

June 24, 2014

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

Re: Comments on Rulemaking and Draft Strategic Plan

Dear Steve:

When I testified at the June 12<sup>th</sup> rule development workshop, I stated that, with the FHFC now incorporating its substantive requirements within each RFA, I see the FHFC Strategic Plan becoming an even more important document. I understand that this document will guide the RFAs and that the public should be able to expect that the RFAs will be one way in which the FHFC implements its strategic plan. To that end, the attachment is the FHFC draft strategic plan with my suggestions in track changes.

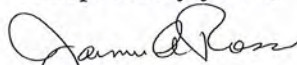
As I stated in my comments on July 12<sup>th</sup>, the FHFC is to be commended for making its rule development workshops more accessible to the public through telephone conferencing and for making its funding more accessible to nonprofits and mission based organizations serving the most vulnerable populations by using the RFA process, rather than the Universal Cycle.

I encourage you to change the proposed fee structure so that nonprofits do not end up paying a greater percentage increase in fees than for- profits. And better yet, the FHFC can reduce its administrative costs and therefore not need to increase fees at all by limiting the number of applications or credits that can be awarded to any one developer.

Finally, I reiterate my oft- made comment that FHFC should allocate at least half of its tax credits for preservation in the QAP—we can reduce the amount of credits per unit, saving public subsidy and allowing vulnerable elders and persons with disabilities to age in place and live independently.

Thank you so much for your consideration.

Respectfully yours,

A handwritten signature in black ink that reads "Jaimie Ross".

Jaimie Ross  
Affordable Housing Director

## **2014 Draft Strategic Plan [with Recommendations by Jaimie Ross, Affordable Housing Director, 1000 Friends of Florida in Track Changes](#)**

June 2014

### **INTRODUCTION**

The purpose of this strategic plan is to provide a three to five year framework for policy and operational decisions at Florida Housing Finance Corporation. While Chapter 420, Florida Statutes, outlines Florida Housing's powers and responsibilities, and explains generally how programs will be implemented, there is an array of choices to be made within that statutory authority.

This plan is Florida Housing's roadmap of how programs will be targeted in the coming years. It is not meant to be a comprehensive plan that includes every facet of what Florida Housing does, but provides a big picture view of the Corporation's most important priorities. The strategic plan responds to current housing conditions and opportunities, projects future issues and concerns and provides a framework to guide operations [and the new Request for Applications \(RFA\) process that Florida Housing has instituted](#).

The plan is divided into the following components:

- Mission and Vision - Statements outlining the purpose, primary objectives and aspirations of Florida Housing.
- Guiding Principles - The values the Board and Staff use to do business.
- Priorities - The goals that Florida Housing will focus on in the coming three to five years. The priorities are grouped by external issues (how Florida Housing wants to impact housing opportunities for Floridians) and internal, or operational, issues.
- Strategies - A list of actions that describe the key steps that Florida Housing will take to implement each priority.
- Performance Measures and Targets - Metrics to evaluate the execution of Florida Housing's goals and actions.
- Current Trends and Conditions - An attachment providing an overview of affordable housing in Florida.

## MISSION

Provide a range of affordable housing [finance](#) opportunities for residents that help make Florida communities great places to live, work and do business.

## VISION

Florida Housing will be recognized as an outstanding provider of innovative, measurable, data-driven and fiscally sustainable [finance](#) solutions to the affordable housing challenges of our state.

## GUIDING PRINCIPLES

As Florida Housing carries out its mission and vision, we will:

- Conduct business in an honest, ethical, open and respectful manner
- Be mindful and accountable stewards of resources entrusted to us
- Allocate resources fairly and consistently
- Remain innovative, flexible and responsive in our programs and funding strategies
- Base decisions on objective data and collaboration with public and private sector stakeholders
- Promote housing stability, sustainability and options for Floridians
- Foster awareness of affordable housing's role in building stronger communities

## PRIORITIES

### I. PRIORITY: Promote and support sustainable homeownership

• **Homeownership Lending Strategies** A. Maintain a continuous lending model, including the availability of down payment assistance, particularly through the state Homeownership Assistance Program, for credit worthy homebuyers

B. Continue the use of mortgage backed securities as a means of limiting financial risk

C. Evaluate alternative servicing opportunities to ensure the continuing delivery and purchase of loans

D. Explore new/emerging financing opportunities to diversify mortgage lending options

E. Recruit and retain reputable lending partners, and ensure that lenders and Realtors® know about and are trained on Florida Housing's programs

F. Enhance financing opportunities for active duty military and veterans

[G. Continue to support the community land trust model of home ownership to retain public investment and create a permanent supply of affordable housing and land stewardship.](#)

### • Homeownership Development Strategies

G. Market Mortgage Credit Certificates to lenders and builders to support development

H. Continue partnering with self-help builders [and community land trusts](#)

I. Work with state, regional and local disability organizations to tie the homeownership needs of their consumers into local SHIP and Florida Housing programs

