THE FLORIDA HOUSING COALITION JOURNAL

BLUEPRINTS

GUIDING THE FUTURE OF AFFORDABLE HOUSING IN FLORIDA

VOLUME 2| FALL/WINTER 2025

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2025 HOME MATTERS REPORT

A clearer look at Florida's housing needs — and the strategies shaping what's next.

Measuring the Momentum

Evaluating two years of Live Local: real progress, real gaps, and the road to long-term impact.

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Building a Better Housing Future for Florida

A WORD FROM OUR CEO

Ashon Nesbitt

Housing has firmly entered the national spotlight. Across the country, federal policy shifts, new funding streams, and renewed attention to housing supply, affordability, and resilience are reshaping the landscape. While uncertainty remains—about timing, implementation, and long-term impacts—one thing is clear: the coming years will bring significant opportunity for communities prepared to act. This issue of Blueprints reflects that moment and explores how Florida is uniquely positioned to lead.

At the state level, recent legislation has laid important groundwork for progress. Combined with a strong infrastructure of housing professionals in local governments and a deeply connected ecosystem of nonprofit organizations, developers, advocates, and financial partners, Florida enters this next chapter with capacity, experience, and momentum. The challenge ahead is not only navigating change but translating policy into practice—and ensuring that new tools and resources deliver real outcomes for people and communities.

This issue of Blueprints recaps key federal and state policy developments while looking forward to what they make possible. As communities prepare for what comes next, the need for coordination, data, and shared learning has never been greater. Florida's housing ecosystem has spent years building those muscles, and that preparation matters now more than ever.

This issue also pauses to honor the life and legacy of Jaimie Ross, our former CEO and forever Housing Champion. Jaimie believed deeply in the power of collaboration and coalition-building to advance housing affordability at scale. Her leadership helped shape the Florida Housing Coalition's role as a trusted convener and thought partner, and her impact continues to guide our work as we look ahead. We carry her vision forward in everything we do.

The energy and alignment across the field were on full display at our Annual Statewide Affordable Housing Conference. As captured in these pages, the conversations, connections, and ideas shared there reinforced a shared understanding: this is a consequential moment for housing in Florida. With the right interventions at the right time, we can turn uncertainty into progress and ambition into implementation.

Looking toward 2026 and beyond, communities across Florida are scaling community land trusts, strengthening nonprofit development capacity, and embedding resilience and innovation more deeply into housing strategies. These efforts reflect a growing recognition that housing is foundational to economic opportunity and long-term community well-being.

Blueprints exists to document this work, surface lessons, and help the field see what is possible when vision meets action. This issue captures a housing ecosystem that is forward-looking, prepared, and committed to shaping the future rather than reacting to it.

Thank you for being part of this mission. Your leadership, partnership, and belief in what's possible continue to move this work forward. Together, Florida is ready—not just to respond to the national housing moment, but to lead through it.

EDITORIAL & DESIGN

EDITOR IN CHIEF
Ashon Nesbitt

ASSOC. EDITOR
Amanda Rosado

CREATIVE
Meghan Shiner

ISSUE CONTRIBUTORS
Christina Apostolidis, Wis Benoit, Abbey Brown, Michael Chaney, Rebecca Darling, Kody Glazer, Mike Kingsella, Peter Lawrence, Ryan McKinless, Anne Ray, Chad Reed

MEET OUR BOARD

THE FLORIDA HOUSING COALITION is a nonprofit, statewide membership organization whose mission is to bring together housing advocates and resources so that all Floridians have a quality affordable home in a suitable living environment. Blueprints is published by the Florida Housing Coalition as a service to its members, housing professionals and others interested in affordable housing issues.

1311 Paul Russell Road, B-201,
Tallahassee, FL 32301

Tel. 850-878-4219

Fax 850-942-6312

info@flhousing.org

www.flhousing.org

HONORING THE LEGACY

Jaimie Ross, the former President and CEO of the Florida Housing Coalition and affordable housing champion, passed away at her home in St. Pete Beach on August 20.

Her contributions to affordable housing will have a lasting impact. Most notably, Jaimie led the Sadowski Coalition, which created a dedicated revenue source for affordable housing in Florida. This affordable housing trust fund has helped develop hundreds of thousands of affordable housing units.

Jaimie built the road we traveled and the bridges we continue to cross in pursuit of safe, stable, and affordable homes for all Floridians. At our 38th Annual Statewide Affordable Housing Conference this past August, we honored and celebrated her extraordinary vision, leadership, and legacy–a legacy that continues to guide our work every single day.

Jaimie Ross

STATUTE SPOTLIGHT

2026 LEGISLATIVE SESSION: *WHAT'S AHEAD FOR AFFORDABLE HOUSING*

Written by Kody **GLAZER, CHIEF LEGAL AND POLICY OFFICER**

By the time you read this, the 2026 Legislative Session will soon be upon us! Florida's affordable housing crisis remains severe: more than 2.4 million low-income households spend over 30% of their income on housing, nearly 31,000 Floridians experience homelessness on a given night, and homeownership is slipping further out of reach for working families. Florida's aging population faces mounting housing challenges. Up for Growth, a national pro-housing organization, estimates a statewide housing unproduction of 244,000 homes.

But there is reason for optimism. The Florida Legislature has the financial and regulatory tools to close this housing gap. Through smart public policy, lawmakers can empower public and private partners to build and preserve the affordable homes Florida needs.

Below are key issues likely to dominate the 2026 Session, along with the Florida Housing Coalition's top priorities.

Fully Funding SHIP and SAIL

Last year, the Florida Legislature fully funded the State Housing Initiatives Partnership (SHIP) program and the State Apartment Incentive Loan (SAIL) for the fifth consecutive year —directing all revenues collected in the Sadowski Affordable Housing Trust Funds to their intended use. The caveat being that in 2021, the Florida Legislature reduced the amount of documentary stamp tax revenue that goes into the Trust Funds by half via Senate Bill 2501.

We urge the Legislature to keep SHIP and SAIL fully funded for a sixth year. These nationally recognized programs are foundational to Florida's affordable housing strategy.

SHIP supports local housing initiatives for 67 counties and 56 municipalities, often as the backbone of a locality's housing ecosystem. Through down-payment assistance, home repair, new construction, gap financing, counseling, and much more, SHIP helps Floridians become and remain homeowners, builds affordable rentals, and assists elders aging in place. SAIL provides low-interest loans to help rehabilitate or build affordable rental homes statewide.

Both programs leverage substantial private investment and serve Florida's workforce—teachers, health care workers, first responders, hospitality employees, seniors, and residents with special needs.

Rural Renaissance Returns?

In 2025, Senate President Ben Albritton championed the "Rural Renaissance," a series of proposals to boost investment and opportunity in Florida's rural communities. Although it didn't pass, the effort is expected to return in 2026.

One key proposal: increasing the minimum SHIP allocation from $350,000 to $1 million per county, significantly boosting rural housing resources. The Coalition supports this increase, provided larger counties don't lose funding to offset it.

If adjustments to the SHIP program are made, we strongly encourage lawmakers to supplement SHIP Program with General Revenue funds so larger counties aren't shortchanged when rural areas are lifted up.

Property Taxes

This could be the most contentious issue of 2026. The Governor continues to advocate for a constitutional amendment eliminating property taxes on homesteads, to be decided by voters in November 2026. The House and Senate will each bring their own proposals, and any amendment must win 60% voter approval. Instead of eliminating or reducing homestead property taxes across the board, there are more nuanced alternatives that would help alleviate property tax burdens for homeowners most in need.

One alternative is a Circuit Breaker Program—a model deployed in other states that caps property tax payments to a percentage of income. We could also enact temporary additional homestead exemptions for first-time homebuyers, expand the low-income senior exemption, and a host of other reforms that don't upend the current system. But no matter what is ultimately sent to the ballot in 2026, get ready for non-stop TV ads this fall on property taxes!

Here are a few questions focused on as the affordable housing community unpacks what property tax reforms could mean:

1. What About Renters? Roughly one-third of Floridians rent. Cutting homestead taxes could shift the tax burden to non-homesteaded properties—including rentals—driving up rents.

2. How Will Localities Fund Essential Services? Property taxes pay for public safety, sanitation, parks, and roads. Reductions could force service cuts or new fees that cost homeowners as much as their old tax bills.

3. What Happens to Local Funding for Affordable Housing? If local governments lose a significant portion of property tax revenue, it will be much harder to set aside local funds for affordable housing. With smaller general revenue budgets, localities will have less flexibility to support construction, preservation, or other housing initiatives—especially since these programs often compete with essential services for limited dollars.

4. What Will Happen to Housing Prices? Eliminating taxes may inflate home prices—or, if services decline, depress them. Policymakers should analyze these tradeoffs carefully before sending any measure to voters.

Live Local 4.0?

The 2026 Session will mark the fourth round of Live Local Act amendments. While sweeping land use changes are unlikely, lawmakers may expand eligibility to include school board or employer-owned property and refine technical provisions. We expect the bulk of changes to happen on the property tax side—especially with the Multifamily Middle Market (MMM) Property Tax exemption. The talk of the town is that as lenders are hesitant to underwrite the flagship Live Local property tax exemption for affordable housing. So changes may be coming on how the exemption is administered, particularly as it relates to the opt-out provision created in 2024. This may be the year we see the exemption triggered earlier in the process, at site plan review instead of lease-up.

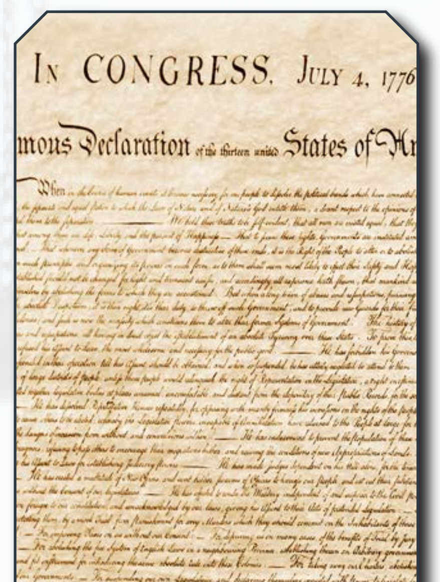
Other Issues to Watch

Accessory Dwelling Units. Last session, the Legislature was as close as you can get to passing a bill to legalize ADUs in all single-family areas statewide. The Florida Housing Coalition supports efforts to send an ADU bill across the finish line this year to unleash ADU development across Florida.

Starter Homes. Following Texas's SB 15, Florida lawmakers may explore reducing minimum lot sizes, allowing "middle housing," and enabling administrative lot splits to revive the starter-home market by increasing the number of smaller homes on small lots.

Senate Bill 180 Reforms. Last year's SB 180 restricted local governments from adopting stricter land use regulations until 2027. Expect renewed debate in 2026 about restoring some local control.

Florida's affordable housing challenges are complex, but they are solvable. With sustained funding for SHIP and SAIL (including consistent funding for Innovative SAIL), and smart, balanced reforms, the 2026 Legislature can make meaningful progress toward a more affordable Florida.



KODY GLAZER is Chief Legal and Policy Officer for the Florida Housing Coalition, with expertise in land use law, affordable housing planning and development, and policy implementation. Kody can be reached at glazer@flhousing.org.

MEASURING THE MOMENTUM

WHERE ARE WE WITH LIVE LOCAL, TWO YEARS IN?

Co-Written by Kody **GLAZER, CHIEF LEGAL AND POLICY OFFICER &** Ryan **MCKINLESS, POLICY ANALYST**

Live Local will turn three during the 2026 Legislative Session! She's past the "Terrible Twos", now able to ask "who," "what," "where" and "why" questions, and can ride a tricycle with ease. And just like an actual three-year-old, we can now see more clearly what kind of person she's becoming.

