

From: Karen Koch <Karen@fshc.org>
Sent: Thursday, November 14, 2019 1:37 PM
To: Comments <Comments@floridahousing.org>
Subject: Florida Supportive Housing Coalition's Strategic Plan Comments

Dear Mr. Dubuque: Thank you for all your support of affordable housing for persons with special needs and those experiencing homelessness. The Florida Supportive Housing Coalition is also very appreciative of you and Florida Housing staff taking the time to allow public comments to Florida Housing's Strategic Plan. Attached are our written comments. If you have any questions, please let me know.

Sincerely,

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Florida Supportive Housing Coalition
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November 14, 2019

Ray Dubuque
Chair, Board of Directors
Florida Housing Finance Corporation
227 North Bronough Street
Suite 5000
Tallahassee, FL 32301

Dear Mr. Dubuque,

Thank you for using an inclusive process as Florida Housing Finance Corporation updates its strategic plan. The Corporation's continued efforts to engage stakeholders in its efforts is of great benefit to the state and the people ultimately served by the housing created.

As mentioned at the October 31, 2019 Board meeting, the Florida Supportive Housing Coalition (FSHC) strongly supports Priority III: Enhance opportunities for special needs and homeless households to access rental housing paired with supportive services.

Progress has been made towards achieving the goals established in the 2014 Strategic Plan. However, there is still important work necessary to ensure all Floridians have access to quality, affordable housing.

While many of the following may fall into one of the goals in the existing plan, we hope the Corporation will:

1. Continue its efforts to reduce barriers to housing for special needs, homeless and extremely low-income households. The 2017 Affordable Housing Task Force heard repeatedly from stakeholders that many households were having trouble accessing the housing financed by the

Corporation. The recommendation of the Workgroup the Corporation convened need to be implemented and expanded so all persons have access to much needed affordable housing.

2. Ensure ELI and Link units are required in all multi-family developments financed by the Corporation and prevent the loss of ELI and Link units in the future. The market will never be able to meet the housing needs of ALI and special needs households. The Corporation must continue to focus its efforts on addressing this critical need.
3. Increase efforts to foster the capacity of mission-driven nonprofit developers; this is especially true for projects serving the homeless and persons with special needs.

To commit to providing high-quality supportive housing, which embraces and implements best-practices, requires an organization with the mission-focus and capacity to serve the residents. It is not possible to make a profit providing supportive housing. Therefore, the selection order should be amended to select Non-Profit Applicants before For-Profit Applicants.

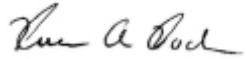
Further, multiple experienced FSHC members and other nonprofits that have partnered with For-Profit developers state that it is far more difficult to serve the desired target populations, and implement the evidence-based practices that prove successful for ensuring ongoing housing stability, when partnered with a For-Profit compared to when they developed the housing independently. Among the challenges encountered are:

- Policies that institute higher barriers to selecting eligible resident households
- Policies that don't support prioritizing housing stability above other outcomes
- Designs that do not include the scope of community amenities the nonprofit believes are required to best serve the residents
- Material selections that do not prioritize long-term durability to ensure ongoing operational sustainability

It is also important for scarce resources to be invested in fostering the continuing development of a robust supportive housing industry. As has been shown by the High-Cost/High-Utilizer pilots initiated by Florida Housing, creating housing that implements best-practices to serve our most vulnerable populations is the highest and best use of limited resources – it improves the individuals' quality of life and saves public resources across sectors. This type of housing is best done by mission-driven organizations.

4. Increase allocations to create housing for special needs and homeless households. According to the Triennial study, homeless and special needs represent 21% of the need. Yet, including Link units, housing for these populations is less than 4% of the Corporation's rental portfolio.
5. FSHC also encourages the Corporation to remain focused on meeting the greatest need. 80% of cost-burdened renter households earn 60% or less of the Area Median Income. Two-thirds of ELI households pay more than 60% of their income for housing. It is essential the Corporation use its limited resources to address these needs and not redirect resources to higher income households.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Koch".

Karen Koch
Executive Director
FSHC