



The American Round Table To Abolish Homelessness

Philip F. Mangano
President and CEO

*Former Executive Director
White House United States Interagency Council
on Homelessness (2002-2009)*

February 22, 2018

VIA EMAIL

Marisa Button, Director of Allocations
Multifamily Development
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, Florida 32301

Re: RFA 2018-103 – Housing credit and SAIL Financing for Homeless Housing Developments Located in Medium and Large Counties - *Non-Profit Applicant Requirement*

Dear Ms. Button:

On behalf of the American Round Table to Abolish Homelessness and in regard to the draft provisions of RFA 2018-103, I offer the following comments to be considered for the RFA that will ultimately be issued. The Round Table works directly with states, cities, and counties across the country to advance strategic solutions to homelessness, with a particular focus on local public-private partnerships and scaling the solution of housing to end homelessness. In my decade of work at the Round Table and in my seven years as the appointed Executive Director of the White House United States Interagency Council on Homelessness, I have strongly supported the engagement of the private sector in partnership with non-profits to expand scaling of housing solutions for our most vulnerable neighbors.

A major concern is the new requirement proposed by FHFC that limits funding eligibility only to non-profit applicants. Joint Ventures with Non-Profits (51% non-profit GP/49% GP) will not be accepted but instead a non-profit entity will have to hold a 100% interest in the GP.

This proposed action would be contrary to the current best and next practice initiatives to create housing targeted to extremely low-income households. For that population, most especially homeless households, we can now verify that we know what to do and we know how to do it. What restrains our ability to scale capacity is the availability of units. ~more

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Government is doing what it can. We now need to supplement government resources with the expertise and experience of private sector developers who build more quickly and efficiently than non-profits.

Scaling for this most vulnerable population will best be accelerated through the involvement of the private development entities who partner with experienced non-profit service providers. That is the partnership, the coalescing of complementary expertise, that will most effectively scale the units needed and offer assurance of supported, successful tenancies.

An example of this strategy is an initiative moving forward now in Seminole County where an experienced developer, Wendover Partners, is partnering with an experienced social service provider, Step Up, to create 84 units of permanent housing for currently homeless families and individuals.

The long experience and expertise of the local developer, Wendover, in navigating development issues, including zoning and siting, combined with the evidence-based social service interventions of Step Up ensure a mature stability throughout the development process, placement of the households, and the on-going social services to ensure support, safety, and security to our most disadvantaged neighbors.

For these reasons, we urge your reconsideration of the proposed requirement. Thank you for the opportunity to comment on this proposal. Please feel free to contact me with any questions.

All the best,

A handwritten signature in blue ink, appearing to read "Philip Mangano", with a long horizontal flourish extending to the right.

Philip Mangano
President and CEO

PFM:vgt