

From: Paula Rhodes <prhodes@invictusdev.com>

Sent: Monday, September 28, 2020 4:59 PM

To: Jean Salmonsens <Jean.Salmonsens@floridahousing.org>

Subject: Comment on Draft RFA 2020-205 - SAIL with Tax Exempt Bonds and 4% Housing Credits

Good afternoon, Jean. Thank you for helping me better understand the interplay among the funding baskets, goals, and sorting order as set out in Section Five, Scoring and Evaluation, of the 8-28-2020 Draft of RFA 2020-205. Based on my current understanding, I have just three comments for consideration.

- 1. Veterans Preference.** Among the Goals established in Section Five, B.3 of the RFA, are two Goals to fund Elderly, New Construction Applications with a preference for Applications that qualify for the Veterans Preference – one Goal for a Large County Application and one Goal for a Medium County Application. I am excited that the Corporation is seeking to boost affordable housing for Elderly Veterans with these Goals. While Veterans of all ages have encountered difficulties after returning to civilian life, Elderly Veterans are doubly vulnerable due to health issues – something the pandemic has made all too clear. To ensure that this vulnerable population has access to the health care services they need, qualification for the Veterans Preference should include proximity to Veterans Administration healthcare services. Please amend Section Four, A.2.b.(2) to require proximity to a VA Health Care System, VA Medical Center, or VA Outpatient Clinic. Also, if the definition's occupancy goal for Veterans were increased from 5% to 10% of units, it would not only have a greater impact on the Veterans population but it would also create a more meaningful distinction among Applications. All non-Self Sourced Applicants are already required to set aside 50% of their ELI units as Link Units with a standard minimum set aside of 10%.
- 2. Sorting Order and Satisfaction of Goals in Large Counties.** Section Five, B.5.a.(1) provides that the first two Applications to be selected for funding will be the two highest ranking applications, one from Miami-Dade County and one from Broward County. While the first Application selected is not limited as to Demographic Commitment, qualification for the Veterans Preference, or whether the Applicant is Self-Sourced, the second Application funded will be impacted by the Demographic Commitment, Veterans Preference qualification, and Self-Sourced status of the first Application selected. The third Application to be selected for funding is one that meets the Goal to fund one Elderly, Large County, New Construction Application that meets the Veterans Preference (Section Five, B.5.a.(2)(a)); however, the RFA goes on to provide in this section that "if at least one of the Applications selected to meet the goal described in (1) above is an Elderly Application, this goal will be considered to be met without selecting any additional Applications." (Section Five, B.5.a.(2)(b)).

The language in paragraph (2)(b) appears to have consequences that may not have been intended. Allowing one of the first two applications selected for funding to satisfy the Elderly, Large County, New Construction Goal could result in no Large County Elderly Application with a Veterans Preference being funded. This would occur if the first application selected for funding is an Elderly Application because the first application is the highest ranking one regardless of Demographic Commitment, Veterans Preference, or Self-Sourcing. It would be unfortunate if the first application selected for funding was an Elderly, New Construction Application that did not provide a Veterans Preference but nevertheless counted towards satisfaction of this Goal.

This could be rectified by increasing the Elderly Large County New Construction Goal from one to two Applications that meet the Veterans Preference.

Increasing the Large County Elderly, New Construction Goal from one to two Applications with a Veterans Preference would be beneficial for other reasons as well. As it happens, Miami-Dade's population has the lowest percentage of Veterans and Broward the second lowest among Florida's Large Counties. And while 9 of the 18 VA Health Care Systems, Medical Centers, and Outpatient Clinics listed on the Florida page of the U.S. Department of Veterans Affairs Veterans Health Administration webpage are in Large Counties only 1 of those is Miami-Dade and none are in Broward.** Having the Goal be to fund two Large County Elderly, New Construction Applications with a Veterans Preference would allow and Application in a Large County with higher Veterans population percentages and greater access to VA healthcare facilities to receive funding. Given there is more SAIL funding available this year than in the past few years, it would be a worthy use of funds to increase the Elderly New Construction funding goal from one to two Applications.

3. **Family Funding Available.** This section of the 8/28/2020 draft RFA provides that the total Family Funding Available is \$60,636,450. It then goes on to state "Up to a maximum of \$24,321,177 of the Family funding (50% of the total)" is set aside for Self-Sourced Applicants that select the Family Demographic Commitment. Follow that, the section provides "\$36,315,273 of the Family funding (50% of the total)" is set aside for Applicants that also select the Family Demographic Commitment but do not qualify as Self-Sourced Applicants. If both set asides are equal to 50% of the same number, I would expect them to be equal in amount. It seems either the dollar amounts or the percentages should be adjusted. The same language appears in Section 1.b.'s Funding Test under (1) Funding Available.

** The table below was cut and pasted from the VA's official website – the county identifiers in red were added by me.

VA Health Care System

Bay Pines: [Bay Pines VA Healthcare System](#) (PINELLAS)

Gainesville: [North Florida/South Georgia Veterans Health System](#)

VA Medical Center

Gainesville: [Malcom Randall VAMC, NF/SGVHS](#)

Lake City: [Lake City VAMC, NF/SGVHS](#)

Miami: [Miami VA Healthcare System](#) (MIAMI-DADE)

Orlando: [Orlando VA Medical Center](#) (ORANGE)

Tampa: [James A. Haley Veterans' Hospital](#) (HILLSBOROUGH)

Tampa: [James A. Haley Veterans' Hospital Primary Care Annex](#) (HILLSBOROUGH)

West Palm Beach: [West Palm Beach VAMC](#) (PALM BEACH)

Outpatient Clinic

Cape Coral: [Lee County VA Healthcare Center](#)
Daytona Beach: [William V. Chappell, Jr., VA OPC](#)
Jacksonville: [Jacksonville OPC \(DUVAL\)](#)
Jacksonville: [Southpoint Clinic \(DUVAL\)](#)
New Port Richey: [New Port Richey OPC](#)
Orlando: [Lake Baldwin OPC \(ORANGE\)](#)
Tallahassee: [Sergeant Ernest I. "Boots" Thomas VA Clinic](#)
The Villages: [The Villages OPC](#)
Viera: [Viera OPC](#)

Thank you again for clarifying the RFA provisions for me and for your consideration of these comments. Please feel free to call or email me if you have any questions.

Regards,

Paula McDonald Rhodes

President

InVictus Development, LLC

1910 West Cass Street

Tampa, Florida 33606

813-448-7868 (O)

813-380-8899 (C)

