

**From:** Shannon Nazworth [<mailto:snazworth@abilityhousing.org>]  
**Sent:** Friday, October 31, 2014 2:48 PM  
**To:** Ken Reecy  
**Subject:** RFA 2014-115 & RFA 2014-116

Dear Ken,

Thank you for the opportunity to provide comments concerning the referenced RFAs. Florida Housing's continuing efforts to seek stakeholder input is greatly appreciated. My comments are limited to the homeless projects.

During meetings in Tampa, it was stated that Florida Housing's goal is to break the state into four regions – Southeast Florida, South Florida, Central Florida and North Florida – and to fund homeless projects in each region. Given an annual SAIL allocation capable of funding two homeless projects each year, this would mean each region will be awarded a homeless project every two years. This is a commendable goal, and I support it. Creating predictability for nonprofits wishing to develop supportive housing for homeless households will greatly assist the state in its efforts to reduce the number of persons experiencing homelessness.

However, as the RFAs are currently drafted, this is not possible. Miami-Dade is guaranteed one project while the remaining 6 counties must compete for the second project. I am aware that there are dynamics associated with Miami projects that led Florida Housing to issue a separate RFA for that county. However, I do not believe this solution is appropriate for homeless projects. Not being familiar with the specifics of Miami-Dade, I cannot offer a specific recommendation for how to address the issue for homeless projects. But I request Florida Housing consider other options for selecting which homeless projects to fund. According to the "2014 Council on Homelessness Report", Miami-Dade has 25.6% of the homeless population within the 7 large counties; it should not be guaranteed 50% of the homeless resources.

Should Florida Housing choose to not amend this aspect of the RFAs, I ask that should a homeless project not be selected in RFA 2014-116 the funding be awarded to the next unfunded eligible homeless project in RFA 2014-115.

With regards to the specifics of the RFA, previously - because some localities do not promote housing for homeless persons - homeless projects were exempted from the Local Government Contribution requirement. This exemption should be reinstated for the RFA.

With regards to the Leveraging calculation, please be sure to include applications that selected and qualified for the homeless demographic commitment with the HCA projects to have the product divided by 1.3.

Regarding the Resident Services for Homeless Projects, we suggest a more limited definition for "Special Resident Hardship Fund". This program should be limited to rent and utility assistance, including move-in expenses. Being a landlord that serves homeless households, I can tell you that objectively defining "hardship" and "necessity" with regards to the need for food and medicine is more than a property manager/owner should be required to do.

Additionally, as described this program expands the services directly provided by the landlord beyond housing related services. Given zoning concerns related to supportive housing, requiring such an expansion for the program is potentially problematic. For applicants that are not concerned about potential zoning issues associated with what they will commit to in the application, the option to select a separate program for food and medical emergency assistance, separate from the “Special Resident Hardship Fund”, can be provided.

Regarding the eligibility for Case Managers, we recommend expanding eligibility to also include persons with an AA degree and two years’ experience working with persons experiencing homelessness.

Regarding the requirement to identify the remaining members of the development team within 7 calendar days of the invitation to credit underwriting, we suggest omitting the General Contractor. Given the tight turn-around time from scoring to board approval to issuance of the invitation, to have the General Contractor identified within 7 days this negates the ability to bid the project and ensure all resources are being utilized in the most efficient manner.

Thank you, again, for this opportunity to provide comments. If you would like clarification concerning any of these comments, please do not hesitate to contact us.

Have a good weekend,  
Shannon Nazworth  
Executive Director



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