

PERMANENT SUPPORTIVE HOUSING

Property Management

GUIDEBOOK



SPONSORED BY:
The Florida Housing
Finance Corporation



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WHAT IS

Permanent Supportive Housing?

Permanent supportive housing (PSH) is an evidence-based housing model that combines affordable permanent housing with access to flexible supportive services. Supportive housing is designed for people with disabilities who are unlikely to be able to maintain stable housing without service-enriched housing. This combination of affordable housing and individualized support services helps individuals live healthier, more stable lives.

Typically, supportive housing is rental housing with a standard lease. The PSH apartments may be scattered through the community in mainstream apartment complexes or may be project-based rental units in one or more developments. In some cases, permanent supportive housing apartments are set-aside units in larger affordable subsidized housing complexes.

Combined with the rental housing are the individualized, flexible, and accessible supportive services. These services may vary widely and often include case management, health care coordination, behavioral health coordination, job and education coaching, assistance with daily living skills, transportation assistance, and assistance accessing mainstream resources such as food assistance and disability income.

Permanent supportive housing for those with disabilities not only saves lives and provides a platform for health and wellness, it also results in cost savings to public service systems.

Introduction

Affordable housing development begins with an idea or, for some, a vision. Bringing that vision to life starts with exploring choices, making decisions, and taking action. The same can be said about the permanent supportive housing (PSH) model. Permanent supportive housing is often more deeply affordable than general affordable housing and offers a permanent private residence in which to thrive – a very different, and much more effective, approach as compared to a congregate setting, an institution, and or an emergency shelter.

The idea or vision for PSH includes not only stable and affordable housing, but the supports needed to maintain housing stability for a lifetime. The visionaries who strive to become developers and operators of permanent supportive housing have a special challenge to not only make the home a reality, but to integrate the community-based supportive services needed by households with disabling conditions who tend to have experienced housing instability or homelessness.

The primary purpose of this guidebook is to provide a tool to assist you in the operation and maintenance of permanent supportive housing, including basic management operations, as well as the coordination and delivery of support services. Part I of this guide is focused on the advance planning of a permanent supportive housing project-based multifamily development. Part II focuses on predevelopment and development activities to build a quality project-based PSH development. In Part III, we highlight the operating and property management approaches and actions that qualify the PSH project property for affordable housing development financial assistance. Part IV rounds out the PSH project framework by providing an overview of how to integrate into the project the support services needed – those that will enable tenants with histories of housing instability or homelessness to achieve housing stability and wellness, even while living with disabling conditions.

This guidebook is sponsored by the Florida Housing Finance Corporation (FHFC) to help applicants for development financing to understand FHFC’s policies and regulations governing program design, operation, and compliance for permanent supportive housing. While applicants for funding may include for profit and non-profit organizations, or joint ventures between both, the guidance is primarily directed to the nonprofit, mission-based organization. The guidebook will also be

helpful for those who may be developing or operating PSH without FHFC financing because the basic tenets of good management and quality support services apply to any PSH project or program.

This guidebook describes the steps and milestones required to bring the initial concept of permanent supportive housing to successful development and sustainable operation. The ultimate goal, of course, is to position your project to provide a permanent residence for people who have faced serious challenges in finding a home that meets their needs for accessibility, affordability, and supports.

The guidebook was prepared by the Florida Housing Coalition, a statewide nonprofit organization whose mission is to bring together housing advocates and resources so that all Floridians have a quality affordable home and suitable living environment. The Florida Housing Coalition provides training, consulting, and technical assistance services in permanent supportive housing, as well as in community development, ending homelessness, affordable housing, and much more. Contact us if you have questions or stories to share!

Permanent supportive housing links decent, safe, affordable, community-based housing with flexible, voluntary support services designed to help the household stay housed and live a more productive life in the community. It looks and functions much like any other brand of housing. People living in supportive housing have a private and secure place to make their home, just like other members of the community, with the same rights and responsibilities. The difference is that they can access, at their option, services designed to build independent living and tenancy skills, assistance with integrating into the community, and connections to community-based health care, treatment, and employment services. (USICH)

Part I

Planning a Permanent Supportive Housing Community

Choices and Decisions

As an organization contemplates the possibility of developing and operating permanent supportive housing, it is helpful to begin with a framework for exploring the project concept and consider the overall process of making initial decisions through the development process. It is important to understand the complexity of this type of housing, including the long term legal, financial, and operational obligations that are involved.

This section outlines the choices and decisions that are followed by pre-development, development and management of permanent supportive housing. The development of affordable housing is a complex and time-consuming process. It is essentially multifamily real estate development, made more complicated by the many strings attached from the source(s) of financing and regulatory constraints.

The graphic below shows the general sequence of the development of affordable housing, from concept to lease up and operation.

The initial decision to pursue the development and operation of permanent supportive housing is contingent upon the consideration of several basic but essential questions.

- Is it right for our organization?
- Will this project further the mission, vision, and strategic plan of our organization?
- Does our organization have the time, capacity, and resources to launch a development project?
- Is there a clear picture of the need and demand for the type of housing being considered?
- Can the project be built as designed and be operated with the intended rent levels expected from the intended residents, or will fundraising and grantwriting be required as a permanent activity to successfully operate the housing? If the latter, does our organization have the capacity to ensure success in those arenas?
- What specific type of project would be appropriate for our organization and most compatible with our mission?
 - A single site project such as an apartment complex?
 - Scattered site housing such as geographically dispersed individual units detached or attached, that are leased with rental or other subsidies?
 - Unit set-asides in an affordable housing project where the owner designates a specific number of units for persons with disabilities or special needs?



While the residence type may vary, the common element in permanent supportive housing is independent living with voluntary supports that are not provided by the property manager. Permanent supportive housing does not include shelters, transitional housing, group homes, assisted living facilities, any other congregate setting, or other specialized licensed residential facilities.

There are many other elements that require decisions during the conceptual phase of a permanent supportive housing project. These additional considerations, along with an assessment of available resources and opportunities, will shape the outcome of the project.

- Will this be new construction or acquisition and rehabilitation of an existing structure?
- What is the size and scale of the property?
- What are the locational criteria for the project?
- Who is the target population?
- What are the roles of the principals (i.e., owner, developer, manager, or a combination)?
- How will we ensure safety and security of the residents and staff?
- Will property management be performed in house or will a third party professional property management company be engaged?
- How will the project support the intended population?

- How will the community respond to the planning and construction of the project?
- Who will be the development team? Do the team members have experience in developing the type of project under consideration?

Rehabilitation or New Construction

Rehabilitation

In some cases, an organization may have access to an existing property. Once the concept is fully explored, it must be determined if that property is suitable for the project in mind.

The age, condition, and configuration of the property must be carefully considered. A capital needs assessment will probably be required by funding sources if the organization is considering rehabilitating an existing building. Whether by donation or purchase, existing buildings must be thoroughly inspected.

General considerations include the following.

- Is the building location optimal to serve the needs of the residents?
- Is the rehabilitation cost effective when compared to either demolition and reconstruction or acquisition of a new site and new construction?



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The table below describes the specific considerations that should be made for acquiring and rehabilitating an existing building.

Considerations for Existing Buildings as Suitable for Permanent Supportive Housing Development	
ENVIRONMENTAL Hazardous materials in construction or vicinity including soils. Water and air quality, noise or light pollution.	Pre-1978 buildings may have asbestos or lead based paint on site. Testing and remediation will be required. This should be done at the outset of the due diligence process to determine if there will be a severe cost impact or delay.
STRUCTURAL CONDITION Foundation, interior structure, exterior coverings, roofing, doors, and windows.	The Capital Needs Assessment will entail examinations by an engineer who must evaluate the condition of the building including code violations or upgrades that will be required.
MECHANICAL SYSTEMS Heating, air conditioning, ventilation, ductwork.	The Capital Needs Assessment process will evaluate the age estimated useful life of mechanical systems. The report should include a replacement analysis that is tied to capital reserves set aside for future repairs or replacement.
ENERGY EFFICIENCY & RESILIENCY Utilities costs affect both tenant and landlord. Consider renewable energy and wind-hazard mitigation.	Existing buildings should be tested for energy efficiency in the equipment and building envelope. A blower door test or other techniques indicate the treatments required to optimize energy efficiency.
HISTORIC PRESERVATION Historic buildings have significance at the local, state or federal level. They add to the character and ambience of a neighborhood and possess unique architectural features that are desirable and aesthetic.	The rehabilitation of designated historic structures can require additional review and approval as well as rehabilitation methods that protect and respect the integrity of the resource.
SECURITY	The site itself and the surrounding area should be considered for security features to provide safety for a vulnerable population.
PAVING AND DRAINAGE	The site should be evaluated for the efficiency of drainage systems on and immediately offsite. Existing paving and curbing condition should be considered for replacement.
CODE COMPLIANCE	Determine if the use of the property is compliant with current codes and if the structure and property configuration conform to current codes.
ADAPTIVE REHABILITATION	When converting from a non-residential use to a residential use, be aware of life safety code variations, the suitability of the building for housing, and the experience of the development team in the complex process of adaptive re-use.
ACCESSIBILITY	Existing buildings may not provide accessibility features critical in serving persons with disabilities. The renovation must meet and possibly exceed ADA standards to serve the needs of the intended residents. Rehab projects financed by FHFC are required to conduct an ADA compliance analysis.

Capital Needs Assessment

A Capital Needs Assessment (CNA) is prepared following an inspection of the property and results in a written evaluation of the property condition. The study provides a minimum cost estimate for items requiring immediate attention. In addition, the study should provide a schedule for the costs of future replacement of mechanical systems so that reserve accounts can be capitalized both at the time of completion and during operation. All rehabilitation projects to be financed by FHFC require a CNA.

The plan should address the following issues.

- Analysis of structural components
- Health and safety issues
- Accessibility features and deficiencies
- Environmental hazards
- Remaining useful life of mechanical systems and major structural components

New Construction

Most financing for the development of permanent supportive housing tends to favor new construction. Newly built properties typically result in lower maintenance and capital costs, as well as higher energy efficiency. Further, accessibility features are part of the design and can include the latest in assistive technology.

Considerations for new construction include the following.

- Has it been determined that there are no existing properties available that would be suitable for the project under consideration?
- Is land available that would be readily prepared for the intended use?
- Does the development team have experience in new construction of affordable housing?

Property Characteristics

Size and Scale of Property

There are many choices when considering the size and scale of a permanent supportive housing project. A project with fewer than 30 units is considered small, while 30 to 60 units would be medium, and more than 60 would be large. The most common configuration is “garden style,” which may include one or more build-

ings that are 1, 2, or 3 stories with or without an elevator. A mid-rise is from 4 to 6 stories, while a high-rise is 7 or more stories. In both a mid-rise and high-rise, an elevator is required in each building. There are also smaller scale options that could include single scattered site properties, duplexes, triplexes, or quadruplexes.

Many developers choose to have mixed uses on site, such as commercial space or services on the ground floor with residences above. It is also possible to choose to include mixed incomes (i.e., a certain percentage of units for those with moderate incomes and the remainder for low income households). Mixed income developments can provide the property owner higher rental income and further the goal of integrating those with special needs into the mainstream. The development of a mixed income community requires flexible financing to be able to serve both very low and higher income residents.

Whether large or small, high-rise or garden, scattered site or an apartment complex, it is important that the setting be integrated into the community. Residents should not be segregated or concentrated. While the housing itself has safety, affordability and accessibility, residents should also have easy access to the community for employment, recreation, education, shopping, services, and worship.

The number of units and the unit size are also important to consider in the conceptual stages. To some degree the number of units and unit sizes are a reflection of the type of supportive housing contemplated. For example, if the target population is persons who have experienced chronic or long-term homelessness and have a disabling condition, then a larger scale project with one-bedroom units might be the best configuration. Housing that will serve adults with developmental disabilities may consider a shared living model with one, two, and three-bedroom units with space for a live-in caregiver. Scattered site single family homes may be a good choice for supported independent living for families with special needs.

Target Population

Permanent supportive housing may serve a relatively broad spectrum of residents. The common element is that supportive housing serves households who



(1) are low income and (2) have special needs that such that the household requires support services to remain stably housed. People who are moving out of homelessness and have disabling conditions generally fall into the very low-income or extremely low-income category. If a household has not yet been awarded disability support income, they may have no income at all.

Housing that costs no more than 30 percent of household income for low income persons is often not available outside of public housing. For example, a person whose sole income is \$750 from Supplemental Security Income (SSI) would typically have to spend 100 percent of their income on housing in the private market and still might not have access to the supports needed to maintain stability in the community.

As with the locational considerations, the developer must evaluate financing choices and make decisions based on the population it will serve. Most organizations have one or more target populations defined within their mission, vision, and core values statements. The target population should comprise those who are living

with disabling conditions requiring support services to remain stably housed, and may be focused on a special subpopulation, as follows.

People living with special needs or disabling conditions may include a target subpopulation, such as:

- People moving out of homelessness
- Survivors of domestic violence
- Seniors
- Foster youth aging out of the child welfare system
- Veterans

Ownership and Management Structure

The developer must consider the ownership structure it will form. The development of affordable housing often requires a combination of team members, each of whom brings specialized resources essential to the success of the project, both in completion of development and long-term operation. Affordable permanent supportive housing is subsidized by public and private sources each with expectations on the compliance and sustainability of operations.

According to the FHFC (Florida Housing) Compliance Guidebook, it is the owner's responsibility to obtain Florida Housing's approval for the management company selected to manage the development. This requirement is in addition to the review of the management company information by the credit underwriter. The owner shall advise the Asset Management Staff of Florida Housing of any change in the owner's selection of a management company; any such new management company shall be approved by Florida Housing prior to the firm assuming responsibility for the development.

