

**BEFORE THE STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION**

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TURKEY CREEK WAY APARTMENTS, LP

FHFC Case # 2022-030BP

FLORIDA HOUSING
FINANCE CORPORATION

Petitioner,
vs.

RFA No. 2022-106
Application No. 2022-261CSN

FLORIDA HOUSING FINANCE
CORPORATION,

Respondent.

**FORMAL WRITTEN PROTEST AND
PETITION FOR ADMINISTRATIVE HEARING**

Petitioner, Turkey Creek Way Apartments, LP (“Turkey Creek”), pursuant to sections 120.57(3), Florida Statutes (“F.S.”), and Rules 28-110 and 67-60, Florida Administrative Code (“FAC”) hereby files this Formal Written Protest and Petition for Administrative Hearing regarding the review, ranking, scoring and eligibility decisions of Respondent, FLORIDA HOUSING FINANCE CORPORATION (“Florida Housing”) in awarding funding pursuant to Request for Application 2022-106 Financing for the Development of Housing for Persons With A Disabling Condition or Developmental Disabilities (the “RFA”). In support Turkey Creek provides as follows:

1. Turkey Creek is a Florida limited partnership in the business of providing affordable housing. Turkey Creek’s address is 56 E. North Avenue, Northlake, Illinois 60164.
2. Florida Housing is the allocating agency for the State of Florida that was granted the authority to issue the RFA for the purpose of construction, redevelopment, or rehabilitation of much needed affordable housing. Florida Housing's address is 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301.

3. On November 4, 2021, Florida Housing issued the RFA which offered funding as follows:

SECTION ONE
INTRODUCTION

This Request for Applications (RFA) is open to Non-Profit Applicants proposing the development of independent Permanent Supportive Housing for either (i) persons with a Disabling Condition that also includes a portion of units for Homeless Households as defined in Exhibit B of this RFA; or (ii) Persons with Developmental Disabilities. Non-Profit Applicant entities may consist of either 100 percent Non-Profit entities or joint ventures between Non-Profit and for-profit entities, if the Applicant meets the definitions of Non-Profit, as defined in Rule Chapter 67-48, F.A.C.

The intent of this RFA is to help communities address the significant need for independent Permanent Supportive Housing for some of their most vulnerable individuals with a disabling condition or developmental disabilities who lack stable housing and coordinated access to appropriate community based healthcare and supportive services. This RFA proposes to utilize Competitive Housing Credits (HC) in conjunction with State Apartment Incentive Loan (SAIL) funding, or grants.

A. Competitive HC, made available for all Applicants

Florida Housing Finance Corporation (the Corporation) is required by section 420.507(48), F.S., to reserve up to 5 percent of its annual allocation of low-income housing tax credits to allocate by competitive solicitation for high-priority affordable housing developments, such as housing for Persons with a Disabling Condition and their families or Persons with Developmental Disabilities, in communities throughout the state.

The Corporation expects to offer an estimated \$2,750,000 of Competitive Housing Credits available to proposed Developments under this RFA for either housing for persons with Disabling Conditions or Persons with Developmental Disabilities.

B. SAIL available for Applications for persons with Disabling Conditions

The Corporation expects to offer an estimated \$4,000,000 of SAIL for housing for persons with Disabling Conditions. A portion of this funding may be used as an Extremely Low Income (ELI) Loan for ELI Set-Aside

Units as further described in Section Four, A.10.a.(2)(b) of the RFA. The ELI loan is a forgivable loan.

C. Grants available for Persons with Developmental Disabilities

The Corporation expects to offer an estimated \$4,600,000 in grants for housing for Persons with Development Disabilities.

D. National Housing Trust Fund (NHTF)

The Corporation expects to offer an estimated \$4,500,000 in National Housing Trust Funds (NHTF). All Applicants that select the Development Category of New Construction will be required to commit a certain number of NHTF Units that meet the requirements outlined in Section Four, A.6.c.(2)(c) of the RFA. Applicants that select the Development Category of New Construction may also commit to additional NHTF Units. NHTF funding will be awarded based on each NHTF Unit, regardless of whether the NHTF Unit was required or optional. The invitation to enter credit underwriting will inform the Applicant of the NHTF award amount, and the requirement to set-aside NHTF Units.

The Corporation is soliciting applications from qualified Applicants that commit to provide housing in accordance with the terms and conditions of this RFA, inclusive of all Exhibits to this RFA, applicable laws, rules and regulations, and the Corporation's generally applicable construction and financial standards.

4. Through the issuance of the RFA, Florida Housing sought to solicit proposals from qualified applicants that would provide affordable housing to persons with a disabling condition including homelessness consistent with the terms and conditions of the RFA, applicable laws, rules, and regulations.

5. On February 17, 2022, Turkey Creek submitted its Application in response to the RFA that included information concerning the development of a 64 unit complex in Volusia County, Florida, named Brentwood Village. Turkey Creek requested \$1,700,000 in housing credits, \$3,867,200 in SAIL funding and \$132,800 in ELI funding. Florida Housing received only 1 application in response to the RFA, that being the Turkey Creek Application.

6. As the owner and developer of a project seeking funding through the RFA, Turkey Creek is substantially affected by the review, scoring, and ranking of its response to the RFA. The results of this proceeding affects Turkey Creek’s ability to obtain funding through the RFA. Consistent with the primary mission and goal of the RFA, Turkey Creek seeks to provide much needed affordable housing in Volusia County. Without the funds provided by the RFA, Turkey Creek will be unable to provide this much needed housing. Accordingly, Turkey Creek’s substantial interests are affected by the decisions made by Florida Housing.