As Live Local approaches this milestone, it's worth taking stock: is the Act that many hailed—ourselves included—as ushering in a "new era for housing" delivering on that promise? Or have its ambitions been weighed down by practical realities?

It's important to recognize that Live Local was never designed to be the silver bullet for Florida's affordable housing crisis. It was one major bill adding valuable tools to the toolkit, but much work remains. The Act didn't address many key areas still ripe for reform: zoning in residential areas, starter homes, accessory dwelling units, local funding for housing, permitting reform, community land trusts, the role of CRAs, fair housing, factory-built housing, building code, fee waivers, and insurance. Each represents an opportunity for state and local action to complement Live Local's progress.

Funding in Live Local

The record investment in affordable housing through the Live Local Act is arguably its most underrated achievement. While headlines focus on the land use mandate and property tax exemptions, the Legislature's funding commitments over the past three sessions have been remarkable.

Since 2023, lawmakers have appropriated **more than $2.7 billion for affordable housing**—including over $589 million for SHIP, over $264 million for SAIL, and $450 million for the Innovative SAIL Program. These record levels won't solve Florida's housing crisis alone, but they represent a major step in the right direction.

Two years in, the **Innovative SAIL Program** has already financed nearly **6,000 affordable rental homes** across 22 counties, serving households primarily below 80% AMI. Unfortunately, in 2025, the Legislature rolled back its ten-year, $150 million annual commitment, making future funding subject to annual appropriations.

To keep this momentum going, housing advocates will need to champion Innovative SAIL each session to ensure this proven program continues to deliver affordable homes for Florida's working families.

Land Use Mandate – ss. 125.01055(7)/166.04151(7)

The Live Local Act land use mandate requires localities to allow multifamily and mixed-use affordable housing in areas zoned for commercial, industrial, and mixed-use —provided at least 40% of units are affordable rentals for households earning up to 120% of area median income (AMI). Eligible projects also benefit from enhanced entitlements, including increased density, height, and floor area ratios, reduced parking requirements, and administrative approval.

As of September 2025, **143 projects statewide** have proposed or applied to use this tool, representing more than **43,000 new homes**, of which at least 40% will be affordable to households up to 120% AMI. Nearly half of these projects are in Miami-Dade County, with additional clusters in Broward, Hillsborough, Palm Beach, Pinellas, and Orange counties. The passage of **SB 1730** last session is expected to spur even greater use by clarifying several key implementation questions.

Still, data on construction progress remains limited. Entitlements don't guarantee development, and many projects are still working their way through financing and approvals. The real test will come in **2027 or 2028**, five years into the Act's life, when we can assess how many of these entitled projects have translated into built and occupied affordable homes.

MMM Property Tax Exemption - s. 196.1978(3), F.S.

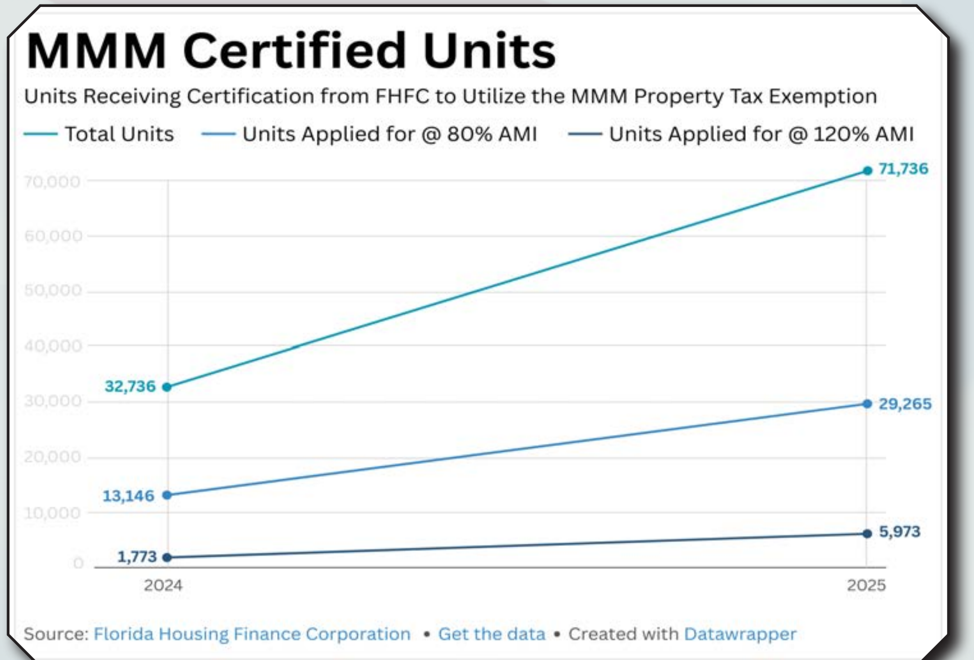
Alongside the land use mandate, the **Multifamily Middle Market (MMM) property tax exemption** is the most widely used—and debated—tool under Live Local. The program offers two tiers of relief for newly built multifamily developments with at least 71 affordable units:

- A **75% exemption** for units affordable to households earning between 80–120% of AMI, and
- A **100% exemption** for units affordable to households at or below 80% of AMI.

Since the Legislature authorized local taxing authorities to **opt out** of the 80–120% AMI exemption in 2024, lenders have become cautious about underwriting projects that rely on it. Because eligibility applies only after affordable units are built and leased to qualified tenants, the uncertainty surrounding local participation makes financing riskier.

In 2025, **35,238 units** applied for the MMM statewide—**29,265** at 80–120% AMI and **5,973** at 0–80% AMI. The share of lower-income units grew notably: from **11.9% in 2024 to 20.7% in 2025.** This shift suggests that the 2024 opt-out provision may be nudging the MMM program toward deeper affordability—a promising sign as policymakers assess its long-term impact. Much of this increase came from Duval County, which saw the largest number of applications (57 developments, 6,649 total units). Miami-Dade followed with 35 developments and 5,763 units.

Interestingly, in Duval County, there is almost an even 50-50 split between the two income tiers. Because local market rents already align with roughly 95–100% AMI, developers there are finding the 0–80% exemption more feasible.



So, How is Live Local Working?

It's safe to say the **funding side** of Live Local has been a success. Record state investments and early results from the Innovative SAIL Program show that homes are being built and preserved across Florida.

For the **land use mandate**, it's still too early to reach firm conclusions. Development takes time—entitlements are only one part of the process—and only a handful of projects have broken ground so far. By 2027 or 2028, we'll have a clearer picture of whether this tool is translating approvals into completed affordable homes.

On the property tax front, results are more mixed. Statewide data show the greatest housing needs remain among households earning at or below 80% AMI. While higher-cost markets like Miami-Dade, Broward, Hillsborough, and Orange also face affordability challenges up to 120% AMI and above, much of the state's rental stock already falls below that threshold. As a result, some developments benefiting from the Multifamily Middle Market (MMM) exemption may not require public subsidy.

Over time, it will be important to examine market trends near MMM-supported properties to determine whether the exemption is spurring new supply, lowering rents, or simply subsidizing existing market-rate housing. Encouragingly, 2025 saw a growing share of units reserved for households below 80% AMI—a sign that the program may be moving in the right direction.

KODY GLAZER is Chief Legal and Policy Officer for the Florida Housing Coalition, with expertise in land use law, affordable housing planning and development, and policy implementation. Kody can be reached at glazer@flhousing.org.

RYAN MCKINLESS is a Policy Analyst for the Florida Housing Coalition, specializing in land use, affordable housing programs, and previous experience working at FHFC. Ryan can be reached at mckinless@flhousing.org

Florida's Innovative SAIL Program: A Promising Start Now at a Crossroads

Early signs show that Florida's Innovative SAIL program is working as intended - or perhaps even better than intended - to create new affordable rental homes that suit Florida's housing needs.

Written by Ryan **MCKINLESS, POLICY ANALYST**

The Innovative SAIL program, created by Florida's Live Local Act in 2023, is a forward-thinking investment in our state's affordable housing infrastructure. The Live Local Act not only created this new initiative but also committed $150 million annually to the program for ten years. But just two years in, the Legislature has already pulled back that long-term funding promise. Instead of guaranteed annual support, funding for Innovative SAIL will now be decided each year through the state's appropriations process. This change means housing advocates will need to champion this important program session after session to keep the program alive and thriving.

So, what is Innovative SAIL? What have we seen so far? And why is it so important to keep pushing for strong, consistent funding? Let's break it down – and explore why this program deserves continued attention and advocacy.

What is Innovative SAIL?

Innovative SAIL, also called the "SAIL-like" program, was designed by the Florida Legislature to provide a crucial gap financing resource for affordable multifamily housing projects, with funds being awarded through competitive Requests for Applications (RFAs) overseen by the Florida Housing Finance Corporation (FHFC). This program follows a tried and proven housing financing model in our state – Florida's traditional State Apartment Incentive Loan (SAIL) program has been a nationwide model for success since its creation nearly 40 years ago.

What sets Innovative SAIL apart is its targeted focus. Under s. 420.50871 of the Florida Statutes, funds are awarded based on specific priorities set by the Legislature to respond directly to Florida's evolving housing needs. These priorities ensure that public investment is strategically aligned with high-impact, future-oriented solutions. These priorities include:

- Redeveloping existing affordable housing.
- Urban infill including conversions of vacant, dilapidated, or functionally obsolete buildings or the use of underused commercial property.
- Mixed-use developments that incorporate nonresidential uses such as retail, office, or institutional.
- Providing housing near military installations in Florida, with preference given to projects that incorporate critical services for servicemembers, their families, and veterans, such as mental health treatment services, employment services, and assistance with transition from active-duty service to civilian life.
- Use or lease of public lands
- Addressing the needs of young adults who age out of the foster care system.
- Meeting the needs of elderly persons.
- Providing housing to meet the needs in areas of rural opportunity, designated pursuant to s. 288.0656

Annual Funding is No Longer Assured

The Innovative SAIL program originally included a legislative pledge to allocate $150 million annually for 10 years, funded through increased revenue to the State Housing Trust Fund. This long-term commitment was designed to ensure predictable support for affordable housing development.

However, House Bill 7031 (2025) eliminated the guarantee of recurring funding. Going forward, the program will depend on the annual appropriations process. While the Legislature did approve $150 million from General Revenue for FY 2025–2026, the loss of a recurring funding commitment signals the need for ongoing advocacy to protect and sustain the program.

After two years in operation, the Innovative SAIL program is delivering measurable results. Data now shows how the program is advancing affordability, meeting the key priorities provided by the Legislature, and distributing funds across Florida.

Providing Deeper Affordability

Innovative SAIL funds are required to serve households at or below 120% of the area median income (AMI). This is a notable difference between the Innovative SAIL program and the traditional SAIL program which is required to serve households at or below 60% AMI. *However, initial results after two years of operation show that Innovative SAIL funds are overwhelmingly being used to serve households at or below 80% AMI*. Here are the numbers:

- 5,968 total affordable rental homes assisted
- Roughly 79% of assisted units will serve households at or below 80% AMI (4,743 units):
  - 1,159 units at or below 80% AMI
  - 1,915 units at or below 60% AMI
  - 584 units at or below 50% AMI
  - 326 units at or below 40% AMI
  - 565 units at or below 33% AMI

Making an Impact Statewide

Innovative SAIL funds are being used to support affordable housing throughout Florida. Through two years, Innovative SAIL funds have been awarded to developments in 22 different counties. As the program receives funding and is allowed to move forward, it will continue to reach new areas of the state.

