



January 7th, 2021

Florida Housing Finance Corporation
VIA Email to:

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RE: HOME-ARP Allocation Plan Draft for Public Comment

RECOMMENDATIONS:

1. **Award TBRA funds to CoCs.** The funding dedicated to Tenant Based Rental Assistance should be awarded to Homeless Continuum of Care to ensure these funds are used to assist clients who have received ESG-CV rental assistance and are not yet sustainable by the time ESG-CV funds end 9/30/22. CoC's manage the specific client data through HMIS on the households served through ESG-CV and would be the best entities to evaluate the need for continued financial assistance through HOME-ARP to ensure housing stability for these households.
2. **Dedicate \$500,000 to Supportive Services.** The Coalition suggests FHFC dedicate \$500,000 to the Supportive Services funding category to be used on the FHFC PSH Pilot Expansion. Specifically, these dollars should fund the Resident Coordinator positions on site. Managing Entities are required to be a partner in this pilot but may lack the resources to fully fund these positions. HOME-ARP Supportive Services can help offset that cost for Managing Entities and ensure each pilot site has the necessary support services to assist residents obtain and maintain housing stability.
3. **Create one new RFA solely for HOME-ARP.** The Coalition recommends FHFC create one new RFA to fund a limited number of projects that will be solely or primarily funded by HOME-ARP. Allowing projects to be solely funded by HOME-ARP outside of the regularly set RFA schedule may attract new applicants that may otherwise be discouraged by complex RFAs with multiple funding streams. Projects funded through this mechanism could be smaller developments that can be completed and online quickly for an immediate impact.
4. **Dedicate funding to Non-Profit Capacity Building and Non-Profit Operating.** The Coalition recommends dedicating funding to the Non-Profit Capacity Building and Operating categories as an incentive for non-profits within non-entitlement jurisdictions with limited capacity to apply and be successful in their applications and awarded projects.
5. **Require entitlement jurisdictions to provide a local contribution.** In previous comments from other statewide organizations, there has been discussion around how to create policies that differentiate proposals in entitlement and non-entitlement communities. The Coalition recommends FHFC require proposals from entitlement jurisdictions for HOME-ARP to secure local government funding or contribution. Requiring local funds for proposals in HOME-ARP entitlement jurisdictions could allow FHFC to fund more units statewide and incentivize developers in non-entitlement jurisdictions to apply as these developers would not be expected to secure a local contribution.

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6. Opportunity to serve underfunded communities.

The Coalition recommends FHFC target specific areas of the state based on homelessness data and previous funding awards. Identified areas are in desperate need of permanent housing stock and are often overlooked. Historically, FHFC funding as well as federal funds like ESG and ESG-CV have been awarded to entitlement communities and major metropolitan areas. The state allocation of \$71 million in HOME-ARP is an opportunity to provide funding to under-served and underfunded communities across the state for development, non-profit capacity building, and social services. Data points to consider when deciding what areas of the state should be included can include; (*See detailed attachment showing specific data point comparisons*)

- a. The number of homeless as a percentage of population
 - i. Based on this data, the following areas have the largest percentage of homeless compared to their general population; (highest to lowest)
 1. Monroe County (FL-604 CoC)
 2. Columbia, Hamilton, Lafayette and Suwannee Counties (FL-518 CoC)
 3. St. Petersburg, Clearwater, Largo/Pinellas County (FL-502 CoC)
 - b. The number of unsheltered homeless as percentage of homeless population
 - i. Based on this data, the following areas have the largest percentage of unsheltered homeless populations compared to homeless population: (highest to lowest)
 1. Hendry, Hardee, Highlands, DeSoto, Okeechobee, Glades Counties (FL-517 CoC)
 2. Fort Pierce/St. Lucie, Indian River, Martin Counties (FL-509 CoC)
 3. Columbia, Hamilton, Lafayette, Suwannee Counties (FL-518 CoC)
 - c. The number of chronically homeless as percentage of homeless population
 - i. Based on this data, the following areas have the highest percentages of chronic homelessness compared to homeless population: (highest to lowest)
 1. Fort Walton Beach/Okaloosa, Walton Counties (FL-505 CoC)
 2. Ft. Lauderdale/Broward County (FL-601 CoC)
 3. Pasco County (FL-519 CoC)