The management company and all on-site personnel are responsible to the owner for implementing the applicable Regulatory Agreement and program requirements correctly. Anyone who is authorized to lease apartment units to residents shall be thoroughly familiar with each federal and state law, rule, or regulation governing certification and leasing procedures. It is also important that the management company provide information, as needed, to Florida Housing and submit all required reports and documentation in a timely manner. It is recommended that a management company representative attend Management Reviews and Physical Inspections conducted by the monitoring agent. (Section 2.3)

There are four primary roles comprising the team:

Nonprofit Organization as Owner. The nonprofit owner may provide land, equity, development oversight, and community goodwill. An experienced high-capacity nonprofit may not only be the owner, but also the developer, property manager, and provider of supportive services, or any combination of those roles.

Developer. The developer is responsible for securing financing, credit underwriting, construction oversight, and completion. The developer may remain in the project as a co-owner or investor.

Property Manager. The property manager takes responsibility for marketing the property, lease-up, move in, move out, rent collections, evictions, accounting, supervision of maintenance, routine reporting to owner, compliance, and monitoring. The property manager may be a contracted third party or may be a division within the ownership structure.

Support Services Provider. While it is sometimes the case that the owner also takes responsibility for support services, it is more often true that the owner relies on third party service providers to work directly with residents to ensure they have access to services. Even when most services will be provided by third parties, a support services coordinator should be on the staff of the owner.

Property Management: In-House or Outsource?

The ongoing success of any affordable housing property is directly related to the quality of its property management services. Permanent supportive housing projects that receive financing from FHFC have strict requirements for experienced property management. FHFC requires the preparation of a Management Plan that identifies the role of the property manager and the role of support coordinators. As discussed in more detail later, permanent supportive housing requires a separation between property management and the provision of support services. This distinction is important and must be designed into the management plan with routine reviews.

Developers and owners who are just getting started in this arena will be required to hire an outside qualified property management company. In Florida, third party professional property management requires a Real Estate Brokerage license. FHFC requires a property manager to have managed at least two properties similar in size and type as the proposed permanent supportive housing project. As the entity gains experience, the owner may bring management in-house if approved by FHFC. In-house management by the owner does not require a brokerage license. The choice to manage in-house will depend on the availability of qualified staff and a strong web-based property management tracking program.

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The property manager must be knowledgeable and capable of being responsible for the following basic requirements.

- Marketing
- Application intake, with support coordinator assistance to applicants as appropriate
- Income qualification and annual re-certification, if required by financing source
- Move-in and move-out procedures
- Eviction procedures consistent with Florida law (F.S. Chapter 83)
- Maintenance of buildings, grounds, and common areas
- Accounting
- Tracking and reporting for annual monitoring
- Annual inspection of units, with assistance from support staff as appropriate
- Monitoring schedule and compliance with financing requirements

Safety and Security Considerations

The safety and security of residents is of utmost importance in the management of supportive housing. Depending on the size of the property and characteristics of the residents, security can be handled in a variety of ways. A professional security analyst should be asked to provide a plan with the type of systems recommended. It is important to include the anticipated costs of security in the operating budget estimates. Security methods may include any of the following, or other options.

- Remotely monitored cameras
- On-site 24-hour monitoring of camera feeds
- Locked entrance with attendant
- Unattended locked entrance

In addition, each apartment should have security features that would be appropriate to ensure the unit is safe and accessible.

Building Consensus, Support, and Momentum

Once the organization has settled on a basic concept, it is important to gain confidence in the overall feasibility of the concept so that it can be further defined. The development of permanent supportive housing does not happen simply as a result of a building sketch and raising some money. There are dozens of relationships that must be cultivated and maintained to bring all of the pieces together to accomplish the stages of development and operation.

Board of Directors

The development of permanent supportive housing requires an informed board of directors that has reached a consensus on the concept and the decision to move forward. Board members should be invited to participate in the concept development phase and understand their role going forward in guidance and direction. The board should also be kept apprised of all activities and provided routine reports and updates. Many of the engagements that will be required in planning and financing the development will require a board resolution in approval.

Support Service Providers

It is important to inform and seek input from the network of appropriate support service providers and, if target-

ing those moving out of homelessness, the Continuum of Care. The successful management of the housing will depend on the availability of support services to help tenants stabilize housing and achieve goals of health and wellness. This topic is covered in more depth in Part IV of this guidebook.

Local Government Leadership, Planning and Housing Staff

Housing is a community asset that is locally based. Public support of housing developments is tied to the problems they solve and the scope and quality of proposals. It is critical to begin early to meet with several stakeholders in the public sector to inform and to receive input. At some point a project may require a public hearing for zoning or funding, for example, and in those cases the importance of having made these connections is amplified.

Many affordable housing projects are also eligible for local government funding. It is important to undertake a review of important local government documents such as the Consolidated Plan, the Local Housing Assistance Plan, and the Housing Element that is part of the Comprehensive Plan. These documents will help inform if the project fits within the local community affordable housing plans.

After reviewing the documents, meet with your local government's housing staff to determine the eligibility of your project for various funding programs, as well as development incentives, application procedures, and critical deadlines and timeframes. It is important to convey to the housing staff that the project will meet a demonstrated need for permanent supportive housing, and that the proposed project will be designed and operated to comply with program rules and regulations. Housing staff may have valuable suggestions on adjusting the concept to ensure eligibility for housing programs and fit within their available funding sources.

The Development Team

The formation of the development team should start early in the process. If your organization is not experienced in development of this type, you will need an experienced co-developer. Other members of the team include the architect, engineer, general contractor, and attorney. The development of affordable housing should be led by a project manager responsible for assembling a team of professionals bringing experience and expertise in their respective fields. For example, projects financed with low income housing tax credits or SAIL funding will be required to have a development team that already has experience with these funding mechanisms. The members of the development team include the following.

- Project Manager
- Developer
- Appraiser/Market Analyst
- Architect/Engineer/Surveyor
- General Contractor
- Consultant
- Legal Team
- Financing Partners
- Property Manager/Real Estate Agent

The Technical Advisor

As early as possible, it is important to communicate with a technical advisor who has expertise in the development of permanent supportive housing. The Florida Housing Coalition's technical assistance team has this expertise and can provide guidance throughout the entire process. Applicants for the Predevelopment Loan Program (PLP), administered by the Florida Housing Finance Corporation, will be assigned a technical assistance provider to assist in forming the development plan and financing structure that are critical in the predevelopment phase. PLP is described further in Part II.



Access the Predevelopment Loan Program at FHFC at: <http://www.floridahousing.org/programs/special-programs/predevelopment-loan-program>

Part II

Developing a Permanent Supportive Housing Community

Predevelopment

The predevelopment stage spans the time from concept development to ground breaking. This phase should not be rushed because spending quality time on predevelopment activities will save time, money, and heartache during development. It is not uncommon for the predevelopment phase to take longer than the overall financing and construction phase of the project.

During the predevelopment process the development team is selected and begins to take action by selecting a site and designing the project. In this formative stage there are opportunities to shift direction, choose a different site, or stop the process altogether. Once financing and credit underwriting are underway, however, it is much more difficult to make substantial changes.

The Predevelopment Loan Program (PLP), which is administered by the Florida Housing Finance Corporation, is an excellent way to borrow low interest funds to pay for many of the expenses incurred during predevelopment. Often, nonprofit organizations do not have the funding available to pay for these expenses in this stage, and the PLP provides the financing and technical assistance to guide the organization through the process.

It should be noted that it is not a bad thing to terminate a project in the predevelopment stage if it has been determined that the project was not feasible, the organization did not have the capacity to execute the project, or the site had issues that could not be corrected or mitigated.

Selecting a Co-Developer

Many organizations that aspire to develop permanent housing do not have experience in the financing and development of housing, nor in the management of rental property. In these cases, predevelopment would likely entail forming a partnership with an experienced developer who can take responsibility for the many requirements ahead. The nonprofit may benefit from the

experience of a co-developer allowing them to eventually develop more projects on their own.

The selection of a development partner for permanent supportive housing follows the same track as other types of housing, but there are some additional considerations. A Request for Qualifications may be the best way to systematically consider and evaluate potential developers. If interested in a developer, it is instructive to visit the developer's projects and talk with their previous clients and funders. Seek to learn if they have completed projects on time and within the budget. Determine if their previous nonprofit partners were active participants, both financially and during the development process. Also consider if the type of housing they have produced is similar to the concept desired (e.g., renovating single family homes is different from new construction of a multifamily rental complex).

The checklist below provides some questions to consider when vetting possible co-developers.

- Experience
 - Is your project the type of project in which this developer specializes?
 - Does the developer deliver a quality product?
 - What is the developer's reputation? Among former nonprofit partners? Funders? Credit underwriters?
 - How many projects have they created and where?
- Resources
 - Do they have appropriate financing? How strong is their balance sheet?
 - Do they have sufficient liquidity?
 - Do they have appropriate and sufficient staffing?
 - What other projects do they have in process or in the pipeline?
 - Are they well-connected?
 - Consider compatibility of mission with Co-Developer partner



- Is the developer a for-profit or nonprofit entity?
- Do they prioritize good design features such as natural light, balconies, gardens, and amenities?
- Does the developer have an affiliation with a property manager experienced in permanent support housing?
- Do they tend to have high requirements (i.e., high barriers) for leasing to tenants? Do they require minimum credit scores, minimum income requirements, clear background checks, pristine former rental history? This is very critical. Seek a partner that will not impose high barriers to qualification for residency in permanent supportive housing.

Site Location Criteria

The developer of permanent supportive housing must consider the most important locational features for the project while at the same time, if seeking FHFC funding, balancing the locational requirements inherent in the FHFC competitive multifamily housing financing opportunities. In exploring choices and making decisions, the developer will weigh these and attempt to choose a site that ensures residents' convenient access to community

services, educational institutions, employment opportunities, medical and support services, shopping, and recreational amenities.

One primary consideration for the location of project is whether the setting is urban, suburban, or rural. The availability of transit, services, and employment are most relevant for the residents. The availability of financing, land, and infrastructure are dependent and contingent upon these development considerations.

The discussion below covers the locational criteria that must be met to participate in the competitive multi-family housing financing programs administered by FHFC. Even if a development will not be using FHFC funding, the criteria bear careful consideration as they are the result of demographic and market analyses that may impact the feasibility of the planned project.

Areas of Opportunity

Projects that are located in defined "Areas of Opportunity" will receive preference for financing in many of the Requests for Applications offered by the Florida Housing Finance Corporation. Geographical criteria are summarized in the table on the next page.



For more information on joint ventures, please visit and view the recorded webinar series by the Florida Housing Coalition at <https://vimeo.com/267291348> and <https://vimeo.com/270495575>.

SITE SELECTION CRITERIA	DESCRIPTION
Geographic Areas of Opportunity	<p>Census tracts that are designated as two or three factor tracts. These are locations with high indicators of community wellbeing:</p> <ol style="list-style-type: none"> 1) Tract median income is greater than the 40th percentile of all tracts in the county, and 2) Educational attainment above the median of all tracts for adults over age 25 have completed some college, and 3) Tract employment rate is greater than the statewide employment rate.
Difficult to Develop Areas (DDA's)	<p>DDA's are areas that have high construction, land, and utility costs relative to area median gross income.</p> <p>DDA's may qualify for a 30 percent basis boost for housing tax credit projects. DDA's apply to an entire county.</p>
Small Area Difficult to Develop (SADDA)	<p>More precisely defined DDA's useful in metropolitan settings to qualify for a basis boost and other incentives.</p>
R/ECAP Areas Racially/Ethnicallly Concentrated Areas of Poverty	<p>FHFC discourages new affordable housing development in R/ECAP areas but will consider applications to preserve or redevelop housing in R/ECAPs.</p>
Qualified Census Tracts (QCT)	<p>QCT's are tracts in which at least half of the households in the tract have an income less than 60 percent of the area median income (AMI) or there is a poverty rate of at least 25 percent. QCT's are eligible for a "basis boost" for tax credit projects. Projects that are located in a QCT that is also in a R/ECAP area (see above) will not qualify for new construction.</p>
Limited Development Area (LDA's)	<p>LDA's are defined by FHFC as having low occupancy conditions (less than 90 percent occupancy) in its rental property portfolio, where development is limited to allow existing properties to stabilize income and occupancy before new developments of similar scope are approved.</p>
Mandatory Distance Requirement Areas	<p>FHFC publishes mandatory distance requirements for certain types of housing in certain areas to prevent the overconcentration of subsidized housing which could affect the occupancy of assisted existing projects.</p>



The Beta Mapping Tool for Multi-family applications is a valuable aid in evaluating a particular site for its potential to be awarded financing from Florida Housing Finance corporation. The instructions for using the tool can be downloaded from this site: <https://www.floridahousing.org/docs/default-source/programs/mapping-basics-user-guide.pdf?sfvrsn=2>

Proximity Considerations

Another important location consideration is meeting the proximity requirements within each Request for Application (RFA) for financing offered by FHFC. Proximity requirements are specified for each RFA; therefore, it is important to evaluate each RFA individually to ensure that the planned project will be on a site that meets the proximity requirements for services, as specified in the RFA.

Importantly, the chosen site must have access to reliable public transportation. Residents unable to walk to bus or transit stops should be able to enroll in paratransit services. Services may be provided to provide transport assistance to bus stops, shopping, and other locations. Residents must have access to groceries, medicine, household supplies, and general shopping.

Each RFA that includes proximity criteria states the maximum distance for a service to qualify as meeting locational requirements. Proximity to services includes the following.

- Bus/Rail stop
- Grocery store
- Medical clinic
- Pharmacy, for elderly and certain other projects
- Public/charter school, for family projects

Other community services that should be carefully examined and identified include the following.

- Education for continuing education, vocational training, and life skills such as cooking
- Support services, such as behavioral health care
- Recreation such as volleyball, basketball, table tennis, bingo, dance classes
- After school programs for youth including academic achievement, social functioning, post high school readiness, if youth will be residents in the development
- Community events
- Small business incubators
- Career source facilities for job preparation, job search assistance, job training
- Child care

Due Diligence Process for Site Selection

The evaluation of the suitability of a site for the proposed development can be accomplished with third

party reports and the use of a checklist to make sure the property can be developed as planned. Sites that must be rezoned, require land use plan amendments, or do not have infrastructure are least desirable. It is best to acquire land that has the correct zoning and land use designations with infrastructure available to the site.