Keeping the Momentum

The Innovative SAIL program is already proving to be an effective tool of the Live Local Act, accelerating the development and redevelopment of affordable housing across Florida. Leveraging increased housing trust fund revenues through a proven SAIL-style financing model, the program delivers results. But with recurring funding no longer guaranteed by the Legislature, we must closely track its early impact to demonstrate continued value. The reality is that affordable housing development does not happen overnight. It takes time for these proposals to move through the financing process before we see shovels in the ground.

The data is clear: Innovative SAIL is working. Let's secure its future and keep building.

RYAN MCKINLESS is a Policy Analyst for the Florida Housing Coalition, specializing in land use, affordable housing programs, and previous experience working at FHFC. Ryan can be reached at mckinless@flhousing.org

INDUSTRYINSIGHTS

How Federal Housing Policy Is Shifting, and Why Florida's Experience Matters

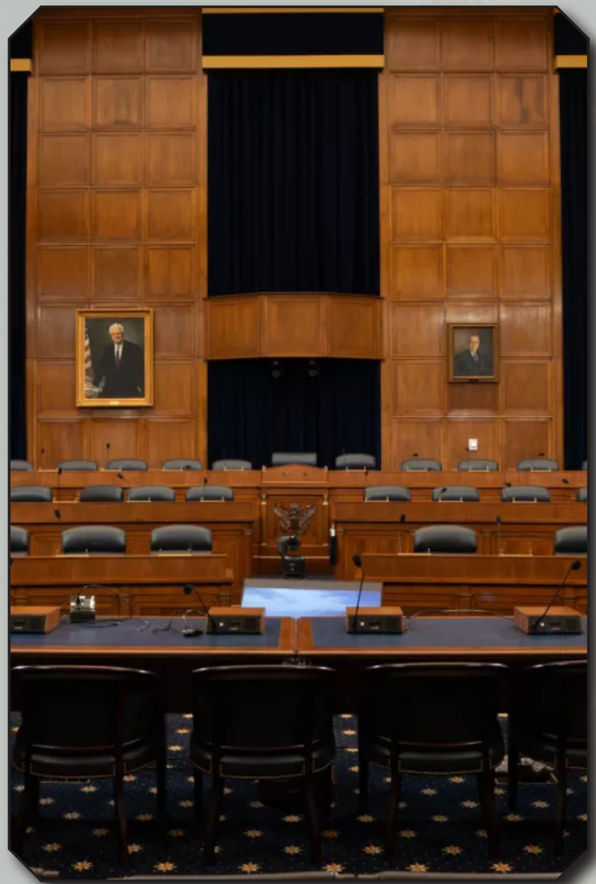
Why D.C. Is Looking to Florida for the Blueprint on Housing Reform.

Written by Mike **KINGSELLA, FOUNDER & CEO , UP FOR GROWTH**

As Congress finalized this year's National Defense Authorization Act, many in the housing space expected a familiar pattern: housing supply issues would be discussed but excluded from the final package. What happened instead was something new. The debate over whether to include a major housing title in a must-pass bill revealed that federal interest in housing affordability has reached the next level.

For Florida's housing leaders, this moment marks a turning point. Washington is beginning to see housing affordability as central to economic and community stability, and lawmakers are looking closely at states that have already modernized their systems. Florida stands out because practitioners here have built coalitions, tools, and implementation capacity that show what sustained pro housing policy can accomplish. This combination of reform and practical know-how is actively influencing how federal committees evaluate their options.

Through its membership in Up for Growth, the Florida Housing Coalition has helped to bring these insights directly to federal conversations. As committees expand their work, more Florida voices can help shape solutions that respond to real development conditions rather than abstract policy debates. The next phase of federal engagement will depend in part on the depth and diversity of experience across Florida's communities.



The NDAA Almost Became a Housing Bill. That Matters.

Earlier this year, the Senate passed its version of the National Defense Authorization Act with a full housing title included. Built from the ROAD to Housing Act, the title proposed streamlining federal regulatory approvals, encouraging zoning code updates, expanding tools for infill and modular construction, and encouraging more housing near transit. Its passage in the Senate marked one of the first times a comprehensive federal housing supply package had moved through a chamber of Congress. That alone should be understood as a milestone.

When the bill went to conference with the House, negotiators gave the housing title serious attention. In the final stages of the process, the conference committee removed it as the NDAA was narrowed to core defense provisions. Even so, the Senate's action confirmed that supply policy is no longer peripheral in Washington. It is now entering the center of the federal agenda.

For Florida practitioners, the takeaway is not that the provisions were removed but that Congress came closer than ever before to advancing a broad supply package. Federal policymakers are explicitly looking for real world examples of systems that expand housing, and Florida's recent reforms have become some of the clearest evidence they can study. Decades of coalition leadership strengthen this signal. Florida's experience is being cited with increasing frequency in committee work as federal staff shape their 2026 priorities.

Federal Momentum on Housing Supply

Congress has introduced more than fifty bills in the current session aimed at expanding the nation's housing supply. This alone reflects a major shift in federal posture, with housing no longer viewed solely as a strictly local concern. Instead, it is now understood as a national economic, workforce, and resilience challenge. Several proposals illustrate how rapidly this shift is taking shape.

The Build Now Act would use the Community Development Block Grant program to encourage jurisdictions to permit more homes and align land use processes with production goals. The Housing Supply Frameworks Act directs HUD to publish model zoning reforms and track adoption, echoing strategies already underway in Florida under Live Local. The Build More Housing Near Transit Act ties transit investments more closely to local housing outcomes, matching planning approaches used in Florida metros. Together, these bills point toward a federal framework that increasingly mirrors the direction Florida has already taken.

National partners monitoring these developments note that many provisions reflect lessons tested in states like Florida. Regulatory updates and coordinated planning have produced measurable outcomes, and those results are informing federal analysis. This underscores Florida's role in shaping the practical experience that is now helping guide national conversations. Those conversations have centered most clearly on two major bills: ROAD and HOME.

ROAD: A Federal Framework for Expanding Housing Supply

The ROAD to Housing Act offers a comprehensive modernization of the federal role in housing production. Many of its elements respond directly to issues that Florida partners have encountered in practice.

- It streamlines federal environmental reviews for infill housing, conversions, and small site development.
- It encourages local regulatory modernization by sharing model reforms and tracking adoption.
- It promotes modular, manufactured, and factory built housing, which is increasingly relevant in regions facing labor shortages or resilience requirements.
- It aligns federal incentives with local permitting outcomes.
- It encourages more housing near jobs and transit.

These provisions reflect a federal approach that recognizes the need for efficiency and predictability across the entire development pipeline. They also reflect lessons from states like Florida where zoning, land use, and permitting reforms have already begun to take hold.

As federal committees study these ideas, the implementation experience of states like Florida is directly informing their work.

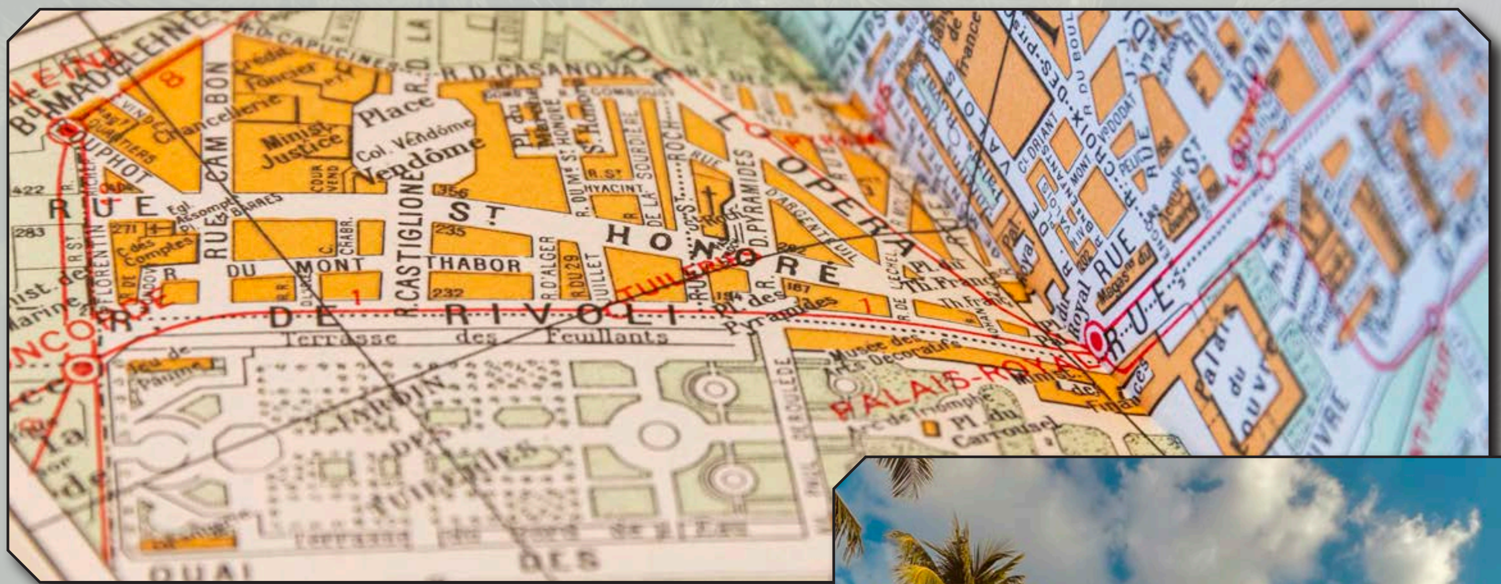
HOME Reform: The Quiet Muscle for Affordable Production

While ROAD focuses on system modernization, the HOME Reform Act of 2025 focuses on program efficiency and flexibility for affordable housing. Several elements are especially relevant for Florida communities.

- Expanded income eligibility up to 100 percent of area median income offers flexibility for mixed income and moderate income projects.
- Allowing HOME funds to support infrastructure in non entitlement areas helps rural and smaller communities prepare sites for development.
- Streamlined reviews reduce processing time for projects using federal and state resources.
- Raising the small project labor threshold supports infill development and nonprofit work.
- Aligning HOME with modular and off site construction supports production in high cost and high risk regions.

Together, these reforms update longstanding federal tools to better match today's housing and development context. They provide flexibility that many Florida jurisdictions and nonprofit partners have sought for years.

Stakeholders following federal policy note that several of these updates reflect challenges raised by states that have modernized their systems, including Florida.



Florida's Role in Shaping Federal Policy

Federal committees increasingly study Florida's approach to housing, from modern zoning allowances to the Sadowski trust fund framework to resilience-oriented planning. Florida offers a clear example of how state policy, local capacity, and strong coalition leadership can work together to accelerate production. As a result, Florida is not simply a case study but a driver of national housing supply thinking.

Florida also has significant influence in Congress. Members of the delegation chair or serve on committees with jurisdiction over housing, banking, transportation, and appropriations. Federal partners regularly draw on the insights Florida housing practitioners bring regarding regulatory, financing, and implementation realities.

Through the Florida Housing Coalition's participation in Up for Growth,

INDUSTRY INSIGHTS

Florida's experience is regularly represented in federal policy discussions. As more Florida organizations engage in these national conversations, federal policymakers gain a clearer understanding of how proposed tools function across the state's diverse development environments. This steady flow of local insight is shaping how federal committees calibrate their proposals.

Florida's policy framework also demonstrates a principle that is gaining traction in federal discussions: pairing strong pro-housing policies with guardrails that avoid unintended harm. The state's long standing prohibition on local rent control is one example. Although well intentioned, rent caps in other contexts have often discouraged new construction and limited the ability to expand housing choices. Florida's emphasis on enabling production while avoiding policies that restrict it offers a balanced approach that federal policymakers are increasingly treating as a key design principle.

