

From: [Shannon Nazworth](#)
To: [Zach Summerlin](#)
Subject: Public comment on behalf of FSHC Policy Committee
Date: Saturday, September 23, 2023 10:57:29 AM

Dear Zach,

As always, thank you for Florida Housing's proactive engagement with stakeholders as it develops its RFAs. These efforts have been a key factor in Florida's progress in addressing the housing needs of its most vulnerable citizens. The Florida Supportive Housing Coalition (FSHC) looks forward to working with all stakeholders to optimize the use of the state's affordable housing resources for persons with special needs (PSN).

The FSHC Policy Committee met to review the Agenda for the Specialized Demographics Workshop held on September 6th. Below are our comments concerning the proposed changes. There is concern that Florida Housing is shifting towards a "blanket approach" when addressing special needs populations as if they have the same needs and requirements. The impact incentivizes items that are not correlated with optimal outcomes for Permanent Supportive Housing (PSH) residents.

The objective of PSH is to support the maximum independence of all residents, not to treat them differently based upon the fact that they have a special need. Several of these proposed changes appear to make assumptions on residents' needs that do not apply to all PSH residents. To achieve the goal of optimal outcomes, it is critical to allow PSH providers to individualize the level of service each household receives, which is a best practice for this population.

We strongly encourage you to reevaluate the following proposed changes.

General Construction Features

- Security – requiring 24-hour video monitoring will be very cost prohibitive and recommend omitting this requirement.
- Delivery rooms or designated package pick-up areas – are frequently a challenge for management. Each member of the committee that operates PSH has not had tenant issues with having packages dropped at the leasing office and retrieved by tenants during normal office hours.
- Walk-in showers – this should not be required in all units with one bathroom; some persons require or prefer a tub rather than walk-in shower; and some families with small children rent studios or 1-bedroom units and need the tub to bathe their children.

Private Transportation

- FSHC strongly disagrees that this be a point item. There are many instances where private transportation is not needed. We want to foster PSH residents' independence to the greatest level possible. Setting the bar too low is contrary to that objective and not in their best interests.

If private transportation is a 10-point item all applicants will be forced to select it to have a viable application; this will cause unnecessary expenses for the operation of the properties.

Additionally, not all residents of PSH properties are PSN, we don't want that level of concentration. Requiring that the van be available to all residents is also extremely cost prohibitive.

Application Selection Process

- FSHC strongly disagrees with setting a minimum score and then instituting tie-breakers to select funded applications. There was mention of a threshold of 75 before instituting tie-breakers. We believe this is too low..
- If the intent is to forego having a 1 or 2 point difference in score dictate selection, then we recommend that tie-breakers commence only if there is a 3-point or less difference between top scoring applications; don't set a low threshold score to be eligible for tie-breakers.
- For tie-breakers, please use items that advance PSH best practices; the most important of which is ensuring that the PSH is provided by an organization with the capacity and experience to produce strong tenant outcomes. The possible tie-breakers referenced in the agenda have nothing to do with PSH. FSHC recommends the following:
 - A nonprofit is in charge of running the property once it opens, including selection of the property management company; if the application is a JV with a for-profit developer this can be verified in the JV agreement and must remain throughout underwriting, closing and monitoring
 - A nonprofit (or one or more nonprofits) receive at least 50% of the developer fee
 - A nonprofit is the owner at the end of the compliance period

We welcome the opportunity to discuss with you in further detail our comments and concerns..

Thank you again for allowing us to participate in the workshops. We value the partnership FSHC has had with Florida Housing and hope you reconsider your proposed changes to the RFA process so that those PSH providers can continue serving this vulnerable population.



FSHC Policy Committee