To ensure project operating feasibility, supportive housing projects should have as little debt as possible. Land costs are often a large portion of the budget and can impact the operational capacity if debt service must be covered. Many local governments have “surplus land” that can be made available to nonprofit housing organizations. In Florida, municipalities are required to maintain an inventory of surplus land suitable for affordable housing, so you should check with the appropriate local government housing department to view the inventory and consider making an application for acquisition.

An expanded list of site due diligence criteria is provided in Appendix III.

Market Analysis

During the credit underwriting process, which is necessary to obtain financing, a market analysis will be required. The market analysis will determine how strong the demand is for this type of housing, how long it will take to reach stabilized occupancy (i.e., 90 percent) and the level of effort or distance away from the site where eligible tenants can be “captured” to move to the property. While the formal market study is part of the underwriting process, it is important to conduct an informal market study as part of the due diligence process prior to site acquisition. For permanent supportive housing, the market has certain characteristics that go beyond income level and would include persons with disabling conditions, who are homeless, or who meet other program requirements.

Legal Consultation

Legal counsel should be available to review the details of all land transactions and loan agreements. Attorneys should be experienced with affordable housing development as well as Florida real estate law. A project using Low Income Housing Tax Credits in financing will need counsel experienced in the closing of these types of agreements and loans.

Financing Process

Once the site has been deemed appropriate for the project, financing must be secured. This process can involve many different sources, each with specific requirements. In Florida, the primary source of financing for affordable housing is from the Florida Housing Finance Corporation, which has provided support and financing for many permanent supportive housing developments. Some Requests for Applications (RFA's) are for larger projects that will utilize Low Income Housing Tax Credits (LIHTC) and SAIL (60 or more units), and others are for medium projects (30-60 units) or smaller projects (less than 30 units).

The primary sources of funding for permanent supportive housing are described in the chart below.

FUNDING	INCOME SET-ASIDE	RENT LIMITS	OTHER
<p>SHIP (State Housing Initiatives Partnership) Funding for construction, rehab, emergency and rental assistance</p>	120% AMI	30% of applicable income limit	20% of program funds must be dedicated to persons with developmental disabilities or other special needs
<p>SAIL (State Apartment Incentive Loan Program) Low interest financing for construction or rehab</p>	20% for <50% AMI Or per LIHTC	30% of applicable income limit	
<p>Low Income Housing Tax Credits (LIHTC) Equity finance for construction</p>	100% < 60% AMI 20% < 50% AMI OR 40% < 60% AMI	30% of applicable income limit	
<p>MMRB (Multi-family mortgage revenue bonds) Equity finance for construction</p>	100% < 60% AMI 20% < 50% AMI OR 40% < 60% AMI	30% of applicable income limit	
<p>HOME</p>	100% < 80% AMI	HOME High and Low Rents set by HUD annually	Can be used for operating reserve or tenant based rental assistance
<p>PLP (Predevelopment Loan Program) Low interest loan for predevelopment expenses</p>	20% < 50% AMI	Based on financing	

The application for financing through FHFC follows an annual process known as the Request for Applications or RFA cycle. The process allows for public input during the design of financing opportunities. The graphic below describes the general process of the RFA cycle, though dates vary depending on the RFA.



Credit Underwriting

Projects that have been successfully ranked in the competitive or non-competitive funding application process are invited to credit underwriting and a credit underwriter will be assigned by the funder. The credit underwriter will remain responsible for the project not only during the preparation of the Credit Underwriting Report, but throughout the construction, leasing and operations of the project during the term of affordability.

The basic process of credit underwriting for project feasibility is to determine if the project has a sound business plan. The credit underwriting process evaluates four main components, as follows:

- Suitability and readiness of the proposed project site
- Financial capacity of developer
- Feasibility of project to operate long term as proposed
- Ability to proceed

Funding Award and Initial Closing

Once the project receives a favorable Credit Underwriting Report, the funds may be officially awarded and there is a closing on the issuance of the loans and grants that have been obtained. From this point construction may commence and funding draws can be requested.

Construction and Lease-Up

After the initial closing on the financing, and receipt of all development approvals and permits, the construc-

tion process begins. During this time the owner and partners must oversee the development and respond to requests for payment, inspections, and overall completion of the units according to plan. During this time the property manager is marketing to potential tenants and pre-leasing the units.

Project Stabilization and Final Closing

Once a project is cleared for occupancy the tenants move in. The property manager is responsible for intake of applications, lease signings, and move ins. Property is considered stabilized when it reaches 90 percent occupancy. This status enables the owners to conduct the final closing on the long-term financial obligations.

Period of Affordability

Each funding source has a set of requirements on affordability, number of set-aside units for special needs, and the term of compliance. The term of compliance is the length of time the property must serve a certain population at certain affordable rents. The period of affordability can range from 15 to 50 years depending on the funding source. The long-term compliance requirements vary from program to program and the most stringent requirement always applies.

Compliance Monitoring

During underwriting a monitoring and compliance schedule is set up in the regulatory documents that defines the frequency and subject of monitoring over



See the Florida Housing Coalition Affordable Housing Resource Guide for comprehensive information on each funding source: <http://www.flhousing.org/wp-content/uploads/2017/05/Affordable-Housing-Resource-Guide-2017-05.pdf>

the period of compliance. Multifamily rental properties financed by Florida Housing Finance Corporation are required to be monitored on several aspects of operations: onsite management, review of tenant files, administrative procedures, and a physical inspection of the property. Noncompliance is reported to the owners and managers who must respond to any concerns and correct any findings.

Regulatory Agreement /Land Use Restriction Agreement

The financing agreements and conditions are described in a Regulatory Agreement, which is filed in the public records for the property as a Land Use Restriction Agreement (LURA).

Part III

Managing and Operating a Permanent Supportive Housing Development

The Property Management Plan

The Property Management Plan is a key factor in the successful and sustainable operation of permanent supportive housing. The Management Plan defines the governing framework of the property and sets forth the policies and procedures to be used by management staff including leasing, support service coordination, maintenance, and compliance with the Regulatory Agreement and any other financing conditions. A separate Management Plan should be provided for each property in the portfolio. This section provides guidance on the preparation of the plan. In Appendix IV, we offer a property management template as a sample framework for new projects.

Staff Organization

Organization Chart

The Management Plan should have an overview indicating all staff and their designated roles and positions. The initial operating team may change over time as the

property is stabilized and there may be different personnel. It may be useful to include an organization chart showing the relationship of the main entities, as well as the management team and the services team.

Property Management Policies

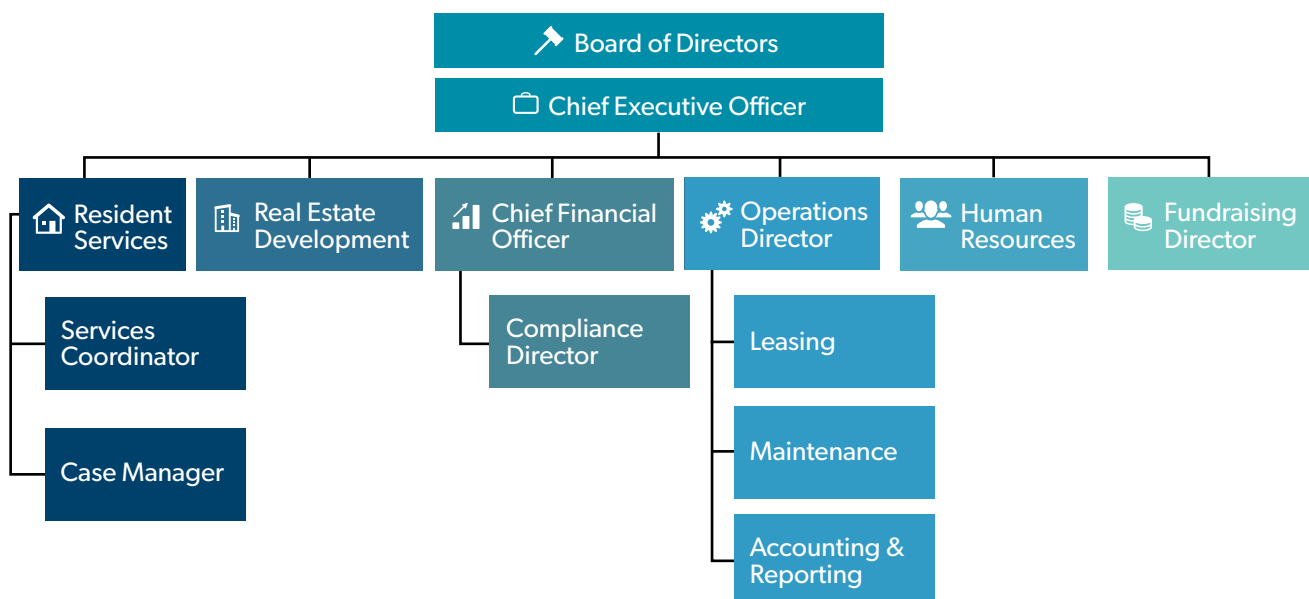
Policies for the management of permanent supportive housing should reflect the purpose and values of the organization and its commitment to provide a quality residential community that meets the needs of its selected tenancy. The policy descriptions below can be adapted for the property management plan.

Leasing Policies

Lease Form

The standard real estate lease provided by the Florida Bar/Florida Association of Realtors is recommended. The leases should not contain requirements for tenants to accept support services, or any other requirements that are not contained in a standard lease (e.g., abstain-

SAMPLE ORGANIZATION CHART | Permanent Supportive Housing with internal property management and resident services



ing from alcohol). All occupants of the unit must be listed on the lease and leases must be current and fully executed. Lease terms must be consistent with the Regulatory Agreement.

Housing First

Housing First should be followed as the core value of the property. This means that individuals and families experiencing homelessness who have disabilities can be rapidly housed in permanent housing without pre-conditions (e.g., drug testing), and then connected to voluntary support services to help achieve housing stability, wellness, and independence.

Referrals

For properties serving residents who have experienced homelessness, the Continuum of Care (CoC) Coordinated Entry System is the most effective way to prioritize individuals in the most need of permanent supportive housing. New units coming online should be registered with the CoC through HMIS to create new program capacity according to the set-aside characteristics of the property. The Coordinated Entry System's prioritization programming will determine the highest priority for each eligible group, which in turn will result in the screening in of referrals in priority order facilitating a smooth enrollment process. All vacancies should be filled through the prioritization and referral of the Coordinated Entry System of the Continuum of Care. For properties serving non-homeless subpopulations, referrals may be received through FHFC's LINK referral agencies or other human services agencies or health care organizations.

Screening In

The tenant selection process must rely on an approach that will screen tenants in, rather than screen them out. It is recognized that applicants for permanent supportive housing may have poor credit, past evictions and negative rental histories, and so on. An applicant with a recent history of poor credit or evictions should be provided an opportunity to present mitigating information and additional information to address concerns or, if appropriate and feasible, pay an additional security deposit. Criminal background checks should be performed only to identify recent convictions for violent crimes, and the consideration of any criminal convic-

tions must take into account the recency, nature, and severity of the crime. Arrest records alone cannot be used to disqualify an applicant for tenancy.

Timeliness

The leasing process must be convenient, streamlined, and efficient to best serve future residents. The review and approval or denial process should be clearly stated. Once an application is submitted, this process should take no longer than several days to a week.

Appeal Process

A written and easy to understand appeals process must be in place and made available to applicants who are denied tenancy. The applicant must be notified as to the reasons for the denial and be provided an opportunity to provide additional information or explanation and to have the denial reconsidered.

Eligibility Determination

If the prospective tenant is referred through the CoC Coordinated Entry System or LINK referral agency, the referral will typically include the documentation required for the determination of eligibility. For all applicants, the property manager must determine the eligibility of an applicant based on program requirements, coordination with service providers, and as provided for in the Regulatory Agreement. The property manager must certify that the tenant meets eligibility requirements.

Tenant Income Certification

The income of applicants must be verified and certified in accordance with the funding sources. Tenants may not be required to have income to live at the property if there is evidence that housing costs can be paid through another source. For instance, the owner and services provider may identify alternative sources of rent subsidies or housing vouchers to cover the rent and utilities for tenants who do not have income while they work with the tenant to obtain income. All tenants' income must be re-verified and certified on an annual basis or according to the Regulatory Agreement.

Annual Re-certification

The property manager must re-certify the eligibility of tenants on an annual basis or as required by funding sources. A development that is categorized as permanent supportive housing certifies that 100 percent of its

units are low income only once, at the first anniversary of the move-in or initial certification, except for HOME units. All FHFC projects must comply with next available unit rules which come into play if a certified tenant vacates a unit.

Accessibility of Application Process

The application process should be streamlined with limited meetings. Property management or support staff may meet an applicant at a convenient location in the community or process the application on the property. The application process should be fully accessible to persons with disabilities and necessary accommodations will be made during the process.

Diversity and Inclusion

The application process and tenancy must be available and inviting to diverse cultures, races, and ethnic groups. Application materials, tenant materials and notices, and similar documents must be available in Spanish and Creole. Accommodations for those with disabilities must be provided.

Intake Documentation

Minimal documentation should be required from applicants including identification, income documentation, and verifying of a disabling condition if applicable. The process should not be overly intrusive or violate confidentiality and privacy guidelines.

Application Fees

There may be application fees, credit check fees, criminal background checks, or deposits. These fees

should be held to a minimum amount to provide accessibility.

Security Deposit

A security deposit may be required to give tenants an incentive to leave the apartment in good condition when they move out. If the tenant cannot pay the security deposit at move-in, a plan should be arranged so the payment is made within the first 6 months.

