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HOUSING STABILITY FOR SCHOOLCHILDREN

Action

I. HOUSING STABILITY FOR SCHOOLCHILDREN

A. Housing Stability for Schoolchildren Program in Santa Rosa County

1. Background:

- a) In 2018, Santa Rosa County was one of two demonstration projects Florida Housing established to evaluate the use of federal HOME funds for tenant-based rental assistance (HOME-TBRA) of up to twenty-four months, paired with Department of Education McKinney-Vento Program resources and community-based case management resources to help families with school-aged children who are experiencing homelessness establish housing stability and achieve self-sufficiency. One requirement for participating counties is that the local public housing agency administering HUD rental assistance across the county will execute an agreement to administer the HOME-TBRA allocated by Florida Housing. The other primary requirement is that an MOU must be executed between Florida Housing, the county's school system, the public housing authority (PHA), and a social services agency having experience providing case management and related services for families and children.
- b) In the Spring of 2020, the Board tasked the Florida Housing staff to expand the Program to add up to three additional eligible counties, and Florida Housing executed the second contract with the Milton Public Housing Authority (PHA) in November 2020 to continue to provide HOME-TBRA funds to eligible households in Santa Rosa County as part of the Program.

2. Present Situation:

- a) Last October, the Milton PHA has informed staff that the Authority will not continue its role in the partnership after it completes administration of the HOME-TBRA for the current families participating in the Santa Rosa County Program. The last of the current participating families will exit the Program no later than the end of September 2025.
- b) On October 22, 2024, The Board approved Florida Housing staff to execute a HOME-TBRA administration contract with the Milton PHA for a period of one year, beginning for the purpose of continuing the administration of the rental assistance for the current families participating in the Program.
- c) The Santa Rosa County School District, the case management provider, and local government officials expressed a strong desire for the Program to continue. Florida Housing staff worked diligently with the local stakeholders including the PHA, to address challenges within these partnerships.
- d) As of June 2025, the PHA has agreed to move forward with the initiative once again and is willing to partner with the other key members to help administer a local Program. The recently executed Housing Stability for Schoolchildren Program in Santa Rosa County Memorandum of Agreement may be reviewed in [Exhibit A](#).

HOUSING STABILITY FOR SCHOOLCHILDREN

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3. **Recommendation:**

- a) Authorize staff to approve up to \$500,000 in HOME-TBRA funds for the provision of rental assistance to serve up to 25 Program eligible families at a time. If authorized, Florida Housing staff will take action to execute an agreement with the Milton Housing Authority to administer HOME-TBRA rental assistance for the Santa Rosa County Housing Stability for Schoolchildren Program.

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II. LEGAL

A. Beacon at Creative Village-Phase II Partners, Ltd.

FHFC Case No. 2025-037VW

Development:	Beacon at Creative Village-Phase II	Location:	Orange County	
Category:	New Construction	Developer(s):	Atlantic Housing Partners, LLLP	
Type:	Mid-Rise	Principal:	Jay P. Brock	
Demographic:	Family	Owner:	Beacon at Creative Village - Phase II Partners, Ltd.	
		Parent Owner:	Southern Affordable Services, Inc.	
Total Units: 39	6 Units @ 30% (ELI & HC-4%) 24 Units @ 60% (SAIL & HC-4%) 9 Units @ 80% (SAIL & HC-4%) 16 Units @ 60% (MMRB)	Funding Requests:	MMRB	\$ 7,650,000
			SAIL	\$1,100,000
			HC-4%	\$555,128
			ELI	\$219,400

1. **Background:**

- a) Beacon at Creative Village-Phase II Partners, Ltd. (“Petitioner”) successfully applied for funding to assist in the construction of Beacon at Creative Village-Phase II, a 39-unit development located in Orange County, Florida (the “Development”). On July 15, 2025, Florida Housing received a Petition for Waiver of Rules 67-21.008(1)(e) and (f) and 67-21.013, F.A.C. (2023) (the “Petition”). Petitioner seeks a waiver of the referenced rules to allow the purchase of Florida Housing issued Multifamily Mortgage Revenue Bonds through a private placement by an entity that is not a Qualified Institutional Buyer. A copy of the Petition is attached as [Exhibit A](#).

2. **Present Situation:**

- a) Rules 67-21.008(1)(e) and (f), F.A.C. (2023) state in relevant part:
- (1) Each Mortgage Loan for a Development made by the Corporation shall:
- (e) Have the initial review, approval, and origination process accomplished by a Qualified Lending Institution.
- (f) Be serviced by such Qualified Lending Institution or other private entity engaged in the business of servicing mortgage loans in Florida as the Corporation shall approve.

Rule 67-21.013, F.A.C. (2023) states in relevant part:

Unless otherwise set forth in a competitive solicitation, any issuance of non-Credit Enhanced revenue Bonds shall be sold only to a Qualified Institutional Buyer or

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a Freddie Mac Multifamily Targeted Affordable Housing Lender. The Corporation shall engage the Investment Banker with respect to such Bonds. The Corporation, in its discretion, will allow only one of either an underwriting discount or a placement agent fee, but not both. Unless such Bonds are rated in one of the four highest rating categories by a nationally recognized rating service and are the subject of a Credit Enhancement instrument, such Bonds shall comply with at least one of the following criteria:

(1) The Bonds shall be issued in minimum denominations of \$100,000 (subject to reduction by means of redemption) and an investment letter satisfactory to the Corporation and its counsel shall be obtained from each initial purchaser of the Bonds (including the underwriter and any purchaser purchasing the Bonds in an immediate resale from an underwriter), and all subsequent purchasers of the Bonds, or

(2) The Bonds shall be issued in minimum denominations of \$250,000 (subject to reduction by means of redemption) and an investment letter satisfactory to the Corporation and its counsel shall be obtained from each initial purchaser of the Bonds (including the underwriter and any purchaser purchasing the Bonds in an immediate resale from an underwriter), but an investment letter shall not be required of subsequent purchasers of the Bonds. Any investment letter shall state, among other things, that such purchaser is a Qualified Institutional Buyer or a Freddie Mac Multifamily Targeted Affordable Housing Lender, is purchasing such Bonds for its own account and not for immediate resale to a purchaser other than a Qualified Institutional Buyer or a Freddie Mac Multifamily Targeted Affordable Housing Lender, and has made an independent investment decision as a sophisticated or institutional investor.

