

October 10, 2019

Marisa Button
Director of Multifamily Allocations
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: RFA 2019-116 – proposed policy changes

Dear Ms. Button,

Thank you for Florida Housing's ongoing commitment to engage stakeholders in the development of its RFAs and policies. Your receptivity to the input of organizations that serve the residents of Florida Housing financed properties is evidence of the Corporation's intent to produce a product that best meets the needs of the persons served.

Florida Supportive Housing Coalition (FSHC) is writing with regards to policy changes proposed to be implemented in RFA 2019-116. First, thank you for your comments during the October 8, 2019 workshop that Florida Housing remains fully committed to the production of ELI units. Much progress has been made in recent years and we are encouraged by your continued commitment.

FSHC has concerns regarding two of the topics discussed at the workshop. First, FSHC is concerned how administration of Self-Sourced Applicants will impact the number of units affordable to Extremely Low-Income households and households who are Homeless or have a Special Need.

During the workshop a developer proposed that Self-Sourced Applicants be exempted from providing units for Extremely Low-Income households; stating the ELI forgivable loan amount does not cover the reduced income associated with providing the units. The attached table demonstrates that in all but one instance, the value of the forgivable loan is greater than the income loss over the term of the loan (comparing ELI rents with 60% AMI rent in four large counties). As Florida Housing knows, throughout the 2017 Affordable Housing Task Force meetings, communities across the state noted that affordable housing for ELI households is their greatest unmet need.

FSHC therefore strongly urges Florida Housing to retain the obligation to provide housing for ELI households. We also strongly urge Florida Housing to continue requiring half of all ELI units be dedicated to the Link program. Link is an important source of supportive housing units throughout the state. Florida Housing's own pilots demonstrate that the impacts on the persons served and the cost reductions to publicly funded systems of care are significant when households in need are provided supportive housing.

FSHC asks that Florida Housing provide its assessment of how this policy change will impact, or not impact, the production and retention of units affordable and accessible to ELI and Special Needs households.

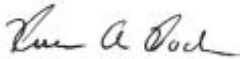
Second, FSHC is concerned about reserving National Housing Trust Fund resources to Homeless and Disabling Conditions RFAs. Florida Housing requires that NHTF be used solely with new construction. Siting Homeless and Disabling Condition properties can be challenging. Frequently rehabilitating existing multifamily properties is the type of development that receives the least resistance.

If Florida Housing is concerned about not deploying all NHTF resources perhaps it could issue the Persons with Special Needs RFA last and add any unused NHTF funds to that RFA. In reviewing the last two years of submittal, all PWSN applications were new construction. If this is done, Florida Housing will have to be sure that all NHTF restrictions and requirements are delineated in the RFA so developers are prevented from inadvertently running afoul of NHTF regulations.

An additional option is to offer NHTF funds to projects under construction but have not yet placed in service. FSHC is sure there are many supportive housing developers that would like to “buy down” additional units to make them affordable to persons on SSI.

FSHC is very grateful for Florida Housing’s leadership in increasing the supply of housing for ELI and special needs households. And we, again, thank you for welcoming all stakeholder input. We look forward to continuing to work with Florida Housing to provide quality supportive housing for all Floridians in need.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen A. Koch".

Karen Koch
Executive Director

Unit Size:	0	1	2	3
Duval				
ELI (33% AMI) rent	404	433	519	599
60% rent	737	787	945	1,090
monthly difference	333	354	426	491
annual difference	3,996	4,248	5,112	5,892
15 yr difference	59,940	63,720	76,680	88,380
ELI loan amount	67,700	67,700	79,500	89,500
ELI loan amount over(under) reduced income amount	7,760	3,980	2,820	1,120
Hillsborough				
ELI (33% AMI) rent	392	420	504	581
60% rent	672	720	864	997
monthly difference	280	300	360	416
annual difference	3,360	3,600	4,320	4,992
15 yr difference	50,400	54,000	64,800	74,880
ELI loan	57,400	57,400	67,200	75,800
ELI loan amount over(under) reduced income amount	7,000	3,400	2,400	920
Miami				
ELI (33% AMI) rent	396	424	509	588
60% rent	849	909	1,092	1,260
monthly difference	453	485	583	672
annual difference	5,436	5,820	6,996	8,064
15 yr difference	81,540	87,300	104,940	120,960
ELI loan amount	90,200	90,200	105,900	119,400
ELI loan amount over(under) reduced income amount	8,660	2,900	960	(1,560)
Orange				
ELI (33% AMI) rent	392	420	504	581
60% rent	672	720	864	997
monthly difference	280	300	360	416
annual difference	3,360	3,600	4,320	4,992
15 yr difference	50,400	54,000	64,800	74,880
ELI loan amount	57,400	57,400	67,200	75,800
ELI loan amount over(under) reduced income amount	7,000	3,400	2,400	920