

Attn: Ms. Tracy Banner

o/b/o Mr. Ray Dubuque, Florida Housing Chairman and Citizen Representative

Board of Directors, Florida Housing Finance Corporation

Dear Ms. Banner and Chairman Dubuque,

On behalf of Volunteers of America (VOA), please find responses to your Sept. 17 inquiry to assist you in broad policy and strategy discussions at the FHFC's board meeting on Oct. 31. Please consider this email to be reflective of both VOANS (National Services), as well as our chartered affiliate, Volunteers of America of Florida.

1. *More General Exemption Benefits beyond only Senior Housing Deals for Tax Credit Joint Ventures Between For-Profit and Non-Profit Partners.*

It is our understanding that only certain joint ventures and structured partnerships by and between for-profit and non-profit developers as "owners" may enjoy the full benefits of tax exemption. As both a 501(c)3 organization, and more importantly a ministry, we are federally designated as fully tax-exempt, as well as certified in each state in which we operate. While we know that tax assessments happen on a municipal level generally and understand the need for public funding sources in your counties, we take the opportunity to encourage a more categorical statewide policy to clarify the conventions of limited partnership between a Non-Profit General Partner and a For-Profit Limited Partner in any special purpose entity for low income tax credit partnerships as structures that do not per se preclude full exemption. Indeed, it is the IRS standard of *substantial control* to test whether an entity is fulfilling its charitable purpose when doing business with for-profits, and the limited partnership corporate structure is designed in conformity and intended in this spirit.

2. *Additional Set-Asides and the Confluence of Mental Illness and other Special Needs.*

As a special-needs provider, our organization understands that in many instances mental health is compromised with substance abuse issues. As such, we implore you to consider additional funding programs or other incentive-based set-asides to better provide mental health services. This is so that a more holistic approach is afforded to address addictions and other needs and to foster service programs that not only rehabilitate but sustain. It is our belief that a broader lens for mental health through set-asides is smarter for combatting some of the most silent and critical societal epidemics. Not unrelated to these issues is the broader point that perhaps outcome-based as well as unique-user metrics should be considered. Our services should ideally touch as many people as possible in need of them. As such, the utility of such programs may be better assessed by additional metrics beyond just occupancy or voucher.

3. *Scalable Rehab Programs to address needs in light of unprecedented Hurricane Sizes.*

Florida has experienced some of the largest hurricanes to make landfall in state. As such, we implore you to consider programming to the commensurate needs for smaller-scale renovations and rehabs needed for properties in Florida that have been hit by some of the largest hurricanes on record.

Thank you for listening to our collective voice at Volunteers of America, and I hope you find our input valuable and helpful to your esteemed organization.

Sincerely,

Jill Phaneuf

o/b/o Volunteers of America National Services Housing

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