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To: <Trey@floridahousing.org>, <trey.price@floridahousing.org>

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Subject: PUBLIC COMMENTS - AFFORDABLE HOUSING WORKGROUP

Mr. Price,

According to the Agency for Health Care Administration there were 1100 state licensed limited mental health Assisted Living Facilities. Today it is reported by AHCA that there are now only 800 state licensed LMH-ALFs. These facilities offer adults with schizophrenia who largely have greater levels of functional impairment than those served in the community or in supportive housing with access to state licensed facilities where there is a resident bill of rights that compels certain types of behaviors on the part of the land lord or operator, there are background screens and requirements regarding the provision of care and services necessary to assist these vulnerable adults remain in the least restrictive setting.

The loss of these state licensed facilities has been identified as a crisis by the state agency and is a growing concern as the adults with schizophrenia start aging and require greater levels of assistance. The rise in unlicensed facilities has also at the same time become a growing concern and how unlicensed facilities are utilizing the state financed or funded programs to offer unlicensed care and services that would otherwise require licensure and would compel protections under the resident bill of rights which includes provisions for civil enforcement actions when rights are violated.

I would like to offer the following recommendations for consideration;

1. For projects that propose to expand the number and access to state licensed ALF beds for adults with special needs to create a new tax credit category that might allow for a doubling of the current tax credit rates that are currently available. The current tax credits are not of sufficient financial incentive to encourage small providers to offer the types of facilities that would be required to help replace the lost residential capacity.
2. Provide incentives for use of rental assistance for projects that are targeted to projects that offer state licensed limited mental health ALFs and would encourage the development of access to housing for those adults with serious mental illness who do not qualify for Medicaid and need access to state licensed limited mental health assisted living facility beds. At present most facilities limit access to beds for non Medicaid individuals as these individuals are more expensive to serve and this results in many people who are non Medicaid often becoming victims of homelessness, shelter care and unlicensed facility operators.
3. Provide incentives for facilities to seek funding for renovation and expansion of bed capacity to help grow existing bed capacity. The new regulatory requirements have combined with chronic under funding of care at \$12.25/day for Medicaid funded resident has created a crisis that has many facilities at a tipping point. The new generator rules will further strain the limited resources of these facilities.

4. Encourage the legislature and local government to provide state funded Assisted Living Facilities that care for the adults with serious mental illnesses or the elderly who are low income with property tax credits that can be used to help pay for the generators, the renovations and other improvements as a means of improving access to care.

I hope you will consider these recommendations.

Thanks

Doug

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