



# Preparing for the SHIP Monitor: Part 1

Sponsored by the Florida Housing Finance Corporation's Catalyst Program

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# Our Thanks to the Florida Housing Catalyst Program



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This 3-part Webinar Series replaces the “Preparing for the SHIP Monitor” Workshop scheduled for May 21, 2020 in Tampa which was cancelled.

### **TODAY’S WEBINAR- Preparing for the SHIP Monitor: PART 1**

This is the first of three webinars provided as replacement for the cancelled “Preparing for the SHIP Monitor” workshop that was to be held on May 21, 2020, in Tampa. Have you received notice that a Florida Housing Finance Corporation Monitor will soon conduct a compliance review of your SHIP program? Don’t get nervous—get prepared. This first webinar will provide the results from an analysis of recent monitoring reports to help you prepare for your monitoring visit and will offer an overview of the monitoring process. Learn about the program details that SHIP monitors focus their attention on during their review of the SHIP jurisdictions program.

### **Preparing for the SHIP Monitor: PART 2- May 26 - 2:00 pm - 3:30 pm**

Don’t be nervous—get prepared for the monitor. In this second webinar you will learn about the items that monitors look for related to file documentation, eligibility determination, and administrative procedures. This may help you achieve the best outcome during your next monitoring visit. The training will outline SHIP rule compliance, as well as options offered by Florida Housing Finance Corporation for addressing non-compliance issues.

### **Preparing for the SHIP Monitor: PART 3- May 27 - 2:00 pm - 3:30 pm**

In this third and final webinar you will learn about budget reconciliation, annual reporting, and SHIP tracking documents that monitors will review. In addition, presenters will discuss the local government monitoring responsibilities when working with Nonprofit Sub Recipients & Sponsors. You will also hear best practices for monitoring rental housing for SHIP compliance



# Catalyst Training Schedule

A banner for SHIP Catalyst Training. On the left, a group of diverse people are smiling and looking at a laptop. On the right, a teal background contains the text 'Fine Tune Your SHIP Program' and 'REGISTER NOW FOR CATALYST TRAINING'. The SHIP logo is on the left side of the banner.

Fine Tune Your SHIP Program  
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TRAINING**

SHIP  
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AUG. 31 - SEPT. 2

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August 31 - September 2

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# Webinar Logistics

- Participants are muted
- Enter your questions in the box in your webinar panel
- Forgot to ask a question or want to ask privately?

eMail [andujar@flhousing.org](mailto:andujar@flhousing.org)

This webinar is being recorded and will be available at [www.flhousing.org](http://www.flhousing.org)

- A survey will immediately follow the webinar; ***please*** complete it! Thanks!



# COVID-19 UPDATES

- Every Thursday from 1:30 pm to 2:30 pm.
- Go to this link to register:  
<https://www.flhousing.org/covid-19-housing-related-resources/>



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## COVID-19: HOUSING-RELATED RESOURCES

Get the information you need to respond to COVID-19. We have started weekly webinars and put together a list of resources to help. Let us know if you find resources that should be added or if you have questions that we can help answer.



# Overview

- Overview of the Monitoring Process
- Elements of Compliance: File Documentation
- Eligibility Determination
- Administrative Procedures, including LHAP
- Annual Report Responsibilities
- Monitoring Sub Recipients and Sponsors
- Monitoring Rental Housing





# FHFC Monitoring Staff

Robin Fowler

Glenda Lang

Russ Polzer

Debbie Wedoe



# FHFC Monitors

- Updates
  - HHRP
- Tips
- Best Practices



# The 10 Most Common Observations Over Time

## Monitoring Findings 10 Years Ago

| TOP FINDINGS  | FREQUENCY |
|---|-----------|
| 1. Inaccurate or Incomplete Income / Assets Verifications | 20        |
| 2. Missing required documents                             | 14        |
| 3. Inaccurate or Incomplete Income Certifications         | 12        |
| 4. Inaccurate tracking of cases and / or expenditures     | 10        |
| 5. Exceeding maximum award                                | 6         |
| 6. Exceeding maximum income limits                        | 4         |
| 7. Discrepancy between LHAP and lien document             | 4         |
| 8. Funding sources not clearly identified                 | 4         |
| 9. Exceeding 120-day clock                                | 3         |
| 10. Lack of clear policies and procedures                 | 3         |