- b) The Development has been awarded funding from the Corporation consisting of \$7,650,000 in MMRB, \$1,100,000 SAIL Base Loan, \$219,401 in SAIL ELI, and \$555,128 in 4% Non-Competitive Housing Credits to build 39 units. This Development is part of a larger planned development that consists of a single, unified five-story building with four residential floors. The residential floors will be divided between Beacon at Creative Village ("Phase I") with 76 units and Beacon at Creative Village - Phase II ("Phase II") with 39 units. The phases will be divided utilizing a condominium structure. Phase II, along with Phase I, will be a "twinning" development where Phase I will be funded with 9% Competitive Housing Credits, while Phase II will be funded with MMRB, SAIL and 4% Non-Competitive Housing Credits.
- c) Petitioner seeks waiver of the referenced rules so that the \$7.65 million in MMRB may be sold through private placement to MSPJ Bond Holdings, LLC (MSPJ). MSPJ is not a Qualified Institutional Buyer as defined in Rule 67-21.002(91), F.A.C. nor has it been designated as a Qualified Lending Institution by Florida Housing pursuant to Rule 67-21.002(92), F.A.C. However, MSPJ's managers and members have experience with the purchase of tax-exempt bonds for affordable housing developments in Florida. MSPJ has to date purchased tax-exempt bonds relating to 10 developments and currently holds \$20 million in tax-exempt bonds through local issuers. Petitioner requests waiver of the provision in Rule 67-21.008(1)(e), F.A.C. requiring the initial review, approval, and origination process for the mortgage loan be accomplished by a Qualified Lending Institution to allow the assigned credit underwriter to perform those functions and authorize the assigned credit underwriter to service the MMRB loan pursuant to Rule 67-

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21.008(1)(f), F.A.C. The Development is paired both physically and financially with Phase I making these developments together very different and unique compared to others in Florida Housing's portfolio. Due to the complicated nature of twinning of the developments; a Qualified Institutional Buyer would likely impose conditions and additional costs that would be a substantial hardship for Petitioner.

- d) Multifamily staff has worked closely with Bond Counsel and the assigned Credit Underwriter to ensure Florida Housing's interests are protected, which include among other items:
- (1) Acknowledgement that Florida Housing staff are making this recommendation based solely on the unique twinning nature of this transaction and that moving forward, the Principals of the Petitioner will need to explore other financing structures, as staff will not make a positive recommendation for this waiver request again.
 - (2) Receipt of the following from the Bond Purchaser:
 - (a) Investor representation and suitability questionnaire.
 - (b) Investment letter from the bond purchaser at closing and in connection with any transfer of the bonds.
 - (c) Complete disclosure of ownership structure of the bond purchaser, including all Principals and their respective ownership interests; and
 - (d) Disclosure of any compensation of fees received by the investor from the Borrower, Developer, or Affiliates.
 - (3) Receipt of an independent legal opinion from outside counsel attesting that:
 - (a) The purchase does not violate securities laws; and
 - (b) The organizational structure/makeup of the Borrower, the Developer, the Equity Provider(s) and the Bond Purchaser do not reflect a related party/related persons.
 - (4) After Florida Housing Bond Counsel (FHBC) review of the independent legal opinion (noted above in item 3) and FHBC's independent analysis of the ownership structure (as provided per item (2)(c)), FHBC must determine that the structure does not violate the related party/persons test, which must be documented in bond closing documents.
 - (5) Appropriate closing document and/or legal opinion must include language that will require:
 - (a) Ongoing financial reporting from the investor through the construction period.
 - (b) Prohibition on bond resales to non-qualified parties without approval.

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- (c) A covenant that the investor will not receive any indirect return beyond stated interest, without express consent from Florida Housing staff; and
- (d) Compliance certificate(s) regarding these matters, provided on at least an annual basis.
- (6) Appropriate credit enhancement on the payment of principal and interest on the bonds must be provided, subject to review and recommendation from the credit underwriter and FHBC.
- e) On July 17, 2025, the Notice of Petition was published in the Florida Administrative Register in Volume 51, Number 138. To date, Florida Housing has received no comments concerning the Petition.
- f) Section 120.542(2), F.S. provides in pertinent part:

Variances and waivers shall be granted when the person subject to the rule demonstrates that the purpose of the underlying statute will be or has been achieved by other means by the person and when the application of a rule would create a substantial hardship or would violate principles of fairness.
- g) Granting the requested waiver does not impact any other participants in funding programs administered by Florida Housing, nor does it detrimentally impact Florida Housing or the Development. Petitioner has demonstrated that strict application of the above Rules under these circumstances would constitute a substantial hardship. Petitioner has also demonstrated that the purpose of the underlying statute, which is to “encourage development of low-income housing in the state” (§420.5099, F.S.), would still be achieved if the waiver is granted.

3. **Recommendation:**

- a) Staff recommends the Board GRANT the following:
 - (1) The requested waiver of Rule 67-21.008(1)(e), F.A.C. (2023) to allow initial review, approval, and origination of the MMRB loan to be accomplished by an entity other than a Qualified Lending Institution; and that Florida Housing authorize the credit underwriter already retained for purposes of the Development's funding requests to perform those functions.
 - (2) The requested waiver of Rule 67-21.008(1)(f), F.A.C. (2023) to allow Petitioner's MMRB loan to be serviced by the credit underwriter assigned to the Development.
 - (3) The requested waiver of Rule 67-21.013, F.A.C. (2023) to allow the sale of the Development's Non-Credit Enhanced Revenue Bonds to an entity other than a Qualified Institutional Buyer, specifically, that Florida Housing authorize the sale of said bonds by private placement to MSPJ; and

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- (4) The requested waiver of the portion of Rule 67-21.013(2), F.A.C. (2023), that would otherwise require MSPJ, as initial purchaser of the bonds, to provide an investment letter to Florida Housing stating that it is a Qualified Institutional Buyer or Targeted Affordable Housing Lender.

MULTIFAMILY PROGRAMS - ALLOCATIONS

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III. MULTIFAMILY PROGRAMS - ALLOCATIONS

A. RFA 2025-108 9% Housing Credit and SAIL Financing for Homeless Housing Developments Located in Medium and Large Counties

1. Background:

- a) On May 13, 2025, Florida Housing Corporation (Florida Housing) issued RFA 2025-108 offering \$5,959,352 of 9% Housing Credits, \$12,400,000 in SAIL funding, and \$1,159,800 in HOME-ARP funding for Non-Profit Applicants proposing the development of housing for Homeless Households that also include a portion of units for Persons with Special Needs, located in the Medium and Large Counties.
- b) The deadline for receipt of Applications was 3:00 p.m., Eastern Time, June 10, 2025.

