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Melissa Levy, Assistant Director of Multifamily Housing
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Ms. Levy,

Thank you for the opportunity to comment on upcoming funding opportunities with Florida Housing.

This comment is not RFA specific but is an overall comment for future RFAs.

Background: Public Housing Authorities are required to procure developers through an open Request for Qualifications (RFQ) solicitation in accordance with the procurement process prescribed by HUD. Once procured the parties enter into an agreement that binds them for a particular time and allows the developer to submit applications on behalf of the joint venture (JV) partnership. Procurements take months to accomplish. They involve preparing the solicitation document, which is approved by the board, advertising the solicitation, and then the received solicitations are scored, the respondents vetted and interviewed and then a recommendation is made. The process is very time-consuming and is completed with the board approving the final choice.

Not all developers have the knowledge and experience to consummate and finalize a PHA or HUD transaction, most of which are very convoluted and laborious. This results in fewer developers having the desire to partner with a PHA. Plus, there's the sharing of the developer fee which developers that work independently do not have. We are thankful for the developers that become partners in the mission of PHAs as it is, in theory, more work for less pay.


Request: We request that FHFC allow PHA JV partnerships the ability to submit additional Priority 1 applications in addition to the three that are typically allotted in an RFA. Not allowing for such has caused some PHA applications to be Priority 2 applications and has resulted in some experienced developers not responding to development partner solicitations because they can't submit a Priority 1 application for the PHA in an upcoming RFA. This has also resulted in a PHA's need to resolicit due to lack of responses to an RFQ. This may also result in a PHA's need to consider a less experienced developer partner because a more practiced developer cannot submit additional Priority 1 applications in an RFA. PHAs typically cannot submit applications

without a JV as they may not be able to provide the required guarantees, or they may not have the experience required of the application process.

PHAs won't typically submit more than two applications per RFA so the suggested request is for a PHA, and their JV developer to have the ability to submit up to three Priority 1 applications if the developer has no other Priority 1 applications otherwise a PHA can submit up to two Priority 1 applications if they are partnered with a JV developer that has additional Priority 1 applications. While we realize that some developers may gain an advantage in this scenario, to not allow this request greatly disadvantages PHAs. This type of allowance was permitted in the past and we request that it be reinstated in future RFAs.

Please let me know if you have any questions or would like further clarification of this concept.

Sincerely,



Jane Dixon, Senior Associate
TAG Associates Inc.