J. Incorporate design techniques into housing that will make units functional for different family types, including the aging population and multi-generational families

K. Incentivize the inclusion of green building features in homeownership development programs

L. Ensure that local governments [and their partners](#) receive training and technical assistance to implement SHIP development strategies, including rehabilitation, accessibility ~~and~~ green building techniques, [and perpetual or long term land stewardship tools](#)

• **Homeownership Sustainability Strategies**

M. Encourage homebuyer education for borrowers

N. Provide training and technical assistance to support strong local housing counseling agencies, including training on operating successful nonprofit businesses

O. Support post-purchase and post-loan modification education and training

P. Promote financial management/literacy education

**II. PRIORITY: Ensure that rental programs are [meeting housing needs in a manner that best serves the public interest.](#)**

~~[A flexible enough to respond to housing needs in Florida's diverse communities and can respond to changing market conditions](#)~~

A. Use market, investment and housing need data to assist in targeting resources to match needs throughout the state [and respond to changing market conditions](#)

B. Enhance the capacity to use property construction cost and operating expense data to assist in allocating resources and in credit underwriting

C. ~~[Prioritize Continue work on a comprehensive preservation strategy to save](#)~~ [critical, aging affordable properties that are worthy of preservation, especially those that are in danger of losing project based federal subsidy and](#) including those in Florida Housing's portfolio

D. Implement strategies to target development that will support local revitalization and economic development efforts

E. Continue to foster a more integrated approach between Florida Housing's asset management and development teams to keep development costs down while incentivizing sustainable development that lowers operating costs over the long term

F. Incentivize the inclusion of green building features to lower operating costs, and accessibility/visitability features that accommodate the physical disabilities and frailty of household members and their visitors

G. Incentivize high quality management of properties in Florida Housing's portfolio

H. Develop partnerships with public/private utilities to build a more robust energy retrofit strategy for properties in Florida Housing's portfolio

I. Provide liquidity for future affordable housing needs by thoughtfully managing Guarantee Program assets and safeguarding the risk to capital ratio while ceding risk

[J. Ensure that rental housing remains affordable for the longest term possible](#)

[L. Allocate subsidies to meet the most critical unmet needs](#)

[M. Avoid over-subsidizing units](#)

[N. Avoid the loss of important or irreplaceable housing stock, such as federally subsidized project base housing for Floridians that might otherwise be homeless or unnecessarily institutionalized](#)

[O. Promote citizen participation in rulemaking](#)

[P. Consider the public benefit of housing delivery by mission based nonprofits](#)

[Q. Use the framework that Florida Housing exists for the public purpose of producing and preserving affordable housing, in contrast to an institutional lender that may be guided by maximizing return on investment or avoiding risk](#)

**III. PRIORITY: Enhance opportunities for special needs and homeless households to access rental housing paired with supportive services**

A. Enhance implementation of the Link strategy as a way to integrate units for extremely low income households with special needs into general occupancy units throughout Florida Housing's portfolio

Draft Strategic Plan • June 2014 • Page 3

Exhibit A Page 3 of 4

- B. Develop a supportive housing model that supports elders aging in place by facilitating and supporting partnerships between developers and health care and other supportive service providers
- C. Continue work to support development of a range of supportive housing options to assist veterans with special needs to live independently in their communities
- D. Strengthen partnerships with state agencies responsible for Medicaid and supportive services
- E. Continue outreach and partnerships with stakeholders in the supportive housing community
- F. Work with state agencies, supportive service providers and developers to compile data for policy makers that evaluates resident outcomes and public cost savings of permanent supportive housing
- G. Work with partners to [preserve and](#) bring [new](#) federal rental assistance funding into Florida to help extremely low income [families](#), elders and persons with disabilities

**IV. PRIORITY: Ensure that information about Florida Housing's programs and the role that affordable housing plays in our state's economy is accessible and understandable to government officials, stakeholders and the public**

- A. Inform federal, state and local officials about affordable housing programs, issues and solutions
- B. Provide easy access to information about Florida Housing programs through various communication media, including internet, print and broadcast
- C. Create a customer focused approach to help different types of developers access Florida Housing's programs, from application for financing, to credit underwriting, to property and asset management
- D. Develop and maintain relationships with local, state and business partners to deliver programs

**V. PRIORITY: Strengthen Florida Housing's operational capacity**

- A. Attract, support and engage a skilled and productive workforce
- B. Preserve the corporation's financial strength in order to serve the needs of Floridians well into the future
- C. Automate, enhance and streamline work processes that are supported by technology
- D. Continue to enhance data and records management through a systematic, planned approach to ensure information is accurate, complete and accessible
- E. Establish an environment in which risk assessment and mitigation is integrated into all business practices and decisions, [while maintaining focus on the public purpose of increasing the production and preservation of affordable housing](#)

**PERFORMANCE MEASURES AND TARGETS**

(To be completed)