

From: Shannon Nazworth <snazworth@abilityhousing.org>

Sent: Thursday, February 22, 2018 11:35:03 AM

To: Marisa Button

Cc: Bill Aldinger

Subject: Comments: RFA 2018-103

Dear Marisa,

Thank you for the opportunity to provide input on RFA 2018-103. Florida Housing's receptivity to stakeholder input is commendable and greatly appreciated. Based upon the discussion at last week's Workshop, I am providing the following recommendations and comments.

- I recommend and request that the timeline for issuing the RFA be extended. There are several important public policy matters under consideration in this RFA and it is important all parties have ample time to review and comment so that the ultimate outcome is the best utilization of limited resources possible.
- An additional reason to extend the timeline is that it can sometimes take many weeks to get all necessary Ability to Proceed and other forms signed; this timeline applies pressure when there does not appear to be a need to create such pressure.
- In addition to the requirement to serve Persons with Special Needs, half of these units - 10% of all units - should be targeted to provide Permanent Supportive Housing.
- Given the probability that a majority of the Homeless units will be targeted to families, there should be more 2-bedroom units permitted. Three-bedroom units are also needed, but many homeless households (per the McKinney-Vento/education definition) are single-female head of household with children. Two-bedroom units often meet their need and are more cost efficient from a rent perspective than 3-bedroom units.
- However, some one bedroom units should be required. Single males are the largest demographic within the HUD defined homeless population. Units for this population should be part of the state's portfolio of units targeting the homeless.
- Prior experience with providing permanent housing for the homeless and persons with special needs is important. In addition to the General Development Experience requirement, there should be a Homeless/Special Needs Housing Prior Experience Requirement. While points are earned in the Narrative sections for demonstrating an understanding of providing housing which serves the Homeless and Persons with Special Needs, there should be a definitive criteria for prior experience.
- Further, the requirements for participation in the local Continuum of Care should be enhanced. Points should be awarded for Applicant's able to demonstrate active participation in the CoC for at least twelve months prior to the RFA issuance date. Active participation can include attendance at general membership meetings, membership on CoC committees, payment of dues (where applicable), etc. (For purposes of this RFA, in this context Applicant is

referring to the Nonprofit entity that is the sole member of the managing member or general partner entity).

Lastly, I would like to discuss the need to increase nonprofit capacity to develop affordable housing – especially housing for Persons with Special Needs and the Homeless. As stated in the Workshop, WHO develops and operates the housing is as important as what housing is developed. In fact, who develops and operates the housing is equally – if not more – important than the housing that is developed.

As this is a public comment, I will not elaborate upon the myriad of recent examples as to how important it is to have developers that are ethical and utilize limited public resources to the highest and best use. Further, it is imperative that the households intended to be served by these resources are in fact able to access the housing. This was a topic of repeated discussion by the Affordable Housing Task Force.

As the Chair of the State of Florida Council on Homelessness, I can state that there have been multiple comments from many CoCs and their members as to the difficulty the homeless households they serve have accessing Florida Housing financed properties, even when units are targeted to Persons with Special Needs and the Homeless.

Further, Florida Housing has previously received comments and feedback from nonprofits that they are unable to serve the persons intended when partnering with a for profit entity. This is due to dictates in the screening and selection criteria; as well as dictates regarding the policies and procedures implemented to address challenges in maintaining a lease – such as a reduction in work hours, unexpected expense or illness, etc.

Mission-driven nonprofits, especially those with prior experience operating housing for the Homeless and Persons with Special Needs, have the experience and focus to implement policies and procedures that permit access to the housing and help vulnerable households maintain that housing.

Florida Housing has stated for many years that it is an important public policy goal to have nonprofit with the capacity to develop and operate affordable housing; especially housing serving the Homeless and Persons with Special Needs. The RFAs targeting the Homeless and Persons with Special Needs are the best way to address this policy goal. For profit entities dominate the other RFAs issued annually by Florida Housing. It is entirely appropriate to have one or two targeted RFAs which include a focus on improving nonprofit capacity.

As respondents to the RFAs for Persons with a Disabling Condition are typically submitted by nonprofits wishing to develop a single project, and not create recurring development capacity, the RFAs for the Homeless and Persons with Special Needs are the RFAs best suited to focus on improving nonprofit development capacity.

The concerns of nonprofits that wish to submit to this RFA but which do not meet the General Development Experience criteria can be addressed by these nonprofits partnering with another nonprofit that has the requisite experience. This will provide an additional benefit to Florida Housing in that multiple nonprofits will have their capacity enhanced through the partnership.

The only real way to increase nonprofit capacity is to increase the amount of capital earned by the nonprofits. If Florida Housing does not retain the 100% nonprofit requirement – which it should – then it must provide points based upon two things:

1. The role of the nonprofit in the project – a list of tasks and responsibilities should be included in the RFA. Points should be assigned to each task. Points should be awarded for each task for which the nonprofit will be responsible.
2. The percent of developer fee that is earned by the nonprofit

I know this is a great deal of public comment. Thank you for taking the time to review it all and consider these comments. Please let me know if you would like additional information concerning any of them.

Thank you,
Shannon Nazworth
Executive Director



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