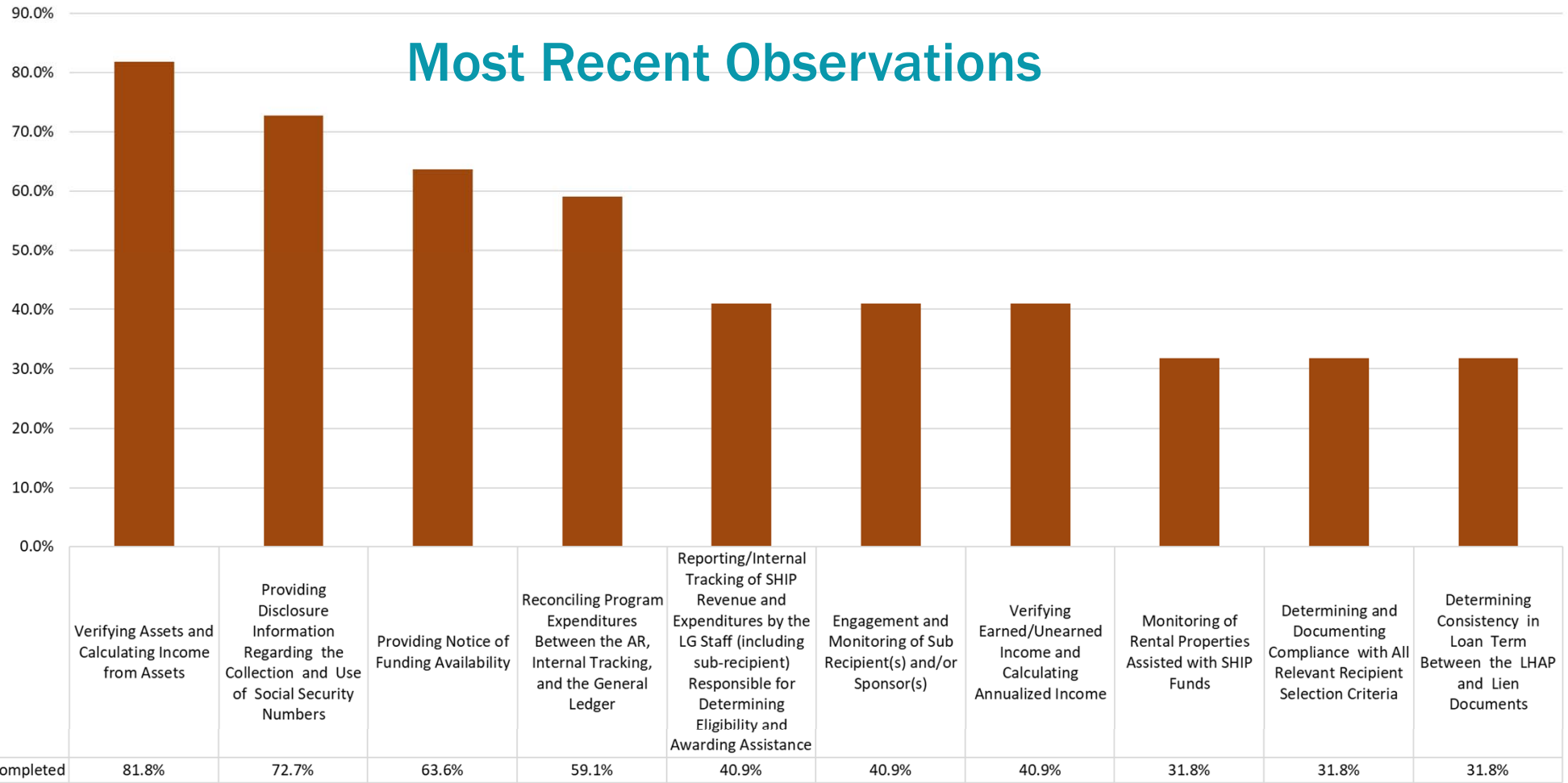


## Two Years Ago

- Differences between LHAP, written agreements, and note & mortgage
- LHAP amendments not submitted to FHFC for review
- Not monitoring rental projects
- Not advertising, Not properly advertising funding
- Improper verification process or documentation
- Income certification form errors
- Insufficient sub recipient documentation in LHAP, Annual Reports and Contracts
- Discrepancies between annual report, the general ledger, tracking spreadsheets, and applicant's file
- Rehab projects: failure to document compliance with purchase price limits
- Incomplete application or file