Looking Ahead to 2026

Congress will return next year to a housing landscape that is more urgent and more politically salient than at any point in recent memory. The pressures of affordability, limited supply, disaster risk, and workforce needs are converging in ways that demand federal attention. The debates that began in 2025 have positioned housing supply not as an adjunct issue, but as a core part of the national policy agenda.

Although the NDAA did not carry housing provisions forward, the legislative work completed this year has laid the groundwork for a focused federal conversation on production, permitting, and the alignment of state and local tools with federal support. There is now bipartisan agreement that modernizing the systems that govern development is unavoidable. States already moving in this direction offer a practical starting point for national strategy.

Florida's experience is especially relevant as committees consider how to translate these ideas into action. The state's ongoing engagement will help ensure that federal reforms reinforce, rather than complicate, the progress communities here are already making. As Congress prepares for 2026, the lessons from Florida will continue to shape how federal policymakers design the next generation of housing supply solutions.

Florida's Voice Matters in Washington

Federal policymakers are moving toward a more active role in housing supply. Although the NDAA did not include housing provisions, the level of attention given to these issues marks a new phase in federal engagement. Florida is uniquely positioned to help shape what comes next.

Florida's practitioners have built a strong statewide coalition, produced innovative policy, and demonstrated what coordinated implementation can achieve. By remaining involved in national policy discussions, Florida partners can help ensure that federal approaches complement and reinforce the progress already underway in the state.

As Congress prepares for 2026, continued engagement from Florida's housing community will help guide the development of federal policies that work in practice and advance housing opportunity for all Floridians.

MIKE KINGSELLA is the Founder & CEO of Up for Growth, a Washington, D.C.–based policy association dedicated to solving America's housing shortage. Mike can be reached at MKingsella@UpForGrowth.org

The State of Florida's Assisted Rental Housing Stock

Taking a look at the Shimberg Center's new report detailing the 314,000 affordable homes that make up Florida's assisted housing inventory

Written by Anne **RAY, FLORIDA HOUSING DATA CLEARINGHOUSE MANAGER AT UF SHIMBERG CENTER FOR HOUSING STUDIES**

In July, we highlighted a finding from the Shimberg Center's 2025 Rental Market Study: nearly 905,000 renter households with incomes below 60% of the area median income (AMI) pay more than 40% of income for their housing. Now, we want to focus on assisted housing, a longstanding and effective solution for creating housing supply at 60% AMI and below. The Shimberg Center's State of Florida's Assisted Rental Housing report provides new detail on the 314,000 affordable homes that make up Florida's assisted housing inventory, and the families, workers, elders, and others who call them home. Thisarticle shares some of the findings from that new report.

The Center's Assisted Housing Inventory tracks affordable rental housing developments receiving funding from Florida Housing Finance Corporation, HUD, USDA Rural Development, and local housing finance authorities. The most active of these programs are Florida Housing's Low-Income Housing Tax Credit (LIHTC), State Apartment Incentive Loan (SAIL) program, and bond financing initiatives. In exchange for assistance, property owners agree to limits on rents and tenant incomes.

Tenant Rents and Income

Average rents in assisted housing developments range from $300 to $1,200, depending on the funding source—well below the state's $1,800 median rent. These rents make housing affordable for people on fixed incomes and workers in many common occupations, including jobs in health care, education, retail, and tourism. Most residents have incomes between $10,000 and $40,000.

Two groups of renters receive particular attention in the report. First, older households have been a core constituency for assisted housing since HUD launched its Section 202 elderly housing program in the 1960s. Federal senior housing programs serve households age 62 and older; Florida Housing's elder set-aside units serve age 55+ households. In all, nearly 2/3 of HUD and USDA units and over 40% of Florida Housing and public housing units serve older households, both in units set aside for them and in the general "family" assisted stock.

Second, assisted housing addresses one of the thorniest problems in affordable housing: providing homes for extremely low-income (ELI) households with incomes below 30-40 percent of AMI. One strategy is deep federal rental assistance. In approximately 53,000 assisted housing units, ELI residents pay 30 percent of their monthly income for rent, with ongoing subsidies from HUD or USDA making up the difference between that amount (typically $300-400) and actual operating costs. A second strategy is Florida Housing's ELI set-asides, which integrate approximately 21,500 ELI units into larger developments serving a mixed-income clientele (mostly households up to 60% AMI).

Preservation of At-Risk Units

The report emphasizes the need to preserve affordability. By the end of 2034, affordability restrictions will expire for 402 developments with 33,284 assisted units. One-quarter of the expiring units are located in Orlando metropolitan counties. Other heavily affected counties include Miami-Dade, Duval, Hillsborough, and Palm Beach.

The expiring include:

- Nearly 20,000 FHFC-funded units, mostly 1990s-era developments reaching the end of 30-year affordability periods. These units will be eligible for market-rate conversion unless new affordable housing financing is introduced.
- Over 4,600 units financed by local bonds, many of which also have expiring Florida Housing subsidies.
- Over 8,000 HUD-subsidized units. The HUD contract expiration represents an "opt-out" decision point where the owner may choose either to extend affordability or to convert the property to market-rate.
- Nearly 2,400 units with USDA Rural Development mortgages. USDA rental assistance contracts cannot be renewed once the mortgage matures, so these units are at severe risk of loss of affordability.

While Florida's Housing's 30-year-old properties comprise the largest group of at-risk units, upcoming losses would have been much greater if the state hadn't taken early steps to encourage 50-year affordability periods. These include:

- Layering SAIL financing with 50-year restrictions over 30-year tax credits
- Incentivizing and requiring 50-year restrictions for competitive tax credits
- Extending affordability at some older properties through additional tax credit allocations

We estimate that over 59,000 LIHTC units are operating under 50+ year restrictions that otherwise would have expired by the end of 2034. Because of extended affordability requirements, we are facing a slope of lost 30-year LIHTC units rather than cliff.

Addressing the remaining at-risk units will require preservation strategies. Preservation involves bringing new financing into an existing assisted housing development to fund needed repairs and extend affordability requirements. Florida Housing has led the state's preservation efforts by devoting LIHTC, SAIL, and bond resources to existing affordable housing units, particularly those with the deep rental assistance that make it possible to house ELI households. To date, Florida Housing's investments have extended affordability for over 30,000 HUD and RD units, in addition to 23,000 units in Florida Housing's own portfolio.

Preservation at FHFC

Since 2022, Florida Housing has released an annual Request for Applications (RFA) using SAIL funding to preserve elderly developments. Here are two examples:

- 2023 (RFA 2023-204): Florida Housing provided $4.5 million in SAIL to preserve two elderly developments—70 units in Orange County and 60 units in Lee County, both at least 20 years old—extending their affordability periods by 50 years. These properties also received Multifamily Mortgage Revenue Bonds (MMRB).
- 2024 (RFA 2024-204): FHFC committed $4.675 million to preserve two elderly developments with 90 units in Duval County and 73 units in Leon County.

Prior to 2022, FHFC had a history of using Housing Credits to preserve existing affordable multifamily housing developments. These types of funding decisions play a critical role in preserving expiring assisted units and ensuring affordable housing remains available for Florida's seniors well into the future. As Ryan and Kody highlighted in July with the story of The Indigo, an effort to preserve a 208-unit apartment complex in Clearwater, preservation takes a mix of tools. Public funds from SAIL, MMRB, local trust funds, infrastructure surtaxes, and Community Redevelopment Agencies (CRAs) play a big role, but private capital and creative financing strategies are also essential to keeping existing homes affordable.

With Florida's affordable housing gap, we can't afford to lose 33,000 units serving 60% AMI households and below. In a forthcoming article, we'll highlight new research showing what happens to rents after developments exit affordability restrictions, and discuss further strategies to ensure the preservation of our assisted housing stock.

ANNE RAY manages the Florida Housing Data Clearinghouse and conducts research on affordable housing needs, preservation, and rental market trends for the Shimberg Center. She has authored numerous statewide and local housing reports. Anne can be reached at aray@ufl.edu

OBBBA Brings Good News for LIHTC, NMTC, and OZ

Bad News for Clean Energy Tax Incentives

Written by Christina **APOSTOLIDIS, PARTNER,** Rebecca **DARLING, PARTNER, &** Peter **LAWRENCE, CHIEF PUBLIC POLICY OFFICER, NOVOGRADAC**

When the One Big Beautiful Bill Act (OBBBA) was signed into law in July, it was good news for stakeholders in the low-income housing tax credit (LIHTC), new markets tax credit (NMTC) and opportunity zones (OZ) incentive. For clean energy tax incentive advocates, the news wasn't so good.

The sweeping OBBBA made permanent most of the provisions in the 2017 Tax Cuts and Jobs Act that expired in 2025, while adding changes to the Internal Revenue Code (IRC) that include deductions for tips and overtime pay and an increase in the child tax credit.

But for stakeholders in the community development tax incentive space, the bill included long-sought provisions–and a harsh pullback on clean energy incentives.

Following is a summary of the key community development tax incentive provisions in the OBBBA:

LIHTC Gets a Boost

Two key provisions of the Affordable Housing Credit Improvement Act (AHCIA), which was introduced in the past six sessions of Congress, were included in the OBBBA and Novogradac estimates the combination of the two could finance an additional 1.22 million affordable rental homes from 2026 through 2035.

The OBBBA permanently lowered the private activity bond (PAB) financing threshold from 50% to 25% of land and building costs for properties placed in service after Dec. 31, 2025, as long as at least 5% of the aggregate land and building costs are financed with PABs issued after Dec. 31, 2025. Acquisition and rehabilitation property can separately qualify so that the rehabilitation portion placed in service in 2026 or later could qualify for the 25% test even for property acquired in 2025.

The legislation also permanently increased 9% LIHTC allocations by 12% starting in 2026. That isn't exactly what was proposed in the AHCIA (which proposed reinstating and making permanent the 12.5% increase that expired in 2021), but it's significant.

The combination of more 9% LIHTCs and the ability of states to fund more properties with PABs and 4% LIHTC (the lower financed-by test should result in additional development, since the same amount of bond cap can be awarded to twice as many properties) should result in a boost in housing financed. That particularly applies to rehabilitation of existing affordable rental housing, which is more likely to use PABs as a financing tool.

NMTC Gains Permanence

The new markets tax credit was enacted in late 2000–25 years ago–and extended by Congress seven times since, the most recent a five-year extension through 2025. The OBBBA made the NMTC a permanent part of the IRC at $5 billion in annual allocation authority (from which investors may claim a 39% tax credit over seven years, generating $1.95 billion in tax credits). With the $10 billion combined 2024-2025 allocation round looming, NMTC advocates faced uncertainty before the OBBBA.

While the NMTC gained permanence, the OBBBA did not include annual inflation indexing nor the ability to take the NMTC against alternative minimum tax liability. NMTC advocates are expected to continue to push for legislation including those provisions, as well as newer proposals, such as eliminating the basis reduction.

OZ Made Permanent With Changes

The opportunity zones (OZ) incentive, part of the landmark 2017 tax legislation, was made a permanent part of the tax code in the OBBBA, with new OZs being designated every 10 years and some changes to the tax benefits.

The new determination period to designate OZs will begin July 1, 2026, and the first new designations will be active Jan. 1, 2027, through Dec. 31, 2036. There are changes in the requirements for OZ eligibility, most significantly that the definition of low-income community (LIC) is narrowed from a median income of 80% of the area median income to 70% and that contiguous tracts are no longer eligible. Census tracts with a median family income of 125% of the area median income will also no longer be eligible. Governors are still limited to designating 25% of their state's eligible LICs, so there will be approximately 30% fewer designated OZ census tracts compared to the first OZ designations. A special rule for Puerto Rico where all its LICs could be designated as OZs is set to expire, but at press time, Treasury hadn't clarified whether the existing Puerto Rico OZs retain that designation through 2026 or 2028.