2. Present Situation:

- a) Florida Housing received 5 Applications in response to this RFA. The Review Committee members, designated by the Chief Financial Officer, were Kelisha Austin, Policy Coordinator (Chair), Lisa Nickerson, Multifamily Tax Credits Director, Hannah Preiser, Multifamily Programs Analyst, Elaine Roberts, Policy Administrator, Nicole Singleton, Policy and Special Programs Manager, Zach Summerlin, Policy Director, and Lisa Walker, Multifamily Programs Manager. Each member of the Review Committee independently evaluated and scored their assigned portions of the submitted Applications, consulting with non-committee staff and legal counsel as necessary and appropriate.
- b) At its July 2, 2025, Review Committee meeting, the individual committee members presented their scores, and the Committee carried out the funding selection process in accordance with Section Five, B. of the RFA. The individual scores are set forth on the RFA webpage and can be accessed here.
- c) The RFA 2025-108 All Applications chart (provided as [Exhibit A](#)) list the received Applications. The eligible Applications (i.e., Applications that met all criteria to be eligible to be considered for funding) and the ineligible Applications are listed in assigned Application Number order.
- d) The Review Committee considered the following motions:
 - (1) A motion for the Review Committee to approve the scoring results set out on Exhibit A and recommendations for funding as set out on [Exhibit B](#).
 - (2) A motion to recommend that the Board approve the scoring results set out on Exhibit A and recommendations for funding as set out on Exhibit B.
- e) The motions passed unanimously.

MULTIFAMILY PROGRAMS - ALLOCATIONS

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3. **Recommendation:**

- a) Approve the Committee's recommendations that the Board, adopt the scoring results of the 5 Applications and authorize the tentative selection of the 2 Applications (set out on Exhibit B) for funding.
- b) If no notice of protest or formal written protest is filed in accordance with Section 120.57(3), Fla. Stat., et. al., staff will proceed to issue an invitation to enter credit underwriting to the Applications set out on the Exhibit B.
- c) If a notice of protest or formal written protest is filed in accordance with Section 120.57(3), Fla. Stat., et. al., then at the completion of all litigation for those Applicants impacted by litigation, staff will present all Recommended Orders for Board approval prior to issuing invitations to enter credit underwriting to those Applicants in the resulting funding range. For those Applications in the funding range but not impacted by litigation, staff will issue invitations to underwriting as outlined in rule 67-48.0072(1), F.A.C.
- d) There is \$509,352 in 9% Housing Credits and \$4,787,500 in SAIL funding remaining. As provided in Section Five, B. of the RFA, any remaining funding will be distributed as approved by the Board

SINGLE FAMILY HOMEBUYER PROGRAMS

Action

IV. SINGLE FAMILY HOMEBUYER PROGRAMS

A. Request Approval of the Eligible Occupations List for the Hometown Heroes Loan Program

1. Background:

The Florida Legislature appropriated \$50 million in the 2025-26 state budget for the Florida Hometown Hero Program (Hometown Heroes). This program provides down payment and closing cost assistance to first time, income-qualified homebuyers so they can purchase a primary residence in the community in which they work and serve. Hometown Heroes also offers a competitive first mortgage interest rate and lower closing costs.

2. Present Situation:

- a) For the 2025-26 state budget year, the law limits eligibility to the following borrowers employed full-time by a Florida-based employer: health care workers, school staff members, first responders, public safety or court employees, child care workers, a servicemember of the United States military or military reserves, the United States Coast Guard or its reserves, the Florida National Guard or a veteran employed full-time by a Florida-based employer.
- b) The law further requires Florida Housing to publish a list of eligible occupations. Therefore, staff has developed a proposed list of eligible occupations ([Exhibit A](#)) for use in the program.

3. Recommendation:

- a) Approve the list of eligible occupations for the Hometown Heroes Program.

HOUSING STABILITY FOR SCHOOLCHILDREN PROGRAM MEMORANDUM OF AGREEMENT

This Memorandum of Agreement (MOA) between the Florida Housing Finance Corporation (Florida Housing), the Santa Rosa County School District, the Milton Housing Authority (Public Housing Authority), and The Childrens' Home Society (Case Management Organization) is for the purpose of implementing the Housing Stability for Schoolchildren Program (hereafter referred to as the Program). The Program will assist families with children participating in the School District's Title IX, Part A: McKinney-Vento Program. Through the provision of funds from Florida Housing administered by the Public Housing Authority and supportive services provided by the Case Management Organization, the families will receive assistance in finding suitable rental housing.

Florida Housing agrees to the following:

1. Allocate and authorize the use of funds for tenant-based rental assistance of no more than 24 months per family for the Program.
2. Execute and manage an agreement with the Public Housing Authority to administer the Program for Santa Rosa County County providing no more than 24 months of Tenant-Based Rental Assistance to participating families. The Program will provide rental assistance for up to 25 households at a time.
3. Monitor the administration of the Florida Housing funds and implementation of the Program.
4. Collaborate with and provide technical assistance to the Program partners in developing, implementing, and evaluating the Program.
5. Monitor and assist with promoting the Program to local and state policymakers, stakeholders, and the public.
6. Coordinate telephonic meetings between the parties of this Memorandum not less than quarterly, to report on progress, challenges, best practices and additional needs.

The Santa Rosa County School District agrees to the following:

1. Consult with the Public Housing Authority to develop household selection criteria that will assist families with children participating in the School District's Title IX, Part A: McKinney-Vento Program that also align with the eligibility requirements set forth in the Code of Federal Regulations (CFR) for Title 24 part 92, Home Investment Partnerships Program (HOME).
2. Build and maintain a pool of households to refer for participation in the Program.
3. Discuss the general parameters of the Program with families and prepare and sign a School District participation agreement with the selected families outlining the expectations of the Program and subsequent school requirements.
4. Refer selected families to the Case Management Organization for preparation of documents regarding Program participation.
5. Provide support and case management for school-aged children participating in the Program.
6. Provide de-identified updates on academic performance and attendance for school-aged children participating in the Program.

7. Communicate with the Case Management Organization regarding any needs identified for school-aged children beyond the scope and capacity of services that are able to be provided by the School District.

Milton Housing Authority **(Public Housing Authority) agrees to the following:**

1. Execute an agreement with Florida Housing to administer the Program for Santa Rosa County providing no more than 24 months of Tenant-Based Rental Assistance to participating families.
2. Develop household selection criteria that will assist families with children participating in the School District's Title IX, Part A: McKinney-Vento Program that also align with the eligibility requirements set forth in the Code of Federal Regulations (CFR) for Title 24 part 92, Home Investment Partnerships Program (HOME).
3. Communicate with the School District and the Case Management Organization as needed to identify, assess, and address the housing stability needs of the households post-move-in.
4. Work with the School District and Case Management Organization to identify documentation needed by households to apply for the Program.

