



February 6, 2023

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Marisa Button, Director of Multi-Family Allocations  
Florida Housing Finance Corporation  
227 N. Bronough St., Suite 5000  
Tallahassee, FL 32301  
**RE: RFA 2023-105**

Dear Ms. Button,

Thank you for the opportunity to comment on RFA 2023-105 and for your continued efforts to ensure that sustainable housing options are available for our most vulnerable citizens.

Casa Familia is seeking to develop a new housing project to serve these special people focused on those who require 24/7 care. As you know, Casa Familia, Inc., a 501(c)(3) corporation, was organized to sponsor multifamily housing for adults with Autism, Down Syndrome, and related intellectual and developmental disabilities (IDD), including those with significant needs.

Funding for such sorely needed housing is possible through RFA 2023-105 (Financing To Build Smaller Permanent Supportive Housing Properties For Persons With Developmental Disabilities). However, a few changes would be necessary to make such a project financially viable and sustainable, for the following reasons:

1. Licensing - The RFA limits such projects to a single 6-bedroom home, and limits licensing to only Community Residential Homes licensed by the Florida Agency for Persons with Disabilities (APD). This is a problem because projects with only a single home have historically struggled to be financially sustainable as a result of high fixed costs (e.g., senior program staff which cannot be spread across more than one home) and insufficient benefit reimbursement rates. Economic sustainability issues are further magnified by the realities of increased staffing costs, staff shortages, and global increases in operating expenses.

Alternatively, Assisted Living Facilities (ALF), licensed through the Agency for Health Care Administration (AHCA) as defined in Florida Statute 429 are defined as “any building or buildings...which provides housing, meals, and one or more personal services for a period exceeding 24 hours to one or more adults who are not relatives of the owner or administrator.” As such, they are not limited to a single Community Residential Home within 1000 feet of another, and thus, they offer the opportunity for much needed economies of scale.



2. Funding Limits - The RFA does not reflect the unprecedented spike in construction costs, which have risen over 25% in Miami-Dade County in the past year alone. We appreciated your study of this in the recently published Construction Housing Inflation Response Program (CHIRP). In addition, the cost to develop homes which are designed to sustainably meet the needs of tenants who require long-term Assisted Living care far exceeds the cost to develop a typical home.

### **Recommendations:**

**A. Development Requirements:** Expand the RFA to include proposals to develop a licensed Assisted Living Facility (ALF) licensed through the Agency for Health Care Administration (AHCA) of up to four (4) single family homes of no more than six (6) bedrooms each. A licensed ALF with 4 homes with a total of 24 bedrooms (e.g.; Bishop Grady Villas, St. Cloud, FL, which is a larger but similar financial model), in which personal services are provided by a single provider, offers economies of scale sufficient to enable such housing to be self-sustaining. Please note that an ALF is an approved setting for recipients of IBudget HCBS Waiver funded Residential Habilitation per the Florida State Transition Plan and meets the requirements of 419.001(e). Also, Florida Statute 419.001 prohibits Community Residential Homes from being developed within a radius of 1,000 feet of another existing such home with six or fewer residents, unless located in a Planned Residential Community of 8+ Acres. Assisted Living Facilities with several buildings or homes under a single AHCA license are not subject to this requirement.

### **B. Funding Limits:**

- Increase the amount of the “base award per unit” for development of licensed Community Residential Homes and Assisted Living Facilities (per the noted recommendation noted in A above) to be equal to that of Supported Living Homes. The construction costs are the same (if not greater) in licensed homes than for un-licensed Supported Living Homes.
- Add a \$100,000 boost per home to support the inclusion of special (and costly) design features and amenities that individuals with significant (24/7) IDD needs, including:
  - Increased square footage in both units and common areas to provide necessary opportunities for social interactions, universal visitability, and reasonable in-unit space for the residents who may be house-bound a large percentage of the time and require an attendant to provide them services on an ongoing basis.
  - Sound attenuation necessary to house individuals who suffer from sensory processing disorders.
  - Smart Technology to address the unique life safety needs, promote self-reliance/independence, and reduce individual dependence on hired support staff for assistance.
  - Lifts and other accessibility equipment and features to support the need of those who require assistance to transfer and complete the Activities of Daily Living.
- Boost the final award by 30 percent to address the rise in construction costs.



We have consulted with numerous experts in the field regarding these comments, including:

- Kaleema Muhammad, Program Administrator, Quality Assurance Unit, Agency for Persons with Disabilities (APD)
- Jim Whittaker, CEO Arc Jacksonville; Group Home and ALF Provider.
- Kevin Johnson, CEO Bishop Grady Villas, ALF Provider and Provider of Residential Habilitation and other services funded through the Agency for Persons with Disabilities (APD)
- Debbie Torrenzio, CEO United Community Option; Group Home Provider, Provider of Residential Habilitation and other services funded through the Agency for Persons with Disabilities (APD)
- Dr. Michael Alessandri, Director of the University of Miami-Nova Southeastern University Center for Autism and Related Disabilities
- Nestor Plana, Managed Care Provider
- Dr. Jeffrey Brosco, professor of clinical pediatrics at the University of Miami and associate director of the school's Mailman Center for Child Development.
- George Braddock, Licensed Architect and General Contractor who pioneered the implementation of person-centered planning principles to homes for people with disabilities. Founders and Developers of the five Florida DD communities who confirmed the problems they could have avoided if these features and accommodations had been incorporated into their properties.

We have also engaged specialty consultants in the following fields:

- Sound Engineering
- Occupational/Sensory Processing Specialist
- Disability Design Consultant
- Life Safety Specialist
- Disability Technology Consultant

We appreciate the opportunity to provide these comments, and for the support of Florida Housing in addressing the needs of these vulnerable citizens.

Sincerely,

Deborah Lawrence  
Senior Housing Director

Cc: Natasha Lowell, Chair  
Marc Plonskier, Real Estate Committee Chair  
Anay Abraham, Executive Director  
Bill Aldinger