TO: Kevin Tatreau

FROM: Alison Colvard

CC: Steve Auger, Nancy Muller, Bill Aldinger

RE: Housing Tax Credits

DATE: June 18,2013

Kevin,

Thank you for the steps that Florida Housing Finance Corporation (FHFC) is taking in meeting the critical need for housing for persons with developmental disabilities. In moving forward to implement those steps into an application process, we ask the FHFC adopt the following recommendations:

- 1. Provide an automatic 30% boost in housing tax credits to any development providing at least 80% of their housing units to persons with developmental disabilities.
- 2. Provide low interest cash flow only loans or grants similar to SAIL to fill the gaps in funding for persons with developmental disabilities.
- 3. If any consideration is to be given to leveraging when evaluating developmentally disabled communities, that it be on a per bedroom basis instead of a by unit basis. If a three bedroom unit houses three households (three persons with developmental disabilities), the cost of that three bedroom unit cannot be compared to the cost of a one bedroom unit that houses only one family. While there is certainly a place for different bedroom sizes in a community, a three bedroom or larger unit provides the greatest affordability to a persons with developmental disabilities on a limited income.
- 4. A Total Development Cost (TDC) per unit of \$163,000 is insufficient to provide for the construction and soft costs of a larger bedroom unit or a community that needs a larger clubhouse to provide for needs of the developmentally disabled. Please consider a staggered cost system based on the number of bedrooms per unit. For example, a one bedroom unit could have a TDC of \$153,000, a two bedroom unit a cost of \$163,000, and three bedroom unit a cost of \$178,000, and a four bedroom a cost of \$193,000 with at least a 10% adjustment upwards for developmentally disabled communities.
- 5. When considering TDC for a developmentally disabled community, please allow for flexibility with greater TDC costs than the maximums mentioned above. Limit the amount of tax credits a community can receive to these TDC maximums. However, a community to provide for greater supports or services that a specific developmentally disabled population may need with higher TDC. These costs do not have to be eligible for housing tax credits, but should not disqualify a community from moving forward.

Thank you for your consideration.