The Childrens' Home Society **(Case Management Organization) agrees to the following:**

1. Collect eligibility documentation for families, such as proof of income, and other relevant documentation, as applicable to partnership agreement as described in the solicitation.
2. Provide case management support for the adults in the family, including post-move-in period for the duration of the family's participation in the Program.
3. Implement the housing stability plan as described in the solicitation.
4. Conduct an initial home visit after move-in and at least quarterly home visits during a household's participation in the Program.
5. Communicate with the School District and the Public Housing Authority as needed to identify, assess, and address the housing stability needs of the households pre- and post- housed.
6. Work with the Public Housing Authority to assist families in preparing documentation needed to apply for the rental assistance.
7. Provide Florida Housing reports of households exiting the Program, including status on returns to homelessness as indicated in the Continuum of Care's Homeless Management Information System for up to two years after exiting the Program.

All parties agree to the following:

1. Upon the receipt of authorized student records, will keep said records confidential, consistent with Florida Statutes, State Board of Education rules, and federal laws relating to Family Educational Rights and Privacy Act (FERPA), also known as the Buckley Amendment U.S. Codes (20 USC 1232g), Code of Federal Regulations (CFR) for Title 34; part 99.
2. Participate in the implementation of the provisions of the applicable competitive solicitation. The intent of this Program is to serve schoolchildren as described within the solicitation. The household receiving the rental assistance must have the children residing in the household on a permanent basis throughout the period of provision of rental assistance.
3. Participate in evaluation activities.

The form may not be changed or altered, except for designated fields.

4. Establish an agreed-to set of performance outcomes relative to housing and school stability.
5. Track performance outcomes.
6. Prepare a report on the outcomes achieved, lessons learned and recommendations for future considerations.

This MOA is for the purpose of describing the services to be provided and coordinating activities to the extent possible and as allowed by law. Florida Housing reserves the right to withhold the approval of new households if any party to this MOA does not provide its described responsibilities.

No contractual rights attach to this MOA for any of the parties or for any third-party benefits. This MOA is effective upon the last signature date. A party may terminate their involvement in the MOA without cause upon written notice to the remaining parties. This agreement may be amended at any time by mutual consent of the parties and reduced to writing.

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SIGNATURE PAGE

IN WITNESS WHEREOF, the parties, by their duly authorized officials, hereby execute this MOA, effective upon the date the last party signs.

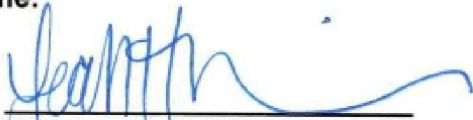
County School District

By: 
SCHOOL SUPERINTENDENT

Print Name: Karen R. Barber

Date: 5.9.2025

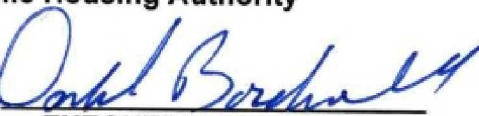
Case Management Organization
Name:

By: 
EXECUTIVE DIRECTOR

Print Name: Leah Harrison

Date: 6.4.25

Public Housing Authority

By: 
EXECUTIVE DIRECTOR

Print Name: Don Bardwell

Date: 5/19/2025

Florida Housing Finance Corporation

By: 
EXECUTIVE DIRECTOR

Print Name: Angeliki G Sellers

Date: 06/23/25

Santa Rosa - SIGNED MOA Housing Stability - June 2025 (002)

Final Audit Report

2025-06-23

Created:	2025-06-17
By:	Nicole Singleton (Nicole.Singleton@floridahousing.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAeN1jmCD7f9ib8an15GX80IB_tSlwqSZt

"Santa Rosa - SIGNED MOA Housing Stability - June 2025 (002)" History

-  Document created by Nicole Singleton (Nicole.Singleton@floridahousing.org)
2025-06-17 - 8:13:57 PM GMT
-  Document emailed to Angie Sellers (angie.sellers@floridahousing.org) for signature
2025-06-17 - 8:14:01 PM GMT
-  Email viewed by Angie Sellers (angie.sellers@floridahousing.org)
2025-06-23 - 8:40:40 PM GMT
-  Document e-signed by Angie Sellers (angie.sellers@floridahousing.org)
Signature Date: 2025-06-23 - 9:09:42 PM GMT - Time Source: server
-  Agreement completed.
2025-06-23 - 9:09:42 PM GMT

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STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION

In re: Beacon at Creative Village – Phase II
Partners, Ltd.,

FHFC File No: 2025-284
FHFC Case No. 2025-037VW

FLORIDA HOUSING
FINANCE CORPORATION

Petitioner.

**PETITION FOR WAIVER OF RULES 67-21.008(1)(e) AND (f) AND 67-21.013
TO ALLOW PRIVATE PLACEMENT OF BONDS WITH ENTITY
OTHER THAN A QUALIFIED INSTITUTIONAL BUYER**

Petitioner, BEACON AT CREATIVE VILLAGE – PHASE II PARTNERS, LTD. (“Petitioner” or “Beacon II”), a Florida limited partnership, hereby submits this Petition to the Florida Housing Finance Corporation (“FHFC” or “Corporation”) for a waiver of FHFC Rules 67-21.008(1)(e) and (f) and 67-21.013, Fla. Admin. Code (effective 6/28/23) in order to allow the purchase of the Corporation-issued Multifamily Mortgage Revenue Bonds for this Development by an entity which is not a Qualified Institutional Buyer.

A. NATURE OF REQUEST

1. As explained more fully in this petition, this Rule variance relates to the proposed purchase of the Florida Housing Multifamily Mortgage Revenue Bonds (“MMRB”) for an application that was awarded funding in RFA 2024-205. The Applicant proposes private placement of the Bonds with MSPJ Bond Holdings, LLC (“MSPJ”) as the purchaser. MSPJ does not meet Florida Housing’s rule definition of a Qualified Institutional Buyer, although MSPJ has previously purchased and currently holds tax-exempt bonds for affordable housing developments.

