



*Achieve with us.*

*For people with intellectual  
and developmental disabilities*

August 19, 2013

Stephen P. Auger  
Executive Director  
Florida Housing Finance Corporation  
227 N. Bronough Street, Suite 5000  
Tallahassee, FL 32301

RE: \$10 million Appropriation for Housing for Individuals with Intellectual  
and/or Developmental Disabilities (I/DD)

Dear Mr. Auger:

Thank you for the opportunity to respond to the information proposed at the August 8, 2013 workshop regarding the funding allocation for housing needs for individuals with Intellectual and/or Developmental Disabilities (I/DD). The Arc of Florida would like to also thank the Florida Housing Finance Corporation for your willingness to take input on such an important topic and for addressing this issue as stated in the Legislative intent.

Please note The Arc of Florida's responses to the following issues:

- As outlined in the Florida Bill of Rights for Persons with Intellectual and Developmental Disabilities and Chapter 393, F.S., each individual should be given a clear choice of where they wish to live in the community regardless of the funding stream (Medicaid Waiver, general revenue, private pay). It is recommended that as part of the RFA, guidance be given that each individual selecting a new voluntary residential placement be counseled by an independent entity regarding the full range of options available to them as an individual protected under Florida Statute 393. Many individuals will select existing types of residential options available to them, as they have been the proven models over time.
- The issues of health and safety as well as accessibility should be given high priority when considering an evaluation system to award funds under this program. The I/DD population is experiencing not only the same aging concerns as the general population, but due to physical and intellectual issues, their aging issues are often compounded by their disabilities requiring increased attention to accommodations. For example, research indicates individuals with Down syndrome experience a much higher rate of Alzheimer's disease as the general population; therefore, as they age-in-place, safety issues in their home environments are ever increasing. Also, given the compounded physical issues of

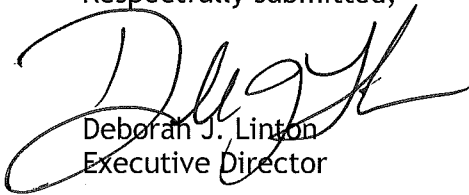
individuals included in the I/DD population, the need for physical plant adjustments are drastically increasing to meet the accessibility of individuals being served. Addressing health, safety and accessibility as top priorities will certainly lend to longer sustainability for these proposed projects.

- It is recommended that employment be clarified to include a variety of employment options including supported employment, work enclaves, and sheltered workshops. Also, as many of the residents in the existing homes are elderly, their interest in employment, as with the general aging/retirement population, will be geared more towards community outings or participation in adult day programs where they can enjoy stimulating age-related programs; not employment-emphasized options. This issue also aligns with the needs of individuals who are medically-fragile and in need of personal care, stimulating activities and stable environments as opposed to employment.
- The Arc of Florida would recommend more emphasis be placed on giving funding priority to those programs with long-term relationships with their communities. The Arcs throughout Florida have developed partnerships with local communities that are approaching nearly six decades of a strong community presence. Along this same line, we would recommend additional credit be given to those programs with strong volunteer foundations. Long-term relations and volunteer based programs will provide a strong system of feasibility and sustainability in Florida's local communities.
- Clarification of "resident community services coordination" is recommended. This term may cause some confusion in the I/DD services arena with that of "support coordination" which is provided as a Medicaid service through the Individual Budgeting Home and Community Based Services waiver. Language such as, "staff employed by a not-for-profit organization providing direct care or oversight management for the day to day operations of a program" is recommended.
- As stated during the workshop, properties must be "ready to go" upon award of the grants. The Arc of Florida suggests that flexibility be given in the allotment of funding for each category based on the types of number of projects applied. If the majority of properties cannot be secured in time, flexibility would allow more awards to be provided to those requesting retrofitting of existing housing.
- Clarification is needed that "live-in staff" are "not" included in the requirements that mandate the property must be 100% occupied by persons with I/DD. Although staff may sleep at the homes, they also typically will maintain their own housing for time off. Staff do not live on these properties 24/7 for 365 days per year.
- You may wish to create responses that are divided between rural and urban areas. Rural areas are faced with a multitude of issues which will impact their scores based on the current configuration of the RFA. Transportation access is an example of how rural areas may not score high due to the lack of public access to this service. However, many local churches assist in providing transportation to outings for rural residents. Residents in rural areas may need to travel outside of the local community to regional medical centers for some medical or dental specialists. This should not count against the rural agencies when it comes to scoring. Regional medical centers often attract the highest quality in specialists. Various other activities may not be available in the rural areas, however the amount of community support for individuals with I/DD demonstrated in many of Florida's rural areas more than makes up for what may be seen as "unavailable services"

- Green is important but other criteria such as health, safety and accessibility are a higher priority with an aging population.
- The Arc of Florida fully supports that each funded project meet the mandate of having a private area where individuals can enjoy visits with family and friends.
- We also recommend that in proposals where a current group home facility is going to be placed up for sale, the anticipated “profit” from the sale of the existing group should be allowed to be used as a 10% match for funding.

Again, thank you for the opportunity to provide public input regarding these important issues. If you need additional information please do not hesitate to contact me at 850-921-0460 or [Deborah@arcflorida.org](mailto:Deborah@arcflorida.org).

Respectfully submitted,



Deborah J. Linton  
Executive Director