



Florida Supportive Housing Coalition

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President:
Shannon Nazworth
Ability Housing of Northeast Florida, Inc.

September 10, 2007

Vice President:
Marsha Popkey
Lee County Department of Human Services

Mr. Steve Auger
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301

Secretary:
Karen Koch
Florida Council for Community Mental Health

Treasurer:
Edi Erb
Homeless Coalition of Hillsborough County

Re: 2008 Universal Cycle Rule Development

Immediate Past President:
Maria Pellerin Barcus
Housing Partners of Florida LLC

Dear Steve,

Directors:
Lisa DeVitto
Substance Abuse & Mental Health Corporation

The Florida Supportive Housing Coalition recognizes and greatly appreciates Florida Housing's efforts to supplement funding for ELI units above the \$15million allocated by the Florida legislature. Thank you for your attempts to help Florida's residents with the greatest need.

Mark Fontaine
Florida Alcohol & Drug Abuse Association

The Coalition believes all Florida Housing resources, including the resources administered through the Universal Cycle, should be distributed in proportion to the state's need. As ELI households have the greatest unmet need, units affordable to ELI households should receive the greatest proportion of the state's affordable housing resources.

Olga Golick
Citrus Health Network

Freyja Sutherland Harris
Florida Coalition for the Homeless

Susanne Homant
NAMI Florida

Jack Humberg
Boley Centers, Inc.

Patricia Humphrey
Seminole Community Mental Health

Elizabeth Jennings
United Way of Palm Beach County

Gary Fink
Housing Partnership, Inc.

Janet Riley
Legal Aid Service of Broward County

Lynn Rosenthal
Florida Coalition Against Domestic Violence

Ex Officio:
Deb Blizzard
Agency for Persons with Disabilities

Mark Engelhardt
USF-Florida Mental Health Institute

Janet Hamer
Federal Reserve Bank of Atlanta

Thomas Liberti
Florida Department of Health
Bureau of HIV/AIDS

Daniel M. Robbin
U.S. Department of Veterans Affairs

However, in response to your specific question, the Coalition recommends ELI funding be used in conjunction with the Universal Cycle as well as a separate funding cycle for households with special needs. \$12million of the ELI funding should be reserved for a special cycle with the balance to be utilized in the same manner as last year's supplemental funding mechanism.

The Special Cycle should be well announced, providing predictability for all interested parties. The Coalition offers its expertise in assisting with rule development for this cycle.

Following are additional comments regarding the Universal Cycle:

- The Coalition requests an analysis on how SAIL funds were allocated in the 2007 Cycle.
- The Coalition shares the concerns expressed by others that the Total Development Costs of some applications are not in line with reasonably projected expenses. Florida Housing must devise a method to ensure all projects have a certain level of 'underwritability' in order to be awarded preliminary funding.
- The Coalition shares the concerns expressed by others regarding the number of applications submitted by a few developers. We support that each application should be complete at submission and that the number of 'lottery balls' available to any single developer or financial beneficiary should be limited. This will ensure that developers submitting a limited number of 'valid' applications will have an opportunity to receive funding in a fair manner.

PARTNER ORGANIZATIONS:



- In conjunction with the above, the Coalition requests that whatever corrective action taken by Florida Housing not have the unintended consequence of making it harder to non-profit developers to increase their capacity. Cures are important and should not be eliminated; the abuse of cures is what needs to be corrected.
- The Coalition requests that the prior experience criteria be amended for non-profit developers submitting smaller projects – developments with 50 or fewer units or requesting a limited amount of Florida Housing resources.
 - Florida Housing's risk is limited due to the reduced level of its resources utilized.
 - Non-profit syndicators have methods for accepting the guarantees of non-profit entities. Therefore, the concern regarding guarantees is not relevant to this proposal.

As always, we thank you and your staff for your dedication to addressing the myriad of housing needs of Florida's residents. Should you desire clarification regarding any of these recommendations, please do not hesitate to contact me at (904) 359-9650.

Thank you,

A handwritten signature in black ink, appearing to read 'SN', with a long horizontal flourish extending to the right.

Shannon Nazworth
Board President