B. THE PETITIONER

2. In RFA 2024-205, Beacon II was awarded \$1,100,000 in base SAIL financing, a \$219,400 ELI loan, \$8.5 million in MMRB, and \$555,128 in annual Non-Competitive Tax Credits from FHFC for a 30 unit new construction development in Orange County. Beacon II would be

co-located in the same multistory building as Phase I of the Beacon development through condominium ownership of floors (or portions of floors) in the building. (Beacon I was awarded competitive (“9%”) housing credits in RFA 2021-202 for the construction of a 79 unit development, with 75 of the units as affordable Set-Aside Units; Beacon I recently received a Rule Waiver to transfer the four market rate units to Beacon II for conversion to affordable units.) Beacon II applied as a Self-Sourced Applicant and in the Development Cost Pro Forma selected “Self-Sourced Bond Financing” as a permanent funding source. The Self-Sourced Financing Commitment Verification Form included with the Application committing \$1,100,000 (equal to Beacon II’s base SAIL loan amount) was signed by W. Scott Culp. For purposes of this petition, Petitioner’s address is that of its undersigned attorney, M. Christopher Bryant, Oertel, Fernandez, Bryant & Atkinson, P.A., 2060 Delta Way, Tallahassee, Florida 32303 (telephone (850) 521-0700, fax (850) 521-0720, E-mail: cbryant@ohfc.com).

3. The Applicant Entity for Beacon II is Beacon at Creative Village – Phase II Partners, Ltd. Currently, the Co-General Partners are JAKS Management, LLC and SAS Beacon at Creative Village – Phase II Managers, LLC (“SAS Beacon LLC”). The Investor Limited Partner placeholder is Southern Affordable Development, LLC. There is currently pending before the Corporation a request to restructure the Applicant entity.

4. The Developer Entity for Beacon II is Atlantic Housing Partners, L.L.L.P. (“AHP, LLLP”), a Florida limited liability limited partnership. The natural person Principal of AHP, LLLP whose development experience was relied upon in the application process to establish General Development Experience was W. Scott Culp.

5. As noted above, Beacon II seeks to have the \$7.65 million in MMRB sold through private placement with MSPJ Bond Holdings, LLC, a Florida Limited Liability Company. The

Managers of MSPJ are Michael J. Sciarrino, Paul Missigman, and Tricia Doody. The Members of MSPJ are Florida CIS Housing Advisors, LP; JAKS Trust II, LLC; Firenze Housing, LLC; and JT Millenia I, LLC. These entities are comprised of individuals, and of entities (trusts, limited partnerships, and LLCs) that are in turn owned or controlled by such individuals, with extensive experience financing and investing in affordable housing developments in Florida. Those persons are Michael J. Sciarrino, Paul Missigman, W. Scott Culp, and Jonathan Thomas. A detailed listing of the structure of MSPJ is attached to this Petition.

C. RULE PROVISIONS

6. Rule 67-21.008(1), Fla. Admin. Code (eff. 6/28/23) sets forth the Terms and Conditions of MMRB Loans, and reads as follows:

(1) Each Mortgage Loan for a Development made by the Corporation shall:

(e) Have the initial review, approval, and origination process accomplished by a Qualified Lending Institution;

(f) Be serviced by such Qualified Lending Institution or other private entity engaged in the business of servicing mortgage loans in Florida as the Corporation shall approve; and,

7. Rule 67-21.013, Fla. Admin. Code (eff. 6/28/23) reads as follows:

Unless otherwise set forth in a competitive solicitation, any issuance of non-Credit Enhanced revenue Bonds shall be sold only to a Qualified Institutional Buyer or a Freddie Mac Multifamily Targeted Affordable Housing Lender. The Corporation shall engage the Investment Banker with respect to such Bonds. The Corporation, in its discretion, will allow only one of either an underwriting discount or a placement agent fee, but not both. Unless such Bonds are rated in one of the four highest rating categories by a nationally recognized rating service and are the subject of a Credit Enhancement instrument, such Bonds shall comply with at least one of the following criteria:

(1) The Bonds shall be issued in minimum denominations of \$100,000 (subject to reduction by means of redemption) and an

investment letter satisfactory to the Corporation and its counsel shall be obtained from each initial purchaser of the Bonds (including the underwriter and any purchaser purchasing the Bonds in an immediate resale from an underwriter), and all subsequent purchasers of the Bonds, or

(2) The Bonds shall be issued in minimum denominations of \$250,000 (subject to reduction by means of redemption) and an investment letter satisfactory to the Corporation and its counsel shall be obtained from each initial purchaser of the Bonds (including the underwriter and any purchaser purchasing the Bonds in an immediate resale from an underwriter), but an investment letter shall not be required of subsequent purchasers of the Bonds. Any investment letter shall state, among other things, that such purchaser is a Qualified Institutional Buyer or a Freddie Mac Multifamily Targeted Affordable Housing Lender, is purchasing such Bonds for its own account and not for immediate resale to a purchaser other than a Qualified Institutional Buyer or a Freddie Mac Multifamily Targeted Affordable Housing Lender, and has made an independent investment decision as a sophisticated or institutional investor.

8. FHFC Rule 67-21.002(91) defines Qualified Institutional Buyer, and notes that a Qualified Institutional Buyer is also sometimes called a “sophisticated investor.” The rule lists entities that the designation Qualified Institutional Buyer “specifically includes.” Generally, the rule lists such entities as insurance companies, regulated investment companies and mutual funds, state investment plans, pension plans, securities dealers, and certain banks or savings and loans.

9. Rule 67-21.002(92) defines “Qualified Lending Institution” to mean any lending institution designated by Florida Housing.

10. Petitioner requests a waiver of Rules 67-21.008 and 67-21.013 in order to allow for the issuance of Non-Credit Enhanced Revenue Bonds, to be sold by private placement to an entity which is not a Qualified Institutional Buyer: MSPJ.

11. MSPJ is not a type of entity listed in the rule definition of Qualified Institutional Buyer, although the rule definition does not expressly limit the term to those listed entities. MSPJ has not been designated a Qualified Lending Institution by Florida Housing.

D. REQUEST FOR RULE WAIVER

12. Beacon II seeks to have the \$7.65 million in Florida Housing – issued MMRB sold through a private placement to MSPJ. MSPJ and its Principals (closely-held Managers and Members, and individuals who own or control such Managers and Members) have significant experience with the purchase of tax-exempt bonds for affordable housing developments. MSPJ has to date purchased tax-exempt bonds relating to 10 different developments, totaling over \$30 million. About \$10 million of those tax-exempt bonds have been paid off, and MSPJ currently holds \$20 million in tax-exempt bonds. In addition, the Principals of MSPJ include Michael J. Sciarrino, W. Scott Culp, and Paul Missigman, who have collectively purchased over \$200 million in tax-exempt bonds for affordable multi-family rental housing through related entities over the years. The experience of the Principals and purchasing tax-exempt bonds spans a period of over ten years.

