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March 17, 2023

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

RE: 2023/2024 Rule Development

Dear Ms. Button:

On behalf of the Coalition of Attainable Housing Providers (CAHP), we are requesting changes to the definition of general requirements for general contractor agreements. Expenses included in general requirements are defined in the General Contractor Cost Certification (GCCC) package which is incorporated into the Rule by reference.

The definition of general requirements currently includes security systems, security personal, and security fencing. Having these items contained in general requirements artificially limits the amount of security that can be procured for construction sites. In addition, many builder's risk policies have security requirements that must be instituted as a condition of the policy. Developers and general contractors need flexibility to meet both insurance policy requirements and the true security needs of the construction site. CAHP requests that all construction site security, including security systems, security personal, and security fencing, be excluded from the definition of general requirements.

CAHP also requests that expenses related to Section 3/Davis Bacon consultants be considered outside of general requirements. Section 3 and Davis Bacon are complex federal programs requiring extensive record keeping by the general contractor. Additional assistance to monitor, ensure compliance, and process the mandatory paperwork for these programs helps reduce delays in the construction schedule and payment processing. Allowing these consultants to be paid outside of the general requirements will encourage general contractors to hire the expertise they need.

Thank you for allowing us to comment on the upcoming 2023/2024 Rule cycle.

Sincerely,

Hana Eskra
Chair, Underwriting Committee