The OBBBA made changes to the deferral and step-up for investments, eliminating the seven-year hold benefit and adding a bonus step-up for rural investments. Under the new OZ regime (popularly called OZ 2.0), capital gains invested in qualified opportunity funds (QOFs) can be deferred from paying taxes on a rolling basis for up to five years. Non-rural OZ investments receive a 10% step up in basis if they are held at least five years and rural QOF investments receive a 30% step-up in basis. Rural QOFs are defined as where 90% of qualified OZ property of a QOF is in rural OZs, as defined by U.S. Department of Agriculture rural business development programs and rural OZs are those that are not in or adjacent to a city or town of 50,000 people (the Novogradac OZ 2.0 mapping tool shows which census tracts are likely eligible as rural OZs). The substantial improvement test, which requires the cost of improvements to exceed the acquisition cost of the property, also drops to 50% in rural areas.

The OBBBA also included reporting and transparency requirements of the OZ Transparency Extension and Improvement Act (OZTEIA) and provides $15 million for implementation.

Clean Energy Suffers a Big Setback

The clean energy sector has scrambled to adapt to the OBBBA's elimination and rollback of key tax incentives integral to the growth of clean energy technologies that grew exponentially after the passage of the Inflation Reduction Act (IRA).

The technology-neutral clean energy investment tax credit (ITC) and production tax credit (PTC) for wind and solar face much earlier sunset dates, requiring them to be placed in service no later than Dec. 31, 2027, unless they begin construction by July 4, 2026–one year after the enactment of the OBBBA. All other technologies eligible under the ITC and PTC retain their phase-out schedule of 2032 to 2036.

If there was a "winner" in the phasedown, it was energy storage property that is collocated and placed in service at wind and solar facilities, which remains eligible to claim the full credit until it is phased out after 2032. There is an exception to the early phaseout for any wind or solar facility that is part of a single project with no more than 1 GW of nameplate generation capacity. That applies to most solar placed on affordable housing properties. Some other good news was that the OBBBA retained the ability to transfer tax credits for projects that are ineligible for elective pay.

The OBBBA also repealed credits for residential clean energy and energy-efficient improvements for owner-occupied homes as of Dec. 31, 2025, and energy credits for commercial buildings (which include multifamily housing properties) and new homes as of June 30, 2026.

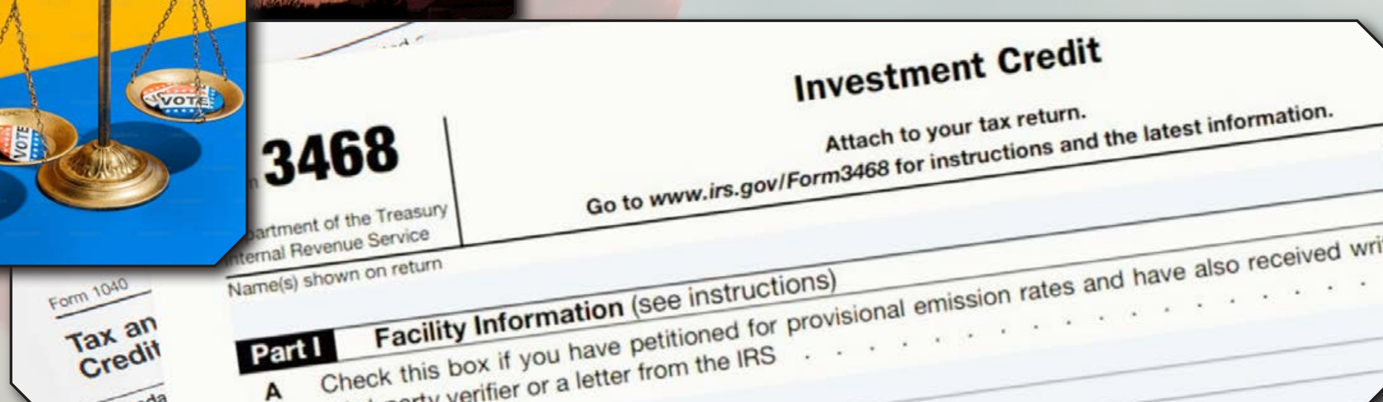
The OBBBA included new foreign entities of concern (FEOC) restrictions that take effect Jan. 1, 2026. The rules lower the threshold for debt ownership by specified foreign entities (which include China) to 15%, while prohibiting taxpayers from receiving "material assistance" from prohibited foreign entities. The definition of "material assistance" is an initial minimum non-FEOC cost percentage, which varies based on technology and components and will increase annually.

HTCs, Proposed Incentives Left Out

While the OBBBA included provisions addressing the LIHTC, NMTC, OZs and RETCs, the bill was silent on some other community development tax incentives.

Despite the best efforts of historic preservation advocates, the OBBBA did not include any historic tax credit (HTC) provisions from the HTC Growth and Opportunity Act. Advocates were hoping the final bill would revert the HTC back to a one-year credit from the current law five-year credit or repeal the HTC basis reduction.

Other proposed community development tax incentives–the neighborhood homes tax credit, workforce housing tax credit, a tax credit to finance the conversion of distressed commercial real estate into affordable housing and an incentive to preserve rental housing owned by tax-exempt entities through loss syndication–were left out of the legislation, meaning proponents will continue to push for Congress to address those issues.



CHRISTINA APOSTOLIDIS
Christina Apostolidis is a partner in the Naples, Florida, office of Novogradac. She can be reached at christina.apostolidis@novoco.com

REBECCA DARLING
Rebecca Darling is a partner in the metro Atlanta office of Novogradac. She can be reached at rebecca.darling@novoco.com

PETER LAWRENCE
is Chief Public Policy Officer of Novogradac & Company LLP. He can be reached at peter.lawrene@novovo.com

2025 HOME MATTERS REPORT

Three Trends that Communicate Recent Housing Challenges

WRITTEN BY WIS BENOIT, RESEARCH ASSOCIATE & TECHNICAL ADVISOR

Each year, the Florica Housing Coalition releases the Home Matters report to help us better understand how housing pressures are impacting Floridians across the state. In the 2025 edition there are Several data points standout in the 2025 edition, but this article will discuss three startling trends that we hope will help housing advocates communicate the magnitude of the challenges unfolding in their own communities.

Each of the three headlines is supported by dashboards featured in the 2025 Home Matters report and that allow users to pull county- or MSA-level data, making it easy to connect these statewide patterns to what's happening close to home.

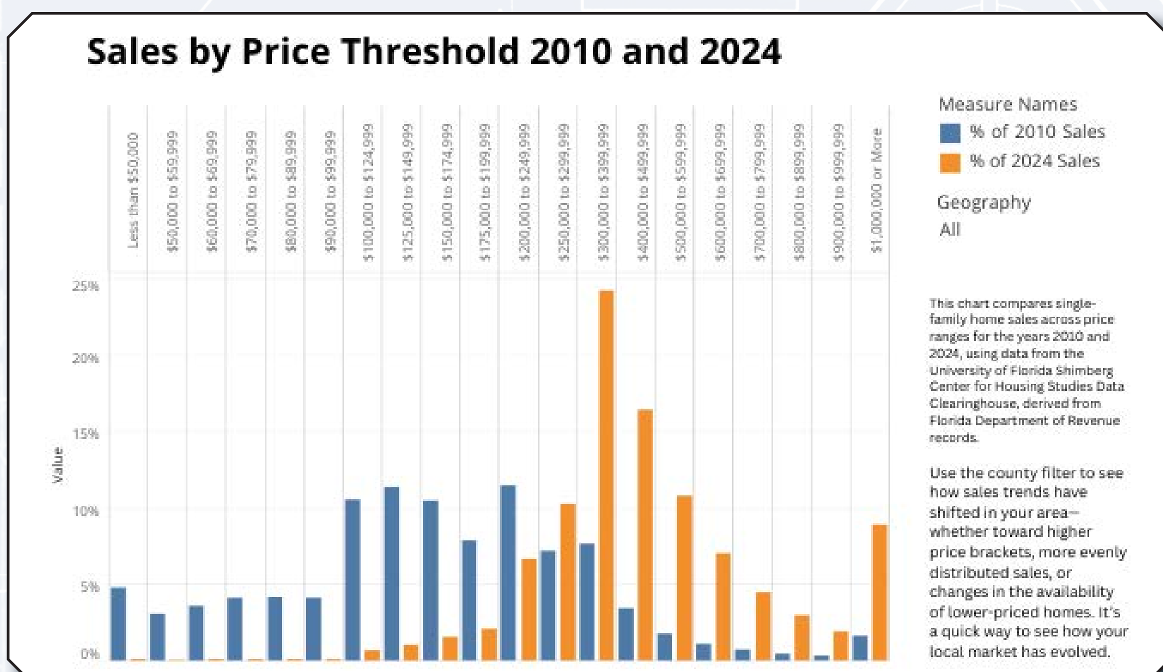
The three trends highlighted in this article are:

1. Affordable for-sale homes are vanishing from Florida's housing market
2. Florida's median-wage workforce struggle to afford housing in their communities
3. Higher-income households are now facing rising housing cost burdens

AFFORDABLE FOR-SALE HOMES ARE VANISHING FROM FLORIDA'S HOUSING MARKET

The first major trend is centered on the shrinking availability of for-sale homes at prices most Floridians can afford. Using data from the University of Florida's Shimberg Center for Housing Studies, we can track both median home sales across different price points over time as well as at points in time. These indicators are important as they communicate both increases in purchase prices over time as well as how the for-sale market may be currently experienced by homebuyers. The Home Matters Report provides similar data for the rental market.

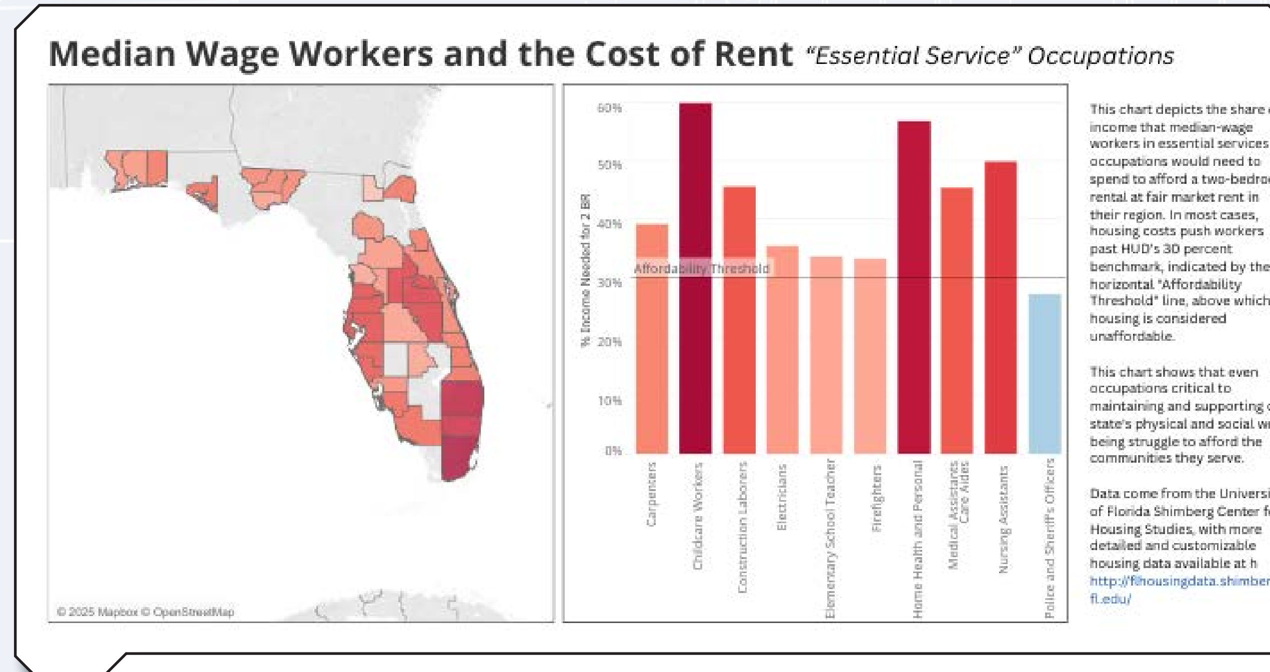
The data shows is that in 2010, nearly half of all home sales in Florida (49.03%) were under $200,000 and only 9.28% were priced above $500,000. By 2024, the landscape had flipped with just 6.13% of homes sold were under $200,000, while 36.32% were above $500,000. This shift reflects not only rising prices, but the erosion of Florida's entry-level housing stock and a market that is pushing homeownership further out of reach for many first-time buyers.

