rehab (OOR)	613,734	60%	H	
Grand Total	1,022,890	100%	Entitle	500,000

20% Special Needs	104,578	Subtotal	Difference
65% Homeownership	339,879	970,601	630,723
75% Construction/Rehab	392,168	970,601	578,434
30% Very Low	306,867		
30% Low	306,867	613,734	Low/VL

409,156 Remaining
(52,289) Admin
(356,867) Mod DPA

SHIP 19/20 0 Left Mod

SHIP 18/19 (0) Left Mod

New Allocation not received yet

Tampa Handout #2: SHIP Strategy Summary

Expended by 06/30/2019		Required set a side		\$1,485,560	\$1,714,108	\$457,095
PY 16-17	Budget	Expended	Homeownership	New Const/Rehab	Special Needs	
Admin	\$301,000	\$301,000				
Homebuyer Counseling	\$50,883	\$50,883				
FTHB assistance - MAP	\$821,917	\$821,917	\$821,917			
Single Family - Domain Homes	\$496,668	\$496,668	\$496,668	\$496,668		
Single Family Rehab- Chinese Drywall	\$35,000	\$35,000	\$35,000	\$35,000		
Single Family Rehab- Disaster Mitigation	\$32,625	\$32,625	\$32,625	\$32,625		
Special Needs ETBCA \$500,000 contract	\$636,294	\$472,540	\$636,294	\$636,294		\$636,294
ETBCA \$1,000,000 contract	\$926,792	\$317,805	\$926,792	\$926,792		
Security Deposit	\$650,000	\$435,587				
SHIP Allocation	\$3,951,180	\$2,964,025	\$2,949,296	\$2,127,379		\$636,294
Difference		\$987,154.30	\$1,463,736	\$413,271		\$179,199
Expended by 06/30/2020		Required set a side		\$1,016,679	\$1,173,092	\$99,738
PY 17-18	Budget	Expended	Homeownership	New Const/Rehab	Special Needs	
Admin	\$182,710	\$182,710				
FTHB assistance- MAP	\$91,445	\$91,445	\$91,445			
Single Family - Domain Homes	\$1,013,333	\$0	\$1,013,333	\$1,013,333		
Special Needs						
CDC	\$500,060	\$0	\$500,060	\$500,060		\$99,738
Still need to expend	\$302,951	\$0				
SHIP Allocation	\$2,090,500	\$274,155	\$1,604,839	\$1,513,394		\$99,738
Difference		\$1,816,345.37	\$588,160	\$340,302		\$0
Expended by 06/30/2021		Required set a side		\$324,147	\$374,016	\$99,738
PY 18-19 Expended by 06/30/2021	Budget	Expended	Homeownership	New Const/Rehab	Special Needs	
Admin	\$49,868					
FTHB assistance - MAP	\$355,001	\$42,093	\$355,001			
Single Family Owner Occupied Rehab	\$607,303	\$0	\$607,303	\$607,303		\$99,738
SHIP Allocation	\$1,012,172	\$42,093	\$962,304	\$607,303		\$99,738
Difference		\$970,079.09	\$638,157	\$233,287		\$0

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Purchase Order

- Best practice
- Track all expenses under PO
- Other source documentation:
 - Canceled checks
 - Paid invoices
 - Contracts
 - Receipts
- Reconcile expenses with finance