7. At Section Five the RFA lists the eligibility items each applicant must meet. In addition to the eligibility items, Section Five (A)(2) identifies point items to be awarded as follows:

2. Awarding Points

Point Items	Maximum Points
Submission of Principal Disclosure Form that is either (a) stamped “Approved” at least 14 Calendar Days prior to the Application Deadline; or (b) stamped “Received” by the Corporation at least 14 Calendar Days prior to the Application Deadline AND stamped “Approved” prior to the Application Deadline	5
Bookmarking Attachments prior to submission	5
Submission of Executive Director Certification of Non- Profit Entity Qualifications Form (Rev. 10-2021) stamped “Received” by the Corporation at least 14 Calendar Days prior to the Application Deadline AND stamped “Approved” prior to the Application Deadline	10
Submission of Corporation-approved Pre-Application Meeting form that meets the requirements of the RFA	10
Developer Experience Withdrawal Disincentive	5
Operating/Managing Experience	45
Access to Community-Based Services and Resources:	--
Access to Community-Based General Services	20
Access to Community-Based Services and Resources that Address Tenants’ Needs	35
Assist Intended Residents in Meeting their Housing Stability and Self-Sufficiency Needs, Goals and Expectations	--
Permanent Housing Stability	10
Self-Sufficiency	10
Total Possible Points	155

The RFA establishes a minimum score of 124. More detail concerning these highlighted subjective scoring items in the RFA can be found at Section Four (C)((A)(1) Narrative Scoring.

8. The RFA at Section Six describes the evaluation and award process as follows:

SECTION SIX
AWARD PROCESS

Committee members shall independently evaluate and score their assigned portions of the submitted Applications, consulting with non-committee Corporation staff and legal counsel as necessary and appropriate.

The Committee shall conduct at least one public meeting during which the Committee members may discuss their evaluations, select Applicants to be considered for award, and make any adjustments deemed necessary to best serve the interests of the Corporation's mission. The Committee will list the Applications deemed eligible for funding in order applying the funding selection criteria outlined in Section Five above and develop a recommendation or series of recommendations to the Board.

9. On April 20, 2022, the designated Review Committee met and considered the Turkey Creek Application submitted in response to the RFA. The Review Committee was made up of Florida Housing staff. At the meeting the Review Committee members determined the eligibility of the Application submitted and read into the record the score for the lone Application. The Review Committee added up the scores awarded and made their recommendation based on the procedure set forth in the RFA. In its consideration, the Committee determined that Turkey Creek's Application passed all threshold requirements and should be awarded 120 out of a possible 155 points. (See Exhibit A)

10. The committee however found the Turkey Creek Application not eligible for funding because it only received 120 points which was 4 points less than the minimum number of points required of 124. Based on the eligibility determination and the points awarded the Review

Committee, following the selection criteria of the RFA, recommended not funding the Turkey Creek Application

11. On April 29, 2022, Florida Housing's Board of Directors accepted the Review Committee's ranking and scoring recommendation as presented.

12. On May 4, 2022, Turkey Creek timely filed its Notice of Intent to Protest. This Protest is being timely filed to gain maximum points in an effort to be eligible for funding. Turkey Creek has standing to file this challenge. Florida Housing has waived the Protest Bond requirement for this RFP.

13. As disclosed in the notes of the Review Committee and as discussed orally during the Review Committee meeting, Turkey Creek did not achieve maximum score for several RFA narrative scoring items. Based on its responses Turkey Creek believes that its Application meets all the requirements of the RFA and responded to all narrative sections as required by the RFA and is entitled to additional points for its narrative responses (See Exhibit B) as explained more fully below.

14. At RFA Section Four (C) Turkey Creek was asked to provide narrative responses concerning numerous aspects of its proposed Development. Turkey Creek could gain up to 120 points for its narrative responses to this section of the RFA which would then be combined with the other points items (35 points) for a total maximum score of 155 points.

15. Specifically the RFA at Section Four (C) asks for information concerning 3 narrative scoring sections. The first narrative scoring section at Section Four (C)(1) is as follows:

c. Narrative Scoring

The following narrative section allows for Applicants to provide detailed responses about the Development. Each response must address the specific criteria identified in the corresponding description. When scoring narrative responses, Florida Housing will only consider the written responses provided in Exhibit A. When assigning points

for each narrative section, only the narrative for that particular requirement will be considered. Information in other narrative sections will not be considered. It is recommended to account for all criteria for each response, even if it requires repeating information in multiple narrative responses.

**1. Operating/Managing Permanent Supportive Housing Experience
(Maximum of 45 points)**

The viability and sustainability of Permanent Supportive Housing is contingent upon the Development having the necessary experience and capacity to successfully operate and manage the traditional functions of affordable rental housing; as well as understanding how to facilitate housing stability and access to community-based resources and services for the tenants.

For points, the Applicant should describe its or, its management company's capacity and experience performing traditional rental housing operations and management functions related to Outreach and Marketing; Tenant Application and Selection; Leasing and Lease Enforcement; Operations and Rental Subsidies; Property Maintenance and Security; Funding and Regulatory Compliance and Reporting; as well as administering optional or required Resident Programs pursuant to the RFA. (30 points)

For points, the Applicant should also describe its capacity and experience to operate and manage the required provision of community-based services coordination relevant to services and resources that are relevant to assist the intended residents have housing stability and integrated lives in the community. The Applicant should also describe its operations and management approach for helping the tenant address and mitigate issues that have or may violate their lease and housing stability. The services coordination staff may or may not be the same staff helping on behalf of the resident to address or mitigate a lease issue. (15 points)

In both descriptions, the focus should be on the years of experience performing the described functions, qualifications of the entity(s), and any best practices that are followed in performing the function(s) related to operating and managing Permanent Supportive Housing and serving the intended households.

The Applicant's description(s) is limited to no more than three typed pages within the text box at question C.1. of Exhibit A. Note: Although the online Application system allows for more than three pages, any portion of the description that is beyond three pages will not be considered.

Note: Providing only a list of Permanent Supportive Housing Developments and/or units will not be a sufficient description of experience for any Applicant or the management company.

16. In essence to achieve maximum points for this first narrative scoring section Turkey Creek needed to explain its management company's capacity and experience performing traditional rental housing operations and management functions related to several listed tasks including:

- a) Outreach and Marketing;
- b) Tenant Application and Selection;
- c) Leasing and Lease Enforcement;
- d) Operations and Rental Subsidies;
- e) Property Maintenance and Security;
- f) Funding and Regulatory Compliance and Reporting;
- g) Administering Optional or Required Resident Programs; and
- h) Experience to Operate Community Based Services.