ATTACHMENT 1: 2020 POINT IN TIME COUNT DATA REGARDING HOMELESSNESS

Figure 1. The Number Homeless as a Percentage of Population

Community/Continuum of Care Coverage Area	Total Homeless PIT 2020	Total General Population Census	Percent Population Homeless
FL-604 Monroe County CoC	421	82,874	0.51%
FL-518 Columbia, Hamilton, Lafayette, Suwannee Counties CoC	578	135,402	0.43%
FL-502 St. Petersburg, Clearwater, Largo/Pinellas County CoC	2,226	959,107	0.23%
FL-509 Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	1,379	647,445	0.21%
FL-508 Gainesville/Alachua, Putnam Counties CoC	880	440,871	0.20%
FL-506 Tallahassee/Leon County CoC	805	444,487	0.18%
FL-606 Naples/Collier County CoC	603	375,752	0.16%
FL-517 Hendry, Hardee, Highlands Counties CoC	403	251,927	0.16%
FL-519 Pasco County CoC	898	561,891	0.16%
FL-513 Palm Bay, Melbourne/Brevard County CoC	940	606,612	0.15%
FL-511 Pensacola/Escambia, Santa Rosa Counties CoC	746	509,905	0.15%
FL-514 Ocala/Marion County CoC	523	375,908	0.14%
FL-504 Deltona, Daytona Beach/Volusia, Flagler Counties CoC	904	668,921	0.14%
FL-512 St. Johns County CoC	367	273,425	0.13%
FL-600 Miami-Dade County CoC	3,560	2,701,767	0.13%
FL-515 Panama City/Bay, Jackson Counties CoC	385	295,346	0.13%
FL-500 Sarasota, Bradenton/Manatee, Sarasota Counties CoC	1,044	833,716	0.13%
FL-505 Fort Walton Beach/Okaloosa, Walton Counties CoC	351	286,973	0.12%
FL-601 Ft Lauderdale/Broward County CoC	2,211	1,944,375	0.11%
FL-510 Jacksonville-Duval, Clay Counties CoC	1,366	1,304,164	0.10%
FL-605 West Palm Beach/Palm Beach County CoC	1,510	1,492,191	0.10%
FL-501 Tampa/Hillsborough County CoC	1,452	1,459,762	0.10%
FL-602 Charlotte County CoC	169	186,847	0.09%
FL-507 Orlando/Orange, Osceola, Seminole Counties CoC	2,007	2,289,420	0.09%
FL-503 Lakeland, Winterhaven/Polk County CoC	612	725,046	0.08%
FL-520 Citrus, Hernando, Lake, Sumter Counties CoC	703	862,066	0.08%
FL-603 Ft Myers, Cape Coral/Lee County CoC	444	760,822	0.06%
Total State of Florida	27,487		