13. Pursuant to Rule 67-21.008(1)(f), Fla. Admin. Code, Beacon II requests that the Corporation approve a “private entity engaged in the business of servicing mortgage loans in Florida” to service the MMRB Loan. Beacon II requests that the underwriter assigned by FHFC for purposes of credit underwriting the Beacon II development perform the role of servicing the loan of MMRB proceeds.

14. It is also requested that FHFC waive the provision of Rule 67-21.008(1)(e) requiring the initial review, approval, and origination process for the mortgage loan accomplished by a Qualified Lending Institution, and, again, that the assigned credit underwriter and mortgage loan servicer accomplish those functions.

15. The MMRB amount for Beacon II is a relatively low bond issue amount: initially \$7.65 million (including \$1.1 million in Self-Sourced Bonds), with a projected permanent bond

amount after stabilization of only \$2,760,714 as identified in the Development Cost Pro Forma Permanent Analysis. The private placement of the bonds with MSPJ could be accomplished efficiently and with less expense than normally associated with a bond issue while still providing FHFC all assurances needed. MSPJ would agree to subordinate the bond interest to the SAIL loan, SAIL LURA, and the Extended Use Agreement (“EUA”) associated with the non-competitive housing credits that Beacon II will receive.

E. JUSTIFICATION FOR REQUESTED VARIANCE

16. Together, Beacon I and Beacon II comprise 115 residential units, all of which are affordable rental units. The combined Development cost is just under \$46 million, of which \$12.18 million is attributable to Beacon II. The primary source of funding for Beacon I (\$26.5 million of the \$33.6 million total sources) is housing credit equity from 9% Competitive Housing Credits; the primary source of funding for Beacon II is MMRB (\$6.55 million in the construction period, and \$1,660,714 million in the permanent period, plus the \$1.1 million in Self-Sourced Bonds), in addition to equity from the 4% Non-Competitive Housing Credits.

17. The “twinning” of the Beacon I and Beacon II developments, both physically and through the condominium ownership, and financially through the complementary financing structures, make these developments unique in Florida Housing’s portfolio. This brings a complexity that most Qualified Institutional Buyers would not find attractive. Private placement of the bonds with a sophisticated investor made up of experienced affordable housing developers and investors who already have a significant stake in the success of Beacon I and Beacon II would be appropriate and desirable.

18. At a minimum, a Qualified Institutional Buyer who may be interested would likely require substantial due diligence and legal opinions given the uncommon condominium ownership

structure of the Beacon I and Beacon II Developments. Conditions such as additional collateralization may also be imposed. These conditions would impose additional costs that are a substantial hardship for Beacon II given the small amount of the bonds.

19. Because Beacon II was selected for funding as a Self-Sourced Application, the Principals of the Beacon II Applicant entity are already committed to purchasing \$1.1 million of the tax-exempt bonds. The financing would be simplified if the balance of Beacon II's MMRB was also acquired by a sophisticated investor that is owned and managed by Principals of the Beacon II Applicant entity. Such Principals already have a strong commitment to the financing, construction, and successful lease up and operation of the development.

20. Private placement of the MMRB with MSPJ is requested because of the relatively small amount of tax-exempt bonds involved. MSPJ and its Principals are sophisticated investors, but do not fall within any of the categories of Qualified Institutional Buyers. The interests of the Corporation, the public, the tenants, and the bondholders can be adequately protected in this without requiring that private placement of the bonds with a Qualified Institutional Buyer. Likewise, such interests can be protected in this case without requiring that the initial review, approach, and origination be accomplished by a Qualified Lending Institution. Again, the bond issue is for relatively small dollar amount of bonds, and as noted previously in this petition, MSPJ, the specific entity has played a significant role in affordable housing finance through its purchase of tax-exempt bonds issued by local HFAs for the development of affordable housing.

F. RELIEF REQUESTED

21. Petitioner requests the following relief:

- a. That the Corporation grant a waiver of Rule 67-21.008(1)(e) to allow initial review, approval, and origination of the MMRB loan to be accomplished by an

entity other than a Qualified Lending Institution; and specifically, that the Corporation authorize the credit underwriter already retained for purposes of this development's funding requests to perform those functions;

- b. That the Corporation, pursuant to Rule 67-21.08(1)(f), authorize the servicing of the MMRB loan by the credit underwriter assigned to this development;
- c. That the Corporation waive Rule 67-21.013 to allow the sale of the Non-Credit Enhanced Revenue Bonds for Beacon at Creative Village – Phase II Partners, Ltd. to an entity other than a Qualified Institutional Buyer; and specifically, that the Corporation authorize the sale of such bonds by private placement to MSPJ Bond Holdings, LLC; and
- d. That the Corporation grant a waiver of the provisions of Rule 67-21.013(2) that would require MSPJ, as the initial Purchaser of the bonds, to provide an investment letter that states that MSPJ is a Qualified Institutional Buyer or Targeted Affordable Housing Lender.

G. STATUTORY PURPOSE SERVED

22. The issuance of revenue bonds by Florida Housing is governed by Part II of Rule Chapter 67-21. The rules are authorized in Part V of Chapter 420, Fla. Stat.; and particularly by Sections 420.507 and 420.508, Florida Statutes, and they implement various provisions of Sections 420.502, 420.507, 420.508, and 420.509.

23. The Legislative Findings of Section 420.502 recognize the need to create inducements for public and private investment in the development of affordable housing; the need for a stable supply of adequate funds for housing financing to encourage construction. Section 402.502, Fla. Stat.

24. The statutory powers of Florida Housing include to borrow money through the issuance of bonds, and to provide for and secure the payment of such bonds, and to provide for the rights of bondholders. Section 420.507(6), Fla. Stat.

25. Section 420.509(1) expressly authorizes the issuance of revenue bonds to achieve the purposes of Part V of Chapter 420. Section 420.509(12) expressly authorizes placement of the bonds through a designated underwriter instead of by public sale, if supported by the characteristics of the bond issue and prevailing market conditions.

26. The purposes of developing affordable housing issuing bonds and lending the proceeds to the Applicant, and performing underwriting, review, and organization services in a financially responsible manner so as to protect the corporation, its portfolio, tenants, and bondholders can all be satisfied through the alternate means set out in this petition.