17. In its response to this first narrative scoring section Turkey Creek provided in several pages detail for each of these individual items as follows:

a) Capacity and Experience:

In its response Turkey Creek highlighted its capacity and experience by introducing its established management partner Royal American Management ("RAM"). In the response information concerning RAM's existing communities including details on those served, outreach, referrals, credit eligibility waivers, and resident selection plan, and referring guidelines was included. The narrative response points out that RAM has experience over numerous properties serving special needs populations and creating selection plans and policies to promote the provision of permanent supportive housing throughout Florida. The narrative response identified the most recent existing developments for which plans have been created included Plateau Village in Lakeland, Polk County which includes the coordination with the local service agencies providing on site staff as a supportive services coordinator. The narrative also explains that "RAM has a proven track record and continues to successfully operate this program, having put over 1,400

people to work in stable, long-term jobs.” “RAM has the knowledge and experience needed to manage communities providing housing for persons with a disabling condition and/or homeless, and will work with the applicant to ensure that decent, safe, and affordable housing is extended to those with the most need.”

b) Operations and Management Functions:

Turkey Creek in its response to this item again highlighted that “Operation and management functions will be carried out by Royal American Management”. The narrative further explains that “RAM handles the overall day to day management function of paying the bills, collecting rent, and oversight of the community”. RAM is well known in the development community and by Florida Housing as well.

c) Tenant Application and Selection and Leasing and Lease Enforcement:

This requirement was addressed throughout the narrative and explained through the programs implemented by RAM. The narrative also introduces another partner, Halifax Urban Ministries (“HUM”). Specifically Turkey Creek indicated that “RAM provides exceptions to remove credit barriers”. Also, “Application fees for ELI households with disabling conditions or homelessness have application fees and deposits waived”. The narrative response explains “RAM will also work hand in hand with HUM with respect to the 50% disabling conditions and homeless populations to be served at Brentwood Village”. Further, Turkey Creek indicated that “RAM will conduct an individual assessment of the record and impact on admission under very specific guidelines”. “If a resident is late on rent, RAM works with HUM to help determine what measures are needed to help bring the resident current”.

d) Operations and Rental Subsidies:

Turkey Creek in responding to this section provided “If a resident is late on rent, RAM works with HUM to help determine what measures are needed to help bring the resident current”. “Operation and management functions will be carried out by Royal American Management (RAM). RAM has extensive experience operating and managing housing that specifically includes persons with disabling conditions, homeless, family, elderly, and other populations.”.

e) Property Maintenance and Security:

This section was addressed by explaining that “RAM has the knowledge and experience needed to manage communities providing housing for the persons with a disabling condition and/or homeless, and will work with the applicant to ensure that decent, safe, and affordable housing is extended to those with the most need.”. These measures are also addressed by maintaining “24-hour Management On-site Contact”.

f) Funding and Regulatory Compliance and Reporting:

This section was addressed by explaining that “Operation and management functions will be carried out by Royal American Management (RAM). RAM has extensive experience operating and managing housing”.

g) Administering Optional or Required Resident Programs Pursuant to the RFA:

The response to this section is extensively detailed in the Turkey Creek narrative response.

h) Capacity and Experience to Operate Community Based Services Coordination and Manage & Operations and Management Approach to Help Tenants:

In its narrative response, capacity is reflected by detailing the services to be provided to residents. In its response Turkey Creek reflects over 20 years of service in providing grant funding of \$1.2 million per year to pay for these services and initiatives. As explained this promotes housing stability and integrates lives into the community as detailed by these measures putting

over 1,400 people to work. Turkey Creek’s team experience is also detailed in specific existing properties RAM serves.

18. In response to these detailed and substantive responses to Section Four (C)(1), Turkey Creek was only awarded 36 out of 45 available points. Turkey Creek believes that either the review committee member reviewing the responses missed or did not fully understand the substance of these detailed responses. Turkey Creek believes additional points are warranted for its responses.

19. Next the RFA at Section Four (C)(2) asks for information concerning access to community based services and resources. Specifically the RFA provides as follows:

2. Access to Community-Based Services and Resources (Maximum 55 Points)

The ability of the tenants at the proposed Development to effectively and efficiently access community-based services and resources is vital to assist these households in obtaining and maintaining a level of stability and self-sufficiency in their community. As specified in each section below, provide a description of the Applicant’s plan to provide access to general community services, as well as specific services and resources that address the needs of these intended tenants, described in question 2 of Exhibit A.

Applicant responses to these items will be evaluated based on the following criteria: (i) a description of the services as provided in the Applicant’s descriptions below; (ii) a description of the partners, roles of each, and capacity of the partners that will provide or facilitate access to these services; (iii) a description of the public and/or private transportation options that will be available to residents of the proposed Development to ensure access to the described general services, including the modes, options and availability of transportation for residents to get to and from these resources; and (iv) a description of how the Applicant believes that the access outlined in (i), (ii) and (iii) above will lead to improvement of tenants’ health, safety, stability, education and employment capacities, quality of life, and ability to successfully live in the community.

All Applicants may be awarded points for providing the following information:

a. Access to community-based general services (Maximum 20 Points)

Describe the community-based general services that will be accessible to tenants, such as shopping for groceries, medicine, clothing, and other

household and personal items. Include other services such as public schools, higher education, training and employment opportunities that are appropriate for the intended tenants. If the description of how the intended residents will access the services includes public transportation, such as bus or rail, state the exact measurement of walking distance to the current bus or rail stop from the proposed Development. State how frequently the bus or rail stop may be accessed by the residents of the proposed Development. Include the cost to the tenant of all public and/or private transportation options listed. (Up to 20 Points)

The Applicant's description(s) is limited to no more than three typed pages within the text box at question C.2.a. of Exhibit A. Note: Although the online Application system allows for more than three pages, any portion of the description that is beyond three pages will not be considered. If the Applicant is awarded funding but is unable to fulfill some or all of the commitments stated, the funding may be rescinded.