Move-In

FHFC requires that no tenant may occupy the property until the lease is fully executed. This will be examined in compliance monitoring.

Welcome Package

Tenants should be provided a welcome package with easy to understand information about services, events at the property, a local map, and information on how and when to pay rent. It is helpful to include a simple “Understanding Your Lease” summary of the important lease terms.

Tenant Handbook

Tenants should be provided a simple and easy to understand handbook that clearly explains their responsibilities with regard to paying rent on time, asking for maintenance, and how to respond in an emergency, whether a personal crisis or a disaster such as fire or flooding. The handbook may also outline what resources are near, what bus routes to take, and hours of operation. Importantly, the handbook must provide current contact information for the property manager, case manager, and emergency services, as in the example presented below.

SAMPLE: Tenant Handbook Contact Info

Name	What They Do	How to Contact
Bob Jones	Maintenance and repairs	Visit Front Office or call 904.555.1234
Julie Gee	Keep track of rent payments	Visit Front Office or call 904.555.1235
Tina Thomas	Case Manager	Visit Room 204 or call 904.555.1236
Emergency	Emergency	Call 911

Furniture and Household Supplies

Furniture and supplies may be available to tenants in need at no charge. Community resources and service providers can be engaged to support the resident's move-in.

Lease Violations

Tenants should be advised of lease requirements. If a violation occurs, the support services staff should be notified and work with the tenant to correct the problem. If the tenant falls behind in rent payments, the property manager may work with the tenant to create a payment plan. If repeated violations occur the support services coordinator and tenant must be informed that an eviction may occur and be given an opportunity to address the issue. If the issue cannot be resolved, the eviction process must comply with Florida landlord-tenant law.

Maintenance and Repair Policies

Maintenance begins with high quality property development using durable, sustainable materials and equipment. The property manager should assign a maintenance supervisor and establish vendor accounts for plumbing, HVAC, electrical systems, and other subcontracted maintenance and repairs. There should be two maintenance schedules – a maintenance schedule that considers the expected replacement of aging equipment and another that schedules preventive measures for testing equipment, the inspection/maintenance of systems, and replacement of items such as filters.

In the maintenance schedule of routine maintenance and corrective repairs, preventive maintenance should include inspections, replacements, and upgrades to prolong the useful life of equipment and avoid costly breakdowns. Proper maintenance should be designed to be readily available to tenants and to prevent hazards to residents and visitors.

Residents should be given adequate accessible notice of maintenance inspections and routine visits for pest control and other scheduled maintenance. Support services staff should also be informed of routine and other planned maintenance and repair visits and should accompany the maintenance staff if deemed appropriate. In addition, the process for requesting repairs and submitting a work request should be clear to residents and support services staff.

All staff, including maintenance staff, should be trained in trauma-informed services and understand how to gain the trust of residents. Often it is maintenance staff who initially discover a tenant may be having problems with housekeeping or personal well-being. If this occurs, the maintenance staff should contact the services coordinator for follow-up.

The Maintenance Plan may include the following.

- Monthly physical inspections
- Daily task list with protocols – daily task list for each maintenance employee, monthly physical inspection, timely handling of work orders and protocols for completing, reporting and ensuring resident satisfaction
- Preventive maintenance – regular inspections, servicing, repairs
- Processes for check-ins with the services coordinator

Building Security and Visitors

The safety and security of residents are of utmost importance in the management of supportive housing. Depending on the size of the property and the characteristics of the residents, security can be handled in a variety of ways. A professional security analyst should be asked to provide a plan with the type of systems recommended. It is important to include the anticipated costs of security in the operating budget estimates. Security methods may include any of the following, or other options.

- Remotely monitored cameras
- On-site 24-hour monitoring of camera feeds
- Locked entrance with attendant
- Unattended locked entrance

In addition, each apartment should have security features appropriate for their disability or condition. It should be noted that guest policies in supportive housing should not be different those in non-supported rental housing. Guests are allowed in supportive housing, as they are at other apartment complexes. The lease should detail how long guests can stay overnight without violating the lease.

Operating Procedures

Operation in Compliance with Financing Requirements

The operation of supportive housing is subject to the property's Credit Underwriting Report, Regulatory

Agreements, LURA, and EUA. The Credit Underwriting Report contains specific criteria under which the project is to be developed and operated. In addition, projects financed by FHFC must comply with the Regulatory Agreement that is contained in Land Use Restriction Agreement (LURA) that is recorded in the public records. An Extended Use Agreement (EUA) may also be part of the LURA. The LURA delineates the compliance requirements for the property including set-asides, unit features, development amenities, tenant programs, and special needs household requirements, if applicable.

Operating Budget and Reserves

The property should be operated according to the approved operating budget. Reserve accounts must be maintained according to the requirements of the funders and as defined in the Regulatory Agreement. The property manager is responsible for the execution of the budget and capitalization of reserve accounts.

During the pre-development phase a preliminary operating budget and pro forma will have been developed. Once the project is awarded financing and goes through Credit Underwriting, the operating budget, with projections for revenue and expenses, becomes an important document in the property management and compliance requirements.

Set-Asides and Unit Mix

The specific set-asides and unit mix for the property must be implemented as required by the Credit Underwriting Report and the Regulatory Agreement. The

Regulatory Agreement contains requirements for the designated set-asides for income categories and tenant subpopulations. The unit mix is determined in the pre-development and underwriting phases, and must comply with the requirements of the sources of funding and ultimately, the Regulatory Agreement.

Our sample unit mix below shows the number of each unit size and the income set-asides for a small ten unit project. This sample also shows the maximum rent allowed and the utility allowances.

Income Limits

Maximum household incomes are based on the requirements of the funding source and are identified in the Credit Underwriting Report and Regulatory Agreement. Income limits based on household and unit size are published annually for subsidized affordable housing. Income limits are posted at <http://floridahousing.org/owners-and-managers/compliance/income-limits>. It is important to view the correct program income limits as there are variations among programs.

Rent Limits

Maximum rents per unit are based upon requirements from the funding source. In cases of multiple sources of financing, the most stringent requirement will apply. Allowable rents are subject to a utility allowance that is deducted from the maximum gross rent allowed for the unit, unless the rent includes utilities. The resulting figure is the maximum allowable household rent contribution.

SAMPLE: Unit Mix Chart

Bed/Baths	No. of Units	Median Income %	Max Rents	Utility Allowance	Max Net Rents	Annual Rents
1/1	3	40%	\$441	\$163	\$278	\$10,008
1/1	5	60%	\$662	\$163	\$499	\$29,940
2/1	2	60%	\$795	\$199	\$596	\$14,304
Totals	10					\$54,252



Property owners and managers of projects funded by FHFC may view compliance requirements at <http://floridahousing.org/owners-and-managers/compliance>.

The rent restrictions for each property are identified in the Credit Underwriting Report as well as the Regulatory Agreement. Rent limits are published annually and are posted on the FHFC website at <http://floridahousing.org/owners-and-managers/compliance/rent-limits>.

Rental Assistance

The rent contribution does not include rental assistance payments under Section 8 of the United States Housing Act of 1937, or under comparable rental assistance programs, or amounts paid for optional supportive services. Properties financed with state or federal funds are prohibited from refusing to accept housing vouchers presented by a prospective tenant.

Utility Allowances

The utility allowance is an estimate of the cost of monthly utilities for the unit type. If the household pays utilities (other than telephone and cable), a utility allowance is deducted from the maximum gross rent allowed for the unit. The initial utility allowances are determined during the Credit Underwriting process and, going forward, must be verified quarterly by the property manager. The frequency of confirmation of the utility allowance is recommended to be quarterly if using the Public Housing Authority utility allowance; others may be confirmed annually.

The utility allowance may be estimated using the following methods.

- Obtain allowances from the Public Housing Authority for the applicable community.
- Obtain utility costs from the applicable utility companies.
- Utilize an energy, water, and sewage consumption analysis model. The model must consider factors including unit size, building orientation, design and materials, mechanical systems, appliances, and characteristics of the building location.

Energy consumption model procedures and forms can be viewed at <http://floridahousing.org/owners-and-managers/compliance/utility-allowance>.

Tenant Eligibility

The property manager determines the eligibility of an applicant based on program requirements, coordination with service providers, and as provided in the Regulatory Agreement. The property manager must certify that the tenant meets eligibility requirements.

All FHFC programs require property managers to recertify the eligibility of their tenants annually. However, a permanent supportive housing development that certifies that 100 percent of its units are low income only re-certifies on the first anniversary of the move-in or initial certification, except for HOME units. Projects with HOME units must recertify tenants according to the HOME rules. When a unit is vacated, there are “next available unit” rules for FHFC financed projects that ensure the required set-asides are met.



Supportive housing owners and managers are required by law to respond appropriately to requests for reasonable accommodations at every stage of operations. This fair housing requirement is critical because supportive housing is specifically designed to help persons with disabilities succeed in accessing and maintaining stable housing.

Financial Management

The property manager is responsible for accounting of revenue and expenses. If federal funds were used in the development of the project, financial accounting standards must comply with federal standards described at 2 CFR 200.302.

Fair Housing

Supportive housing owners and managers are required by law to respond appropriately to requests for reasonable accommodations at every stage of operations. This fair housing requirement is critical because supportive housing is specifically designed to help persons with disabilities succeed in accessing and maintaining stable housing.

General Fair Housing Requirements

Persons living with disabilities are legally entitled to request accessibility accommodations if they need it in order to have the full use and enjoyment of their housing. The housing provider has a duty to make reasonable accommodations to each person residing or working at the housing site.

“Federal law prohibits discrimination against persons with disabilities and requires all landlords to provide reasonable accommodation for tenants’ disabilities. The Fair Housing Act, as amended in 1988, prohibits all housing providers from discriminating against people with disabilities, including psychiatric disabilities. A housing provider violates the Fair Housing Act when it ‘refuses to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling . . .’ unless such accommodation will fundamentally alter the provider’s program or cause an undue financial or administrative burden. Similarly, Section 504 of the Rehabilitation Act of 1973 prohibits all federally funded entities from discriminating against any otherwise qualified individual ‘solely on the basis of his or her handicap,’ and includes an implicit requirement to provide reasonable accommodation.”

The Act applies to many types of housing decisions, including marketing, showing the property, the decision

to rent to the prospective tenant, the lease terms, the eviction process, and the decision to renew the lease. Examples of discrimination can include anything from refusal to rent to a person due to the specific type of disabling condition, to having overly broad criminal record exclusions, to asking intrusive or inappropriate questions during the application process.

Marketing

The Fair Housing logo and statement of non-discrimination must be included on all marketing materials and applications. The organization should post in visible locations the Fair Housing posters available from HUD. The logo and statement are presented below.



As an equal opportunity housing provider, **[insert name of organization]** provides housing opportunities regardless of race, color, national origin, religion, sex, physical or mental disability, familial status or any other classification protected by applicable federal, state, or local law.

Reasonable Modifications and Reasonable Accommodations

The Fair Housing Act requires landlords to allow tenants to make “reasonable modifications” to the unit if necessary for a person with a disabling condition to fully use the housing. An example of a modification is replacing a standard doorbell with a flashing light for a person with a hearing impairment.

The Act also requires that the landlord make “reasonable accommodations” in rules, policies, practices, or services that are necessary for the tenant with a disability to access and fully use the housing. An example of an accommodation is when a tenant with PTSD requests that he be notified at least 48 hours in advance of a maintenance visit, so he can make a plan to vacate the apartment prior to the maintenance person entering. Similarly, properties that do not allow pets as policy must still allow service animals for tenants.

At any point during the application process or lease term, if an applicant, advocate, or services coordinator requests a modification or accommodation, the request must be addressed in a timely manner.

Affirmative Fair Housing Marketing Plan

HUD regulations require developments insured and/or subsidized under programs administered by HUD to implement an Affirmative Fair Housing Marketing Plan (“AFHMP”), Form HUD-935.2, approved for the development.

Key Requirements of the AFHMP:

- The purpose of the plan is to ensure that eligible families of similar income levels shall have a similar range of housing opportunities.
- The marketing effort shall attract a broad cross section of the eligible population without regard to race, color, religion, sex, disability, familial status, or national origin.
- Whenever additional applicants are needed to fill available units, advertising shall be carried out in accordance with the FHFC-approved AFHMP.
- The plan outlines marketing strategies the owner shall use, including special efforts to attract persons who are least likely to apply because of such factors as the racial and ethnic composition of the neighborhood in which the development is located.
- Marketing shall also seek to reach potential applicants outside the immediate neighborhood if marketing only within the neighborhood shall create a disparate impact against certain classes (e.g., if the neighborhood includes no persons of color).
- Owners shall monitor the results of the marketing effort and adjust their marketing techniques as necessary.

To view the Fair Housing Act, visit <https://www.justice.gov/crt/fair-housing-act-2>.

Support Services

The plan for provision of support services must be created and implemented to ensure that tenants have access to the services they need to maintain stable housing and improve health and wellness. Support services may be provided entirely in-house, by outside providers, or using a combination of those two approaches. Many supportive housing providers have a designated staff person who serves as the services coordinator and then the services themselves are pro-

vided by other provider agencies. Regardless of the approach, it is important that the tenants, the property manager, the provider agencies, and all staff understand how services will be delivered and the process for requesting and accessing services.

The plan should indicate what, if any, services will be provided in-house or through outside providers, and make explicit the role of the support services coordinator. Because support services should be flexible, individualized, and voluntary, there should be process in place to engage the tenant in the determination of what services he or she needs and desires, and how those services will be provided in a manner most accessible to the tenant.

Support services are discussed further in Part IV of this guidebook.

Administrative Procedures Compliance Monitoring

All properties funded by FHFC are required to be monitored regularly for compliance with program rules and the specific requirements of the Regulatory Agreement. In cases where there are multiple properties, a Compliance Plan may be necessary along with hiring full time compliance specialists and a third-party reviewer of intake procedures and tenant eligibility determinations.