H. AVOIDING SUBSTANTIAL HARDSHIP

27. As described previously in this Petition, Beacon II would experience substantial economic hardship if the rules at issue were not waived, and if the bonds had to be purchased by a Qualified Institutional Buyer. The small amount of bonds, along with the unique physical character of the development and the other aspects of the financing (such as the Self Sourced Bond Financing) make it unfeasible for a Qualified Institutional Buyer to participate as a bondholder under commercially reasonable terms. Allowing MSPJ Bond Holdings, LLC, to purchase the bonds through private placement would be economically and logistically efficient, with conditions that would mitigate any potential risk to Florida Housing, the public, the tenants, and the investors.

28. The waivers being sought are permanent in nature. However, the initial review, approval, and origination by a credit underwriter's service instead of a Qualified Lending Institution appears to be temporary in nature, with such tasks concluding upon issuance of the

bonds.

29. If Florida Housing has questions or requires additional information, Petitioner is available to provide any information necessary for consideration of this Petition.

WHEREFORE, Petitioner Beacon at Creative Village – Phase II Partners, Ltd., respectfully requests that the Florida Housing Finance Corporation provide the following relief:

- A. Grant the Petition for Wavier and all the relief requested herein; and
- B. Enter an order granting a variance of Rules 67-21.008(1)(e) and (f) and 67-21.013, Fla. Admin. Code (eff. 6/28/23).

RESPECTFULLY SUBMITTED this 15th day of July, 2025.

/s/ M. Christopher Bryant

M. Christopher Bryant

Fla. Bar Number 434450

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& ATKINSON, P.A.

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cbryant@ohfc.com

Secondary: bpetty@ohfc.com

*Counsel for Beacon at Creative Village – Phase II
Partners, Ltd.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Petition for Waiver is being filed by electronic filing with the Corporation Clerk for the Florida Housing Finance Corporation, 227 North Bronough Street, Fifth Floor, Tallahassee, Florida 32301, CorporationClerk@floridahousing.org, and the Joint Administrative Procedures Committee, 680 Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400, Joint.admin.procedures@leg.state.fl.us, and by electronic transmission to Ethan Katz, Assistant General Counsel, Florida Housing Finance Corporation, 227 North Bronough Street, Fifth Floor, Tallahassee, Florida 32301, Ethan.Katz@floridahousing.org, this 15th day of July, 2025.

/s/ M. Christopher Bryant
Attorney

**MSPJ Bond Holdings, L.L.C.
Limited Liability Company**

LEVEL 1

Manager	Michael J. Sciarrino	Natural Person
Manager	Paul M. Missigman	Natural Person
Manager	Tricia Doody	Natural Person
Member	Florida CIS Housing Advisors, LP	Limited Partnership
Member	JAKS Trust II, L.L.C.	Limited Liability Company
Member	Firenze Housing, L.L.C.	Limited Liability Company
Member	JT Millenia I, L.L.C.	Limited Liability Company

LEVEL 2

Florida CIS Housing Advisors, LP, Limited Partnership

General Partner	Florida CIS Housing Advisors, LLC	Limited Liability Company
Limited Partner	Michael J. Sciarrino Irrevocable Trust	Trust
Limited Partner	Suzanne Sciarrino	Natural Person

JAKS Trust II, L.L.C., Limited Liability Company

Manager	W. Scott Culp	Natural Person
Member	W. Scott Culp Family Trust	Trust
Member	Julie Culp Family Trust	Trust
Member	W. Scott Culp Irrevocable Trust	Trust

Firenze Housing, L.L.C., Limited Liability Company

Manager	Paul M. Missigman Revocable Trust	Trust
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JT Millenia I, L.L.C. Limited Liability Company

Sole Member	Jonathan Thomas	Natural Person
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LEVEL 3

Florida CIS Housing Advisors, L.L.C., Limited Liability Company

Manager	Michael J. Sciarrino	Natural Person
Member	Paul M. Missigman	Natural Person
Member	Michael J. Sciarrino Revocable Trust	Trust

Michael J. Sciarrino Irremovable Trust

Manager	Michael J. Sciarrino	Natural Person
Member	Paul M. Missigman	Natural Person
Member	Michael J. Sciarrino Revocable Trust	Trust

W. Scott Culp Family Trust

Trustee	W. Scott Culp	Natural Person
Beneficiary	W. Scott Culp	Natural Person

Julie Culp Family Trust

Trustee	W. Scott Culp	Natural Person
Trustee	Julie A. Culp	Natural Person
Beneficiary	Julie A. Culp	Natural Person

W. Scott Culp Irrevocable Trust

Trustee	Thomas A. Shaw	Natural Person
Beneficiary	Amanda Rockwood	Natural Person
Beneficiary	Katharine Culp	Natural Person
Beneficiary	Stephanie Kettinger	Natural Person

Paul M. Missigman Revocable Trust

Trustee	Paul M. Missigman	Natural Person
Beneficiary	Paul M. Missigman	Natural Person

LEVEL 4

Michael J. Sciarrino Revocable Trust

Trustee	Michael J. Sciarrino	Natural Person
Beneficiary	Michael J. Sciarrino	Natural Person

RFA 2025-108 All Applications

Application Number	Name of Development	County	County Size	Region	Demo	Total Units	Name of Principal Representative	Developer	HC Request Amount	SAIL Request Amount	ELI Loan Request Amount	Total SAIL Request (SAIL plus ELI)	Eligible For Funding?	Priority Level	Previous Submission Preference?	Operating/ Managing Experience Points Preference	Involvement in the Local Homeless Resources Network Points Preference	Accessibilit y Preference	Qualifying Financial Assistance Preference	A/B Leveraging	Florida Job Creation Preferenc e	Lottery Number
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Eligible Applications

2025-383CSA	The Shores	Volusia	M	N	H <80	80	Rob Cramp	HTG The Shores Developer, LLC; HFH The Shores Developer, LLC	\$3,200,000	\$4,700,000	\$248,200	4,948,200	Y	1	Y	Y	N	Y	Y	B	Y	3
2025-385CSA	ViaNova	Leon	M	N	H <80	86	Janet M Stringfellow	Gorman & Company, LLC; VOAF Ortus Developer, LLC	\$3,200,000	\$5,909,900	\$340,100	6,250,000	Y	1	Y	Y	N	Y	N	A	Y	2
2025-386CSA	Carrfour Apartments	Marion	M	N	H <80	57	Stephanie Berman	C4Dev, LLC	\$2,250,000	\$2,500,000	\$164,300	2,664,300	Y	1	Y	Y	Y	Y	Y	A	Y	5

Ineligible Applications

2025-382CSA	CDS Roosevelt Apartments	Hillsborough	L	TB	H <80	160	Andrew Sewnauth	CDS Monarch, Inc.	\$3,300,000	\$4,511,200	\$571,000	5,082,200	N	1	N	N	N	Y	N	A	Y	1
2025-384CSA	Residences at Chapman	Miami-Dade	L	S	H <80	84	Scott Hansel	Pinnacle Communities II, LLC; Residences at Chapman Developer LLC	\$3,300,000	\$5,639,000	\$611,000	6,250,000	N	1	Y	N	N	Y	Y	A	Y	4

RFA 2025-108 Review Committee Recommendations

Total HC Available for RFA	5,959,352
Total HC Allocated	5,450,000
Total HC Remaining	509,352

1,159,800 in forgivable HOME-ARP funding has been made available in this RFA. Each Application will be awarded a portion of the total available. The HOME-ARP funding amount may increase or decrease in credit underwriting, based on overall awards.