- b. Access to community-based services and resources that address tenants' needs (Maximum of 35 Points)

Healthcare and services provided by community-based services and resources are vital to help the intended households to achieve and maintain optimal wellness, stability and self-sufficiency in the community. Additionally, the availability of community-based healthcare and services for the needs of the intended households is imperative to the sustainability of successful housing.

Describe how residents will be assisted to access appropriate physical health, behavioral health and wellness, and self-sufficiency services and activities that can lead to stable and integrated lives in their community.

The description provided in all Applications should include the following:

- (1) The Development's physical proximity to health care and services, and/or which services/programs will be provided on-site. If the description of how the intended residents will access the services includes public transportation, such as bus or rail, state the exact measurement of walking distance to the current bus or rail stop from the proposed Development. State how frequently the bus or rail stop may be accessed by the residents of the proposed Development. Include the cost to the tenant of all public and/or private transportation options listed;

- (2) All key services and programs that will be provided directly through the Applicant, community partnership or other providers to assist the intended residents, and the benefits of offering these services/programs; and
- (3) If the intended residents are those who are transitioning from an institution or community residential care, in addition to the above information, describe how the transitioning residents' preferences and continued support and healthcare needs will be met through access to community-based resources now that the individual will be living in the independent Permanent Supportive Housing Development. This includes physical, medical, behavioral, functional, and social preferences and needs, as applicable. Explain how these will be identified and how the determination will be made that the services, supports and resources needed to live independently are available at the proposed Development. Explain how the Resident Services Coordination Plan service plan is supported at the proposed Development. Examples would be 24-hour staff, capacity for specialized medical equipment, and/or partnerships with a Managing Entity, as defined by the Agency for Healthcare Administration or Medicaid Managed Care organization, as defined by the Department of Children and Families.

Applicants that are proposing Developments serving the Persons with Disabling Conditions Demographic Commitment should also include the following in the description provided:

The nature of any partnerships with the Local Homeless Assistance Continuum of Care lead agency and members as well as other relevant linkages with lead agencies or services providers that are key to helping the intended households maintain stability in the community. These descriptions should describe how the provision of the services is funded.

The Applicant's description(s) is limited to no more than three typed pages within the text box at question C.2.b. of Exhibit A. Note: Although the online Application system allows for more than three pages, any portion of the description that is beyond three pages will not be considered. If the Applicant is awarded funding but unable to fulfill some or all of the commitments stated, the funding may be rescinded.

20. In essence this section asked Turkey Creek to discuss potential tenants access to identified community based services and resources including shopping, medicine, clothing, schools, and employment. In response to this RFA section Turkey Creek provided as follows:

a) Community Based Services:

In its narrative response Turkey Creek referenced specific vendors and distances of facilities that would service its tenants. Turkey Creek elaborated in its response, “Community based general services will be accessible to tenants including grocery stores, medical facilities and pharmacies, numerous clothing outlets and options, as well as household and personal preference shopping needs”. In addition to specific naming the facilities and vendors names the narrative response includes the distance to 4 grocery stores, 6 medical facilities, 2 clothing shops, and 7 shops for household and personal items. Turkey Creek further explained that services are accessible through the bus system and the bus stops are adjacent to the proposed Development site so there is minimal walking distance for residents for transportation and ultimately the desired service.

b) Other Services:

Other services are listed and explained in the narrative response beginning with HUM and the provision of “on-site supportive services and coordinator for referrals of specific needs of the residents” and “case management to families for self sufficiency”. These are the types of services that are appropriate for the intended tenants.

21. In response to this detailed narrative response at Section Four (C)(2), Turkey Creek was awarded only 42 out of the possible 55 points. Turkey Creek believes that either the review committee member reviewing the response missed or did not fully understand the substance of this detailed response. Turkey Creek believes it is entitled to additional points.

22. Next the RFA at Section Four (C)(3) asked Turkey Creek to explain how it would assist its residents in meeting their needs related to housing stability and sufficiency and what it has been doing over the 18 months prior to RFA issuance. The RFA provides as follows:

3. Assist Intended Residents in Meeting their Housing Stability and Self-Sufficiency Needs, Goals and Expectations

The intent of Permanent Supportive Housing financed pursuant to this RFA includes assisting residents in meeting their needs, goals and expectations related to housing stability and self-sufficiency. As a result of the complex short- and long-term needs of intended residents who benefit from Permanent Supportive Housing, the Corporation's objective is to finance Developments in which the Applicant has a strong knowledge of and experience providing assistance, relevant to housing stability and self-sufficiency.

In its narrative, the Non-profit entity's described experience should come from experience as a current provider of housing and/or supportive services. The description should be pertinent to households the Applicant proposes to serve at the proposed Development. This narrative is not meant to promote serving residents with fewer or less acute needs who may have higher permanent housing stability or self-sufficiency, but rather to help improve permanent housing outcomes for all individuals of the intended population. Scoring will be based on the relevance and successful outcomes of the supports offered over the last 18 months that are particular to and appropriate for the intended households proposed to be served in question 2 of Exhibit A of this RFA.

The narrative should indicate whether the approach is considered a "Best Practice" as it fits the definition in Exhibit B or is considered an evidence-based practice by supportive housing stakeholders.

For each section below, describe in detail how Non-Profit entity has worked to assist households to meet these needs, goals and expectations over the 18 months prior to the RFA issuance. The description should include information regarding the efforts made and practices used; the type and depth of partnerships with community organizations or agencies directly related to helping households obtain and/or maintain their permanent housing stability and self-sufficiency needs, goals, and expectations; as well as demonstrated successful outcomes from the described efforts. Describe the organizations, such as homeless service agencies, child welfare, and health care providers with which partnerships have been developed. The description should include the contributions of each entity in the partnership and how the work of the partnership has benefited Persons with Special Needs in meeting their needs, goals and expectations related to housing stability and self-sufficiency.

a. Permanent Housing Stability (Up to 10 points)

Describe in detail how the Applicant has worked to assist households to meet their permanent housing needs, goals and expectations to create housing stability over the 18 months prior to the RFA issuance.