The Compliance Period begins on the date the first unit is occupied, or if already occupied, on the date of loan closing, and ends in accordance with the number of years prescribed in the Regulatory Agreement.

Monitoring takes place both remotely and on-site. The on-site monitoring is referred to as the Management Review and Physical Inspection. During this process the following program components and documentation are reviewed.

- Administrative procedures compliance
- File inspection
- Physical inspection
- Rent and income limits
- Utility allowance
- Tenant programs and services
- Tenant rent ledgers
- Communication with key LINK Referral Agency

The resulting observations are provided in a Management Review Report. The property owner must respond within a given time period to the observations and document how deficiencies will be corrected. Following this exchange, a Closeout letter is provided.

During the monitoring a sample of files will be inspected and checked for the following:

- Tenant income certification and verification
- Certification of household eligibility
- Rental application
- Tenant recertification documentation and notes
- Student verification, if appropriate

The physical inspection will refer to the Uniform Physical Condition Standards (UPCS) 24 CFR 5.703, unless otherwise required in the Regulatory Agreement. Units will be inspected to ensure they are decent, safe, sanitary, and in good repair. Violations include but are not limited to: smoke detectors in unit do not work, one or more stove burners do not work, presence of bed bugs or other pest infestation, graffiti, and units unsuitable for occupancy.

Reporting Requirements

Each funding source requires reporting on a timely basis. These requirements are included in the Regulatory Agreement. Projects with multiple sources of funding must use the most stringent reporting requirements.

The following reports must be submitted to the project credit underwriter and to FHFC.

Annual Reports

- Program Report
- Occupancy and Vacancy of Development
- Set-aside Requirements
- Recertification Status of Each Unit
- Income and Rent Restrictions
- Categorical Requirements
- Public Purpose Requirements

Monthly Reports

- Managers' Report – narrative memo
- Occupancy Report (Move-out/move-in) with make-ready info
- Availability Report
- Waitlist/Applicant List
- Rents as Charged Report
- Turnover and Capital Improvement Schedule
- Work Order Summary

Quarterly Reports

- Property Manager's Budget to Actual Report
- Summary Financial Report

At the Request of Owner

- Resident receivables report
- General Ledger for review of specific accounts

Reports are to be sent to FHFC and the Appropriate Credit Underwriter:

Florida Housing Finance Corporation	compliance.reporting@floridahousing.org
Amerinat	AmeriNatcompliance@amerinatls.com
First Housing	compliance.reporting@firsthousingfl.com
Seltzer Management Group, Inc.	compliance.reporting@seltzermanagement.com



The FHFC Compliance Guidebook can be downloaded from this site:

<http://floridahousing.org/owners-and-managers/compliance/compliance-guidebook>

Record Retention and Access

The record retention time periods are based on funding requirements, but generally the manager must retain all household files and records of documentation for at least six years after an applicant is rejected or after a unit has been vacated. The owner or manager must keep reports and records on a building by building basis. Files should be stored off-site in a secure location and maintained in a system that is flood and fire proof. Properties funded with Low Income Housing Tax Credits must store records securely for the entire compliance period.

The property manager may be required to provide access to records while adhering to applicable state and local laws regarding privacy and obligations of confidentiality. In certain cases, permanent supportive housing services provision may involve medical records; the confidentiality of these records is protected by the Privacy Rules established by the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Staff Training

All staff who work on the property should have training in the overall program operations, property processes and systems, and customer service. All staff must recertify annually in Fair Housing regulations and have a clear understanding of the requirements prohibiting discrimination, as well as reasonable accommodations and modifications.

All staff, regardless of their role or the frequency of interaction with tenants, should be receive Trauma-Informed Care training as part of their onboarding process, with annual retraining. Managing and operating permanent supportive housing for persons with disabilities and special needs requires that all staff have a general understanding of the tenant population and learn the most effective ways of interacting with applicants and tenants.

Below is a partial list of training that all staff should receive upon onboarding and on at least an annual basis. Support services staff should have additional training, as described in Part IV.

- Fair Housing
- Trauma-informed care
- Sexual harassment policy
- Conflict of interest policy
- Policies to guard the confidentiality and privacy of applicants and tenants
- Techniques to de-escalate crises and conflicts
- Processes for emergencies and critical incidents
- Processes for communication between the property management division and the support services division
- Compassionate communication (also known as nonviolent communication)
- Reasonable accommodations and modifications



PART IV

Support Services in Permanent Supportive Housing

Introduction

High quality support services are critical to the success of permanent supportive housing. Support services should be designed to help households remain stably housed throughout their tenancy and maximize health and wellness. The services will provide supports for tenants as they work on personalized goals. Services should be tailored to the individual needs and desires of the household. Services must also be voluntary on the part of the tenant and based on the tenant's timeline and goals, not the service provider's. Below we describe the role of support services, who should provide those services, how to provide voluntary services, and tenant rights and responsibilities.

Separation of Property Management and Support Services

Earlier in this guidebook, we presented various models and approaches to managing the property. Regardless of whether the property management is outsourced or in-house, the support services need to be separate from property management. The role of property management is strictly for the activities of managing the site, including the following.

- tenant application and eligibility determination
- rent collection
- maintenance and repairs
- legal issues surrounding non-payment of rent
- compliance
- accounting

Property managers can and should inform tenants about the availability of and processes for accessing support services; however, it should be clear that services are voluntary and not a condition of tenancy.

At times a well-meaning property management staffer may feel the need to become involved in helping tenants with personal issues. However, to the greatest

extent possible, property management staff and maintenance staff should be sensitive to tenants but not become involved in their personal lives or attempt to provide their own style of guidance or advice. Rather, any concerns or issues that non-services staff identify should be brought to the attention of the support services providers, to allow the professionally trained services provider to follow up.

Support service activities may include any of the following.

- case management and service planning
- service coordination
- assistance with independent living skills
- creating a plan for meaningful daily activities
- help managing crises
- accessing physical and behavioral health care
- help applying for mainstream benefits, including disability income
- identifying and applying for employment opportunities
- accessing natural supports, such as places of worship, family, and affinity groups

Voluntary Service Provision

Voluntary service provision means the household is not required to participate in services. Services remain available to each household for the duration of the tenancy, but tenancy is not tied to the household's participation in services. There should never be any repercussions for nonparticipation. Households can refuse to participate services at any time or disengage from services altogether. As long as the household satisfied the requirements of the standard landlord-tenant lease, as described previously, the household remains a tenant.

Although services are entirely voluntary from the tenant's perspective, the service provider or services coordinator should continue to try to engage the

household and offer support. Households living in permanent supportive housing often have challenges that have been barriers to maintaining stable housing in the past. The goal of the service provider is to work with each household in addressing and reducing these barriers to ensure housing stability.

If a tenant refuses services or expresses they would like to stop services, the service provider can explore why this may be the case. Again, the service provider should always work to engage tenants and maintain a positive relationship; however, there should be no coercion to accept services. If the household is at risk of losing their housing due to nonpayment of rent or other lease violations, the property manager should alert the service coordinator so he or she can engage assertively with the tenant to help prevent eviction.

Service Provision Models

Support services can be provided in a variety of different ways. Services may be provided (1) by in-house staff, or (2) by partner organizations. Services may also be provided (1) on-site, or (2) off-site.

In-House Services Staff

The owner-operator of the permanent supportive housing development may choose to employ an in-house support services staff. As noted previously, the in-house support services division should be separate from the property management division.

The primary benefit of having an in-house services staff is that the owner has greater ability to: ensure staff are qualified, demand high-quality services, require accountability, and more readily track services provision. Having an in-house services staff does not eliminate the opportunity to partner with other providers for specialized services. For instance, the primary case managers may be in-house, while the mental health provider may be a partner organization. Finding the right balance is the key to success.

The appropriate case load for a case manager in permanent supportive housing depends on the target population and the severity of issues and disabilities. An “intensive case manager” may have a caseload of 15 very high-need tenants, while in another supportive housing

environment with lower-need or more stable tenants, the caseload may be as high as 40.

Caseloads can be increased somewhat when the staffing plan includes Peer Support Specialists who can assist with daily interactions, transportation, daily living skills, and so on. Peer Support Specialists, who are certified through the Department of Children and Families, are persons with a mental health diagnosis and/or substance use disorder. Peer Specialists utilize their lived experience to help others in their journey of recovery, which enriches the experience of the tenant and increases the probability the tenant will engage in services.

If the operator plans to provide services in-house, the budget and management plan should reflect a consideration of the professional qualifications required for service staff, the appropriate compensation for the desired experience and any licensure, and the necessary number of staff to provide high quality services considering the number of tenants and characteristics of the target population.

Service Provision By Partner Organizations

In many cases, the owner-operator of the development chooses to partner with community-based services providers for services. The primary benefit of outsourcing services is that there is likely a lower cost to the owner. The cost, however, may be a loss of quality control, which in turn might lead to more property management issues and a higher eviction rate.

Local community-based services provider partners may include the local Center for Independent Living, the community mental health provider, a substance use disorder provider, a federally qualified health center, a homeless services nonprofit, or the Veterans Administration, just to name a few. These organizations may be able to bill Medicaid or other insurers for the services provided, or they receive grants and donations to enable them to provide the services. In some cases, the provider agencies will require the supportive housing operator to pay for the services rendered; in these cases, the cost of those services must be factored into the pro-formas and budgets.

On-Site Services

Most supportive housing developers have at least one service coordinator or case manager with an office on

Case Manager in Permanent Supportive Housing Responsibilities

The case manager provides support services to tenants residing in a supportive housing development. The primary goal of support services is to help all households maintain stable housing. A secondary goal is to help tenants move toward health and wellness.

Duties:

- Engage new households and describe the procedure for accessing support services.
- Determine tenants' needs by completing an intake assessment and developing a housing and service plan based on the household's stated goals.
- Refer tenants to services, including, but not limited to, employment services, medical health care, behavioral health care, support groups, and mainstream benefits.
- Advocate for needed services and benefits including completing applications for mainstream benefits, Social Security benefits, and healthcare benefits.
- Maintain client records by completing accurate and timely documentation and updating housing and service plans regularly.
- Participate in professional development.
- Maintain a database of resources available for clients to access.
- Interact with the property management division on matters concerning tenants housing stability.

Skills and Qualifications:

The case manager should have a experience and education in human services. Preferred candidates will have a bachelor's degree in Human Services, Social Work, Psychology, or a similar field, and at least two years of post-degree professional work experience in the field. Additionally, candidates should understand, and employ, trauma-informed care, person-centered strengths-based planning, harm reduction, motivational interviewing, and recovery-oriented care.

Necessary Skills Include:

Professional decision making, written and verbal communication, customer services skills, emotional intelligence, conflict resolution, empathy, crisis intervention and resolution, attention to detail, agility with electronic data systems, and time management.

property. This case manager or service coordinator engages every tenant as a potential recipient of support services and works to develop rapport with each household.

Whether all the services are provided by in-house staff or outsourced, having those services provided on the property is preferable. On-site services are much more accessible to tenants, making it more likely that tenants will engage in voluntary services. Further, regular interaction between tenants and case managers tends to build a trusting relationship more quickly, even if that interaction is as simple as saying hello in the hall or running into each other in the lobby or at the snack machine.

If certain services are provided offsite, referrals with a "warm handoff" and accessible transportation should be made. In some cases, the on-site case manager may need to accompany the tenant to her appointments offsite.

Offsite Services

As discussed above, it may be impossible for certain services (e.g., medical care or group therapy) to be provided on-site. In these cases, the service coordinator or case manager should help connect the tenant to those services or health care at another location. There may also be cases in which the services provider, whether in-house or outsourced, has a central location where the tenants are expected to receive services; if at all possible, this should be avoided. Rather, it is much better to schedule home visits, so the service provider meets with tenants in their own apartments.

Contracting Support Services

As noted above, in many cases, support services will be contracted out to a community-based service provider. Owners/

property managers should identify service providers who are experienced in dealing with the population residing at the development. It is assumed that in supportive housing, most tenants have disabilities. To the extent possible, therefore, service providers should be chosen based on the nature of the tenants' disabilities.

Community service providers generally have expertise in one or a few specific domains. Below are examples of categories service providers may serve.

- Intellectual and developmental disabilities
- Substance use disorders
- Mental health conditions
- Co-occurring disorders (Substance Use and Mental Health diagnoses)
- Children with disabilities
- Households moving out of homelessness
- Elderly
- Survivors of domestic violence
- Infectious diseases (e.g., HIV/AIDS)
- Families involved in the child welfare system
- Veterans

This list is not exhaustive but demonstrates that there are several different types of support services to consider based on the development's target population. These categories need to be carefully considered when choosing appropriate service providers.

Some service providers can provide a generalist approach. In this approach, a generalist case manager is hired that is familiar with each of the community services available to assist people with disabilities or other vulnerabilities and barriers. The case manager should have relationships with each of the specialized providers and be able to seamlessly refer households to those services. The case manager need not have clinical licensure; rather the case manager links tenants to licensed professionals as appropriate.

Below is a sample job description of case manager. This job description applies whether the case manager is in-house or outsourced.

Training and Competencies in Support Services

Regardless of whether support services are provided

in-house or outsourced, there are specialized trainings that should be required by quality supportive housing providers. Below is a representative but not exhaustive list of appropriate trainings. Terms with an asterisk are defined in the Glossary provided in Appendix II.

- Trauma-informed care*
- Person-centered, strengths-based planning
- Harm reduction*
- Motivational interviewing* and the stages of change
- Recovery-oriented care*
- Crisis intervention, de-escalation, and resolution
- Crisis planning
- First aid
- Fair housing

Funding for Support Services

Services should be provided to households without regard to insurance or income status. At an early meeting, the case manager should assess if the household already has support services in place provided by another agency or agencies. Partnering with existing services helps maintain consistency of services and collaboration, and ensures services are not duplicated.

