

From: Shannon Nazworth [<mailto:snazworth@abilityhousing.org>]

Sent: Wednesday, March 13, 2013 10:11 PM

To: Kevin Tatreau

Cc: Bill Aldinger

Subject: special needs RFP comments

Dear Kevin,

I am writing on behalf of the Florida Supportive Housing Coalition to provide comments concerning the High Priority Special Needs Request for Proposal. First, we would like to thank Florida Housing for recognizing the housing needs of persons with special needs as a high priority for the State of Florida. Following are comments concerning the draft RFP issued on February 21, 2013. In candor, it is difficult to draft comments, recognizing the RFP is still in development. Please feel free to contact me should wish to discuss these comments further.

In definitions:

b. – I recommend changing Permanent Supportive Housing to: "Permanent Supportive Housing means rental housing that is leased affordably to Persons with Special Needs with incomes that do not exceed 60 percent of the Area Median Income (AMI). Permanent Supportive Housing shall strive to meet the needs and preferences of the Persons with Special Needs residents; and promote independent living skills and activities, access to community services and amenities, and inclusion in the general community."

d. – In speaking with a representative from the VA's homeless team, in order to include persons that served in the Reserves and National Guard, I recommend changing the definition of Veteran to "Veteran means a person who served at least one day in the active U.S. military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable or who served in the National Guard or reserve, or who served at least one day in the National Guard or reserve and discharged or released there from under conditions other than dishonorable."

In Exhibit A:

1.b(2) – Veterans with Disabling Conditions, what are the parameters for determining someone is a "high utilizers of publicly funded resources".

1.c. – Add "persons with diagnosable substance abuse disorder" to the populations served.

1.e.(2) – Please amend to: "No units in the Development shall be larger than 4 bedroom units and no more than 20 percent of the total units in the Development shall be larger than 3 bedroom units. For Developments proposing a shared-housing model, each non-related persons leasing a unit shall have a private bedroom with a private bath."

There is no logical reason to exclude studio/efficiency apartments as eligible housing. They are often the most cost effective method for providing housing to those with the lowest incomes.

3.a.(1) – This RFP should be limited to nonprofit organizations with missions focused on the provision of Permanent Supportive Housing as reflected in their Articles of Incorporation and/or By-Laws.

3.a.(3) – This section should be eliminated. A Technical Advisor or Consultant is not sufficient to demonstrate capacity. Just as affordable housing experience is required of the Developer independent of TA/Consultants, the Developer must independently demonstrate this capacity.

5.b. – A more thorough review of the subsidy/gap financing being provided should be conducted to ensure the appropriate per unit SAIL-like subsidy is being provided.

Additionally, projects should be permitted to commit up to 50% of their units for ELI households. The greatest need amongst Persons with Special Needs is the housing needs of ELI households.

7.a.(1) – Applicant should not be required to identify "existing staff" that will be the primary service coordination provider. If the Applicant is to be the service provider, as with a third-party provider, they should demonstrate the organization's capacity.

7.2 – Why is an onsite manager a threshold item? The fact that residents have a special need in no way dictates that they require 24-hour onsite staffing. This is treating Persons with Special Needs differently due to their "classification" rather than determining their individual needs. Some projects may be best served by having on-site staff 24 hours a day, but not all will require such.

Also, you will need to define Scattered Site for the RFP. The Florida Housing's UAC definition differs greatly from the common understanding of the term.

8.b. – Should VA clinics also be added to the community-based resources.

11.b. – If the projects are required to have only 20% of the units ELI, the same requirement of Limited Development Area projects, why do they require additional gap financing. The fact that the residents have a special need does not indicate a need for greater operating subsidy. It is the economic status of most Persons with Special Needs that requires the subsidy; not their special needs status. Gap financing should only be provided for projects reserving more than 20% of the units for ELI. Sizing of the gap financing needs to be diligently assessed during underwriting.

11.d. – as is done in the UAC , demonstration of ability to fund the developer should not be required.

Scoring:

Throughout the RFP, Florida Housing favors "innovative and best practices". This is to be commended. How is Florida Housing going to determine if what is proposed is a best practice? Scorers will have to be well versed in how to identify proposals that truly depict innovative and best practices.

Underwriting:

5. – The experience and capacity of the service provider(s) and property management agent should also be considered.

14.g. – I would add the Applicant to the list of entities for which board approval is required to subcontract with a "related entity".

9. – The average physical occupancy rate should account for the incomes and special needs status of the intended residents. A "family" property with no support and 60% AMI rents having a high vacancy rate does not indicate the lack of need for the proposed project.

Thank you, again, for your support of housing for persons with special needs. If you would like any additional information, please feel free to contact me.

Thank you,
Shannon Nazworth
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Executive Director



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