## Most Recent Observations



# Regulatory Compliance Requirements

Monitoring in SHIP Rule:

## **Section 67-37.019 (1)-(6)**

- Maintain a financial tracking system
- Annual Gross Income... verified and certified
- Income calculated by annualizing verified sources... income limits cannot be exceeded
- Entity... assisting rental developments shall monitor annually, determine tenant eligibility... at least for 15 years



# Steps of the Review



1. Email and SHIP Questionnaire
2. Conference Call
3. Introduction letter
4. Remote Desk Audit
5. Site Visits (when feasible)
6. Examination of Records
7. Complete review
8. Meet with staff to report observations
9. E-mail Monitoring Report
10. Local Government Response
11. Close out letter



# The Questionnaire

See Handout

- Staff
- Subrecipient/Sponsor
- LHAP and Interlocal Agreement
- Definition of income
- File checklist
- Project Delivery and Program Income
- Financial Tracking and Reconciliation
- Rental Properties
- NOFA/Waiting List
- AHAC Advertisement if applicable
- Manufactured housing
- General Ledger
- Chief elected official



# Documents Requested



- New Staff notification to FHFC
- Subrecipient and sponsor agreements
- Most current Local Housing Assistance Plan
- File Checklist
- Tracking System
- Finance Dept. general ledger information
- NOFA or waiting list
- Advertisements for annual report
- Addresses for rental properties
- AHAC notice
- Chief Elected Official Contact Information
- Other items may be requested

# Analysis of a Monitoring Report

## Purpose of Review

- Compliance with F.S., F.A.C. and LHAP
- 65% Homeownership set-aside,
- 75% construction,
- 20% special needs,
- 20% cap on mobile homes,
- very low and low income set-asides,
- 10% for admin



# Monitoring Report Sections

- I. Overview of SHIP Program
- II. Authorization and Purpose of Compliance
- III. Monitoring Participants and Exit Interview Attendees
- IV. Monitoring Objectives, Resources and Sample Selection
- V. Activity Summary by Fiscal Year
- VI. Material Observations
- VII. Nonmaterial Observations
- VIII. Conclusions



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## Section I.

### Overview of SHIP Program

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Florida Housing Finance Corporation (also referred to as “Florida Housing,” “FHFC,” or “the Corporation”) administers the State Housing Initiatives Partnership program (also referred to as “SHIP”), which provides funds to local governments (also referred to as “LG(s)”) as an incentive to create partnerships that produce and preserve affordable homeownership and multifamily housing. The program was designed to serve very low, low and moderate-income families.

SHIP funds are distributed on an entitlement basis to all 67 counties and 53 Community Development Block Grant entitlement cities in Florida. The minimum allocation is \$350,000 per county, unless legislative appropriations provide for a lesser amount. In order to participate, local governments must establish a local housing assistance program by ordinance; develop a local housing assistance plan and housing incentive strategy; amend land development regulations or establish local policies to implement the incentive strategies; form partnerships and combine resources in order to reduce housing costs; and ensure that rent or mortgage payments within the targeted areas do not exceed 30 percent of the area median income limits, unless authorized by the mortgage lender.



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## Section II.

### Authorization and Purpose of Compliance Monitoring

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Florida Housing's authority to monitor a local government's use of SHIP funds is established under Chapter 420.9075 § (9) which reads:

*"The corporation shall monitor the activities of local governments to determine compliance with program requirements and shall collect data on the operation and achievements of housing partnerships."*

The purpose of monitoring is to evaluate whether a local government participating in the SHIP program performs complete, accurate, and timely work consistent with provisions within:

- Chapter 420, Part VII, Fla. Stat. §907-9076 (as amended);
- Chapter 67-37 Fla. Admin. Code (as amended);
- The local government's approved Local Housing Assistance Plan (LHAP) that includes the applicable fiscal year that is the subject of monitoring;
- Pertinent chapters and subsections of the Laws of Florida (as amended) that include the applicable State fiscal years that are the subject of monitoring (as amended); and
- Guidance provided by the U.S. Department of Housing and Urban Development, including guidance provided in *HUD Handbook 4350.3: Occupancy Requirements of Subsidized Multifamily Housing Programs* (as amended).



