

WENDOVER

HOUSING PARTNERS

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February 19, 2018

VIA E-MAIL

Marisa Button
Director of Multifamily Allocations
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Tallahassee, FL 32301
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**RE: RFA 2018-103 – Housing credit and SAIL Financing for Homeless Housing
Developments Located in Medium and Large Counties**
Requirement for Non-Profit Board members to submit IRS Form W-9 or IRS Form 8821

Marisa:

Wendover Housing Partners appreciates the opportunity to comment on RFA 2018-103 following the recent workshop.

In addition to the issue of Non-Profit entities as the only eligible applicants to this RFA, **another area of concern is the requirement for all board members of the non-profit applicant to submit IRS Form W-9 or IRS Form 8821.**

Board members of non-profit entities are required to be disclosed on the Principals of the Applicant and Developer(s) Disclosure Form (“Applicant Disclosure Form”). Because the Board Members are disclosed on the Applicant Disclosure Form, the Board Members will be required by submit either IRS Form W-9 or IRS Form 8821, even though the Board members will not receive a direct or indirect financial benefit from the Development.

Board members for non-profit entities serve only in an advisory capacity and receive no salary, thus, they and are **not** Financial Beneficiaries as defined in the Rule. Therefore, they should not be required to submit IRS Form W-9 or IRS Form 8821. These forms force non-profit board members to unnecessarily disclose confidential personal information. As a result of this requirement, Wendover has experienced Board Members (many of whom are in the public eye) willing to step down, causing the project team to lose the invaluable advice of these volunteers.

For these reasons, we respectfully request your reconsideration of this requirement.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan von Weller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ryan von Weller
Wendover Housing Partners