Rehab or New Construction Costs

Hard costs

- Materials and supplies
- Infrastructure
- Contractor profit and overhead

Soft Costs

- Engineering
- Recording fees
- Drawings

Tampa Handout #3: Payment Tracking

Name	Address	Amount	Payment Request (Draws #)	Administration Fees	Program Delivery	Total Payment Requested	Income Level	Age	Family Size	Race	Special Need	Running Balance
Client #1	123 ABC Lane Tampa 33610	24,375.00	16,562.50	1,201.42			30%	36	8	Black	Yes	1,000,000.00
Client #2	101 N Florida St. Tampa 33612	23,750.00	9,500.00	1,201.42			50%	79	1	White	Yes	1,000,000.00
Client #3	147 Ybor City, Tampa, 33612	24,950.00	9,980.00	1,201.41		39,646.75	80%	67	4	Hispanic	Yes	960,353.25
		29,924.00	19,974.00	1,419.55			50%	67	1	Hispanic	Yes	960,353.25
		22,800.00	14,300.00	1,419.55			50%	45	1	Other	Yes	960,353.25
		-	8,312.50	1,419.55		46,845.15	50%	79	1	White	Yes	913,508.10
			9,950.00	922.50			50%	67	1	Hispanic	Yes	913,508.10
			8,500.00	922.50		20,295.00	50%	45	1	Other	Yes	893,213.10
			7,812.50	916.75			30%	36	8	Black	Yes	893,213.10
		7,950.00	7,950.00	916.75			80%	69	1	Black	Yes	893,213.10
			5,937.50	916.75			50%	79	1	White	Yes	893,213.10
			14,970.00	916.75		40,337.00	80%	67	4	Hispanic	Yes	852,876.10
		30,400.00	30,400.00	2,190.00			80%	60	2	White	Yes	852,876.10
		13,400.00	13,400.00	2,190.00		48,180.00	50%	70	1	White	No	804,696.10
		30,300.00	30,300.00	2,923.12			50%	51	2	Black	Yes	804,696.10
		28,162.50	28,162.50	2,923.13		64,308.75	50%	62+	1	Black	Yes	740,387.35
		30,145.00	30,145.00	2,251.00			80%	62+	1	Black	Yes	740,387.35
		14,875.00	14,875.00	2,251.00		49,522.00	80%	41-61	5	Black	Yes	690,865.35
		12,212.50	12,212.50	1,407.76			80%	62+	2	Black	Yes	690,865.35
		12,552.71	12,552.71	1,407.76			50%	62+	4	Black	Yes	690,865.35
		17,467.46	17,467.46	1,407.75		46,455.94	50%	62+	1	Black	No	644,409.41
		26,579.25	26,579.25	1,328.96	3,322.41	31,230.62	50%	62+	1	Black	Yes	613,178.79
		32,900.00	32,900.00	1,265.63	3,164.07		30%	62+	1	Hispanic	No	613,178.79
		17,725.00	17,725.00	1,265.62	3,164.06	59,484.38	80%	41-61	5	Black	Yes	553,694.41
		22,895.60	22,895.60	1,144.78	2,861.95	26,902.33	50%	62+	2	White	Yes	526,792.08
		12,212.50	12,212.50	699.92	1,749.79							526,792.08
		17,467.45	17,467.45	699.92	1,749.79							526,792.08
		12,315.00	12,315.00	699.91	1,749.79	49,344.07						477,448.01
		24,493.00	24,493.00	1,224.65	3,061.63	28,779.28						448,668.73
		22,150.10	22,150.10	861.63	2,154.07							448,668.73
		12,315.00	12,315.00	861.63	2,154.07	40,496.50						408,172.23
		10,517.00	10,517.00	631.91	1,579.77		80%	62+	1	Black	No	408,172.23
		17,307.50	17,307.50	631.91	1,579.77		30%	62+	2	Hispanic	Yes	408,172.23
		10,090.00	10,090.00	631.90	1,579.77	44,549.53	80%	62+	1	Black	No	363,622.70
		17,307.50	17,307.50	485.24	1,213.11							363,622.70
		13,195.94	13,195.94	485.24	1,213.11							363,622.70
		14,819.75	14,819.75	485.24	1,213.11							363,622.70
		1,380.00	1,380.00	485.24	1,213.11							363,622.70
		10,497.00	10,497.00	485.24	1,213.10							363,622.70
		1,029.00	1,029.00	485.25	1,213.10	69,419.28					No	295,203.42

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Purchase Assistance Costs

Hard cost

- includes the down, payment closing cost and gap financing for purchase assistance

Soft cost

- Inspection
- Title work
- Recording fees
- Counseling fees

Direct Rental Assistance Costs

Hard Cost

- Rent paid to the landlord
- Utilities paid to the utility company

Soft cost

- Housing stability counseling
- Housing Locator

Reconciliation

- Monthly Tracking
- City's Financial Reporting
- Program Income

Record Retention

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SHIP Record Retention Policy

- Keep SHIP files for 5 years after loan has been released or satisfied

AND

After audits released for the SHIP distribution that funded assistance

Example:

- Applicant assisted with 13/14 funds in August 2013
- Audited in 2016
- SHIP assistance loan forgiven after 10 years, 2023
- Retain the file until 2028

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More on SHIP Record Retention Policy

- Keep applications that do not receive SHIP assistance
- For how long?
 - Determine the SHIP distribution that would have funded the application
 - Keep the application for 4 years after the end of the 3-yr period when closed out
 - Application received 13/14
 - Distribution will be closed out on June 30, 2016
 - Retain file until June 30, 2020
- Also retain advertisements, waiting lists until the SHIP fiscal year has been monitored and the grant closed out

Record Request under Chapter 119.07

- There is no official SHIP records request form.
- Must notify applicants that their information is subject to Florida's Record request law
- The law is stated most directly in section 119.07:
- "Every person who has custody of a public record shall permit the record to be inspected and examined by any person desiring to do so, at any reasonable time, under reasonable conditions, and under supervision by the custodian of the public record or the custodian's designee. The custodian shall furnish a copy or a certified copy of the record upon payment of the fee... of not more than 15 cents per one-sided copy."

Exceptions

- The Florida Statutes outline several exceptions that are relevant to SHIP housing files: **“Medical history records, bank account numbers, credit card numbers, telephone numbers, and information related to health or property insurance furnished by an individual to any agency pursuant to federal, state, or local housing assistance programs are confidential and exempt.”** In addition, Section 119.0721 provides an exemption for social security numbers: **“Effective October 1, 2002, all social security numbers held by an agency or its agents, employees, or contractors are confidential and exempt.”** Despite these exemptions, it is strongly recommended that **you check with your legal counsel prior to denying anyone access to a public record.**

Other Exceptions

- Any information not otherwise held confidential or exempt from s. **119.07(1)** which reveals the home or employment telephone number, home or employment address, or personal assets of a person who has been the **victim of sexual battery, aggravated child abuse, aggravated stalking, harassment, aggravated battery, or domestic violence** is exempt from s. **119.07(1)** and s. 24(a), Art. I of the State Constitution, upon written request by the victim, which must include official verification that an applicable crime has occurred. Such information shall cease to be exempt 5 years after the receipt of the written request.

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Please complete the evaluation!

Thank you for joining us!

Technical Assistance Hotline: 1-800-677-4548

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