### Section III.

#### Monitoring Participants & Exit Interview Attendees

The LG's SHIP program is administered by the [REDACTED] SHIP Department, under the supervision of the County's Budget Director.

#### Location & Dates

On-site visit location: [REDACTED]  
 Date(s) of visit: 2/10 through 2/13/2020  
 Date of Exit Interview: 2/13/2020

#### Participants

|       | Name         | Job Title                                | Attended Exit Interview<br>(Y or N) |
|-------|--------------|--|-------------------------------------|
| FHFC: | Robin Fowler | SHIP Compliance Monitoring Administrator | Y                                   |
|       | Debbie Wedoe | Asset Management Senior Analyst          | Y                                   |
| LG:   | [REDACTED]   | SHIP Coordinator                         | Y                                   |
|       | [REDACTED]   | Budget Director                          | Y                                   |

Exit Interview attendees were provided monitoring notes which were discussed with LG staff as



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## Section IV.

### Monitoring Objective, Resources, and Sample Selection

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The LG's SHIP distributions for the following fiscal years are listed in the table below:

| Fiscal Year | Annual Distribution |
|-------------|---------------------|
| 2017-18     | \$350,000.00        |
| 2018-19     | \$350,000.00        |
|             |                     |

Internal tracking of revenue and expenditures for each of the applicable fiscal years subject to this monitoring was submitted by the LG on 1/28/2020 and lists funds expended for the following program uses (excluding funds used for administration expenditures):

| FY   | Uses of Funds <sup>A</sup> |  |
|--|----------------------------|--|
| 2017-18  | Homeownership Activities   | Purchase Assistance; Emergency Repairs                           |
| 2018-19  | Homeownership Activities   | Purchase Assistance; Demolition/Reconstruction; Emergency Repair |
|  |                            |  |
| <sup>A</sup> The LG did not expend , and is not expected to expend, any SHIP funds for Homeowner Counseling.   |                            |  |
| <sup>B</sup> At the time of the on-site monitoring, the LG was still accepting applications for this fiscal year, so no funds for any housing activities had been either encumbered or expended. |                            |  |

#### Monitoring Objective





- 2 most current open fiscal years
- Status of encumbrance and expenditures
- Total funds available including PI and carry over
- Available and expended for Admin

## Section V.

### Activity Summary by Fiscal Year

(Compliance with Encumbrances, Expenditures, and Set-Aside Requirements<sup>5</sup>)

| As of February 10, 2020 <sup>6</sup>                           |                     |                     |  |
|--|---------------------|---------------------|--|
| Encumbrance / Expenditure Deadlines                            | FY 17-18            | FY 18-19            |  |
| ▪ Encumbrance Deadline <sup>8</sup>                            | 6/30/2019           | 6/30/2020           |  |
| ▪ Expenditure Deadline <sup>9</sup>                            | 6/30/2020           | 6/30/2021           |  |
| <b>Funds Available</b>   |                     |                     |  |
| ▪ Annual Distribution  | 350,000.00          | 350,000.00          |  |
| ▪ Program Income (PI) Available                                | 171,537.61          | 98,607.48           |  |
| ▪ Carry Over from Previous Distribution                        | -5,320.29           | -6,635.84           |  |
| <b>Total Funds Available</b>                                   | <b>\$516,217.32</b> | <b>\$441,971.64</b> |  |
| <b>Available for Administrative Expenditures<sup>10</sup></b>  |                     |                     |  |
| ▪ From Annual Distribution (10% of Distribution)               | 35,000.00           | 35,000.00           |  |
| ▪ From Program Income  | 0.00 <sup>11</sup>  | 9,860.74            |  |
| <b>Available for Housing Program Activities</b>                |                     |                     |  |
| ▪ From Annual Distribution (Distribution less Available Admin) | 315,000.00          | 315,000.00          |  |
| ▪ From Total Funds Available (Less Admin from Dist. & PI)      | 481,217.32          | 397,110.90          |  |
| <b>Encumbered Funds (Housing Program Activities)</b>           |                     |                     |  |
| ▪ Amount Encumbered from the Distribution                      | 315,000.00          | 299,800.00          |  |
| ▪ Total Amount Encumbered                                      | 487,853.16          | 299,800.00          |  |
| <b>Amount Encumbered by Encumbrance Deadline</b>               | <b>112,134.78</b>   | <b>Still Open</b>   |  |
| ▪ Remaining Amount to be Encumbered (from Distribution)        | 0.00                | 15,200.00           |  |
| ▪ Remaining Amount to be Encumbered (Total Avail. Funds)       | 0.00                | 82,110.90           |  |
| <b>Expended Funds (Housing Program Activities)</b>             |                     |                     |  |
| ▪ Expended   | 211,788.01          | 14,202.00           |  |
| ▪ Remaining to be Expended by Deadline                         | 276,065.15          | 382,908.90          |  |