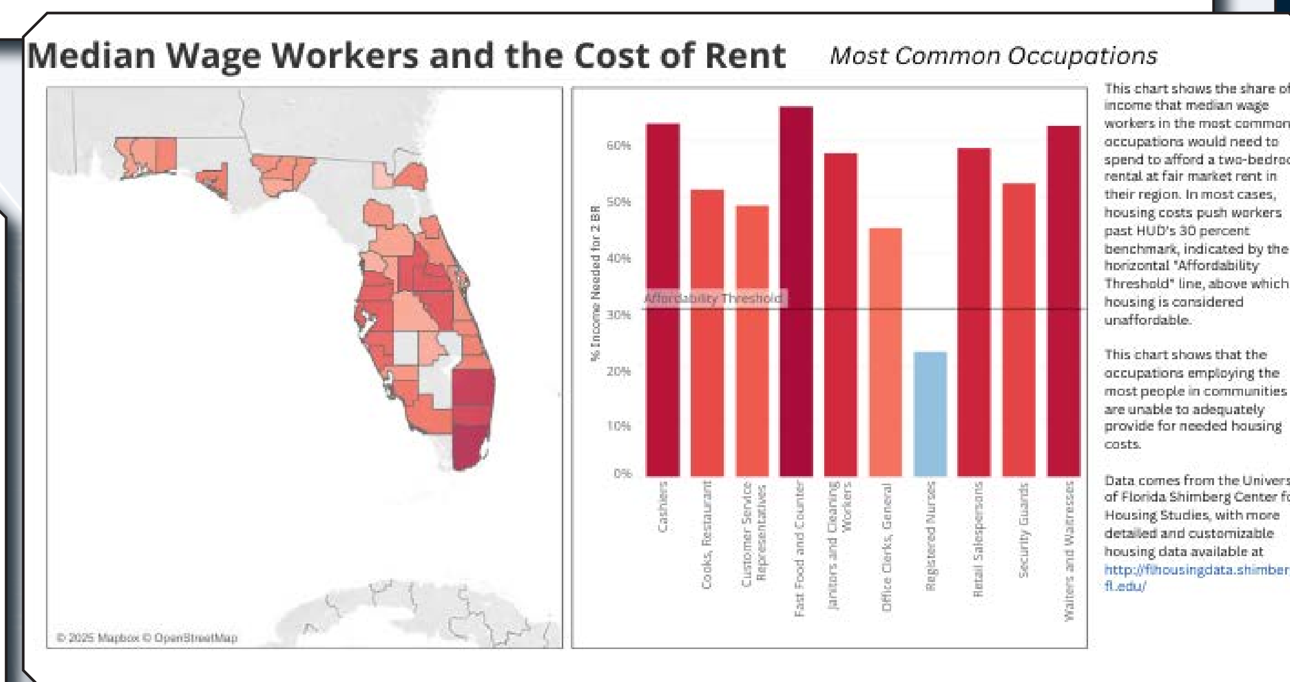


The dashboard presents this information at the county level, allowing users to quickly pull local numbers that strengthen presentations, grant applications, and conversations with policymakers or community partners.

MANY OF FLORIDA'S MEDIAN-WAGE WORKFORCE STRUGGLE TO AFFORD HOUSING IN THEIR COMMUNITIES

The second emerging trend in this year's Home Matters analysis is the widening gap between what Florida's workforce earns and what housing actually costs in their communities. For legislators, local officials, and employers, knowing which workers can no longer afford to live near their jobs is a major policy concern. As workers get pushed farther from employment centers, commuting distances grow, transportation costs rise, and overall household expenses climb well beyond what is considered affordable. A common misconception is that lower-wage service jobs, such as fast-food workers, restaurant staff, cashiers, and





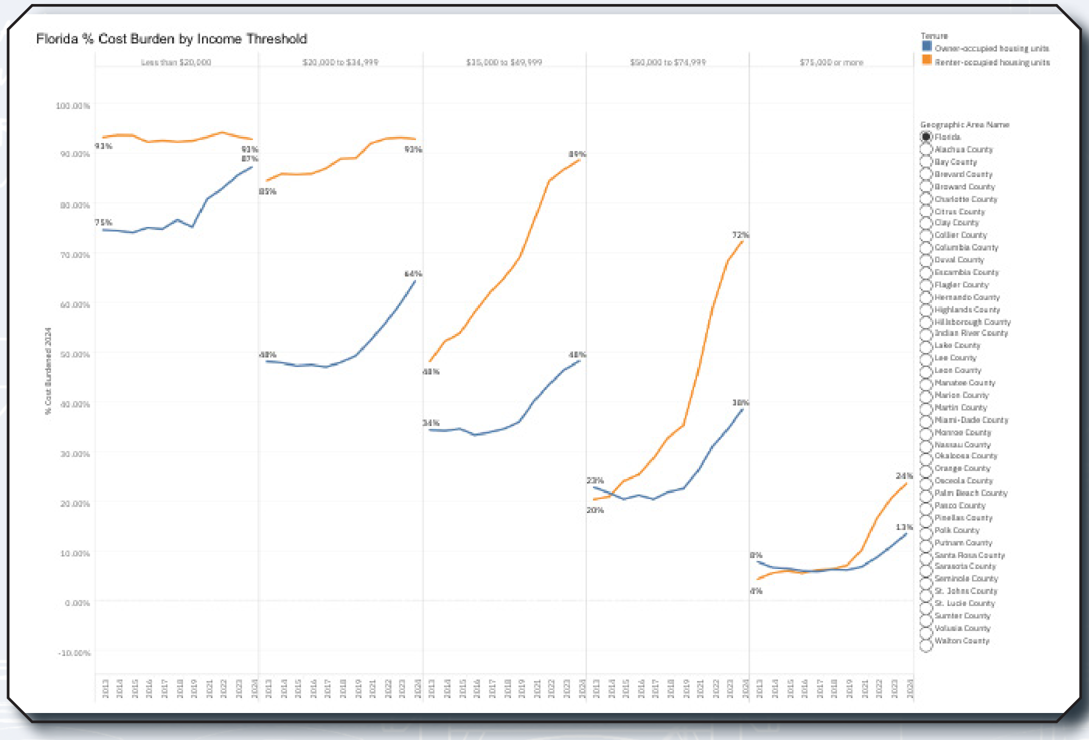
customer service representatives, are fundamentally different from roles like fundamentally different those typically referred to in discussions of "workforce housing" such as education, public safety, or health care professionals. In reality, all of these workers play essential roles in keeping communities functioning. And even if someone insisted on drawing that distinction, the data still tell the same story: many workers of jobs widely viewed as essential are paying far more than an affordable share of their income toward housing.

Using workforce data tables from the Shimberg Center's Housing Data Clearinghouse, we developed a dashboard that compares the median wages of Florida's most common occupations to the income needed to afford a two-bedroom rental at Fair Market Rent. Across most MSAs, only one or two occupations earn enough to meet this affordability threshold. The dashboard can be filtered by MSA, allowing users to pull localized data and strengthen messaging for their own communities. For instance, in the Orlando-Kissimmee-Sanford MSA, a median-earning firefighter would pay nearly 50% of their income on a 2-bedroom rental at Fair Market Rent.

HIGHER-INCOME HOUSEHOLDS ARE NOW FACING RISING HOUSING COST BURDENS

The third key trend emerging in Home Matters is the rapid rise in housing cost burdens among higher-income households—an unexpected shift that broadens our understanding of Florida's affordability crisis. Cost burden has always been a core measure in the report, with long-standing evidence of severe pressure among renters and lower-income households. But when this year's analysis breaks out cost burden by income group using ACS Table B25106 (2013–2024), a new story becomes clear.

Among renter households earning $50,000–$74,999, the share experiencing cost burden grew from 20 percent in 2013 to 35 percent in 2019, then surged to 72 percent in 2024. Renter households earning $75,000 or more saw cost burden rise from 4 percent to 7 percent through 2019, followed by a sharp jump to 24 percent in 2024. Homeowners have also felt increasing pressure: households earning $35,000–$49,999 remained stable through 2019 but climbed to 64 percent cost burdened by 2024, while owners earning $75,000 or more saw their cost burden rate double from 6 to 13 percent in the same period.



Low-income households still face the most severe affordability challenges, but the acceleration among moderate- and higher-income households reveals a crisis expanding across the income spectrum. This trend mirrors what many communities are witnessing firsthand: affordability pressures are no longer isolated to the lowest-income groups. The dashboard includes this cost-burden data by county, giving local leaders direct access to the numbers they need to illustrate how these statewide patterns show up close to home.

Together, these insights offer help support more complete picture of the forces shaping Florida's housing landscape. Many partners view advocacy as the work of building shared understanding so that communities can move toward shared commitment to practical solutions. The data included in this year's Home Matters report supports that work by helping local leaders connect statewide trends to the lived realities of their own residents.

This analysis is only the beginning of what Florida's housing data can reveal. We look forward to working with advocates, policymakers, and community partners across the state to deepen this understanding and strengthen Florida's housing ecosystem.

Data for these dashboards comes from the University of Florida's Shimberg Center for Housing Studies, where additional interactive tools and detailed datasets are available.

WIS BENOIT is a Research Associate and Technical Advisor for the Florida Housing Coalition, supporting local governments and housing providers with analysis, zoning policy insights, and research on state and federal housing programs. Wis can be reached at benoit@flhousing.org

2025 CONFERENCE RECAP

The 2025 Florida Housing Coalition Conference brought the state's housing ecosystem together in a way that felt equal parts momentum and mission. Nearly 1,300 housing leaders, practitioners, policymakers, lenders, developers, and community partners gathered in Orlando for three days of strategy, skill-building, and straight-up Florida-style collaboration.

This year's agenda delivered everything from deep-dive policy sessions and community land trust intensives to hands-on workshops, research insights, and conversations that challenged the status quo. Federal, state, and local experts highlighted the changing landscape of housing policy, while practitioners shared on-the-ground solutions already moving the needle across Florida.

The energy was unmistakable: members forging new partnerships, first-time attendees jumping into the conversation like seasoned pros, and longtime advocates mapping out what's next for affordability, resilience, and equity. It wasn't just a conference—it was a statewide reset button, aligning everyone on where we're going and how we get there together.

If you were there, you helped shape the future of Florida's housing strategy. If you missed it… well, you're going to want to lock down your spot next year.

Stay tuned for 2026 registration details by visiting the following website: www.conference.flhousing.org.