Total SAIL Available for RFA	12,400,000
Total SAIL Allocated	7,612,500
Total SAIL Remaining	4,787,500

Application Number	Name of Development	County	County Size	Region	Demographic	Total Units	Name of Principal Representative	Developer	HC Request Amount	Total SAIL Request (SAIL plus ELI)	Eligible For Funding?	Priority Level	Previous Submission Preference ?	Operating/ Managing Experience Points Preference	Involvement in the Local Homeless Resources Network Points Preference	Accessibility Preference	Qualifying Financial Assistance Preference	A/B Leveraging	Florida Job Creation Preference	Lottery Number
2025-386CSA	Carrfour Apartments	Marion	M	N	H <80	57	Stephanie Berman	C4Dev, LLC	\$2,250,000	2,664,300	Y	1	Y	Y	Y	Y	Y	A	Y	5
2025-383CSA	The Shores	Volusia	M	N	H <80	80	Rob Cramp	HTG The Shores Developer, LLC; HFH The Shores Developer, LLC	\$3,200,000	4,948,200	Y	1	Y	Y	N	Y	Y	B	Y	3

Proposed Occupation List for 2025 Hometown Heroes Program

This proposed occupation list follows the language in SB 2502, the Implementing Bill for the 2025-2026 General Appropriations Act.

For the 2025-2026 fiscal year, eligibility for financial assistance through the program appropriated in the 2025-2026 General Appropriations Act shall be limited to the following borrowers:

- A person employed full-time by a Florida-based employer as a health care worker, school staff member, first responder, public safety or court employee, or child care worker;
- A servicemember of the United States military or military reserves, the United States Coast Guard or its reserves, or the Florida National Guard; or
- A veteran employed full-time by a Florida-based employer.

HEALTHCARE WORKERS

Borrowers employed full-time by a Florida-based healthcare provider/physician, hospital, assisted living facility, healthcare facility, and mental health facility are eligible. *Examples include, but are not limited to:*

Nursing

Advanced Practice Registered Nurse (APRN)
Clinical Nurse Specialist
Licensed Practical Nurse (LPN)
Nurse Anesthetist
Nurse Midwife
Nursing Assistant (CNA)
Nursing Technician
Registered Nurse (RN)

Medical Technicians

Anesthesia Support Technician
Cardiology Technician
Clinical Technician
Computed Tomography (CT) Technician
Emergency Room (ER) Technician
Laboratory Technician (Including Phlebotomist)
Monitor Technician
Music Technician
Neurology Technician
Nuclear Medicine Technician
Orthopedic (Ortho) Technician

Pharmacy Technician
Radiation Technician
Rehabilitation (Rehab) Technician
Sonographer
Surgical Technician
X-ray Technician

Medical Therapists

Audiology Therapist
Occupational Therapist
Physical Therapist
Respiratory Therapist
Speech Therapist

Physicians & Pharmacists

Anesthesiologist
Anesthesiologist Assistant
Dentist
Hearing Aid Specialist
Nuclear Pharmacist
Optician
Orthotist
Pharmacist
Pharmacy Technician
Physician
Physician Assistant
Prosthetist

Mental Health Workers

Psychiatrist
Psychologist
Behavioral Health Technician
Behavioral Therapist
Mental Health Specialist
Social Worker

Other Healthcare Workers

Acupuncturist
Assisted Living Administrator
Genetic Counselor

Home Health Aide
Massage Therapist
Medical Assistant (CMA or MA)
Patient Care Assistant
Patient Transporter (Orderly)

SCHOOL STAFF MEMBERS

Borrowers employed full-time by a Florida-based K-12 public, private, charter or magnet school are eligible. *Examples include, but are not limited to:*

Assistant Principal
Career Specialist (Guidance Counselor)
Classroom Teacher
Food Service / Cafeteria Staff
Librarian / Media Specialist
Maintenance / Janitorial Staff
Principal
School Counselor
School Psychologist
Social Worker
Teacher Aide

FIRST RESPONDERS

Borrowers employed full-time by a FL-based fire department, ambulance service or hospital are eligible. *Examples include, but are not limited to:*

Emergency Medical Technician (EMT)
Firefighter
Paramedic

PUBLIC SAFETY WORKERS

Borrowers employed full-time by a Florida-based local, county, state, or federal law enforcement department, juvenile detention facility, correctional facility or emergency operations center are eligible. *Examples include, but are not limited to:*

911 Public Safety Communicator (911 Operator or Dispatcher)
Adult Protective Services Enforcement
Child Protective Services Enforcement
Correction Officer
Correctional Probation Officer

Juvenile Detention Officer
Juvenile Probation Officer
Sworn Law Enforcement Officer (Local, State or Federal)

COURT EMPLOYEES

Borrowers employed full-time by a Florida-based county, state or federal court, court administrator's office, State Attorney's Office, or Public Defender's Office are eligible. *Examples include, but are not limited to:*

Assistant Public Defender
Assistant State Attorney
Attorney
Court Clerk
Court Stenographer (Court Reporter)
Judge

CHILD CARE WORKERS

Borrowers employed full-time with a Florida-based licensed child care facility pursuant to s.402.301-402.305 or exempt from licensure pursuant to s.402.313 and 402.316 are eligible. *Examples include, but are not limited to:*

Any worker at a licensed Child Care facility
Any worker at a licensed or registered family day care home

MILITARY

A servicemember of the United States military or military reserves, the United States Coast Guard or its reserves, or the Florida National Guard, including:

Air Force, Air Force Reserve & Air National Guard
Army, Army Reserve & Air National Guard
Coast Guard & Coast Guard Reserve
Florida National Guard
Marine Corps & Marine Corps Reserve
Navy & Navy Reserve
Space Force & Space Force Reserve

VETERANS

Veterans employed full-time by a Florida-based employer who have been discharged under other than dishonorable conditions from one of the eligible Military or Reserve branches above.