

From: Michael Chaney <chaney@flhousing.org>
Sent: Monday, October 26, 2026 3:06 PM
Subject: SHIP Rule proposed amendments: comments and questions

Hello Rob,

Thank you to you and FHFC for hosting the recent workshop on the proposed amendments to the SHIP Rule. We have comments and questions on three items that we hope may help inform the final Rule.

1. Clarification on 67-37.007(3)(f) — DPA, rehabilitation, and the 75% construction set-aside.

The proposed rule provides that DPA counts toward the 75% construction set-aside only if rehabilitation is provided and is **“required to ensure the home is safe, decent and liveable.”** Would FHFC consider adding clarification or a definition of how to determine when rehab paired with DPA meets that standard? We’re also hoping to understand whether this change means only SHIP funds spent on rehabilitation would count toward set-aside compliance. Our current interpretation is broader, counting repairs made by the seller up to 12 months before the sale, or by the buyer up to 12 months after, as expenses that trigger compliance.

2. Extended record retention.

On the proposed seven-year retention period: would it apply only to new records, or also to existing records that haven’t yet reached the end of the current five-year period? We’d also gently note that seven years is more demanding than the general federal retention period for some CDBG and HOME records, which may draw some concern from local governments.

3. Expenditure of funds for affordable rental housing — 67-37.005(5)(c).

Two clarifying questions on new item 5. First, is item 5 meant to be the only subparagraph that applies to affordable rental housing, or can items 1, 2, or 4 also trigger an “expenditure”? Second, how does new item 5 differ from item 2? Both appear to require occupancy by an eligible household after a home is built, so we want to be sure we’re reading the distinction correctly.

Thank you again for the opportunity to comment, and please let us know if it would be helpful to discuss any of this further.

Sincerely,
Michael

Michael Chaney
Florida Housing Coalition
Phone 850 980-1307