For monitoring of selected administrative activities, a “**material observation**” refers to an error, omission, or violation of an administrative activity that is required under either Fla. Stat.; Fla. Admin. Code; pertinent chapters and subsections of Laws of Florida; or which is included in the LG’s LHAP, and for which:

- no documentation was found that confirmed that the activity had been performed; or
- documentation examined revealed the activity was performed in a manner inconsistent with Fla. Stat.; Fla. Admin. Code; pertinent Laws of Florida; or the LHAP.

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**Section VI.**  
**Material Observations**  
(Requires Responses from the LG)

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**A. SELECTED ADMINISTRATIVE ACTIVITIES<sup>17</sup>**

For the applicable fiscal year that is this subject of this monitoring, testing of selected administrative activities that are not client-specific was performed and included an examination of the following (as applicable): (1) the approved LHAP; (2) Interlocal Agreement; (3) documents related to the engagement and monitoring of eligible Sponsor and Sub Recipient files; (4) required notices to FHFC regarding new staff, as well as other required public notices (notice of funding availability, notice of availability of the AR, and the AHAC notice); (5) LG internal tracking of activities funded by each applicable State fiscal year distribution; (6) eligible activities funded, including reviewing compliance with required set-asides; (7) LG reconciliation of internal tracking of revenue and expenditures, (including reviewing allowable administrative costs) to the general ledger; (8) Local Housing Assistance Trust Fund statements; (9) reporting requirements; (10) monitoring of rental units; (11) record retention policies; (12) set-aside compliance; and (13) denied files.<sup>18</sup>

Also included were monitor-prepared reconciliations of each applicable State fiscal year’s revenue and expenditure amounts as reported on:

## Activities and Observations

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Testing of selected administrative activities revealed the following material observations:

|  |                      |
|--|----------------------|
| <b>Observation #:</b>  | 1                    |
| <b>Administrative Activity:</b>  | Encumbrance Deadline |
| <b>Applicable State Fiscal Year(s):</b>  | 2017-18              |
| <b>Observation:</b><br>For the applicable State fiscal year 2017-18, the LG's annual distribution was \$350,000.00, and funds were to be encumbered by 6/30/2019. However, only \$112,134.78 was encumbered for housing program activities by that date. It should be noted that little work for the fiscal year had been performed at the time the current SHIP Coordinator, who had no prior experience with the SHIP program, began employment with the County. As a result, the SHIP Coordinator had less time in which to encumber funds in a manner consistent with the administrative rule. However, all funds had been encumbered at the time of the on-site monitoring. |                      |
| <b>Recommendation:</b><br>The LG should ensure all SHIP funds for an applicable State fiscal year are encumbered by the associated deadline.   |                      |

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## **Section VI.**

### **Prior Monitoring - (Review and Additional Work)**

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The LG was last monitored by FHFC in 2015. There were no outstanding issues from the prior monitoring that required additional examination as part of this most recent monitoring

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## Section VII.

