



National Church Residences
EXCELLENCE THAT TRANSFORMS LIVES

July 30, 2014

Florida Housing Finance Corporation
c/o Steve Auger
c/o Ken Reecy
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: Comments on the Draft RFA 2014-111

Dear Steve:

Thank you for the opportunity to present recommendations on the Draft RFA for 2014-111 as your office formalizes this RFA. We hope these comments will be informative as your office prepares to release the final RFA 2014-111. Included below are recommendations on behalf of National Church Residences in the areas of (1) 15% ELI Set-Aside, (2) 24/7 Staffing, (3) Elderly Transformative Preservation Set-Aside and (4) SAIL Loan Request with 35% Cap on TDC.

(1) 15% ELI Set-Aside

We respectfully request the ELI Set-Aside for Elderly Transformation Preservation be set at 10% of the project's total unit mix. For those developments up against the SAIL funding cap as determined by 35% of Total Development Costs, the ability to secure additional ELI funding is valuable but unfortunately creates a larger funding gap as the development uses need to be adjusted upwards accordingly. Leaving the ELI conversation requirement at 10% of the units will lessen that funding gap creation. Lastly for ELI, we request that the selection of set aside units for conversation purposes be at the discretion of the development's Sponsor without negative funding impact. For example, it would preferred to convert existing 50% units rather than the existing 60% units in order to create both greater affordability for the current 50% residents and to help further strengthen the development's debt sizing.

(2) 24/7 Staffing

We strongly believe 24/7 on-site staffing is unnecessary and will be cost prohibitive for this proposed Elderly Transformation Preservation set-aside. As a leading provider of senior affordable housing, including housing with health care services, we have not found it necessary to provide staffing 24/7. Residents' housing and health care needs are met during business hours through onsite service coordination or onsite provision of health care services. Should residents have needs that fall outside normal business hours, those services are coordinated and brought to the resident.

As a more appropriate alternative, we suggest FHFC require an evidence based "Resident Assessment" as part of the application for the ETP set-aside to determine the 24-7 needs of the residents. The Assessment will provide the foundation for matching appropriate resources to the level of services needed in a particular development, eliminating any gaps in the needs of the residents.

(3) Elderly Transformative Preservation Set-Aside

The proposed ETP set-aside promotes the right ideas in bringing together partnerships to utilize the strengths of each partner to bring services and support to the needs of the elder populations in the affordable senior housing community. We strongly encourage FHFC to consider funding at least two developments under this set-aside as we believe a single PILOT does not allow much room for strong advocacy going forward.

(4) SAIL Loan Request with 35% Cap on TDC

The proposed draft RFA currently caps the request of SAIL funds to 35% of the Total Development Cost (TDC). It is our understanding the calculation for determining 35% of the TDC includes the current SAIL request, the ELI Loan amount and the principal balance of any existing SAIL or HOME Loan(s). Omitting the existing SAIL or HOME Loan in this calculation allows for a stronger financially feasible project, allowing the adequate focus to be placed on the preservation and the partnerships of support services that will be necessary to make this PILOT project viable.

Thank you for your consideration of the above comments, and we would be happy to provide any additional information. We look forward to reviewing the next Draft RFA.

Sincerely,



Sarah Branch
Sr. Project Leader

CC: Michelle Norris, National Church Residences
Joe Hall, National Church Residences