



June 1, 2018

Marisa Button, Multifamily Allocations  
David Westcott, Homeownership Programs  
Florida Housing Finance Corporation  
227 Bronough Street, Suite 5000  
Tallahassee, Florida 32301

RE: Comments for HOME MF Program

Dear Ms. Button & Mr. Westcott:

First, thank you for the opportunity to provide comments to the HOME program as related to rental housing for the future RFA's.

The following are recommendations in order to make the HOME program conducive to MF rental developments that can be successful:

1. HOME should be paired with LIHTC in order to leverage available funds
2. Affirm that HOME can be used with 4% credits
3. Raise the number of units to 100 that can be eligible for funding based on the market need
4. In order to exponentially increase the efficiency of the resource, provide a cap for the "resource" (HOME) that can be used in conjunction with 9% or 4% to leverage available funds. (i.e. maximize unit).  
Recognize better leveraged deals through:
  - a. Higher ranking
  - b. Goal
  - c. Maximum \$ per unit or overall cap
5. Require that sufficient due diligence items are required at RFA submission to make sure projects are ready to move forward quickly to meet the deadlines associated with Federal law in conjunction with the overview and Credit Underwriting Process of Florida Housing (HUD 2-year Expenditure Rule)
6. Priority should be given to CHDO's
7. Clarify use of funds in participating jurisdictions and non-participating jurisdictions. If funding is allowed in areas that receive their own funding, ensure that evidence is provided that no funding is available in those areas currently

More specific comments will follow once an actual draft RFA is produced. Feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan J. Leigh". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Susan J. Leigh