

September 26, 2013

Mr. Steve Auger
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Comments on Preservation RFA 9-13-2013 Draft

1. Page 10, 5b(2) allows a PHA community a 5 point boost in proximity points. Please allow existing USDA/RD 515 and/or 514/516 communities to be eligible for the 5 point proximity boost. These communities are built in rural areas with very limited services and this 5 point boost would make the proximity scoring equal to that permitted for PHA communities.

2. Page 31, Funding Selection 5 – To be eligible for the RD Preservation goal, the development should be an the existing USDA/RD 515 or 514/516 community and agree to remain in the 515 or 514/16 USDA/RD loan portfolio as documented by the letter as required on page 24 8(3)(b)(ii).

The language for the 538 program should be completely removed. The current way this section is written would allow any development to apply and receive the RD Preservation goal as long as they had a commitment for a USDA/RD 538 loan but does not impose an obligation to remain in the USDA/RD portfolio.

3. Page 60, Required Resident Programs. Additional services should be added as an option to both Family and Elderly Demographics.

Resident Activities and Financial Counseling as included in previous Universal Application instructions should be added to this RFA (see attachment from UA1016).

Thank you for the opportunity to comment on the draft Preservation RFA. If you have any questions or need clarification on any of the above comments, please do not hesitate to contact Angela Hatcher or myself at (727) 449-1182.

Sincerely,



Thomas F. Flynn
President

Cc: Mr. Ken Reecy, FHFC
Mr. Kevin Tatreau, FHFC

Enclosures: Page 31 RFA 2013 draft
Page 86, UA1016 Instructions

2. Ranking Process: All eligible Applications will be sorted in the following order:

- First by the Age of Development (with preference given to Applications that demonstrate within the documentation provided at question 4.c. of Exhibit A that the proposed Development was originally built in the year 1984 or earlier);
- Next by RA Level 1, 2 or 3 (with preference given to Applications that achieve an RA Level Classification of RA Level 1, 2 or 3 at Section Four A.4.c. of the RFA);
- Next by the Application's eligibility to be considered to be concrete construction, as outlined at Section Four A.4.c.(3) of the RFA (with Applications considered to be concrete construction listed above Applications that are not considered to be concrete construction);
- Next by the Application's eligibility for the Per Unit Construction Funding Preference which is outlined in Section Four A.8.e. of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- Next by the Application's Leveraging Classification (with Applications that receive the Classification of A listed above Applications that receive the Classification of B);
- Next by the Application's Proximity Score (with preference given to Applications with the highest proximity score in Section Four A.5.c. of the RFA);
- Next by RA Level (with preference given to Applications with the lowest RA Level Classification so that RA Level 1 Applications receive the most preference and RA Level 6 Applications receive the least preference);
- Next by the Application's eligibility for the Florida Job Creation Preference which is outlined in Exhibit C below (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- And finally by lottery number, resulting in the lowest lottery number receiving preference.

3. Funding Test: Applications will be selected for funding only if there is enough funding available to fully fund the Eligible Housing Credit Request Amount.

4. County Test: Funding will be limited to 1 Application per county (County Test), unless the only eligible unfunded Applications that can meet the Funding Test are located in a county where an Application has already been tentatively selected for funding, as further outlined below.

5. Goals: The Corporation has a goal to fund at least one Elderly RD Preservation Development and up to one Family Demographic Development. To be eligible for the Elderly RD Preservation Development goal, the ~~Application must have met all of the RFA's Program Requirements outlined in Section Four A.8.b.(3)(c).~~ To be eligible for the Family Demographic Development goal, the Applicant must have selected the Family Demographic at question 1 of Exhibit A. Any Application selected to meet these goals will count for purposes of the County Test. The Corporation is not precluded from funding another eligible Elderly Demographic Application that also qualified for the Elderly RD Preservation Development goal, subject to the County Test and the Funding Test.

6. Selection Process: The first Applications selected will be eligible Applications that meet the goals.

The first Application that will be selected for funding will be the highest ranked eligible Application that is eligible for the Elderly RD Preservation Development goal. If this goal is met, or if there are no eligible Applications that meet this goal, then the next Application that will be considered for funding will be the highest ranked eligible Application that is eligible for the Family Demographic Development goal. If the Family Demographic Development goal is met,

Insert: The Applicant must remain in the USDA/RD 515 or 514/516 loan portfolio as documented in letter as Attachment 9.

mental health provided by licensed or certified professionals relevant to the activity; (ii) at least weekly scheduled and structured health and wellness educational activities providing information and instruction on topics such as nutrition and diet, medications, mobility and exercise, good mental health and health care self-advocacy; and (iii) at least daily activities related to resident appropriate exercise and physical movement.

- (b) **Mentoring and Intergenerational**– The Applicant or its Management Company shall establish and maintain partnership(s) with a primary or secondary education institution(s) to encourage and coordinate structured mentoring, tutoring and other intergenerational activities among the residents and community's students. Other examples include foster grandparents, volunteer companion and chore programs. Electronic media, if used, must be used in conjunction with live instruction. (2 points)

Add as an Option
for Resident
Programs

- b. **Resident Activities** - These specified activities are planned, arranged, provided and paid for by the Applicant or its Management Company and held between the hours of 9:00 a.m. and 9:00 p.m. These activities must be an integral part of the management plan. The Applicant must develop and execute a comprehensive plan of varied activities that brings the residents together and encourages community pride. The goal here is to foster a sense of community by bringing residents together on a regularly scheduled basis by providing activities such as holiday and special occasion parties, community picnics, newsletters, children's special functions, etc. (2 points)

- c. **Financial Counseling** - This service must be provided by the Applicant or its Management Company, at no cost to the resident, and must include the following components: must be regularly scheduled at least once each quarter; must include tax preparation assistance by qualified professionals; must include educational workshops on such topics as "Learning to Budget", "Handling Personal Finances", "Predatory Lending", or "Comparison Shopping for the Consumer". Counseling sessions must be held between the hours of 9:00 a.m. and 8:00 p.m. and electronic media, if used, must be used in conjunction with live instruction. (2 points)

- d. **English as a Second Language** – The Applicant or its Management Company must make available, at no cost to the resident, literacy tutor(s) who will provide weekly English lessons to residents in private space on-site. If the Development consists of Scattered Sites, this resident program must be provided on the Scattered Site with the most units. Lessons must be offered between the hours of 9:00 a.m. and 8:00 p.m. and electronic