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Mr. Kevin Tatreau
FLORIDA HOUSING FINANCE CORPORATION
227 North Bronough St., Suite 5000
Tallahassee, FL 32301

RE: REQUEST FOR PROPOSALS 2013-08

Dear Kevin:

Thank you for the opportunity to provide comments on the Request for Proposals 2013-08. We have three items for your consideration, one related to Leveraging of Non-FHFC Resources and two related to collaborative partnerships with experienced supportive service providers and housing managers.

1. In order to maximize the limited amount of tax credits available for this High-Priority Special Needs RFP, it is essential for Florida Housing to encourage the leveraging of other sources of funding. The other High-Priority RFP for PHA Revitalizations accomplishes this by creating the following scoring item:

Leveraging with non-FHFC Resources (Maximum 35 Points):

Provide, as Attachment 14 to Exhibit A, a listing of permanent funding resources from local or federal government sources and/or PHA resources (all of which for purposes of this provision will be considered to be "Qualifying Financial Assistance"). The listed items must include the amount, source, and value (as prescribed in 9.b. below) for each Qualifying Financial Assistance as well as the calculations used to determine their values (as prescribed in 9.b. below). The financing proposal documentation provided in 11.c. below will be reviewed for financing terms. Any Qualifying Financial Assistance identified in this section must be included in the Development Cost Pro Forma and utilized for permanent funding as presented in the RFP if the Applicant is awarded funding under this RFP.

a. The total amount of Qualifying Financial Assistance provided for the Development will be scored by comparing the total amount of such funding per Housing Credit Set-Aside unit relative to the other Applicants to this RFP. (Up to 25 Points)

b. The terms of the Qualifying Financial Assistance shall be used to determine the value of the assistance relative to market pricing which will be scored by comparing the total value of such funding per Housing Credit Set-Aside unit relative to the other Applicants to this RFP. (Up to 10 Points)

The value of the Qualifying Financial Assistance that is provided in the form of a loan shall be calculated by first determining the net present value of any loan payments including any balloon payment of principal due on a non-amortizing or non-fully amortizing loan, using a discount rate of 4.89%. The resulting net present value of the loan payments shall be subtracted from the original loan principal amount.

The resulting difference is the value of the Qualifying Financial Assistance that was provided in the form of a loan.

If the Qualifying Financial Assistance is provided in the form of a grant, then the amount of the grant shall be the value of the Qualifying Financial Assistance. The sum of all calculated values from the Qualifying Financial Assistance will be used to determine a score as prescribed herein.

While it need not have the same scoring weight, a similar section of the Special Needs RFP must be significant enough to influence developers to seek out other sources of funding, i.e. loans, grants, section 8 rental assistance, etc., so as not to rely entirely on an extremely limited amount of credits. Incorporating such an incentive to leverage non-FHFC funds (and thus lower tax credit requests) could be the determining factor in allowing the \$1,720,000 pot to fund another development after the first. While we do recognize that the initial tie-breaker favors the lowest Housing Credit Request per Set Aside Unit, we feel a tie is unlikely with the amount of subjectivity, variability, and total points possible in this RFP process, making it somewhat of a non-factor. Since the RFP is shortly due to be released, we recommend that you simply incorporate the same scoring section from the High Priority PHA Revitalization RFP, included in its entirety above.

2. In Section Six, Exhibit A, 3.a.3.a, the RFP language indicates that:

The Applicant must describe the Developer's experience in developing and operating Permanent Supportive Housing, and more specifically, the households the Applicant is proposing to serve. Provide the description as Attachment 6 to Exhibit A. (Up to 20 Points)

And in 3.a.3.b the RFP states:

To supplement or complement the Developer's experience, the Developer may list any national, state or local entities that it has executed or shall execute an agreement with that will provide technical assistance or related services to assist in the development of the Permanent Supportive Housing to serve the households the Applicant is proposing to serve. For each entity listed, describe its role and responsibilities related to the proposed Development, and describe its experience and qualifications relevant to carrying out its role and responsibilities. A letter, signed by both the entity and the Developer, shall be submitted at Application for each listed entity stating its interest in executing an agreement, the duties it will carry out for the proposed Development, and its experience and qualifications in carrying out the duties. The Applicant shall commit to submit the executed agreement between the Developer and each entity for review and approval by the Corporation during the credit underwriting process. Provide the information as Attachment 6 to Exhibit A. (Up to 5 Points)

Due to the fact that very few Veterans-specific Permanent Supportive Housing projects have been funded by FHFC and developed by qualified applicants in the State of Florida, it seems unreasonable to weigh such experience that a developer might have so heavily compared to that of contracted support services provider. We suggest incorporating 3.a.3.a and 3.a.3.b into a singular scoring category where developer experience and/or formal collaborative partner experience count toward the 25 point maximum score. There is simply too much disparity between an applicant having developer's experience compared to partnering with experts in the field who are just as capable, if not more so, to advise and implement Best Practices for the project as defined in this RFP.

The addition of qualified entities (as currently described in 3.a.3.b) to a project team specifically to advise and implement Best Practices should be viewed as critical to the success of the development of a Veteran's specific Permanent Supportive Housing project. If a developer cannot claim direct experience in this narrow development field, engaging the necessary experienced experts should be determined to be suitable for the purposes of this RFP and application. Therefore, a total of 25 points should be available to applicants for either direct development team experience and/or the creation of formal and complimentary collaborative partnerships. There should be no delineation between the two.

3. Additionally, Section 6 3.b.1 of the Special Needs RFP reads:

Management Company Experience with Permanent Supportive Housing (Up to 10 Points): Describe the Management Company's experience in managing Permanent Supportive Housing, specifically, the households the Applicant is proposing to serve.

As is similarly stated in this letter regarding the Development Entity's required experience, a collaborative management partnership with an organization that has specific experience in the narrow field of Housing Management for Veterans with Special Needs should garner some points, if not be sufficient to receive maximum points in this category. In this way, FHFC will be encouraging partnerships with Permanent Supportive Service Providers that have experience in housing management of the target population, allowing a comprehensive team to enact Best Practices for the management and operation of these Tax Credit Properties.

We appreciate FHFC and its staff considering these changes/comments prior to finalizing and issuing the RFP.

Sincerely,



Glen F. Bamberger
Wendover Housing Partners, LLC

Cc: Mr. Steve Auger
Ms. Laura Cox
Mr. Wayne Conner
Ms. Nancy Muller
Ms. Jade Grubbs
Mr. Wellington Meffert