### Nonmaterial Observations

(Responses from the LG Not Required)

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For monitoring of selected administrative activities, LG income eligibility determinations, and compliance with selected LHAP requirements, a “**nonmaterial observation**” refers to an error, omission, or violation that: 1) is not in conflict with a selected activity required by Fla. Stat.; Fla. Admin. Code; pertinent Laws of Florida; applicable HUD guidance; or the LHAP; and that does not result in:

1. a confirmed adverse impact on the eligibility of the household to receive assistance;
2. a confirmed adverse impact on the eligibility of the housing unit to receive assistance;

Testing of selected administrative, non-income, and income eligibility activities revealed the following nonmaterial observations:

|   |  |
|---|--|
| <b>Observation #:</b>   | 7  |
| <b>Activity:</b>  | Loan Terms Inconsistent Between LHAP and Lien Document |
| <b>Applicable State Fiscal Year(s);</b>   | 2017-18  |
| <b>Client Name:</b>   | Stephanie G.   |
| <b>Strategy:</b>  | Purchase Assistance                                    |
| <b>Observation:</b>   |  |
| The LHAP states that forgiveness will be prorated annually over the 10-year term (1/10th) yet |  |

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## Section VIII.

### Conclusion

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Chapter 420.9075 (9), Fla. Stat., requires Florida Housing to monitor the activities of local governments to determine compliance with program requirements. For those selected administrative and program activities tested in this monitoring, the focus was on: 1) identifying instances of both material and nonmaterial noncompliance with applicable governing laws, rules, contracts, and the LHAP and; 2) identifying instances of inefficient or ineffective operational practices so that problems may be corrected and addressed in a manner that would improve the LG's administration of the program.

It should be noted that this monitoring, and the resulting conclusions reached, were based on a sampling of program activities and does not relieve the LG of its responsibility to assure compliance in all areas of its SHIP-assisted activities.

#### *Recapture*

A recapture of SHIP funds may be required based upon the corrective action take to address the following:

- Failure to meet required set-asides if currently encumbered but unspent funds are not expended by the deadline or if certain requirements, such as verification of rehabilitation or of Special Needs status, cannot be documented by the deadline.



# Monitoring Report Includes Local Government Response

## **SHIP Rule: 67-37.019 (7)**

- Submit a written response to the Material Observations
- Response submitted within 30 days
- Include an explanation and/or remedy
- A plan for correcting issues with timeline
- Plan for repayment of ineligible expenses



# Local government responses

## Examples of the Good, Bad and Ugly



### **GOOD: State new policies:**

"This department has undergone personnel changes. Previous staff processed the files that were reviewed. Current staff will do \_\_\_\_\_ to avoid this observation in the future."

### **GIVE SPECIFICS**



## Examples of the Good, Bad and Ugly



## Current Monitoring Observations

### **BAD: Response to expenditure deadline non-compliance**

"Certainly every effort is made to expend funds timely and we have historically met deadlines, but a jurisdiction as vast and diverse as the County would not be able to adhere to these constraints as they would pose an undue burden...."



## Examples of the Good, Bad and Ugly



## Current Monitoring Observations

### **UGLY: Response to a county using SHIP funds to meet cash flow needs:**

"The board was not aware of any state law or regulation that restricted the use of SHIP funds"

# Current Monitoring Observations

## Implications of Non-Compliance

### **SHIP Rule 67-37.019 (8)**

#### Pattern of Violation:

(8) If ... an eligible jurisdiction has established a pattern of violation ... the Corporation shall report such pattern of violation to the Executive Office of the Governor ...  
**distribution of program funds... will be suspended.**



# If Funds are Suspended: Corrective Action Plan

- The eligible jurisdiction shall develop a corrective action plan (CAP) within 60 days
- Propose corrective action for each violation
- Implement within 3 months of the CAP's approval by Florida Housing
- Upon approval of the CAP, program funds will be distributed.