PATHWAYS TO AFFORDABILITY

LEVERAGING FACTORY-BUILT HOUSING IN FLORIDA

Written by Chad **REED, DIRECTOR, PROGRAMS AND GROWTH &** Abbie **BROWN, ASSOCIATE**

Florida is adding homes faster than almost any state, but starter homes remain out of reach for many first-time homebuyers. Factory-built housing offers a fast, affordable, and resilient solution, but still makes up only a small share of new homes. Pathways to Affordability: Leveraging Factory-Built Housing in Florida, a new report from Ivory Innovations and the Florida Housing Coalition, outlines seven practical steps to expand the use of factory-built housing across the state. This brief summarizes those steps:

1. Create a unified Florida Office of Off-Site Construction

Centralize modular and manufactured home oversight in one state office to streamline approvals, administer grant and pilot programs, publish toolkits and guidance, and enforce uniform treatment between factory-built and site-built homes.

2. Modernize public engagement to better reach new homebuyers

Leverage younger generations' openness to factory-built homes by shifting marketing to channels they trust and content that resonates with their tendency to prefer denser, more urban neighborhoods.

3. Launch a factory-built housing pilot program to de-risk early adoption

Support first-in-region projects with financing guarantees, crew training stipends, and dedicated help with permitting and approvals. Where possible, partner with economic development agencies to provide low-cost lots in exchange for affordability commitments.

4. Provide first-time buyer incentives for HUD-code and modular homes

Clarify program eligibility so factory-built homes titled as real property qualify across all down payment assistance programs. Pair these changes with targeted outreach that highlights modern design, appreciation data, and competitive financing options.

5. Showcase the resilience of off-site construction to natural disasters

Use Florida-specific storm-performance data to counter outdated safety perceptions of manufactured housing. Integrate this evidence into building official training, buyer education, and disaster recovery procurement guidelines.

6. Enable and support factory-built accessory dwelling units

Advance legislation that makes ADUs by right and requires local governments to allow modular and HUD-code units. Publish a statewide toolkit with pre-approved plans, e-permitting templates, and inspection checklists to speed approvals and installation.

7. Create an off-site building track at Florida colleges and universities

Partner with community colleges and universities to offer a short certification in off-site construction. Combine coursework with paid training in factories or on installation crews to build a skilled workforce that can scale production.

To read the full Pathways to Affordability: Leveraging Factory-Built Housing in Florida Report, please visit www.ivoryinnovations.org/reports

CHAD REED is Director of Programs and Growth for Ivory Innovations. Chad can be reached at chadwick@ivoryinnovations.org.

ABBIE BROWN is an Associate at Ivory Innovations. Abbie can be reached at abbie@ivoryinnovations.org.

SHIP CLIPS

ANSWERS FOR REAL-WORLD SHIP SCENARIOS

Written by Michael **CHANEY, DIRECTOR OF SHIP AND CATALYST PROGRAM(S)**

VALUE OF A COLLECTION ASSET

We have a client who has listed valuable coins as personal property and believes they have a $6,000 value. To prove this, would we need to collect a professional appraisal of these coins? Would a letter of explanation from the client valuing them herself suffice?

A collection of rare coins is a type of non-necessary personal property asset. Documenting attempts to get third-party verification of the value of the coins is an important step in the income qualification process. However, the cost of obtaining an appraisal of this coin collection may be cost prohibitive for an applicant seeking housing assistance. Also, in a case like this with a collection that might be worth $6,000, the total value of non-necessary personal property assets might not amount to $51,600 and so might not be counted as part of household assets.

If an applicant cannot obtain a free estimate of the value of the coin collection and can provide documentation that an appraisal would be cost-prohibitive, then self-certification of this asset would be acceptable. If it comes to obtaining a self-certification, it should list the attempts made to obtain an appraisal and the amount the appraisal would cost. The applicant could even submit a written estimate of the appraisal attached to the self-certification.

SHIP RENTAL MONITORING

The Florida Housing Coalition's recent "SHIP Rent Limits Policy" webinar addressed how SHIP is usually not the only source of subsidy contributing to the affordability of rental units that are newly constructed or repaired. Housing Credits, SAIL, and HOME funds from Florida Housing Finance Corporation often supply additional funding and if so, Florida Housing will monitor the rental property. Is it always the case that SHIP staff may rely on the FHFC monitoring report to comply with SHIP monitoring requirements?

The SHIP Statute addresses how Florida Housing or another entity may monitor rental units in which SHIP is invested. Section 420.9075(4)(e) states "to the extent another governmental entity or Corporation program provides periodic monitoring and determination, a municipality, county, or local housing financing authority may rely on such monitoring and determination of tenant eligibility." The statute mentions periodic monitoring, so even though the Housing Credits reports of FHFC's external monitoring agents are completed only once every three years, SHIP staff may often rely on them without doing any additional monitoring on the two 'off years' between reports. Note that Housing Credits-funded properties are monitored every three years but other FHFC programs such as SAIL, HOME, and Multifamily Mortgage Revenue Bonds (MMRB) require annual monitoring.

While SHIP staff may often rely on Florida Housing's monitoring reports, however, your question asks if they may **always** use these reports to comply with SHIP monitoring requirements. The answer is no, and here is a scenario that illustrates why:

Special Needs Scenario: One SHIP community helped to construct 5 units in a 100-unit rental property on the condition that tenants who meet the statutory special needs definition must occupy these units.

- **TAKEAWAY:** This scenario illustrates that SHIP may impose some requirements on rental units that are outside of the focus of a standard FHFC monitoring visit.
- **BEST PRACTICE:** Plan ahead. Before the rental development is constructed, work to add SHIP-specific monitoring tasks to Florida Housing's checklist of items to monitor. The special needs requirement is not a standard item that FHFC automatically monitors. SHIP staff will have to monitor this unless they can integrate it into the content that Florida Housing's external agents will monitor.

A Scenario involving Sampling: While the last scenario illustrates the limitations of relying on FHFC monitoring, this scenario demonstrates its benefits. Although SHIP requires monitoring of all SHIP-funded rental units, Florida Housing's programs like HOME, SAIL, and Housing Credits allow monitors to sample units. Under Florida Housing's policy, if a rental property includes SHIP plus a Corporation funding source that allows for the use of sample monitoring and a local government is relying for SHIP compliance on the monitoring performed by Corporation monitors, then sampling provisions of the other program can be used. However, if a rental property includes Florida Housing funding alongside SHIP, but the local government has elected to conduct its own monitoring rather than rely on monitoring performed by a FHFC monitor, then all SHIP-assisted units must be monitored. Similarly, if SHIP is the only funding source, then all SHIP-assisted units must be monitored.

TAKEAWAY: Florida Housing's sample monitoring policy can save SHIP staff time on rental monitoring, especially in cases where SHIP funds most or all of the rental units in a property. Consider a 50-unit rental property assisted with both HOME and SHIP. The SHIP annual report shows all 50 units were SHIP-assisted. If SHIP staff monitor this themselves, all SHIP-funded units must be monitored. If Florida Housing monitors this, then HOME's sampling provisions will be used.
BEST PRACTICE: While some situations may warrant SHIP funding many of the units in a property, it is uncommon to report that every unit in a large property is SHIP-assisted. In general, SHIP staff should consider investing SHIP in only a handful of units to avoid heavy monitoring requirements.

A HOME OWNED BY A TRUST

Is it permissible to provide SHIP rehabilitation assistance for a home that is owned by a living trust and is listed as such on the property records? This is the applicant's trust, but she is not listed on the property record, although it is homesteaded.

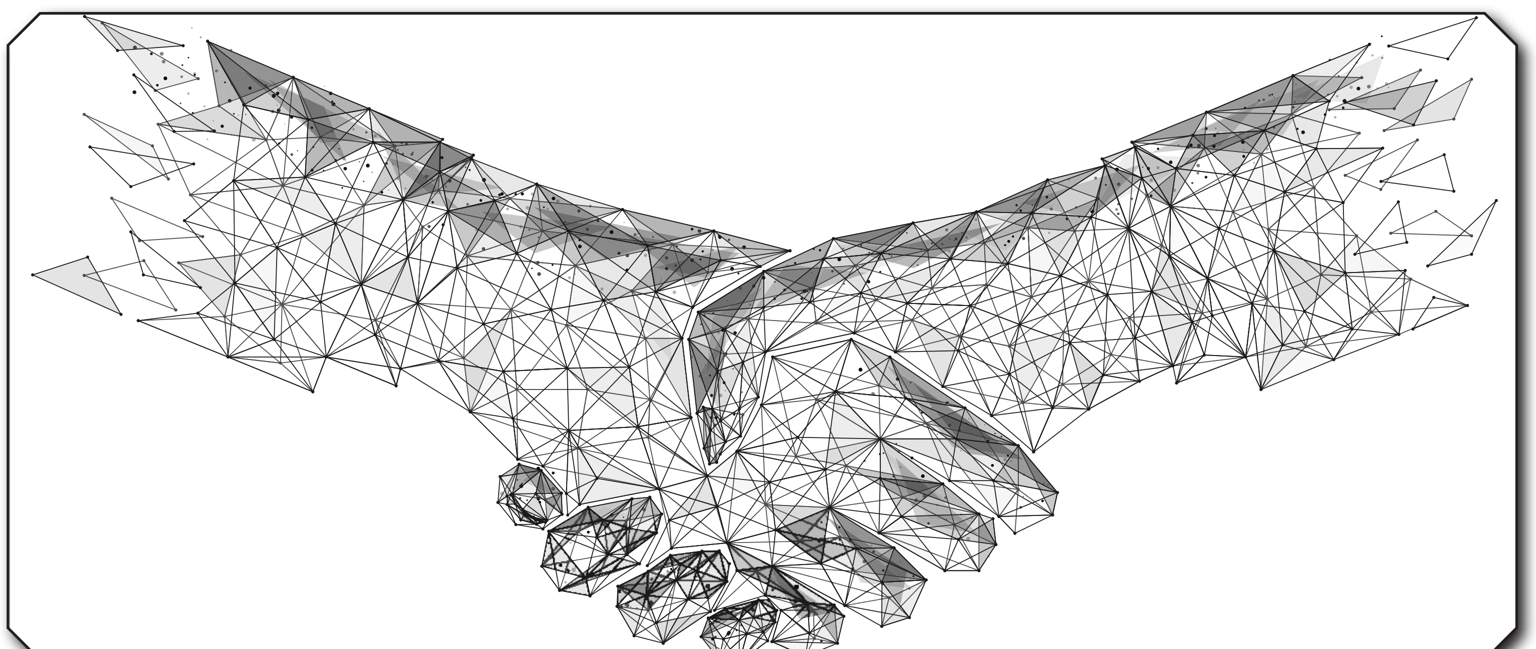
HUD allows living trusts, at 24 C.F.R. 92.254(d)(3) of the federal regulations to meet the HOME program's definition of "homeownership." Living trusts, also called inter vivos trusts, are considered proof of ownership for owner-occupied rehabilitation programs. SHIP follows this same guidance. A local government can provide rehabilitation assistance on a home owned by a living trust where all beneficiaries of the trust are income-eligible and occupy the property as their principal residence. Contingent beneficiaries who receive no benefit from the trust nor have any control over the trust assets until the beneficiary is deceased need not be SHIP income eligible.

Obtain a copy of the Trust Agreement and make sure the applicant or applicant's co-signer has the authority to enter into a mortgage on the property. Check to see who the trust beneficiaries are. The trust must be valid and enforceable and ensure that each beneficiary has the legal right to occupy the property for the remainder of his or her life. To be eligible for SHIP assistance, such applicants must be the current beneficiary and make the home their principal residence.

AMERICORPS AND OTHER INCOME EXCLUSIONS

An applicant for SHIP assistance is a member of the Americorps program. She receives monthly financial support from Americorps but has informed me that this income is not counted in eligibility calculations. Is that correct?

