



**Southern Affordable Services, Inc.**  
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October 31, 2014

**VIA EMAIL**

Florida Housing Finance Corporation  
Attn: Ken Reecy  
227 N. Bronough Street, Suite 5000  
Tallahassee, Florida 32301

Florida Housing Finance Corporation  
Attn: Bill Aldinger  
227 N. Bronough Street, Suite 5000  
Tallahassee, Florida 32301

Florida Housing Finance Corporation  
Attn: Steve Auger  
227 N. Bronough Street, Suite 5000  
Tallahassee, Florida 32301

Subject: Homeless "Goal" Other Large County RFA

Dear Ken, Steve and Bill:

As you know, since 2009 our organization has been operating a program called "New Moves Partnership" which has to date assisted over 300 homeless individuals and/or families in obtaining housing by partnering with participating apartment owners to allow these clients to move in and live in those communities. In fact, our 300<sup>th</sup> New Moves family moved into Valencia Forest which was financed with Florida Housing MMRB and 4% HC. The focus of the "New Moves Partnership" is on families that are homeless due to acute economic hardship resulting from job loss, death, health issues and other non-controllable events that have lead to the loss of suitable housing. These are the folks that might find themselves living in a weekly motel or, unfortunately, a family "living" in a vehicle. Our "New Moves Partnership" program focus is not on the population of those that would be considered "chronically" homeless.

A major part of the success of our program is the presence of being able to partner with case managers at various agencies, other not-for-profit organizations and religious organizations that provide resources and services so that the landlords that are offering the housing component knows that these families are getting much needed assistance beyond their housing. We have partnerships with Harbor House, Catholic Charities, The Sharing Center, Northland Church, Union Rescue Outreach Mission, Community Food and Outreach Center, Metropolitan Ministries, Children's Home Society and First Baptist of Orlando. These organizations assist with the "case management" component and we work with the landlords to provide the clients with suitable housing in apartment complexes. The management companies and owners that offer the housing component include AGPM, Pinnacle Management, Bainbridge Management, Hampton and Hampton Realty, Royal American Management, PMI Management and Concord Management.

It is our intention to be able to take the next step and own and develop a community for "New Moves" families by applying in the upcoming RFA cycle for the "homeless" demographic qualification.

Our concern is that it appears that the required resident programs and the selection of the minimum number of other resident programs for "homeless" applicants might result in unintended consequences of resources not being utilized efficiently. Specifically, the "Case Management" requirement that the Applicant or Management Company must provide a Case Manager (at least one for every 25 Homeless or formerly homeless resident families) and that such person acting as a Case Manager must possess at least a bachelor's degree in human services or a related field. We see a couple of issues with this.

1. First, as it is drafted, it seems the "Case Manager" must be an employee of the owner or the management company. Can this requirement be met by partnering with an agency or other not-for-profit that provides these services rather than requiring the Applicant of the Management Company to employ this person when it can be accomplished by another agency dedicated to those individuals' needs? We agree a case manager should be involved and our New Moves Partnership requires a case manager. But we believe the current draft should allow the case manager to be from a partner organization. Even though we also require a case manager, often the programs involved like Medicaid or "VASH" have a mandatory requirement of "case management". In summary, please allow this requirement to be met through an agreement with another organization.
2. Second, an informal survey of the case managers that we have been working with and are some of the most dedicated do not meet the draft RFA's current requirement of at least a bachelor's degree in human services or a related field. Not all the best most experienced case managers meet this qualification. This is too narrow. If a social service agency or not-for-profit employs this person as a "case manager" we believe we should rely on those organizations to hire qualified "case managers" regardless of a specific educational degree. This is what these agencies do day in and day out and they hire case managers from a variety of education backgrounds.
3. Another concern in the current draft is the awarding of points for "Management Experience with Permanent Support Housing (up to 20 points)". First, we cannot locate any definition of "Permanent Support Housing" elsewhere in the RFA instructions or Rule 67-48 Draft. Secondly, we believe what we offer and have been offering as assistance with our New Moves Partnership and the related experience should garner experience points however it is defined. We believe any definition should cover experience with the community's intended targeted "homeless" clients, whether the targeted group is more of the "chronically" homeless or those that we serve that are experiencing "situational" homelessness. Our clients that are served do require assistance beyond a "roof" over their heads, but maybe not as comprehensive or intensive services as those that are generally considered "chronically" homeless who may suffer from mental illness or other debilitating factors. But we hope you are open to the category of "homeless" we serve and allow us to compete by judging our experience based on the component of the "homeless" population we serve.

*Ken Reecy, Steve Auger and Bob Aldinger*

*October 31, 2014*

*Page 3*

We would also like to suggest two other changes to the current draft in connection with the "homeless" goal:

1. **Local Government Contributions:**  
Please give automatic points for the "homeless" demographic applicants. Requiring this gives an opportunity for "nimbyism" in certain municipalities.
2. **Points for Contributing Developer Fees as Resource for Operations:**  
Please consider awarding additional points if the developer contributes its Developer Fee (more than the 5% in the rules if fee is 21%) for use as a reserve to assist in funding operations. This would be essential for the long term success of the community and would provide a meaningful scoring item.

If you have any questions, please do not hesitate to contact me.

Sincerely,  
SOUTHERN AFFORDABLE SERVICES, INC.



Jay P. Brock  
Executive Vice President of sole member general partner