The description is limited to no more than two typed pages within the text box at question C.3.a. of Exhibit A. Note: Although the online Application system allows for more than two pages, any portion of the description that is beyond two pages will not be considered.

b. Self-Sufficiency (Up to 10 points)

Describe in detail how the Applicant has worked to assist households in meeting their self-sufficiency needs, goals and expectations over the 18 months prior to the RFA issuance. The assistance may be related to a household's income, benefits, education/training, or ability to meet its activities of daily living.

The description is limited to no more than two typed pages within the text box at question C.3.b. of Exhibit A. Note: Although the online Application system allows for more than two pages, any portion of the description that is beyond two pages will not be considered.

23. In response to this section Turkey Creek provided detailed responses as follows:

a) Access to Community Based Services and Resources:

In specifically responding to this issue Turkey Creek discussed access to appropriate services. "The residents of Brentwood Village receive access to appropriate physical health, behavior health and wellness, and self-sufficiency services and activities that can lead to stable and integrated lives in the community through Halifax Urban Ministries (HUM) and Royal American Management (RAM)". These resources and services will be provided on site for the convenience of the residents. Transportation assistance will be provided for access to the grocery store, doctor's appointments, social outings, etc.

b) Key Services and Programs:

In addressing key services and programs these services, programs and providers are identified and detailed throughout the narrative response. Turkey Creek points out that these identified services will “enhance the living experience of residents” and are “designed to assist the residents to sustain housing stability and to live productively in the community”, as well as to “promote self-care and independence”. Also included in the narrative response is reference to the “Resident Services Plan” and how that plan will empower residents.

c) Nature of Any Partnership:

In responding to this section Turkey Creek indicates that it has partnered with HUM. Specifically Turkey Creek points out that HUM receives “grant funding from the Volusia/Flagler County Coalition for the Homeless CoC #FL-504” which is the Local Homeless Assistance Continuum of Care for the area. The narrative further reflects how services are funded through those grants.

d) Housing Stability and Self Sufficiency:

In the narrative response to this section Turkey Creek elaborates on its Best Practices in fulfilling housing stability and self-sufficiency. The narrative points out “Best Practice” is defined in Exhibit B as “A program, activity or strategy that has been field test and has been shown to work effectively and produce successful outcomes and is supported by subjective and objective evaluation and research”. The Turkey Creek strategy is reflected as creating and using a “Tenant Selection Plan with RAM to use as a model in our communities serving those with special needs including homeless, disabling conditions, and developmental disabilities to use as a best practices model to help remove barriers to stable permanent supportive housing”. This strategy also includes having a “financially stable developer and owner, capable of handling predevelopment through

and including the asset management of a property” promotes the “best chance of success for affordable and supportive housing communities”. This has helped to meet permanent housing needs.

e) Non-Profit Entity Work to Assist Households:

In response to this section Turkey Creek points out it’s a valued partnership with HUM. HUM has worked with over 94,000 persons through meals, showers and hygiene, clothes and shoes, food and case management, and sheltering. In specifically addressing what Turkey Creek has done in the last 18 months, the narrative points out that “TDC works continually on all of the existing communities and prospective communities to identify local and support agencies in need of permanent supportive housing.” Turkey Creek also explains how it works currently with “local housing authorities to determine access to programs or services that can benefit our communities” and what has been done in providing “on site personnel that will provide a variety of programs to help support housing stability with our residents”.

24. In its response Turkey Creek comprehensively addressed each and every element listed in the instructions above at Section Four (C)(3), Turkey Creek however was awarded only 7 out of a possible 20 points. It is clear that Turkey Creek’s responses were not adequately considered by Florida Housing’s Review Committee member and more points should have been awarded.

25. Florida Housing’s failure to properly assign points by the review committee at the RFA Narrative Scoring Sections is clearly erroneous, contrary to competition, arbitrary, and/or capricious, and in violation of the terms of the RFA. With additional points Turkey Creek would be eligible for funding.

26. Turkey Creek reserves the right to amend this Petition as necessary.

27. Material Issues in Dispute

- a. Whether Florida Housing's review and actions taken concerning the Turkey Creek Application in response to the RFA was arbitrary or capricious, clearly erroneous or contrary to competition.
- b. Whether Turkey Creek's Application has been appropriately reviewed and scored.
- c. Whether Turkey Creek is entitled to additional points.

WHEREFORE, Turkey Creek requests that a settlement meeting be scheduled and to the extent no settlement is reached a hearing scheduled and ultimately the entry of a Recommended and Final Order determining that Florida Housing's review and scoring of applications was contrary to the RFA specifications and to Florida Housing's governing statutes, rules and policies to such an extent as to be arbitrary, capricious, contrary to competition, and clearly erroneous and awarding additional points to the Turkey Creek Application resulting in Turkey Creek being the highest ranked eligible unfunded Application entitled to an award of funding.

Respectfully submitted,

CARLTON, FIELDS

/s/ Michael P. Donaldson

MICHAEL P. DONALDSON

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Counsel for Turkey Creek Way Apartments, LP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Formal Written Protest and Petition for Administrative Hearing was filed by e-mail with Ana McGlamory, Corporation Clerk, at (CorporationClerk@floridahousing.org), and a copy via email to Hugh Brown, General Counsel, at (Hugh.brown@floridahousing.org), both with the Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000, Tallahassee, FL 32301, this 13th day of May , 2022.

