



October 16, 2019

Marisa Button
Director of Multifamily Allocations
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: RFA 2019-116 SAIL Financing of Affordable Multifamily Housing Developments to be Used in Conjunction with Tax Exempt Bonds and Non-Competitive Housing Credits

Dear Ms. Button:

We appreciate the opportunity to comment on Florida Housing Finance Corporation (FHFC)'s proposed changes to the next SAIL RFA (2019-116), presented and discussed at a workshop on October 8th, 2019, and value FHFC's partnership in administering the Low-Income Housing Tax Credit (Housing Credit) Program.

Enterprise Community Partners (Enterprise) is a proven and powerful nonprofit that improves communities and people's lives by making well-designed homes affordable. We bring together the nationwide know-how, partners, policy leadership and investments to multiply the impact of local affordable housing development. Over more than 35 years, Enterprise has created 585,000 homes, invested more than \$43 billion and touched millions of lives.

Enterprise strongly objects to the provision for "Self-Sourced Applicants" to retain the right to seek a qualified contract, as detailed in Section G.3 of the RFA 2019-116 recently issued by FHFC.

FHFC currently has exemplary policies for preserving long-term affordability of properties developed under the Housing Credit program, with a 50-year affordability requirement and waiver of qualified contract (QC) for both the 9% and 4% projects. FHFC should under no circumstances lessen those requirements and accept just 15 years of affordability for "Self-Sourced Applicants." While these applicants may be bringing their own funds to a project, these projects will still utilize federal Housing Credits.

The clear Congressional intent is for Housing Credit properties to provide a minimum of 30 years of affordability. Due to the way the Housing Credit market has evolved and functions today, the QC has become a mechanism to avoid fulfilling that intent. That is why Congressional leaders have introduced bipartisan, bicameral legislation, *The Save Affordable Housing Act* (S.1956, H.R.3479), to eliminate the QC provision going forward and modify the formula for determining the QC price for existing properties.

FHFC's proposal is a big step backwards in efforts by Florida and other states to ensure that the current QC provision does not subvert Congress' intent in requiring extended affordability. FHFC should remove this provision from the RFA.



If you have questions about these comments or the many ways in which other state Agencies limit access to the QC process, please feel free to reach out to me or Sarah Brundage, senior director, public policy, at sbrundage@enterprisecommunity.org or 202-403-8001.

Thank you for your continued work to address housing affordability in Florida.

Scott Hoekman
President & CEO
Enterprise Housing Credit Investments, LLC
Shoekman@enterprisecommunity.com
410-964-0552