

-----Original Message-----

From: Shannon Nazworth [snazworth@abilityhousing.org]

Sent: Monday, April 08, 2013 09:51 PM Eastern Standard Time

To: Kevin Tatreau

Subject: Comments RFP 2013-08

Kevin,

The following are comments are provided on behalf of the Florida Supportive Housing Coalition. We thank you and the Florida Housing staff for its continued support of providing housing for Persons with Special Needs.

Section II - regarding Development Expenses as relate to calculating the Set-Aside Gap Loan cashflow, since "only those expenses disclosed in the operating pro forma included in the final credit underwriting report", please work with the underwriters to ensure less experienced developers include appropriate contingencies for future expense categories.

Section II - for the Total Development Cost, please be sure to account for any operating subsidy reserve to be funded equivalent to the 5% increase to Developer Fee for qualifying projects as eligible costs.

Section II - for Non-Profit, to qualify for the definition, the 501(c)3 organization should receive at least 50% of the Developer Fee. In underwriting it should be confirmed that the allocation of Deferred Developer Fee shall be in accordance with the percentage of Developer Fee to be received.

Section VI.A.3.a.(3).(b) - just as use of a consultant or technical advisor is eligible for demonstrating experience, there should not be points for use of a technical advisor in this scoring. Should such points be permitted, if an Applicant is eligible for these points, they should not be eligible for more than 15 points in Section VI.A.3.a.(3).(a). There is no rational reason an organization requiring technical assistance should be eligible for the maximum points for experience; in fact any organization receiving points in Section VI.A.3.a.(3).(b) should only be eligible for 12 points.

Section VI.A.4.e. - what is the scoring criteria associated with the number of buildings. The RFP should delineate if more or fewer buildings is considered a positive or negative.

Section VI.A.5.1.(1).(b) – Applicants should not be required to set-aside 50% of the set-aside units to a single subset of Persons with Special Needs. Projects which serve a broad cross-section of target populations are a vibrant, vital component of the continuum of Permanent Supportive Housing. To require 50% of the set-aside units be limited to a single sub-set is contrary to established evidence based-practices.

Section VI.A.10.c – is the maximum GC Fee delineated in the RFP? It is not provided in the Fee Disclosure section.

Exhibit B, 1.a. – what is the rationale for limiting the percentage of efficiency units permitted?

Exhibit B, 3.a.(3) – Why are all units in a rehabilitation project serving persons with physical disabilities required to have all Accessible, Universal Design and Visitability features? There is a broad spectrum of disabilities within “physical disabilities”, is it too restrictive to require every unit in a rehab to meet this requirements?

Exhibit B, 4.b. – why is an on-site manager required 24 hour a day? The fact that the residents are Persons with Special Needs does not de facto require 24 hour on-site staff. This Resident Service is not required of ‘standard family deals’, why are Persons with Special Needs being classified as having this requirement. It reinforces the false perception that Persons with Special Needs require property management features not required in standard projects. This is not true. This should not be Required Resident Services. It can be an additional service discussed in the project narrative.

Exhibit B, 7. – why is the difference for Florida job creation rate so wide?

Exhibit C, 28.e.(2). - how would a project not be for Persons with Special Needs?

Please feel free to give me a call should you require any additional information.

Thank you
Shannon Nazworth
Executive Director
Ability Housing of Northeast Florida, Inc.
76 South Laura Street, Suite 303
Jacksonville, Florida 32202
(904) 359-9650, ext. 106 • fax: (904) 359-9653
www.abilityhousing.org

Providing quality, affordable community-inclusive housing for individuals and families experiencing or at risk of homelessness and adults with a disability.