

SHIP Administrators throughout Pinellas County have identified several provisions within the current State Housing Initiatives Partnership (SHIP) regulations that may benefit from clarification or revision to better support effective local program administration and the evolving housing needs of Florida communities. The recommendations from Pinellas County are intended to enhance administrative efficiency, provide greater flexibility in responding to local housing conditions, reduce unnecessary barriers to program implementation, and strengthen the ability of local governments to effectively deploy SHIP resources while maintaining appropriate accountability and compliance with State requirements.

Based on our collective experience implementing SHIP-funded programs, administering housing assistance, and serving income-eligible households, the administrators respectfully recommend consideration of the following regulatory revisions:

1. **Problem:** All eviction prevention rent assistance on mobile homes older than 1994 is not permitted. For individuals living in older homes, especially seniors, they have no other option to move when they are needing assistance. There are nearly 300 mobile homes and manufactured housing parks in Pinellas County. The median age of all residential homes in Pinellas County is 45 years (the highest in Florida). County data shows over 44,000 manufactured home units, with many parks heavily populated by units built during the building booms of the 1960s, 1970s, and 1980s. Additionally, individual mobile home park communities or census tracts with high concentrations of manufactured housing typically report median household incomes that skew lower than the broader county average—often ranging between \$35,000 and \$55,000, heavily influenced by fixed retiree incomes or working-class demographics.

Recommendation: SHIP administrators within Pinellas County recommend revising State regulations to allow eviction prevention that provides rental assistance for eligible households living in mobile homes built before 1994. These households often have limited affordable housing alternatives, and older mobile homes may be difficult or impossible to relocate. Allowing assistance when the household otherwise meets program requirements would help prevent displacement and homelessness while preserving an important source of affordable housing.

2. **Problem:** SHIP Admin/HDS: Increasing cost and responsibilities with implementing SHIP (AHAC, staffing costs, etc.) and decrease in the amount allowed to be charged as Project Delivery Costs impede program viability. SHIP administration has to cover the cost, not only to handle Direct administrator of cost for carrying out a new funds, but it also has to be used to cover managing the loan portfolio - Including the time and cost associated with collecting loan payments, working with clients when their department periods and, addressing loans that fall into non-compliance. Additional requirements aside, such as an AHAC, the admin cap does not cover these costs. Although SHIP has been fully funded in the last few years, the amount of funds going into the trust fund has diminished in the amount of funding that jurisdiction are receiving has reduced as well. But the same requirements still apply in terms of administrative work.

Recommendation: Allow 10% of program income to also be used for Administration and consider increasing the percentage that can be charged for project delivery costs from 5% to 10%.

3. **Problem:** Many jurisdictions cannot run down payment assistance through SHIP anymore because the admin funding does not cover the costs to administer it-especially for smaller jurisdiction that may have to contract out this work to a third-party agency. This is an allowable cost with federal HOME and CDBG money as part of the project.

Recommendation: Allow the income certification and case processing fee for down payment cases and rental assistance to count as project delivery cost chargeable to the project.

4. **Problem:** Rental Income Certifications for Rental Eviction, Rent & Utility Start-Up, and rental development income certifications. Full income certification can be burdensome on renters that are either needing a short turnaround to stay housed or get approved to move into an apartment. Rental development compliance (for the property manager) and monitoring (for the jurisdiction) can be time consuming and costly. Staffing costs for monitoring are not sufficiently covered by SHIP Admin.

Recommendation: Recommend adopting similar policies as HUD has adopted for the HOME program (see 24 CFR Part 92.203):

Allows acceptance of documentation from other federal assistance/voucher providers as proof of income eligibility (this also can encourage developments to accept vouchers)
Requires income certification (or proof from another assistance agency) for the initial certification, and then either obtain source documents in consequent years or obtain a written statement from the household of the amount of household income and family size with a certification that information is complete and accurate and that additional documentation will be provided if requested.

5. **Problem:** Special Needs classification for SHIP 20% set-aside: Pinellas County's population is aging - many of the clients we (SHIP jurisdictions) serve for home improvement programs are seniors - many need bathroom modifications to reduce falls in their home (which helps maintain their independent living). However, the overwhelming majority do not receive in-home healthcare.

SHIP currently requires, under the classification of "Disabling Condition" that the person has the disabling condition impacting one or more life functions **and** be receiving in-home healthcare. A large portion of SHIP-funded home rehabilitation clients are age 62 or older. The demand for accessibility modifications is high; however, most of these clients do not receive home healthcare (which is part of the SHIP requirement in order to include these clients toward the "special needs" set aside requirement under the category of "disabling condition." Requiring older adults to obtain medical documentation can create an unnecessary barrier and delay assistance, particularly when the accessibility need can be reasonably identified through an inspection or assessment of the home.

6. **Recommendation:** Allow applicants aged 62 and older who receive accessibility-related assistance, without requiring a physician's certification and requirement of enrollment in home healthcare, to count toward the special needs set-aside requirement. While an individual may not have a formally documented disability, age-related mobility and accessibility needs can still affect their ability to safely use and remain in their home.

For applicants under age 62, in order to be counted toward the "special needs" set-aside, require the doctor's note to confirm the household member has a disabling condition that limits one or more life functions and that they would benefit from the accessibility improvements due to their disabling condition. Eliminate the requirement for them to also be receiving home healthcare.

7. **Problem:** SHIP funding used to support new multifamily rental projects must be committed, expended, and the project must have certificate of occupancy all within 2 years. This is often an unrealistic development timeline, especially for larger multifamily developments.

Recommendation: Extend timelines for SHIP funds in multifamily rental projects to, at minimum, 2 years to commit funding to a project, 3 years to fully expend SHIP funds, and 4 years to receive certificate of occupancy. Also recommend applying this timeline to each phase of a multi-phased project.

8. **Problem:** SHIP awards require that 60% of award are spent on homeownership projects, yet the required affordability set asides make it difficult to use SHIP funds for anything except down payment assistance programs. It is nearly impossible in today's housing market and economic challenges for anyone earning 80% of area median income or below to afford homeownership, even with down payment assistance.

Recommendation: Either reducing the 60% homeownership requirement to between 30% and 50% to free up more SHIP funds for affordable rental project support or adjust the AMI set aside requirements higher for homeownership project support.

9. **Problem:** Current SHIP statute requires PJs to reserve at least 30 percent of local housing trust fund for VLI households and 30 percent for LI households. The statute also requires a minimum of 20 percent for persons with special needs.

While this establishes important protections for households with the greatest affordability needs, the needs of the communities are not uniform. A community may have a significant population of households that are VLI that cannot afford available housing with or without assistance. A community may have a shortage of workforce housing for households between 80-120% AMI with comparatively fewer viable options to utilize SHIP funds. Costs associated with housing, such as insurance, property taxes, rent, and construction costs can create substantial cost burdens for those above the VLI requirement. This leaves communities with available SHIP resources but limited eligible projects or qualifying households for immediate and documented need for assistance.

Recommendation: Re-evaluate income set-asides by giving local governments flexibility to shift between VLI/LI/MI based on documented housing needs