October 23, 2017
Trey Price, Executive Director
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

Dear Mr. Price:

Thank you for continuing the Florida Housing Finance Corporation’s efforts in developing supportive housing for persons with disabling conditions and special needs, and those experiencing homelessness. Thank you also for helping the Workgroup understand their needs.

The Florida Supportive Housing Coalition is the only statewide organization whose mission since 2000 has been to advocate for the expansion of supportive housing for individuals with disabling conditions. This includes individuals experiencing psychiatric disorders, individuals with developmental disabilities, veterans or seniors with special needs, victims of domestic violence, youth aging out of foster care, and individuals and families with extremely low incomes (ELI). The Florida Supportive Housing Coalition is also an advocate for individuals experiencing homelessness.

Although in recent years there have been good strides by the state and Florida Housing Finance Corporation to advance homeless and special needs housing the overall inventory is still well below need. Housing for ELI is also limited. For example:

- Homeless and Special Needs Housing is only 3.4% of the existing housing inventory. (7,293 units out of 213,225 produced) (FHFC, Sept. 2017) compared with 22% of the need.
- Persons experiencing homelessness or individuals with special needs are 22.4% of the total need. (184,161/822,552) (119,324 households with special needs + 32,533 homeless individuals + 32,304 homeless families). (2016 Rental Market Study)
- Households with extremely low incomes comprise 40% of the total need. (2016 Rental Market Study, p 8)
- Florida has only 32 affordable and available rental units for every 100 households with incomes of 0-30 percent AMI, a deficit of 309,971 units. For most other income ranges, the number of units is equal to or greater than the number of households. (2016 Rental Market Study, p. 28). 

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Florida has only 32 permanent supportive housing units for every 100 homeless individuals and eight permanent supportive housing family units for every 100 homeless families. (2016 Rental Market Study, p.67).

Based on the statistics and our experience in advancing housing targeting households with special needs, etc. the Florida Supportive Housing Coalition offers the following recommendations.

1) Florida Housing Finance Corporation should target its entire rental housing resources for special needs, extremely low income, and homeless housing units until parity is reached. Both Florida law and the 2016 Rental Market Study support this.
   - Section 420.0003(3)(a) Housing need (states) - "The continuum of need for decent and affordable housing shall be addressed, with an emphasis on assisting the neediest persons".
   - The 2016 Rental Market Study (p.44) states "its affordable/available analysis highlights the severity of the need for housing supply for households at the lowest income levels" and ... "Additional production should be targeted based on demographics, with services and design measures to serve special needs households appropriately... rather than adding to saturated markets".

2) Florida's Federal Tax Credits should be set aside for Homeless and Special Needs Housing until parity is reached. This recommendation would incentivize more developers to build special needs and homeless affordable housing by offering a market driven tool for mobilizing private investment capital.

3) Request the legislature appropriate $10 million to Florida Housing Finance Corporation for communities that are leading the way with public/private financing initiatives for special needs and homeless housing. This funding could be used to leverages private and philanthropic investment capital on a matching basis.

4) The Legislature should amend the Florida Local Option Food & Beverage Tax statute (Chapter 212.0306 F.S.) to allow for Local Option referendums to increase local funding for affordable housing. For example Miami Dade County was able to get an exemption to pass a local food and beverage tax to create funding for homelessness. It provided match money to help draw federal funds and to create local initiatives. It currently raises about $20 million a year from 1% food and beverage tax collected in certain restaurants.
5) Request the Legislature explore funding and regulatory changes that would increase rental assistance and other housing supports for persons with special needs or experiencing homelessness through the assistance of the Department of Children & Families, the Department of Elder Affairs, and the Agency for Health Care Administration.

For example permanent supportive housing should be added as a special living arrangement to the Department of Children & Families Rule 65-A2 so recipients on SSI under the Department of Children & Families can receive Optional State Supplementation (OSS). Optional State Supplementation is a form of housing assistance allowable under federal law (Regulations No. 16 - Section 416.2001; 416.2020 through 416.2035; and 416.2050). It is payable to an eligible an individual or couple with no countable income in excess of the Federal SSI rate.

Each state sets its own payment rate, living arrangement variations, and/or geographic variation. More than half of the states include persons living in an independent living arrangement such as permanent supportive as eligible to receive OSS. Currently Florida only defines group living arrangement such as an assisted living facilities and residential treatment facilities as special living arrangements. This change would allow individuals or couples whose incomes are only SSI to receive up to $238/individual or $478/couple per month to assist in meeting rent requirements.

6) Florida Housing Finance Corporation has begun to include scored questions regarding low barrier intake in its special needs RFA’s. Florida Housing Finance Corporation should adopt these same scored questions in all its RFAs to encourage all developers (not just not-for-profits in special needs cycles) to implement low barrier intake practices.

Although the task is challenging it is a challenge worth accomplishing. We all know that housing is important to everyone and safe and stable housing significantly improves the self sufficiency of persons with special needs or of those experiencing homelessness. Research also shows supportive housing provides significant cost savings across other public resources.

We hope you find the recommendations useful and will include them into the Workgroup recommendations. If you have any questions please let us know by emailing: karen@fshc.org

Sincerely,

Olga Golik
In-coming President, FSHC

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