

Marisa Button  
Multifamily Development Programs  
27 North Bronough Street, Suite 5000  
Tallahassee, FL 32301

Dear Marisa:

Thank you for the opportunity to provide comments to Florida Housing Finance Corporation's (Florida Housing) rule development process. Florida Housing's openness to stakeholder input is welcomed and appreciated.

The Florida Supportive Housing Coalition (FSHC) would like to express its opposition by Florida Housing to eliminate the goal that a non-profit be selected in its Medium and Small RFA process. We understand the difficulty you may have with the current definition and that a simple 501(c)3 status verification does not achieve the intent of Florida Housing or FSHC wanting to support established non-profit organizations with a commitment to the community and the tenants.

We are asking that Florida Housing not abandon its goal of supporting 100% non-profits but continue to work on developing a robust methodology for defining a 100% non-profit. This is important because we believe a 100% non-profit brings a commitment and understanding of the needs of low income and extremely low-income tenants that for-profits do not. These organizations have deep community roots and the knowledge and ability to leverage community resources. Many of these non-profits, however, do not have the same capital investment to compete with a for-profit or to file legal challenges.

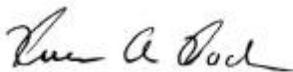
Florida Supportive Housing Coalition commits to assisting Florida Housing to achieve its initial goal of increasing the capacity of non-profit organizations. We are also available to help strengthen the difference between a 100% nonprofit from a for-a profit who mainly creates a non-profit only to compete in this arena but has no history or goal to a long term commitment of serving the residents for which Florida Housing issued the RFA.

Florida Supportive Housing Coalition to assist Florida Housing to achieve its initial goal of increasing the capacity of non-profit organizations and are available to help strengthen the difference between a 100% nonprofit from for-a profit who mainly acquires a non-profit status only to compete in this arena but has no history or goal to a long-term commitment of serving the residents for which Florida Housing issued the RFA. We also recommend that only developments in which nonprofits are active participants, with controls and responsibilities, be considered within any definition of a Nonprofit.

Lastly, we reiterate our prior comments that when a development is dedicated to serving Homeless and Special Needs households that mission-focused nonprofit developments be selected before for-profit developments. Demonstrated experience in operating supportive housing is essential to the success of the residents and the property Nonprofits versed in best-practices, with control of the operation of the properties, are the best stewards of state and public resources of housing targeting these households.

Please let us know how we may assist Florida Housing in developing its policies regarding nonprofit developments.

Thank you,



Karen A. Koch  
Executive Director