/s/ Michael P. Donaldson
MICHAEL P. DONALDSON

Scoring Items	Contributor/ Reporter	2022-261CSN Brentwood Village
Development Name		
Points Items		
Bookmarking Attachments prior to submission (Section Three, A.2.b.) (5 points)	Cori	5
3.a.(4) Submission of Executive Director Certification of Non-Profit Entity Qualifications Form (Rev. 10-2021) stamped "Received" by the Corporation at least 14 Calendar Days prior to the Application Deadline AND stamped "Approved" prior to the Application Deadline (10 points)	Charles	10
3.a.(5) Submission of Corporation-approved Pre-Application Meeting form that meets the requirements of the RFA (10 points)		10
3.b.(3)(b) Development Experience Withdrawal Disincentive (maximum of 5 points)		5
3.c.(2) Submission of Principal Disclosure Form that is either (a) stamped "Approved" at least 14 Calendar Days prior to the Application Deadline; or (b) stamped "Received" by the Corporation at least 14 Calendar Days prior to the Application Deadline AND stamped "Approved" prior to the Application Deadline (maximum of 5 points)		5
C.1. Operating/Managing Experience (maximum of 45 points)	Elaine	36
C.2.a. Access to Community-Based General Services (maximum of 20 points)	Ryan	16
C.2.b. Access to Community-Based Services and Resources that Address Tenants' Needs (maximum of 35 points)		26
C.3.a. Assist Intended Residents in Meeting their Housing Stability Needs, Goals and Expectations (maximum of 10 points)	Zach	3
C.3.b. Assist Intended Residents in Meeting their Self-Sufficiency Needs, Goals and Expectations (maximum of 10 points)		4
Total Points (maximum of 155 points)		120
Eligibility Requirements		
Submission Requirements met (section Three, A.)	Cori	Y
1. Applicant Certification and Acknowledgement Form provided and meets requirements		Y
2.a. Demographic Commitment selected		Y
2.b. At least one Persons with a Disabling Condition population selected, if applicable		Y
2.c. Demographic Commitment description provided		Y
3.a.(1) Name of Applicant provided	Charles	Y
3.a.(2) Evidence Applicant is a legally formed entity provided		Y
3.a.(3) Evidence Applicant qualifies as a Non-Profit Applicant provided		Y
3.a.(6) Documentation that the Applicant informed the jurisdiction's Local Continuum of Care lead agency head of its intent to apply for funding to develop housing pursuant to this RFA provided, if applicable		Y
3.b.(1) Name of Each Developer provided		Y
3.b.(2) Evidence that each Developer entity is a legally formed entity provided		Y
3.b.(3)(a) Developer Experience Requirement met		Y

RFA 2022-106 Scoring Sheets

Scoring Items	Contributor/ Reporter	2022-261CSN Brentwood Village
Development Name		
3.c.(1) Principals for Applicant and Developer(s) Disclosure Form provided and meets requirements		Y
3.d. Name and contact information of Management Company provided		Y
3.e. Community-Based Board of Directors Requirement met		Y
3.f.(1) Authorized Principal Representative provided		Y
4.a. Name of Proposed Development provided		Y
4.b.(1) Development Category selected		Y
4.b.(2) Development Category Qualifying Conditions met		Y
4.c. Development Type provided		Y
4.e. Breakdown of number of units associated with each Development Category, Development Type, or ESS/non-ESS Construction		Y
5.a. County identified		Y
5.b. Address of Development Site provided		Y
5.c. Question whether a Scattered Sites Development answered		Y
5.d.(1) Development Location Point provided		Y
5.d.(2) Latitude and Longitude Coordinates for any Scattered Sites provided, if applicable		Y
5.e. Confirmation that the proposed Development is not located in a known flood zone or wetland area provided	Cori	Y
6.a. Total Number of Units provided and within limits		Y
6.c.(1) Minimum Set-Aside election provided		Y
6.c.(2) Total Set-Aside Breakdown Chart properly completed		Y
6.d. Unit Mix provided and meets requirements		Y
6.e. Number of residential buildings provided		Y
7.a. Evidence of Site Control provided		Y
7.b.(1) Appropriate Zoning demonstrated		Y
7.b.(2) Availability of Water demonstrated		Y
7.b.(3) Availability of Sewer demonstrated		Y
8.d. Green Building Certification or Minimum Additional Green Building Features selected, as applicable		Y
9. Services Coordination Experience Requirement met		Y
10.a.(1) Applicant's Housing Credit Request Amount provided		Y
10.a.(2) Applicant's SAIL or Grant Request Amount provided		Y
10.c. Development Cost Pro Forma provided (listing expenses or uses) and Construction/Rehab analysis and Permanent analysis (listing sources) – Sources must equal or exceed uses	Kristin	Y
Total Development Cost Per Unit Limitation met (Section Five, A.1.)		Y
Verification of no prior acceptance to an invitation to enter credit underwriting for the same Development (Section Five, A.1.)	Liz T	Y
Verification of no recent de-obligations (Section Five, A.1.)		Y
Financial Arrears Met and Insurance Deficiency Requirement met (Section Five, A.1.)	Kenny	Y
Minimum Total Score of 124 points is met?	Yes or No	N
All Eligibility Requirements Met?	Yes or No	N
Tie-Breakers		
10.d. Qualifying Financial Assistance Funding Preference		N
10.e. Per Unit Construction Funding Preference	Kristin	Y

RFA 2022-106 Scoring Sheets

Scoring Items	Contributor/ Reporter	2022-261CSN
Development Name		Brentwood Village
Florida Job Creation Preference (Item 3, of Exhibit C)		Y
Lottery Number	Inspector General	1

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C. Narratives

1. Operating/Managing Experience (Maximum of 45 points)

As further explained in Section Four, identify the entity or entities that will carry out operations and management functions at the Development and describe its experience in managing developments, including performing operations and management functions specific to the needs of the intended tenants. The Applicant's description is limited to no more than three typed pages within the text box below.