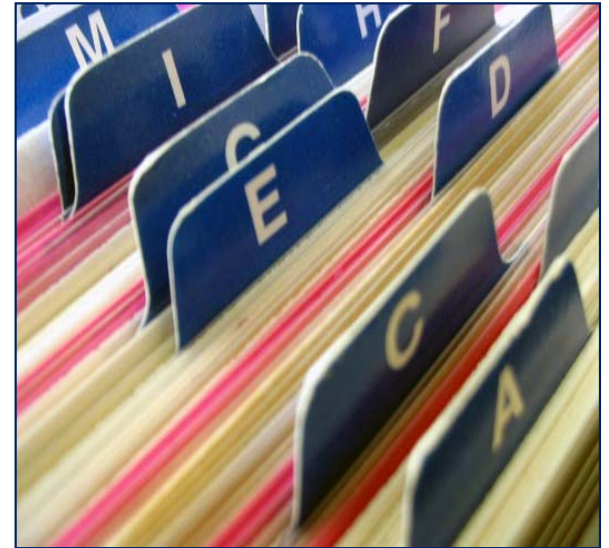


# File Documentation



# File Guidance

- File Checklist
  - If it's on the checklist but not in the file, it will be included in monitoring report
- Date stamp all verifications
- All documents: signed, dated
- Security Agreement: signed, dated, recorded
- Consistency in file documentation and organization



# File Documentation for All SHIP Files

## Application for Program Assistance

- Signed by all household members over 18

## Identification for all household members

- example: copy of Driver's License

## Authorization for the Release of Information Form

- Signed by all household members over 18

## Income and Asset Verification Forms

- All household members



# The Application or File Contains...

- **Public Records Statement:** Household members understand that all documents are subject to Chapter 119 of Florida's public records laws.
- **Release of Information:** Signed statement by all adult household members consenting to verification of income and asset information.
- **Social Security Number:** City/County must give written explanation of purpose and authority for collecting social security numbers.
- **Warning:** Florida Statute 817 provides that willful false statements or misrepresentation concerning income and assets or liabilities relating to financial condition is a misdemeanor of the first degree and is punishable by fines and imprisonment provided under §775.082 or 775.083.

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# MORE FILE DOCUMENTATION

## Income Certification Form

- Signed by all household members 18 years of age or older
- Effective date, funding year

## Detailed income calculations

- All income and assets

## Fund encumbrance and expenditure

- When funds were encumbered and fully expended

## Recorded Lien Document with Default Provisions



# Rehabilitation File Documentation

- Proof of Property Ownership
- Initial Property Inspection
- Work Write-up & Cost Estimate
- Contractor(s) Bid or Proposals
- Documentation of Contractor Licensure
- Change Orders (if applicable)
- Contractor/Homeowner Contract
- Construction Payment Requests
- Work Inspection Report(s)
- Interim and Final Payments
- Certificate of Completion
- LHAP specific requirements (ex. Insurance required, no liens)



## For Rehabilitation Projects Right of Rescission

Give applicant 3 days to change their minds and cancel the loan

**OR**

Have City/County attorney review the TILA regulations and issue a statement that its not needed. Place this written determination in your file



# Purchase Assistance Documentation

- Contract for Purchase (maximum Value)
- Loan Disclosure Forms (cash contribution)
- Copy of First Mortgage Document (affordability)
- Copy first mortgage Title Insurance (clear title)
- LHAP specific requirements (example: Counseling certificate, cash contribution)

## If Rehab Included

- List of repairs and proof repairs completed
- Final Inspection Report/pictures
- Certificate of Occupancy



## Problems with Files

- Incomplete application or other forms
- Income Certification errors
- Missing required documents
- Discrepancy between LHAP and Lien documents
- Documentation of Special Needs (SSDI, SSI)



# File Documentation: Which Forms are *NOT* Required

- Initial Property Inspection
- Three-year employment history
- Authorization for Release of Information Form
- Divorce Decree (for child support income, if applicable)
- Client Notes/File Log
- Proof of citizenship
- Contractor(s) Bids
- Income Verification Forms
- Pay Stubs
- Copy of Driver's License
- Affidavit of Unemployment
- Work Write-up
- Cost Estimate
- Certificate of Completion
- Income Tax Return (for self employed applicants)
- Certification of No Income Change (signed w/contract)
- Income Certification Form
- SHIP Application
- Award Letter





## SHIP File Retention Policy

- **Cases Assisted:** Wait five years after loan has been released/satisfied, provided audits have been released, whichever is later.
- **Cases Not Assisted:** Retain for four years after Closeout Annual Report for that SHIP Distribution has been submitted.