Funding for support services will likely require multiple sources. Most tenants in supportive housing are eligible for Social Security Disability Benefits and/or Supplemental Security Income (SSDI/SSI). These benefits offer public insurance in the form of Medicare and/or Medicaid. Households over 65 and households with SSDI are eligible Medicare, while those receiving SSI are eligible for Medicaid. Some households will qualify for both, dependent upon income and disability.

It is important to understand the differences in these benefits and what services are offered that could offset the cost of support services. For example, Medicaid eligible individuals with a mental health disorder are eligible to receive a specialized service known as Targeted Case Management. Understanding the benefits and services for which the tenant is eligible will reduce the cost or increase the income to the supportive housing provider.

In Florida, the Department of Children and Families receives substance abuse and mental health (SAMH)

funding to serve households who are uninsured. These SAMH funds are contracted out to seven different Managing Entities (MEs), which in turn contract with local service providers. MEs are administrative organizations who fund mental health and substance abuse providers serving uninsured households. It is not unusual for supportive housing households to have received services at one of the funded provider organizations. In addition to funding behavioral health agencies, MEs can provide funding to employ Peer Support Specialists, described earlier in Part IV.

In addition to billing insurance (including Medicaid) for services and accessing funding or services provided through the Managing Entities, there are a variety of other sources of funding for support services. For instance, the HUD CoC Program provides certain limited funding for supportive housing programs and rapid re-housing programs, which may help fund or augment services. Other funding sources include local government funding, funding specific to certain types of disabilities, and private philanthropy and foundations. Because funding for support services is competitive and limited, it is critically important to partner with funded community-based organizations to the extent possible.

Documentation and Privacy Issues

Support services staff must never violate the privacy of the tenant by disclosing personal information to the

property manager or any other person not directly involved in the coordination of support services. Communication on tenant lease issues is important, but services staff should have clear guidelines for what information they are authorized to disclose and under what conditions. For example, the case management staff could recommend to the property manager that the household be given the opportunity to be put on a payment plan. The case manager can share this information without getting specific about why that is being recommended. At the same time the property manager must not demand to be apprised of issues related to disabilities or health, or make an inquiry for information that is confidential or private (e.g., the status of a child welfare case); violating this tenet is a fair housing violation and harms important trusting relationships. Protected information should only be disclosed with a proper authorization and informed consent to release information.

Case managers must maintain a secure database and locked file cabinets for documentation. There are several different databases available for case management. If the supportive housing property serves households who were formerly homeless, a possible alternative is the Homeless Management Information System (HMIS). HMIS is the database the Continuum of Care uses to record services for households experiencing homelessness and households who are receiving services from permanent housing programs.





APPENDICES

APPENDIX I

Resources

RESOURCES RELEVANT TO THE MANAGEMENT OF PERMANENT SUPPORTIVE HOUSING

<p>Affordable Housing Resource Guide Florida Housing Coalition summary of funding resources for the development of affordable housing</p>	<p>http://www.flhousing.org/publications/</p>
<p>Case Manager Guidebook Florida Housing Coalition overview of best practices in support services to help persons moving out of homelessness</p>	<p>http://www.flhousing.org/publications/</p>
<p>FHFC Rent Limits</p>	<p>http://www.floridahousing.org/owners-and-managers/compliance/rent-limits</p>
<p>FHFC Income Limits for Rental Housing</p>	<p>http://www.floridahousing.org/owners-and-managers/compliance/income-limits</p>
<p>FHFC Special Needs Housing Website</p>	<p>http://apps.floridahousing.org/StandAlone/SpecialNeeds/</p>
<p>FHFC Predevelopment Loan Program</p>	<p>http://www.floridahousing.org/programs/special-programs/predevelopment-loan-program</p>
<p>FHFC Compliance Guidebook</p>	<p>http://floridahousing.org/owners-and-managers/compliance/compliance-guidebook</p>
<p>Florida Landlord Tenant Act (F.S. Ch. 83.40)</p>	<p>http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0000-0099/0083/0083.html</p>
<p>HUD Supportive Housing Program</p>	<p>https://www.hud.gov/hudprograms/supportive-housing</p>
<p>Substance Abuse and Mental Health Services Administration (SAMHSA) Guidebook: Understanding Permanent Supportive Housing</p>	<p>https://store.samhsa.gov/shin/content/SMA10-4510/SMA10-4510-06-BuildingYourProgram-PSH.pdf</p>
<p>U.S. Interagency Council on Homelessness: Tools for Planning Supportive Housing</p>	<p>https://www.usich.gov/solutions/housing/supportive-housing</p>

APPENDIX II

Glossary

Glossary of Selected Terms (Current as of June 2018)

The following definitions are applied to multifamily rental housing programs administered by the Florida Housing Finance Corporation.

“Disabling Condition” means a diagnosable substance abuse disorder, serious mental illness, developmental disability, or chronic physical illness or disability, or the co-occurrence of two or more of these conditions, and a determination that the condition is:

- a. Expected to be of long-continued and indefinite duration; and
- b. Not expected to impair the ability of the person with special needs to live independently with appropriate supports. (420.0004(7), F.S.)

“Harm Reduction” or harm minimization, includes a range of public health policies designed to lessen the negative social and/or physical consequences associated with various human behaviors, both legal and illegal. In the context of substance use and mental health, harm reduction includes taking measures to minimize the harm that might result from continuing substance use or untreated or undertreated mental health issues.

“Homeless,” applied to an individual, or “individual experiencing homelessness” means an individual who lacks a fixed, regular, and adequate nighttime residence and includes an individual who:

- a. Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
- b. Is living in a motel, hotel, travel trailer park, or camping ground due to a lack of alternative adequate accommodations;
- c. Is living in an emergency or transitional shelter;
- d. Has a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;
- e. Is living in a car, park, public space, abandoned building, bus or train station, or similar setting; or

- f. Is a migratory individual who qualifies as homeless because he or she is living in circumstances described in paragraphs (a)-(e). (Section 420.621(4), F.S.)

“Low Income” means the Adjusted Income for a Family which does not exceed 80 percent of the area median income. (FAC 67-48.002(77))

“LURA” or “Land Use Restriction Agreement” means an agreement which sets forth the set-aside requirements and other Development requirements under a Corporation program. (FAC 67-48.002(78))

“Motivational Interviewing” is a technique that helps people resolve ambivalent feelings and insecurities to find the internal motivation they need to change their behavior. It is a practical, empathetic, and short-term process that takes into consideration how difficult it is to make life changes.

“Person with a Disability” means, pursuant to Section 3 of the Americans with Disabilities Act of 1990, as amended by the ADA Amendments Act of 2008, an individual to which both of the following applies:

- a. The individual has a physical or mental impairment that substantially limits one or more of the major life activities of such individual; and,
- b. The individual is currently or was formerly regarded as having an existing record of such an impairment. (FAC 67-48.002(86))

“Person with a Disabling Condition” means a person with a Disabling condition as defined in Section 420.0004(7), F.S.

“Person with Special Needs” means an adult person requiring independent living services in order to maintain housing or develop independent living skills and who has a disabling condition; a young adult formerly in foster care who is eligible for services under s. 409.1451(5); a survivor of domestic violence as defined in s. 741.28; or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemen-

tal Security Income (SSI) program or from veterans' disability benefits. (Section 420.0004(13), F.S.)

“Recovery-Oriented Care” means providing services in a manner that recognizes that recovery is not necessarily about cure but is about having opportunities for choices and living a meaningful, satisfying and purposeful life, and being a valued member of the community; accepts that recovery outcomes are personal and unique for each individual; empowers individuals so they recognize that they are at the center of the care they receive.

“Special Needs Household” means a household consisting of a family that is considered to be homeless, a survivor of domestic violence, a person with a disability, or youth aging out of foster care. These households require initial, intermittent or on-going supportive services from one or more community-based service providers to obtain and retain stable, adequate and safe housing in their communities. (FAC 67-48.002(108))

“Special Needs Household Referral Agency” means a participating organization that is included on the Special Needs Household Referral Agency Participation List, effective 1-12-09, incorporated by reference and available on the Corporation's Website under the 2011 Universal Application link labeled Related References and Links or from <http://www.flrules.org/Gateway/reference.asp?No=Ref-00500>. (FAC 67-48.002(109))

“Trauma-Informed Care” is an organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes phys-

ical, psychological and emotional safety for both consumers and providers, and helps survivors rebuild a sense of control and empowerment.

“Very Low-Income” means

- a. With respect to the SAIL Program,
 1. If using tax-exempt bond financing for the first mortgage, income which meets the income eligibility requirements of Section 8 of the United States Housing Act of 1937, as in effect on the date of this rule chapter; or
 2. If using taxable financing for the first mortgage, total annual gross household income which does not exceed 50 percent of the median income adjusted for family size, or 50 percent of the median income adjusted for family size for households within the metropolitan statistical area (MSA), within the county in which the Family resides, or within the state of Florida, whichever is greater; or
 3. If used in a Development using Housing Credits, income which meets the income eligibility requirements of Section 42 of the IRC; or
- b. With respect to the HOME Program, income which does not exceed 50 percent of the median income for the area, as determined by HUD, with adjustments for family size, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on a basis of HUD findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes. (FAC 67-48.002(119))

APPENDIX III

Due Diligence

Site Selection Due Diligence Process: Third Party Reports Required

Survey

The surveyor should provide the following information on the site:

- Boundaries
- Legal Description
- Encumbrances
- Easements
- Structures
- Access
- Right of Way
- Elevation (flood or wind zone)

Appraisal – Informal

The informal appraisal can give a general idea of the current value and that of comparable properties. This initial work helps you make the go or no-go decision.

- Comparative analysis of similar properties
- General market for similar properties- how long on market, price reductions
- Value of vacant and unimproved land

Appraisal – Formal

It is likely that the credit underwriter will require a specific type of appraisal. Credit underwriters for Florida Housing Finance Corporation order the appraisal and the developer must pay the fees involved. These can range from under \$5,000 to \$6,500. It is important to discuss the finding with the appraiser so proper decisions can be made. The formal appraisal will provide the following

- Market Overview
- Improvement Analysis
- Highest and Best Use Analysis
- Marketability and Exposure Period

The formal appraisal valuation procedures will result in a set of valuations for the property ranging from undeveloped to developed with or without long term

affordability restrictions. Affordable housing subsidies will result in long term or permanent affordability requirements that affect the market value of the property. For purposes of obtaining financing for permanent supportive housing development, the credit underwriter expects the purchase price to be consistent with appraised values. The appraisal considers the market rate rental income the property could garner, the land value, and the value as a property with restricted rents.

Land Use and Zoning

Florida real properties may have a basic zoning category that would allow the development of rental housing, but a planned unit development (PUD) zoning request might be more compatible with the specific requirements of the site. This process takes time and there are fees. Property that is not zoned for residential uses may be problematic. In these cases, it is best to seek guidance from the planning department and request that the City or County conduct the rezoning on behalf of the project.

Environmental Review

Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the National Environmental Protection Act and other related Federal and state environmental laws. Mitigation may be required for protected habitat, wetlands or species. Projects that will negatively impact properties that have historical or archaeological significance may not be permitted or there may be mitigation requirements. The purchase contract should have an exit if the site has significant environmental issues.

Hazardous Materials

Any pre-1978 buildings must be inspected for the presence of lead-based paint and asbestos. If the project moves forward remediation will be required by licensed, certified hazardous materials professionals.

Flood Elevation

Determine the elevation of the site and if it is within a 100-year flood zone or a wind velocity zone. Flood and wind insurance will be required as well as advanced disaster preparedness.

Soil Testing

Soil testing can reveal conditions that will adversely impact the budget or engineering of the site. The presence of dense material (rock) under the surface can require funding to remove it. Sandy soils may not drain properly and can require additional engineering expenses to correct.

Site Planning Sketches

Site plan approval is required by FHFC in the Request for Application process. This is a threshold item. Site planning is not the same as architectural drawings for the development of the project. Full architectural drawings are costly and should not be undertaken until funding has been awarded and the project is in the underwriting stage.

Access and Egress

The entry and exit points to a property should be considered with regard to traffic safety as well as safety of pedestrians who come and go from the property. Projects on a busy road will require protective fencing and signage to protect residents.

Lot Coverage

Most zoning ordinances have maximum lot coverage ratios of built to open space. This can be a barrier if the proposed project is multiple buildings or the building size required exceeds the lot coverage ratio. Check if relief is offered through the local SHIP Local Housing Assistance Plan (LHAP) or Comprehensive Plan Housing Element.

Storm Water Retention

Many land development codes require storm water runoff to be detained on site. If the engineer determines that there is inadequate space on a site to handle the retention areas, an alternative methodology may be required. A site with a low elevation that collects water may need to be rejected if there is inadequate space for the excess water or if the site is in a flood hazard area.

Utility Access

The existence of utilities at the site must be documented when responding to the RFA process of FHFC. These include electric, water, sewer, and roads. If any of these are not available to the site an inquiry should be made as to the estimated cost to bring this infrastructure to the site. It is also important to check with the capital improvements plan of the municipality to learn if and when these improvements might be provided to the site.

APPENDIX IV Property Management Plan Template

Overview

The Property Management Plan is a key factor in the successful and sustainable operation of permanent supportive housing. It defines the governing framework of the property and sets forth the policies and procedures to be used by management staff including leasing, support service coordination, maintenance and compliance with the Regulatory Agreement and any other financing conditions. A separate property management plan must be provided for each property in the portfolio. This Appendix provides a template that may be adapted for a permanent supportive housing project. Section 1 concerns property management, while Section 2 focuses on support services.