Operation and management functions will be carried out by Royal American Management (RAM). RAM has extensive experience operating and managing housing that specifically includes persons with disabling conditions, homeless, family, elderly, and other populations. The relationship between management and the resident community-based services provider is key in a successful community. Halifax Urban Ministries (HUM) will provide a qualified, on site Supportive Services Coordinator that will work on site at Brentwood Village to specifically meet the variety of needs of the disabling conditions, homeless, family, and individuals that become our residents. HUM has already entered into an MOU and agreement for servicing and being a part of the Brentwood Village community. While RAM handles the overall day to day management function of paying the bills, collecting rent, and oversight of the community, RAM will also work hand in hand with HUM with respect to the 50% disabling conditions and homeless populations to be served at Brentwood Village. If a resident is late on rent, RAM works with HUM to help determine what measures are needed to help bring the resident current. If there is a sickness or other extenuating circumstances and temporary assistance is needed, HUM helps to bridge that gap with the resident with their on going support for the special needs population. If help is needed specific to the disabling condition or prior homelessness, HUM identifies the need and brings counseling, medical, or educational measures to the table to help the resident get back on track.

RAM provides exceptions to remove credit barriers for low-income applications and those with special needs. These measures include forgiveness of prior landlord debt, and accepting a referral letter from an emergency shelter, hospital, or congregate home, or family member or friend will be accepted if a rental history is not available. Traditional affordable housing credit history eligibility can be waived for applicants that are participating in a program or receive assistance that provides for ability to recover economic losses related to the tenancy. HUM will work with persons that go through their programs and be able to provide this type of evidence for persons with disabling conditions and homelessness. Application fees for ELI household with disabling conditions or homelessness have application fees and deposits waived so help remove the barrier to safe permanent supportive housing. Typical restrictions for an arrest for past criminal activity will not necessarily be the basis for rejection. This does not negate certain violent and felony offenses, but provides the needed consideration to help those that have gone through rehabilitation programs and reentry programs to have the ability for permanent supportive housing. Where needed RAM will conduct an individual assessment of the record and impact on admission under very specific guidelines specified in the Resident Selection Plan and other management documents specific to Brentwood Village. RAM has experience over numerous properties serving the special needs population in creating selection plans and policies to promote the provision of permanent supportive housing throughout Florida. Some of the most recent developments for which these plans have been created include Plateau Village in Lakeland, Polk County and they include the coordination with the local service agencies providing on site staff that are paid for by the property as a supportive services coordinator.

Supportive Housing is not just housing – it is an environment that allows interactive access to a wide array of “rich services” to enhance the living experience of residents. RAM, as the manager of Brentwood Village and in partnership with Turnstone and HUM, will provide and/or facilitate access to an array of supportive services designed to assist the residents to sustain housing stability and to live productively in the community. Residents will be provided with direct access to a variety of services including adult education, information referral for health and employment services, and crisis intervention. Comprehensive supportive services promote self-care and independence and are coordinated by RAM in conjunction with the on-site case manager and organizations and agencies which service this targeted population. These supportive services include but are not limited to:

24-hour Management On-site Contact

Resident Services Coordinator

Counseling/Case Management-Provided by professionals including Assessments, Resource and Referral to Community Agencies, and Veteran's Benefits Counseling and follow-up.

Transportation Assistance-Grocery store, doctor's appointments, social outings, etc.

Daily Social Activities-On-site, supervised, structured activities, at no cost to the residents, at least five days a week.

The Resident Services Plan-Includes activities that empower residents. Residents will be encouraged to participate in activities centered on their interests. This is determined through resident survey's and residents taking ownership in planning activities.

Group counseling

Medical Seminars for Post- Traumatic Stress Disorder

Job Readiness/ Vocations skills training

Job Placement

Chemical dependency/ substance abuse counseling

Clothing referrals

Life Skills workshops

The goal is to foster a sense of community by bringing residents together on a regularly scheduled basis by providing activities such as holiday and special occasion parties, community picnics, newsletters, special functions, etc. RAM employs a full-time Resident Services Coordinator whose job is to develop customized Resident Services plans based on community needs and the desires of the residents. The coordinator puts together resident surveys, plans activities, coordinates with facilitators, provides professional flyers and annual activity calendars, and generally assists the staff in any way necessary to ensure that the programs are implemented.

RAM's commitment to serving the special needs population goes far above and beyond the norm. Many residents living in Royal American managed communities are considered at or below poverty level and face a number of barriers to improving their financial situation and quality of life. However, in order to do so, they desperately need resources and personalized assistance. RAM is committed to this effort and established a 501(c)(3) in 1999 called One on One, One by One. RAM has sustained this effort for nearly 20 years, acquiring performance-based grant funding of up to \$1.2 million per year, to pay for supportive services and operate this initiative. This organization assists individuals in making the transition from welfare to work and includes transportation, job training, improving employability skills, child care, and much more. The program serves individuals with disabilities including physical, mental

and emotional. RAM has a proven track record and continues to successfully operate this program, having put over 1,400 people to work in stable, long-term jobs.

RAM currently manages several properties similar in size and design to the subject property:

Mayfair Village-(4 years) 83-unit family community in Jacksonville, FL, serving formerly homeless individuals and families that includes persons with a disabling condition. RAM provide voluntary resources to all residents.

Casa Matias-(8 years) 80-unit family community in Naranja, FL, with 50% Homeless set-aside leased up in 2012. 26 of the 80 households come from a chronically homeless background that also includes persons with a disabling condition. RAM works closely with ownership to provide extensive supportive services to the residents.

Labre Place-(8 years) 90-unit family apartment community located in Miami, FL, which has a 55% Homeless set-aside. We leased up this community in 2012 and provide comprehensive resident services on site with the help of a non-profit organization dedicated to serving the homeless community in South Florida.

Renaissance Village-(4 years) 52-unit family community in Jacksonville, FL, a thriving community where formerly homeless and at-risk individuals can peacefully live their lives. RAM and the ownership provide voluntary, individualized support services to all residents to help them regain and maintain their ability to positively contribute to the community they call home.

St. Martin's Place-(5 years) 94-unit family apartment community located in Miami, FL, which has a 50% Homeless set-aside. We leased up this community in 2015 and provide comprehensive resident services on site with the help of Volunteers of America, a non-profit organization dedicated to serving the homeless community nationwide.

Sulzbacher Village-(2 years) 70-unit community in Jacksonville, FL, serving homeless women and children and families. Residents work with case managers one-on-one to develop a plan that meets their particular needs.