Figure 2. The Number Unsheltered Homeless as Percentage of Homeless Population

Community/Continuum of Care Coverage Area	Total Homeless PIT 2020	Total Unsheltered Homeless	Percent Homeless Population unsheltered
FL-517 Hendry, Hardee, Highlands, DeSoto, Okeechobee, Glades Counties CoC	403	355	88%
FL-509 Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	1,379	1,191	86%
FL-518 Columbia, Hamilton, Lafayette, Suwannee Counties CoC	578	494	85%
FL-519 Pasco County CoC	898	688	77%
FL-505 Fort Walton Beach/Okaloosa, Walton Counties CoC	351	255	73%
FL-508 Gainesville/Alachua, Putnam, Bradford, Gilchrist, Levy Counties CoC	880	601	68%
FL-605 West Palm Beach/Palm Beach County CoC	1,510	1,030	68%
FL-515 Panama City/Bay, Jackson, Holmes, Washington, Calhoun, Gulf Counties CoC	385	249	65%
FL-513 Palm Bay, Melbourne/Brevard County CoC	940	574	61%
FL-520 Citrus, Hernando, Lake, Sumter Counties CoC	703	424	60%
FL-512 St. Johns County CoC	367	205	56%
FL-511 Pensacola/Escambia, Santa Rosa Counties CoC	746	374	50%
FL-504 Deltona, Daytona Beach/Volusia, Flagler Counties CoC	904	453	50%
FL-603 Ft Myers, Cape Coral/Lee County CoC	444	211	48%
FL-602 Charlotte County CoC	169	76	45%
FL-601 Ft Lauderdale/Broward County CoC	2,211	984	45%
FL-604 Monroe County CoC	421	178	42%
FL-501 Tampa/Hillsborough County CoC	1,452	612	42%
FL-502 St. Petersburg, Clearwater, Largo/Pinellas County CoC	2,226	808	36%
FL-500 Sarasota, Bradenton/Manatee, Sarasota Counties CoC	1,044	363	35%
FL-510 Jacksonville-Duval, Clay, Nassau Counties CoC	1,366	451	33%
FL-503 Lakeland, Winterhaven/Polk County CoC	612	190	31%
FL-514 Ocala/Marion County CoC	523	150	29%
FL-600 Miami-Dade County CoC	3,560	1,020	29%
FL-606 Naples/Collier County CoC	603	168	28%
FL-507 Orlando/Orange, Osceola, Seminole Counties CoC	2,007	459	23%
FL-506 Tallahassee/Leon, Gadsden, Liberty, Franklin, Wakulla, Jefferson, Taylor, Madison County CoC	805	109	14%
Total State of Florida		12,672	

Figure 3. The Number Chronically Homeless as Percentage of Homeless Population

Community/Continuum of Care Coverage Area	Total Homeless		Percent Chronic
	PIT 2020	Total Chronic	
FL-505 Fort Walton Beach/Okaloosa, Walton Counties CoC	351	183	52%
FL-601 Ft Lauderdale/Broward County CoC	2,211	654	30%
FL-519 Pasco County CoC	898	265	30%
FL-502 St. Petersburg, Clearwater, Largo/Pinellas County CoC	2,226	592	27%
FL-513 Palm Bay, Melbourne/Brevard County CoC	940	245	26%
FL-508 Gainesville/Alachua, Putnam Counties CoC	880	225	26%
FL-514 Ocala/Marion County CoC	523	130	25%
FL-511 Pensacola/Escambia, Santa Rosa Counties CoC	746	184	25%
FL-507 Orlando/Orange, Osceola, Seminole Counties CoC	2,007	489	24%
FL-517 Hendry, Hardee, Highlands Counties CoC	403	98	24%
FL-506 Tallahassee/Leon County CoC	805	192	24%
FL-603 Ft Myers, Cape Coral/Lee County CoC	444	93	21%
FL-501 Tampa/Hillsborough County CoC	1,452	266	18%
FL-500 Sarasota, Bradenton/Manatee, Sarasota Counties CoC	1,044	188	18%
FL-605 West Palm Beach/Palm Beach County CoC	1,510	241	16%
FL-600 Miami-Dade County CoC	3,560	524	15%
FL-602 Charlotte County CoC	169	23	14%
FL-606 Naples/Collier County CoC	603	80	13%
FL-503 Lakeland, Winterhaven/Polk County CoC	612	78	13%
FL-512 St. Johns County CoC	367	43	12%
FL-518 Columbia, Hamilton, Lafayette, Suwannee Counties CoC	578	65	11%
FL-515 Panama City/Bay, Jackson Counties CoC	385	43	11%
FL-504 Deltona, Daytona Beach/Volusia, Flagler Counties CoC	904	76	8%
FL-520 Citrus, Hernando, Lake, Sumter Counties CoC	703	58	8%
FL-604 Monroe County CoC	421	31	7%
FL-510 Jacksonville-Duval, Clay Counties CoC	1,366	71	5%
FL-509 Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	1,379	45	3%
Total State of Florida	27,487	5,182	