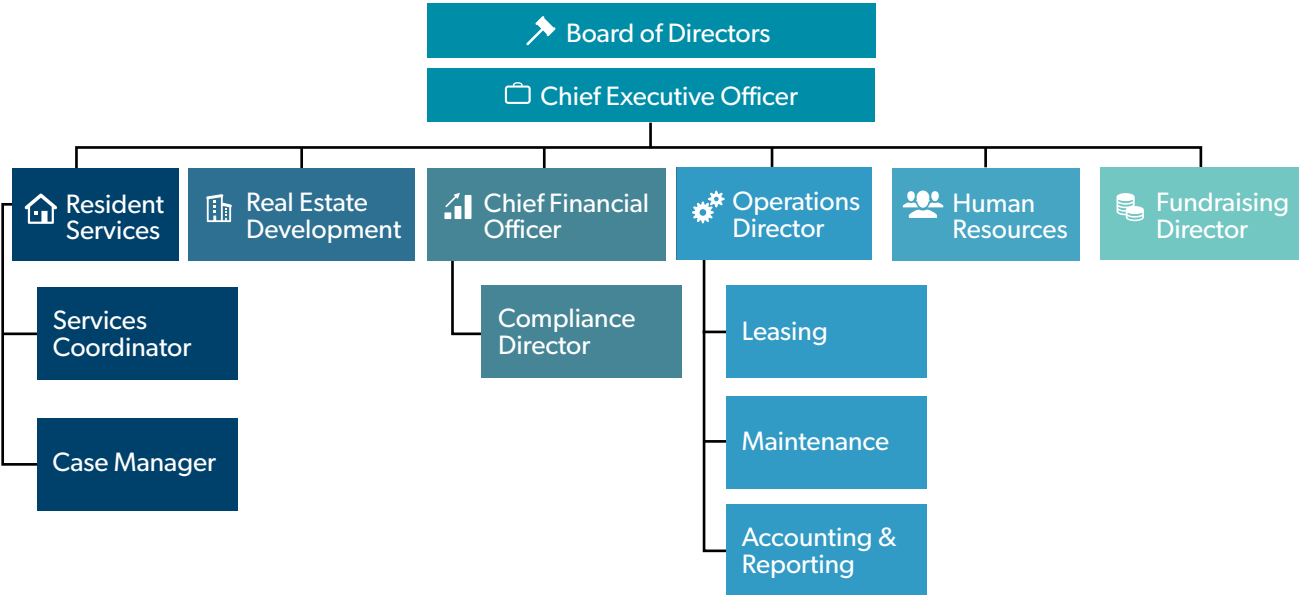
SECTION 1: Property Management

General Information

- Name of Property:
- Location:
- Date Put in Service:
- Owner:
- Manager:
- Leasing Office Location:

Organization Chart

SAMPLE ORGANIZATION CHART | Permanent Supportive Housing with internal property management and resident services



Job Descriptions and Qualifications

The Property Operations Director is responsible for the management of the property (or portfolio of properties), supervise management staff, and report to the CEO. This position is fully accountable for all day to day property operations, including overseeing and enhancing the value of the property

The Resident Services Coordinator is responsible for implementing the support services program within the property on behalf of the residents. The Resident Services Coordinator maintains the service coordination plan and agreements with third-party support providers and works to expand services as needed on behalf of the residents. The Resident Services Coordinator supervises the Case Manager and the Support Coordinator, and reports to the CEO. The Resident Services Coordinator is responsible for reporting on services provided for compliance purposes.

The Support Coordinator is responsible for oversight of supports and services to individual residents. The Support Coordinator monitors the ongoing and active involvement of third-party support providers and is responsible for overseeing incident reporting from the Case Manager.

The Case Manager provides and/or helps coordinate support services to tenants to ensure they maintain housing stability. The Case Manager has a direct relationship with each tenant beginning with the intake and leasing process, and throughout tenancy. The Case Manager helps the tenant acclimate to the housing and services provided and is on call to assist in any incidents. The Case Manager assists with coordinating third-party providers as appropriate.

The Leasing Staff are responsible for the leasing, marketing, and maintaining positive resident relations of the property. The Leasing Coordinator oversees the application and eligibility process in conjunction with the Case Manager and the assistance of the Leasing Agent. The Leasing Coordinator is responsible for compliance with Fair Housing requirements and ensuring that the Affirmative Fair Housing Marketing Plan is implemented properly. The Leasing Coordinator oversees the appeals process. The Leasing Agent works to ensure that all approvals and rejections are recorded. The Leasing Agent

tracks the annual lease cycle and notifies the tenant and Case Manager, if appropriate, of lease renewal and re-certification of income, as required.

The Maintenance Staff are responsible for maintaining the property's appearance and function, and ensuring that all repairs are completed on a timely basis. The Maintenance Staff supervises groundskeepers, painters, plumbers, and other subcontracted services. The Maintenance Manager is responsible for overseeing the Maintenance Plan and conducting the scheduled inspections, replacements and preventive maintenance activities. The Maintenance Staff work with Leasing to ready units for move in and assist with inspections when tenants move out.

Accounting Staff record financial transactions, track actual versus budget, and prepare appropriate financial statements and reports.

Compliance Staff are responsible for the preparation of monthly/quarterly/annual reports required by FHFC and other funders. Compliance staff are responsible for adhering to the monitoring schedule and meeting with monitors during on-site inspections.

Management Policies

Housing First is the core value of the property. This means that individuals and families experiencing homelessness who have disabilities must be rapidly housed in permanent housing without preconditions or service requirements, and they are connected to voluntary support services to help them achieve housing stability, wellness, and independence.

Leasing Policies Referrals

For applicants who are experiencing homelessness, referrals must be received through the Continuum of Care (CoC) Coordinated Entry System. For others, referrals may be received through FHFC's LINK referral agencies or other human services agencies or health care organizations. In addition, anyone may apply.

Application Fee

There will be no fee to apply. No fees will be collected for credit or criminal background check.

Security Deposits

The security deposit will be \$____. This is a nominal amount that will help incentivize the tenant to take good care of their apartment. If the applicant does not have the money, community resources will be sought to assist. The security deposit will be returned to the tenant (even if made on their behalf by a support provider) if they have paid all rent, paid for any repairs due to damages, left the apartment clean with only normal wear and tear, removed all personal belongings from the apartment, and returned keys to the property manager.

Lease Form

The lease form to be used is that made available by the Florida Bar/Florida Association of Realtors. All occupants of the unit must be listed on the lease. Leases must be current and fully executed. Lease terms must be consistent with the Regulatory Agreement. The lease may not include any requirements regarding tenant service compliance or engaging with services.

Tenant Handbook

Leasing and services staff will explain the lease and the Tenant Handbook to each tenant to make sure they understand it. Once the lease is signed, a copy of the lease and Tenant Handbook will be provided to the tenant. The handbook clearly explains the tenant's rights, as well as the tenant's responsibilities regarding paying rent on time, requesting repairs or maintenance, and responding to an emergency, whether personal crisis or disaster such as fire or flooding. The handbook contains current contact information for the property manager, case manager, and emergency services.

Move In

Support staff will schedule a move-in time and will accompany the new tenant to their unit and provide the Welcome Package. A copy of the lease will be provided to the Case Manager. FHFC requires that no tenant may occupy the property until the lease is fully executed. Compliance will be examined during monitoring.

Welcome Package

Tenants should be provided a welcome package with easy to understand information about services, events at the

property, a local map and bus routes, and information on how and when to pay rent.

Furniture and Household Supplies

Furniture and supplies may be available to tenants in need at no charge. The Case Manager will help coordinate community resources to engage in supporting the tenant's move-in.

Rent Payments

Paying rent on time is very important. Rent may be paid in person in the leasing office or using our online payment portal. The Case Manager will assist the tenant to make sure they have chosen a method most convenient to them. In cases of late or non-payment the Case Manager will work with tenant to solve the problem, which may include setting up a payment plan. Third party support providers may be called in to assist.

Lease Violations

If a lease violation occurs the tenant and the Case Manager will be notified. The Case Manager will work with the tenant to solve the problem.

Screening In

It is our policy that the tenant selection process screens tenants in, rather than screening them out. An applicant with a recent history of poor credit or evictions should be provided an opportunity to present mitigating information and additional information to address concerns or, if appropriate and feasible, pay an additional security deposit. Criminal background checks are performed only to identify recent convictions for violent crimes, and the consideration of any criminal convictions must take into account the recency, nature, and severity of the crime. Arrest records alone cannot be used to disqualify an applicant for tenancy.

Timeliness

Our leasing process is intended to be convenient, streamlined, and efficient to best serve future residents. Once an application is submitted, this process should take no longer than five business days.

Appeal Process

A written and easy to understand appeals process is in place and made available to applicants who are denied

tenancy. The applicant is notified by telephone and in writing as to the reasons for the denial and are provided an opportunity to provide additional information or explanation and to have the denial reconsidered. If the applicant is working with a service provider, the service provider is also notified.

Eligibility Determination

The Leasing Staff determine the eligibility of an applicant based on program requirements, coordination with service providers, and as provided for in the Regulatory Agreement. The property manager must certify that the tenant meets eligibility requirements.

Tenant Income Certification

The income of applicants is verified and certified in accordance with the funding sources. Tenants are not required to have income to become a tenant if there is evidence that housing costs can be paid through another source, such as rent subsidies or housing voucher. All tenants' income must be re-verified and certified on an annual basis or according to the Regulatory Agreement.

Annual Re-Certification

The property manager will re-certify the eligibility of tenants on an annual basis or as required by funding sources. (A development that is categorized as permanent supportive housing certifies that 100 percent of its units are low income only once, at the first anniversary of the move-in or initial certification, except for HOME units.) All FHFC projects must comply with next available unit rules which come into play if a certified tenant vacates a unit.

Accessibility of Application Process

The application process will be streamlined with limited meetings. Leasing and support staff may meet an applicant at a convenient location in the community or process the application on the property. The application process will be fully accessible to persons with disabilities and necessary accommodations are provided during the process.

Diversity and Inclusion

The application process and tenancy are available and inviting to diverse cultures, races, and ethnic groups. Application materials, tenant materials and notices, and sim-

ilar documents must be available in Spanish and Creole. Accommodations for those with disabilities is provided.

Intake Documentation

Applicants will be asked to provide identification, income documentation if any, and verification of a disabling condition if applicable. The applicant should provide evidence of a housing voucher or rent subsidy agreement at the time of application.

Maintenance and Repair Policies

The maintenance supervisor is responsible for the preparation and update of the Maintenance and Repair Plan. The plan includes routines for scheduled routine maintenance and corrective repairs. Preventive maintenance includes inspections, replacements and upgrades to prolong the useful life of equipment and avoid costly breakdowns. Proper maintenance should be designed to be readily available to tenants and to prevent hazards to tenants and visitors.

Maintenance staff will be trained in trauma-informed services and sensitivity to gain the trust of tenants and to be aware of potential health and safety concerns about a tenant. Any concerns should be immediately conveyed to the Case Manager.

The Maintenance Plan includes the following:

- Monthly physical inspections
- Daily task list with protocols, including daily task list for each maintenance employee, monthly physical inspection, timely handling of work orders and protocols for completing, reporting and ensuring tenant satisfaction
- Preventive maintenance procedures, including regular inspections, servicing, repairs
- Check-ins with the case manager

Building Security and Visitors

The safety and security of tenants of utmost importance. The Security plan for the property includes the following methods and protocols (select from among the alternatives below).

- Remotely monitored cameras
- On-site 24-hour monitoring of camera feeds
- Locked entrance with attendant
- Un attended locked entrance

In addition, each apartment is furnished with security features that are appropriate for the tenant’s disability or condition.

Operating Procedures

Operation in Compliance with Financing Requirements. The operation of the property is subject to the Credit Underwriting Report, Regulatory Agreements, LURA and EAU. These documents are stored at: _____.

Operating Budget and Reserves. The property manager is responsible for the preparation of an operating budget and reserve schedule that is to be approved by the CEO and Board of Directors. Reserve accounts will be maintained according to the requirements of each funder and as defined in the Regulatory Agreement. The property manager is responsible for the execution of the budget and capitalization of reserve accounts.

Set-asides and Unit Mix. The specific set-asides and unit mix for the property will be implemented as required by the Credit Underwriting Report and the Regulatory Agreement. The Regulatory Agreement contains requirements for the designated set-aside for income levels and target population. The unit mix is determined in the pre-development and underwriting phases and must comply with the requirements of the sources of funding and ultimately, the Regulatory Agreement.

**Example:
Income Limits**

Maximum household income is based on the requirements of the funding source and are identified in the Credit Underwriting Report and Regulatory Agreement.

Income limits based on household and unit size are published annually for subsidized affordable housing. Income limits are posted at <http://floridahousing.org/owners-and-managers/compliance/income-limits>. It is important to view the correct program income limits as there are variations among programs.

Rent Limits

Maximum rents per unit are based upon requirements from the funding source. In cases of multiple sources of financing, the most stringent will apply. Allowable rents are subject to a utility allowance that is deducted from the maximum gross rent allowed for the unit, unless utilities are included in the rent. The resulting figure is the maximum allowable household rent contribution.

The rent restrictions for each property are identified in the Credit Underwriting Report as well as the Regulatory Agreement. Rent limits are published annually and are posted on the FHFC website at <http://floridahousing.org/owners-and-managers/compliance/rent-limits>.

Rental Assistance

The rent contribution does not include rental assistance payments under Section 8 of the United States Housing Act of 1937, or under comparable rental assistance programs, or amounts paid for optional supportive services. Properties financed with state or federal funds are prohibited from refusing to accept housing vouchers presented by a prospective tenant.

Utility Allowances

The utility allowance is an estimate of the cost of monthly utilities for the unit type. If the household pays utilities (other than telephone and cable), a utility allowance is

SAMPLE: Unit Mix Chart

Bed/Baths	No. of Units	Median Income %	Max Rents	Utility Allowance	Max Net Rents	Annual Rents
1/1	3	40%	\$441	\$163	\$278	\$10,008
1/1	5	60%	\$662	\$163	\$499	\$29,940
2/1	2	60%	\$795	\$199	\$596	\$14,304
Totals	10					\$54,252

deducted from the maximum gross rent allowed for the unit. The initial utility allowances are determined during the Credit Underwriting process and, going forward, must be verified quarterly by the property manager. The frequency of confirmation of the utility allowance is recommended quarterly if using the Public Housing Authority utility allowance. Others may be confirmed annually.

