



Florida Supportive Housing Coalition

P.O. Box 11242 • Tallahassee, Florida 32302 • www.fshc.org

October 14, 2021

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

Re: RFA 2022-103; Housing Credit and SAIL Financing to Develop for Homeless Develop Persons Located in Medium and Large Counties

Dear Ms. Button,

I am writing on behalf of the Florida Supportive Housing Coalition (FSHC). Thank you for Florida Housing's ongoing commitment to engage stakeholders in the development of its RFAs and policies. Your receptivity to the input of organizations that serve the residents of Florida Housing financed properties continues to evidence the Corporation's on-going commitment to produce housing that best meets the needs of the people being served.

As a coalition of major leaders and stakeholders in Florida's supportive housing industry, FSHC strongly believes that Non-Profit Entity control over the development and operation of supportive housing development is essential to ensure that the result is 1) of the highest quality in housing and services; 2) consistent with best practices in the field; and 3) sustainable over 50-year term compliance periods. We are very appreciative of the Corporation's commitment to management control and material participation by non-profit entities as reflected in the definition of "Non-Profit Applicant" and establishing the goal of funding a 100 percent non-profit applicant.

We strongly believe that requiring that the non-profit entity receive 51 percent of the Developer Fee is the best way of ensuring that the Non-Profit Entity exercises control over the development and long-term operation of supportive housing. We are confident, given the limited number of projects that are funded annually, that qualified joint venture development partners can be identified to meet non-profit needs. If the non-profit has 51 percent ownership, 51 percent of the management control, and is primarily responsible for the provision of services and the long-term viability of the project, it should also receive 51 percent of the Developer Fee. This is also the most meaningful way to build the capacity of non-profits to undertake future projects.

We endorse the requirements for the Executive Director Certification of Non-Profit Entity Qualifications Form for evaluating the qualifications of a non-profit entity. We also think Florida Housing should require the submission of the past three years of Form 990 (not 990-EZ or 990-N); which should reflect a mission and programs of serving the target population for the RFA. A non-profit that only has to submit a 990-EZ or 990-N may not have the capacity to own and manage a Florida Housing funded housing project.

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Likewise, we welcome the Resident Community Based Services Coordination Experience Requirements, which are consistent with qualification requirements for developers and property management companies. In addition, we encourage FHFC to verify all information contained within the application, especially that information which resulted in being selected for funding, both in underwriting and ongoing compliance monitoring.

One of the questions raised was “How should FHFC score PSH providers entering a market compared to those already active in a market?” We determined it is hard to develop an objective method which would not also make it hard for both established and “new entrant” organizations to serve new markets. However, we encourage all scoring related to partnerships, etc. to be weighted based upon the amount of specificity as to what the applicant has or will do; with greater weight placed on the role and community relationships of the nonprofit service provider in applications that are joint ventures with for-profit entities.

Finally, FSHC appreciates the opportunity to continue to work with FHFC to discuss how best to implement joint ventures between non-profit and for-profit entities in future Homeless, Persons with Special Needs and Disabling Condition RFAs as well as other issues. FSHC continues to believe that properly structured Non-Profit/For-Profit partnerships are needed to increase the supply of permanent supportive housing commensurate with the need and we hope these recommendations contribute to that goal.

FSHC continues to greatly appreciate Florida Housing’s leadership in increasing the supply of quality supportive housing. And we, again, thank you for welcoming all stakeholder input. We look forward to continuing to work with Florida Housing to provide quality supportive housing for all Floridians in need.

Thank you,



Olga Golik
Board President