

Hello Florida Housing folks:

Please consider these comments when you are developing the Housing Credit and SAIL PSN RFAs for the coming year.

1. **Grab bars:** I think all tubs and showers in ALL housing, but especially all elder and PSH housing units should include grab bars as a matter of course – one in the tub/shower, and one right outside the tub/shower. While many people see a grab bar and don't think it's useful for them, both personal experience and that of family/friends has convinced me that people don't realize how helpful they can be, even as a simple place to grab to keep one's balance, no matter our ages or abilities. They are great for children, too. But for PSH properties, I think they are essential, and they are low cost. In summary, they should be a requirement in all bathrooms.
2. **Walk-in showers:** I believe showers are a safer alternatives to bathtubs, and I applaud Florida Housing for considering this requirement. Florida Housing is proposing a walk-in shower, which online is defined as not having a curb so that one can just roll a walker or wheelchair into the shower. I am not convinced that most people need this level of support in a shower. The design of many walk-in showers is such that the bathroom floor outside the shower can be wet and a hazard in itself, particularly if the shower curtain drags on the floor as I've seen in some ADA-compliant walk-in showers in hotels. If Florida Housing is going to require walk-in showers, please consider providing guidance or more specificity regarding the type of walk-in shower required (there seem to be several options). For most residents, a small step over into the shower (especially with a grab bar for support) will be an adequate approach and easier than a tub. Additionally, shower stalls should be big enough for a shower chair and ideally have a way to allow someone sitting to control the water flow from the shower (this latter can be a reasonable accommodation).
3. **Security features:** Regarding 24-hour video security, please strike the word "monitoring" from 24-hour video recording. Also, if staffing of a front desk is to be required (not a bad idea, but quite an expense for a more than full time staff, assuming day, evening and weekend coverage), Florida Housing should specify what is expected to ensure that this requirement is similarly implemented across developments.
4. **Narrative sections:** It is a good idea to combine the two community-based services narratives, particularly because the (mostly) same transportation access information is provided in each narrative. Th transportation information can take a page or more in each of the current narratives. If these two narratives are combined, please consider increasing the overall number of pages allowed to a total of five (5) for the new narrative.
5. **Application Selection Process:**
  - a. The proposed addition of Priority 1 applications is a sensible way to ensure that a wide range of qualifying developers have an opportunity to be selected for funding.
  - b. The proposal made in the September 6<sup>th</sup> PSH Meeting to change the selection process to one that bases selection on tiebreakers once an application has received a minimum score changes the process to focus on objectives which are less important to Florida Housing and creates more of a lottery approach. Goals have always been useful in

application selection and should be continued. But tiebreakers, which in the past have allowed Florida Housing to choose one application over another in the unlikely event of a tie, are currently less important than the scores themselves. Practically speaking, the new proposal would make the tiebreakers more important (as long as a high score is received). Any tiebreaker used for this purpose would take on momentous importance. For instance, if private transportation is the first tiebreaker, then every application will include it, even in situations where knowledgeable development organizations believe that it is more important to focus operating dollars to staff a front desk than to provide private transportation. It's important that Florida Housing continue to provide the flexibility needed to allow for a range of resident needs to be met – what's good for one resident group in a particular location is not as useful for a different group in another location. Of course it is frustrating when an application receives 1-2 points less than another application, but this seems preferable than to focus on a few tiebreakers.

- c. Raising the use of leveraging to choose PSH developments (vs how leveraging has been to date fairly low on the list of application selection strategies for PSH) seems counter-intuitive to ensuring that residents get to live in properties with a robust set of property amenities. If Florida Housing is concerned about the level of development costs being proposed in PSH applications, it would be helpful to have a discussion with the development community.

Thank you for the opportunity to comment on proposals Florida Housing has made for the upcoming PSH RFAs. As always, we know that the work you do in this area is tough, balancing a variety of needs to help Florida better serve its residents.

Sincerely,  
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