



February 27, 2023

Marisa Button, Director of Multi-Family Allocations
Florida Housing Finance Corporation
227 N. Bronough St., Suite 5000
Tallahassee, FL 32301

Dear Ms. Button,

Thank you for the opportunity to comment on **RFA 2023-105**. My comments follow those previously submitted by Deborah Lawrence.

Casa Familia is seeking to develop a licensed assisted living facility – Community Residential Homes - to serve special people 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. To better enable this RFA to support this long-ignored segment of those with IDD, we respectfully suggest the following:

1. Licensing – As Ms. Lawrence explained, the RFA limits licensing to only Community Residential Homes licensed by the Florida Agency for Persons with Disabilities (APD). Due to the inherent economies of scale that reduces the costs and stretches the Medicaid reimbursement to allow greater affordability and operating efficiencies, we suggest that Assisted Living Facilities (ALF) licensed through the Agency for Health Care Administration (AHCA) as defined in Florida Statute 429 be an acceptable alternative.

Per FS 429, AHCA allows provides that “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. Number of Homes – To achieve a minimal level of efficiency, we suggest that applicants be allowed to receive funding for up to 2 Community Residential Homes per application. 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. 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).

Sincerely,

Marc S. Plonskier, Chair, Real Estate Committee Chair