You are correct that Americorps incomes is not counted as part of household income. This is specifically addressed in the HUD document "Federally Mandated Exclusions From Income" found at https://www.federalregister.gov/documents/2024/01/31/2024-01873/federally-mandated-exclusions-from-income-updated-listing#print. This document is periodically updated and was most recently published in February 2024. It includes an updated "List of Federally Mandated Exclusions From Income". Item 16 confirms the exclusion of "Allowances, earnings and payments to Americorps participants under the National and Community Service Act of 1990." Download this HUD document and review the variety of income exclusions. Among them are payments from the Low-Income Home Energy Assistance Program (LIHEAP) and Earned Income Tax Credit (EITC) refund payments.



Need help with SHIP? Visit flhousing.org/ship-support or call the SHIP Hotline at 800-677-4548. Got a question for SHIP Clips? Email Michael Chaney at chaney@flhousing.org.

MICHAEL CHANEY is Director of the Catalyst Program for the Florida Housing Coalition, focusing on providing training, publications, and local support for the Florida Housing Finance Corporation's Catalyst funding. Michael can be reached at chaney@flhousing.org.

COALITION NEWS

ADVANCING VISION, IMPACT, AND PEOPLE IN 2025

Written by Amanda **ROSADO, CHIEF OPERATING OFFICER**

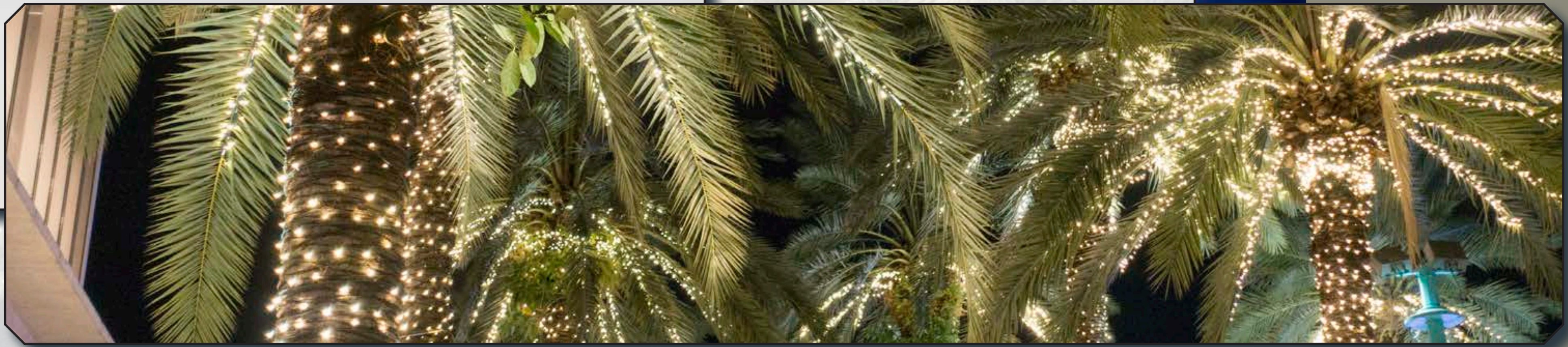
As 2025 comes to a close, the Florida Housing Coalition is reflecting on a year defined by focus and intentional progress. More than a list of accomplishments, this year was shaped by the choices we made about where to concentrate our time, energy, and resources during a period of growing complexity in Florida's housing landscape.

Throughout the year, we returned to a central question: where can the Coalition add the most value right now? That question guided our strategic initiatives, informed our internal and external priorities, and helped us remain grounded in our mission.

In 2025, our work emphasized strengthening what we do best. We expanded and refined training and technical assistance to support housing practitioners, local governments, and nonprofit partners navigating increasingly difficult policy and funding environments. We deepened policy and research efforts to ensure they remained closely connected to implementation and practical use in communities across the state.

As this Journal issue highlights, we rolled out initiatives like the Housing Action Lab to bridge policy, data, and practice, helping communities move from planning to action. We continued advancing longer-term work focused on permanently affordable homeownership, housing and community development, resilience and disaster recovery, and data-informed decision-making to strengthen housing crisis response systems over time.

Equally important, we remained focused on supporting our team. The Coalition's impact depends on people who bring deep expertise, care, and integrity to their work.



Strengthening internal alignment, tools, and support systems remains central to our ability to remain a trusted partner across all 67 counties.

MEET OUR VIP TEAM

This year also marked an important evolution in how we organize and advance our strategic initiatives. We formally rolled out our VIP Team: Vision. Impact. People.

This framework reflects how we approach meaningful change.

CHARLES KNIGHTON
Senior Program Manager

TIFFANY ADAMS
Technical Advisor

AMANDA ROSADO
Chief Operating Officer

- **Vision** means setting clear direction for complex housing challenges and staying focused on long-term solutions.
- **Impact** means prioritizing initiatives that lead to measurable, lasting outcomes for communities across Florida.
- **People** means recognizing that this work cannot be done alone. We intentionally leverage the expertise, leadership, and experience of our members, partners, and collaborators to execute the vision.

LOOKING AHEAD

As we move into 2026, the Coalition is entering the new year with clarity and confidence. The foundation strengthened in 2025 allows us to remain focused on what matters most, scale what works, and continue building partnerships that drive meaningful housing solutions.

We are deeply grateful to our members, partners, funders, and collaborators who make this work possible. Together, through shared vision and sustained commitment, we are advancing impact for communities across Florida and strengthening the systems that ensure safe, stable, affordable housing for all.

As always, your partnership is central to this work. Because of you, our mission that continues to evolve, strengthen, and deliver for Florida is what carries us into the year ahead.

Thank you for everything you do!

AMANDA ROSADO is Chief Operating Officer for the Florida Housing Coalition, leading the organization's strategic planning and operational processes, while also providing technical assistance. Amanda can be reached at rosado@flhousing.org.

STAFF DIRECTORY

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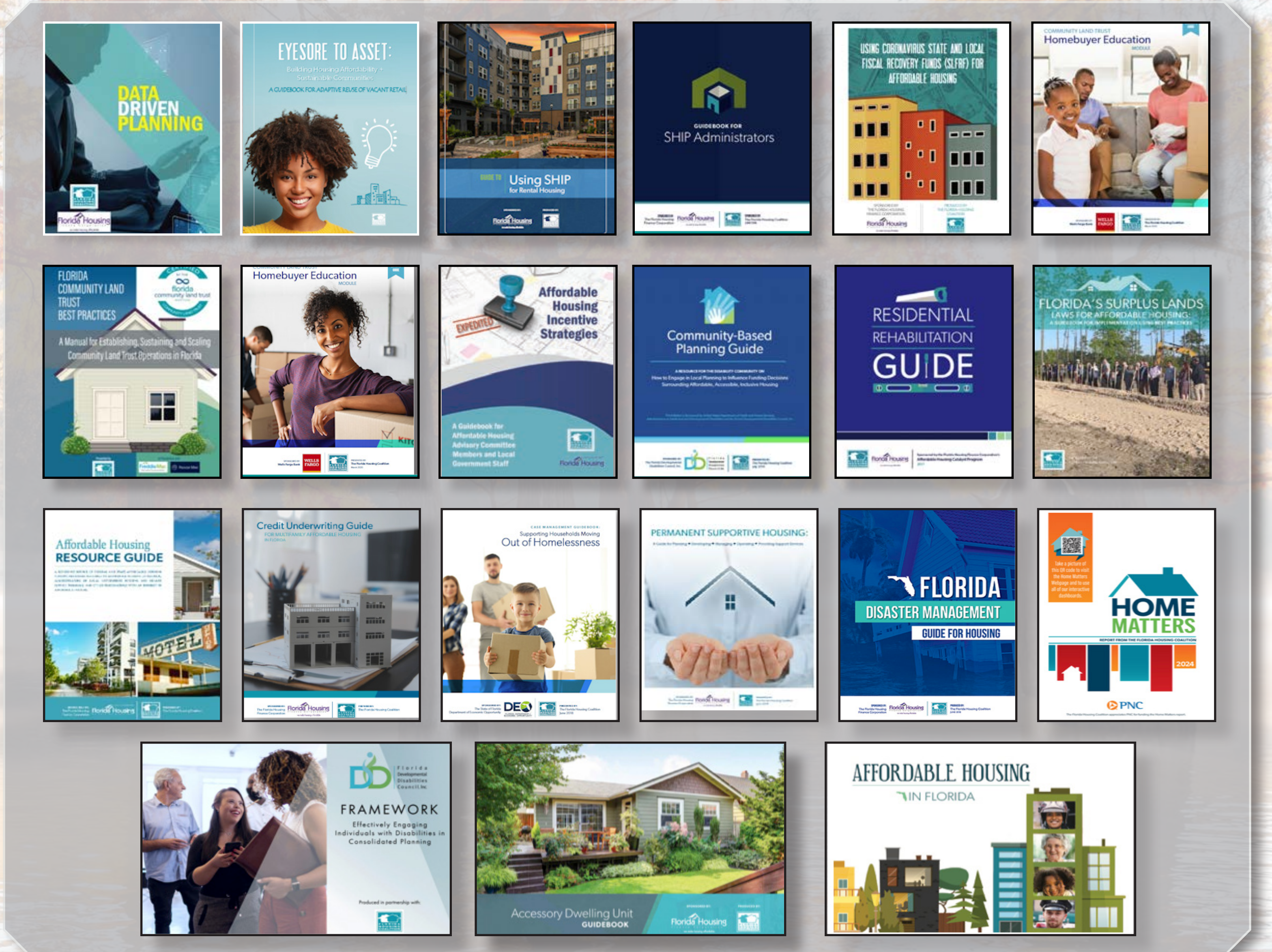
OUR READS

UNLOCK FLORIDA'S HOUSING KNOWLEDGE — FREE AND AT YOUR FINGERTIPS.

Whether you're shaping policy, building communities, or driving innovation, you need the right knowledge to make an impact. The Florida Housing Coalition's award-winning publications deliver the latest trends, research, and strategies across Florida's housing ecosystem — ***free to access, free to share, and built for action.***

From practical how-to guides to in-depth research reports, explore more than two dozen expertly crafted resources designed to equip you for success.



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SMART SOLUTIONS START WITH SMARTER INFORMATION.

BUILDING FLORIDA'S FUTURE ONE HOME AT A TIME

FHC SERVICES

AFFORDABLE, ATTAINABLE HOUSING DOESN'T JUST HAPPEN.

IT'S BUILT THROUGH *VISION, STRATEGY,* & *COLLABORATION.*

The Florida Housing Coalition is the trusted partner behind the plans, programs, and policies that shape Florida's housing ecosystem.

From ending homelessness to creating first-time homeownership opportunities, we bring unparalleled expertise to empower governments, nonprofits, and businesses alike. Our team combines data-driven strategies with community-centered engagement, turning housing challenges into solutions embraced by public and private stakeholders across the state.

When you partner with the Florida Housing Coalition, you don't just move projects forward, *you move communities forward.*

> *"THERE IS TRULY NOTHING THAT HAPPENS IN FLORIDA HOUSING WHERE THE COALITION ISN'T ADVOCATING, INFLUENCING, LEADING, OR PARTNERING. THANK YOU FOR YOUR LEADERSHIP."*
>
> — ESTHER MARSHALL, FIFTH THIRD BANK

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BLUEPRINTS

The Florida Housing Coalition's Journal on guiding the future of affordable housing in Florida.

VOLUME NO.2

FALL/WINTER 2025

1311 N. Paul Russell Road, B-201, Tallahasse, FL 32301
Tel. 850-878-4219, www.flhousing.org
info@flhousing.org