



Southern Affordable Services, Inc.

September 26, 2013

Steve Auger, Executive Director
Ken Reecy, Director of Multifamily Housing
Florida Housing Finance Corporation
227 N. Bronough St., Suite 5000
Tallahassee, FL 32301

Re: RFA Grant for Homeless Persons

Dear Steve and Ken:

We are writing to provide comments with regard to the draft RFA Financing to Build Permanent Supportive Housing for Homeless Persons and Families. Our comments are as follows:

Attachment 2 – Non-Profit Applicant’s Articles of Incorporation

The current draft requires that the Non-Profit Applicant’s Articles of Incorporation document that since August 1, 2012 or earlier, the Applicant entity has had a primary mission that includes Homeless Persons.

Suggestion: Delete this requirement entirely or modify the requirement to add that so long as it is stated in the articles of incorporation by the RFA deadline and submitting other documentation demonstrating efforts to assist homeless persons on or before August 1, 2012. We are concerned that the wording of this requirement may be narrowly construed which would result in otherwise experienced, qualified not-for-profits being disqualified.

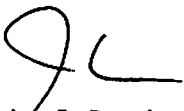
We are a 501(c)(3) not-for-profit organization that has provided extensive efforts to assist homeless persons and families in the Central Florida region since prior to August 1, 2012. However, our articles of incorporation provide that our primary purpose is to “relieve the poor and distressed by developing, owning, and operating housing for rent to eligible individuals with low and moderate annual income at affordable rates”. Although our articles of incorporation do not specifically mention “Homeless Persons”, we believe that our articles of incorporation’s purpose does encompass serving “Homeless Persons” and, as described below in our “New Moves Partnership”, we definitely serve Homeless Persons. However, we are also experienced with the typical litigious nature of FHFC funding cycles and so, to avoid any

potential challenge, we would suggest that FHFC either eliminate this requirement (the statute authorizing the funding only requires it be awarded to private not-for-profit organizations and does not require the not-for-profit's articles of incorporation to have a primary purpose of serving Homeless Persons) or modify the requirement by changing the date to this being in the articles of incorporation by the RFA deadline so long as the applicant can otherwise document efforts to address homelessness before August 2012.

As mentioned above, through our "New Moves Partnership" program, SAS has assisted 194 families who are newly homeless as a result of job loss, death, health issues and other non-controllable events that have led to the loss of a home. SAS, in its homeless efforts, through the "New Moves Partnership", works with case managers of various agencies, charitable organizations, and faith-based organizations while also arranging for housing for the clients at multi-family communities at free or drastically reduced rates. In June 2012, the City of Orlando recognized SAS's "New Moves Partnership" program by proclamation as we surpassed the milestone of assisting over 100 homeless families. We invite you to learn more about us and the "New Moves Partnership" at our website – <http://southernaffordableservices.org/givingback>.

Thank you for your consideration.

Sincerely,



Jay P. Brock

cc: Bill Aldinger - FHFC