## Retention Examples

**EXAMPLE:** 15/16 Emergency Recipient's assistance is granted

- Audits are released after expenditure deadline of June 30, 2018
- Keep file until June 30, 2023

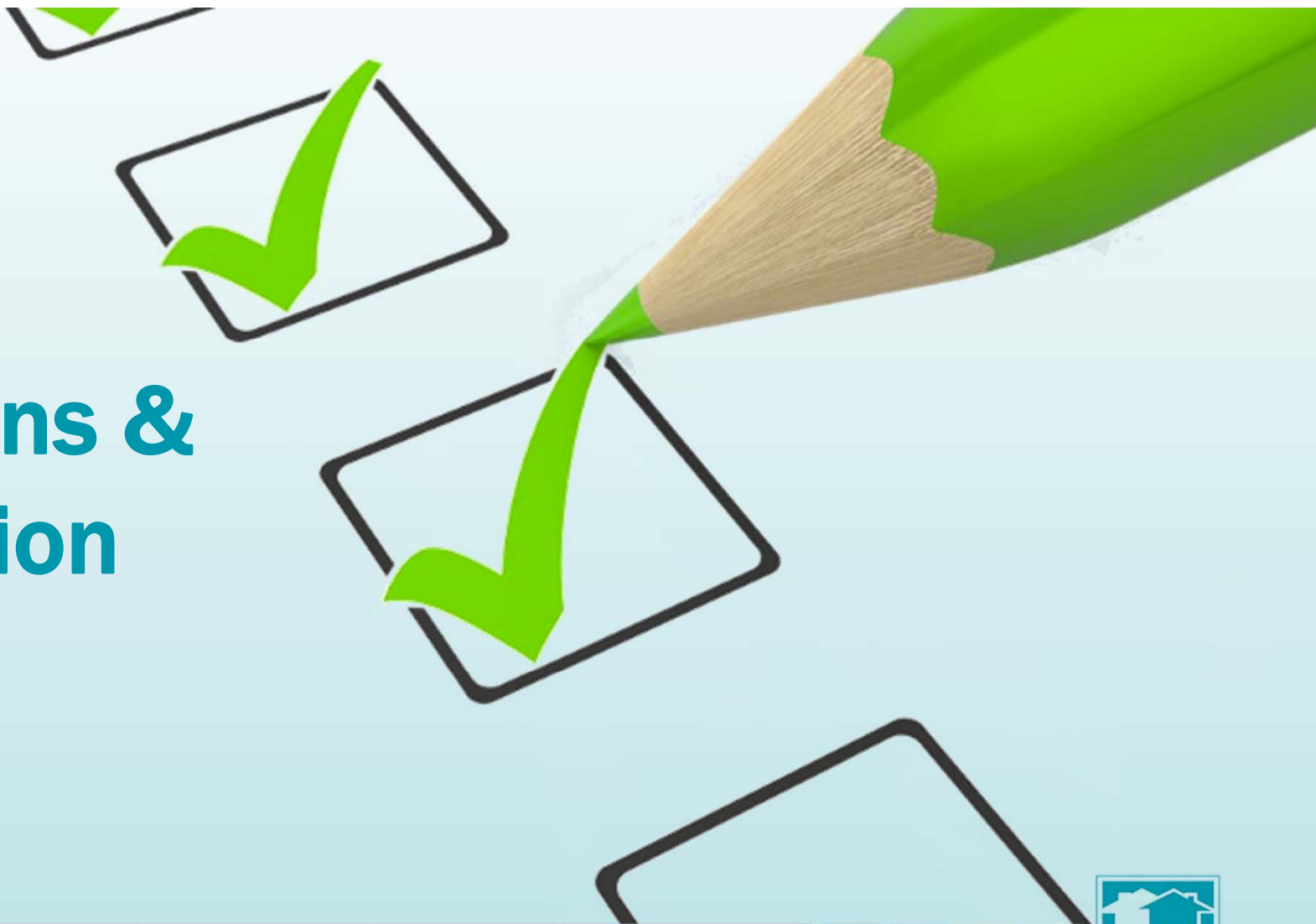
**EXAMPLE:** 16/17 Buyer's assistance has 10-year lien.

- Keep file for 5 years after lien expires





# Questions & Evaluation



# *Please complete the evaluation!*



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