The utility allowance may be estimated using the following methods:

- Obtain allowances from the Public Housing Authority for the applicable community.
- Obtain utility costs from the applicable utility companies.
- Utilize an energy, water, and sewage consumption analysis model. The model must take into account factors including unit size, building orientation, design and materials, mechanical systems, appliances, and characteristics of the building location.
- Energy consumption model procedures and forms can be viewed at <http://floridahousing.org/owners-and-managers/compliance/utility-allowance>.

Tenant Eligibility

The property manager determines the eligibility of an applicant based on program requirements, coordination with service providers and as provided in the Regulatory Agreement. The property manager must certify that the tenant meets eligibility requirements.

All FHFC programs require property managers to re-certify the eligibility of their tenants annually.; However, a permanent supportive housing development that certifies that 100 percent of its units are low income only re-certifies on the first anniversary of the move-in or initial certification, except for HOME units. Projects with HOME units must recertify tenants according to the HOME rules. When a unit is vacated, there are “next available unit” rules for FHFC financed projects that ensure the required set-asides are met.

Financial Management

The property manager is responsible for accounting of revenue and expenses. If federal funds were used in the development of the project, financial accounting standards must comply with federal standards described at 2 CFR 200.302.

Fair Housing

Supportive housing owners and managers are required by law to respond appropriately to requests for reasonable accommodations at every stage of operations. This fair housing requirement is critical because supportive housing is specifically designed to help persons with disabilities succeed in accessing and maintaining stable housing.

General Fair Housing Requirements

Persons living with disabilities are legally entitled to request accessibility accommodations if they need it in order to have the full use and enjoyment of their housing. The housing provider has a duty to make reasonable accommodations to each person residing or working at the housing site.

“Federal law prohibits discrimination against persons with disabilities and requires all landlords to provide reasonable accommodation for tenants’ disabilities. The Fair Housing Act, as amended in 1988, prohibits all housing providers from discriminating against people with disabilities, including psychiatric disabilities. A housing provider violates the Fair Housing Act when it ‘refuses to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling . . .’ unless such accommodation will fundamentally alter the provider’s program or cause an undue financial or administrative burden. Similarly, Section 504 of the Rehabilitation Act of 1973 prohibits all federally funded entities from discriminating against any otherwise qualified individual ‘solely on the basis of his or her handicap,’ and includes an implicit requirement to provide reasonable accommodation.”

The Act applies to many types of housing decisions, including marketing, showing the property, the decision to rent to the prospective tenant, the lease terms, the eviction process, and the decision to renew the lease. Examples of discrimination can include anything from refusal to rent to a person due to the specific type of disabling condition, to having overly broad criminal record exclusions, to asking intrusive or inappropriate questions during the application process.

Marketing

The Fair Housing logo and statement of non-discrimination must be included on all marketing materials and applications. In addition, the property posts in visible locations the Fair Housing posters available from HUD. The logo and statement are presented below.



As an equal opportunity housing provider, [insert name of organization] provides housing opportunities regardless of race, color, national origin, religion, sex, physical or mental disability, familial status or any other classification protected by applicable federal, state, or local law.

Reasonable Accommodations

This property respects applicants' and tenants' right to request "reasonable modifications" to the unit, if necessary for a person with a disabling condition to fully use the housing. We also make "reasonable accommodations" in rules, policies, practices, or services that are necessary for the tenant with a disability to access and fully use the housing. At any point during the application process or lease term, if an applicant, advocate, or services coordinator requests a modification or accommodation, the request must be addressed in a timely manner. If denied, the prescribed appeals process will be made available.

Service Animals

Tenants with service animals must provide verification from a licensed professional stating the need for the service animal, without disclosing the nature of the issues that give rise to that need. The tenant is responsible for cleaning up after the animal and must keep the animal leashed or crated and under control at all times. While there will be no pet deposit required, the tenant will be responsible for any damage to the unit caused by the service animal.

Affirmative Fair Housing Marketing Plan

HUD regulations require developments insured and/or subsidized under programs administered by HUD to implement an Affirmative Fair Housing Marketing Plan ("AFHMP"), Form HUD-935.2, approved for the development.

Key Requirements of the AFHMP

- The purpose of the plan is to ensure that eligible families of similar income levels shall have a similar range of housing opportunities.
- The marketing effort shall attract a broad cross section of the eligible population without regard to race, color, religion, sex, disability, familial status, or national origin.
- Whenever additional applicants are needed to fill available units, advertising shall be carried out in accordance with the FHFC-approved AFHMP.
- The plan outlines marketing strategies the owner shall use, including special efforts to attract persons who are least likely to apply because of such factors as the racial and ethnic composition of the neighborhood in which the development is located.
- Marketing shall also seek to reach potential applicants outside the immediate neighborhood if marketing only within the neighborhood shall create a disparate impact against certain classes (i.e., if the entire neighborhood includes no minorities).
- Owners shall monitor the results of the marketing effort and adjust their marketing techniques as necessary.

Support Services

The property's plan for the provision of support services is in place (see Section 2) to ensure that tenants have access to the services they need to maintain stable housing and improve health and wellness. Regardless of the specific plan or approach, the property ensures that tenants, the property manager, the provider agencies, and all staff understand how services will be delivered and the process for requesting and accessing services.

Administrative Procedures

Compliance Monitoring.

The property manager and compliance staff are responsible for fulfilling all compliance monitoring duties required by FHFC or other funders. All properties funded by FHFC are required to be regularly monitored for compliance with program rules and the specific requirements of the Regulatory Agreement.



To view the Fair Housing Act, visit <https://www.justice.gov/crt/fair-housing-act-2>

(In cases where there are multiple properties a Compliance Plan may be necessary along with hiring full time compliance specialists and a third-party reviewer of intake procedures and tenant eligibility determinations.)

The Compliance Period begins on the date the first unit is occupied, or if already occupied, on the date of loan closing, and ends in accordance with the number of years described in the Regulatory Agreement.

Monitoring takes place both remotely and on-site. The on-site monitoring is referred to as the Management Review and Physical Inspection. During this process the following program components and documentation are reviewed:

- Administrative procedures compliance
- File Inspection
- Physical Inspection
- Rent and Income Limits
- Utility Allowance
- Tenant Programs and Services
- Tenant Rent Ledgers
- Communication with key LINK Referral Agency

The resulting observations are provided in a Management Review Report. The property owner must respond within a given period of time to the observations and document how deficiencies will be corrected. Following this exchange, a Closeout letter will be provided.

During the monitoring a sample of files will be inspected and checked for the following:

- Tenant Income Certification
- Rental Application
- Verification of Income
- Tenant Recertification documentation and notes
- Student Verification

Property owners and managers of projects funded by FHFC may view compliance requirements at <http://floridahousing.org/owners-and-managers/compliance>.

The physical inspection will refer to the Uniform Physical Condition Standards (UPCS) 24 CFR 5.703, unless otherwise required in the Regulatory Agreement. Units will be inspected to ensure they are decent, safe, sanitary, and in good repair. Violations include, but are not limited to: all smoke detectors in unit do not work, one or more stove burners do not work, presence of bed bugs or other pest infestation, graffiti and units unsuitable for occupancy.

Reporting Requirements

Reports will be submitted to funders and the credit underwriter as follows.

Annual Reports

- Program Report
- Occupancy and Vacancy of Development
- Set-aside Requirements
- Recertification Status of Each Unit
- Income and Rent Restrictions
- Categorical Requirements
- Public Purpose Requirements

Reports are to Be Sent to FHFC and the Appropriate Credit Underwriter:

Florida Housing Finance Corporation	compliance.reporting@floridahousing.org
Amerinat	AmeriNatcompliance@amerinatls.com
First Housing	compliancereporting@firsthousingfl.com
Seltzer Management Group, Inc.	compliance.reporting@seltzermanagement.com



The FHFC Compliance Guidebook can be downloaded from this site:
<http://floridahousing.org/owners-and-managers/compliance/compliance-guidebook>

Monthly Reports

- Managers' Report- narrative memo
- Occupancy Report (Move-out/move-in) with make ready info
- Availability Report
- Waitlist/Applicant List
- Rents as charged report
- Turnover and Capital Improvement Schedule
- Work Order Summary

Quarterly Reports

- Property Manager's Budget/Actual report
- Summary Financial Report

At Request of Owner

- Tenant receivables report
- General Ledger for review of specific accounts

Record Retention and Access

The time records must be retained is based on funding requirements, but generally the manager must retain all household files and records of documentation for at least six years after an applicant is rejected or after a unit has been vacated. The owner or manager must keep reports and records on a building by building basis. Files should be stored off-site in a secure location. They should be maintained in a system that is flood and fire proof. Properties funded with Low Income Housing Tax Credits must store records securely for the compliance period.

The property manager may be required to provide access to records while adhering to applicable state and local laws regarding privacy and obligations of confidentiality. Permanent supportive housing may involve some medical records. The confidentiality of these records is protected by the Privacy Rules established by the Health Insurance Portability and Accountability Act of 1996 (HIPPA).

Staff Training

All staff who work on the property will have training in the overall program operations, property processes and systems, and customer service. All staff must recertify annually in Fair Housing regulations and have a clear understanding of the requirements prohibiting discrimination, as well as reasonable accommodations and modifications.

All staff, regardless of their role or the frequency of interaction with tenants, will receive Trauma-Informed Care training as part of their onboarding process, with annual retraining. Below is a partial list of training that all staff should receive upon onboarding and on at least an annual basis.

- Fair Housing
- Trauma-informed care
- Sexual harassment policy
- Conflict of interest policy
- Policies to guard the confidentiality and privacy of applicants and tenants
- Techniques to de-escalate crises and conflicts
- Processes for emergencies and critical incidents
- Processes for communication between the property management division and the support services division
- Compassionate communication (also known as nonviolent communication)
- Reasonable accommodations and modifications

SECTION 2: Support Services

High quality support services are critical to the success of permanent supportive housing. Support services should be designed to help households remain stably housed throughout their tenancy and maximize health and wellness. The services will provide supports for tenants as they work on personalized goals. Services should be tailored to the individual needs and desires of the household. Services must also be voluntary on the part of the tenant and based on the tenant's timeline and goals, not the service provider's. Below we describe the role of support services, who should provide those services, how to provide voluntary services, and tenant rights and responsibilities.

Separation of Property Management and Support Services

The property will maintain supervisory and programmatic separation between property management and support services. The role of property management is strictly for the activities of managing the site, including the following.

- tenant application and eligibility determination
- rent collection

- maintenance and repairs
- legal issues surrounding non-payment of rent
- compliance
- accounting

Property managers can and should inform tenants about the availability of and processes for accessing support services; however, it should be clear that services are voluntary and not a condition of tenancy.

Support service activities may include any of the following.

- case management and service planning
- service coordination
- assistance with independent living skills
- creating a plan for meaningful daily activities
- help managing crises
- accessing physical and behavioral health care

- help applying for mainstream benefits, including disability income
- identifying and applying for employment opportunities
- accessing natural supports, such as places of worship, family, and affinity groups

Voluntary Services

At the property, all services are voluntary; this means that no tenant is required to participate in services. Services remain available to each household for the duration of the tenancy, but tenancy is not tied to the household’s participation in services. There will be no repercussions for nonparticipation.

Although services are entirely voluntary from the tenant’s perspective, the service provider or services coordinator consistently tries to to engage the household and offer support. The goal of the service provider is to work

Service	In-House	Third Party Agency
Service Coordination	Services Coordinator	
Case Management (General)	Case Manager	
Targeted Case Management		Community Mental Health Provider Agency A
Substance Use Services		Substance Use Provider Agency B
Domestic Violence Related Services		DV Provider Agency C
Services for Those Formerly Trafficked		Human Trafficking Agency D
Child Care and After-School Services		Early Learning Coalition
Employment Services		CareerSource, Goodwill
Mental Health Treatment		Community Mental Health Provider Agency E, Federally Qualified Health Center F
Intellectual and Developmental Disabilities, Etc.		ID/DD Provider Agency G

with each household in addressing and reducing these barriers to ensure housing stability.

If a tenant refuses services or expresses they would like to stop services, the service provider can explore why this may be the case. Again, the service provider should always work to engage tenants and maintain a positive relationship; however, there should be no coercion to accept services. If the household is at risk of losing their housing due to nonpayment of rent or other lease violations, the property manager should alert the service coordinator so he or she can engage assertively with the tenant to help prevent eviction.

Service Provision Approach

In this section of the Management Plan, describe the roles and responsibilities of in-house services staff and third-party providers. Each service contemplated should be identified, along with a specific provider agency, if outsourced. An example is below. For each of the third-party agency partners, a Memorandum of Understanding (MOU) and/or contract for services must be in place.

Training and Competencies in Support Services

Appropriate training and professional development will be required of in-house and third-party service providers, including the following.

- Trauma-informed care
- Person-centered, strengths-based planning
- Harm reduction
- Motivational interviewing and the stages of change
- Recovery-oriented care
- Crisis intervention, de-escalation, and resolution
- Crisis planning
- First aid
- Fair housing

Documentation and Privacy Issues

Support services staff must never violate the privacy of the tenant by disclosing personal information to the property manager or any other person not directly involved in the coordination of support services. Protected information should only be disclosed with a proper authorization and informed consent to release information. Support services staff and providers must maintain a secure database and locked file cabinets for documentation, utilizing the processes and systems provided by the property.

ACCESS AN ELECTRONIC VERSION OF THE

Permanent Supportive Housing

PROPERTY MANAGEMENT

GUIDEBOOK

AND OTHER VALUABLE RESOURCES UNDER THE PUBLICATIONS TAB
ON THE FLORIDA HOUSING COALITION'S WEBSITE AT:

WWW.FLHOUSING.ORG