Quiet Waters-(10 years) 93-unit elderly apartment community located in Belle Glade, FL, which has a 50% Homeless set-aside. RAM leased up this community in 2009 and has continued successful management since that time, serving the target population.

Bonita Cove-(8 years) 60-unit family apartment community located in Miami, FL, which has a 50% Homeless set-aside. 21 of the 60 households come from a chronically homeless background. We work closely with the non-profit General Partner, Carrfour Supportive Housing, to provide extensive supportive services to the residents, many of which are Veterans.

RAM has the knowledge and experience needed to manage communities providing housing for the persons with a disabling condition and/or homeless, and will work with the applicant to ensure that decent, safe, and affordable housing is extended to those with the most need.

2. Access to Community-Based Services and Resources (Maximum 55 Points)

a. Access to community-based general services

As further explained in Section Four, describe the community-based general services that will be accessible to tenants, such as shopping for groceries, medicine, clothing, and other household and personal items. (Up to 20 Points)

The Applicant's description(s) is limited to no more than three typed pages within the text box below.

Brentwood Village is located off of Nova Road in Daytona, which is a major north/south throughfare through the city. Community based general services that will be accessible to tenants include grocery stores, medical facilities and pharmacies, numerous clothing outlets and options, as well as household and personal preference shopping needs. This includes:

Groceries:

Placita Grocery .12 miles, Aldi .4 miles, Winn Dixie 1.28 miles, and Save a Lot 1.17 miles.

Medicine:

Volusia Medical Center .7 miles a full-service hospital offering family and pediatric care, Halifax Medical Center 1.1 miles a full service hospital and named a 50 top cardiovascular care center , SMA Healthcare specializing in comprehensive care for mental illness and addiction and behavior healthcare needs .87 miles, Winn Dixie Pharmacy 1.28 miles, Steve's Pharmacy 1.1 mile, and the Clinical Pharmacy 1.0 miles.

Clothing:

Family Dollar .15 miles providing household/grocery/clothing and personal care options, City Thrift .35 miles providing discount clothing/shoes/furniture and household items,

Household and personal items:

Family Dollar .15 miles providing household/grocery/clothing and personal care options, City Thrift .35 miles providing discount clothing/shoes/furniture and household items, Big Value Garden Center .52 miles with a garden center/household items/and gifts, Walgreens 1.41 miles with shampoos/deodorants and a wide variety of personal care and household items, Wells Fargo banking .08 miles for personal banking needs, Harbor Freight .4 miles batteries/lighting/, Derbyshire Park .15 miles to the north of the site providing a variety of athletic venues.

Halifax and Urban Ministries (HUM) main office is 1.5 miles from the site. HUM will provide on-site supportive services coordinator for referral to specific needs of the residents, and they will be on site in the community building. Through HUM a Feed-a-Family Homeless Prevention Program distributes over 500 tons of food each year for free. They consider this a "first line of defense" in preventing homelessness freeing up funds for rent and utilities. They also offer referrals and case management to families for self-sufficiency. Bridge of Hope Daily hot meal Programs provide balanced lunches 363 days a year. These are all available to our residents in need only 1.5 miles from Brentwood Village.

Public transportation is provided through Voltran, a service of the Volusia County government. Routes can be accessed through a free app call MyStop Mobile. Two bus stops are adjacent to our site, one on Brentwood Drive and one on Derbyshire Road. There are 8 bus stops within .16 miles of the site. These offer multiple bus routes and take residents through the City.

Additional shopping at Tanger Outlet that includes a Ross Dress For Less AND Rue 21 AND American Eagle and Gap Factory clothing stores, Sam's Club for grocery and household, Academy Sports for clothing and household items, Famous Footwear Outlet AND Rack Room Shoes and Crocs at Tanger for shoe stores, and Bath & Body Works for personal items store to name a few are all only 2.2 miles away and easily accessible by bus.

b. Access to community-based services and resources that address tenants' needs

As further explained in Section Four, describe how residents will be assisted to access appropriate physical health, behavioral health and wellness, and self-sufficiency services and activities that can lead to stable and integrated lives in their community. (Up to 35 Points)

The Applicant's description(s) is limited to no more than three typed pages within the text box below.

The residents of Brentwood Village receive access to appropriate physical health, behavior health and wellness, and self-sufficiency services and activities that can lead to stable and integrated lives in the community through Halifax Urban Ministries (HUM) and Royal American Management (RAM). Particulars are noted below. RAM and HUM will have offices on site at the community center and HUM's main office is 1.5 miles from the site.

Supportive Housing is not just housing – it is an environment that allows interactive access to a wide array of “rich services” to enhance the living experience of residents. RAM as the property manager of Brentwood Village and HUM will provide and/or facilitate access to an array of supportive services designed to assist the residents to sustain housing stability and to live productively in the community. Residents will be provided with direct access to a variety of services including adult education, information referral for health and employment services, and crisis intervention. Comprehensive supportive services promote self-care and independence and are coordinated by HUM in conjunction with the on-site RAM manager and organizations and agencies which service this targeted population. These supportive services include but are not limited to:

24-hour Management Contact, on-site Resident Services Coordinator, and Counseling/Case Management-Provided by professionals including Assessments, Resource and Referral to Community Agencies, and Veteran’s Benefits Counseling and follow-up.

Transportation Assistance - Grocery store, doctor’s appointments, social outings, etc.

Daily Social Activities-On-site, supervised, structured activities, at no cost to the residents, at least five days a week.

The Resident Services Plan-Includes activities that empower residents. Residents will be encouraged to participate in activities centered on their interests. This is determined through resident survey’s and residents taking ownership in planning activities. Group counseling, Medical Seminars for Post-Traumatic Stress Disorder, Job Readiness/ Vocations skills training, Job Placement, Chemical dependency/ substance abuse counseling, Clothing referrals, Life Skills workshops are offered depending on the resident's interest.

The Brentwood Village Supportive Services agent is HUM. HUM receives grant funding from the Volusia/Flagler County Coalition for the Homeless CoC #FL-504 for Supportive Services, leasing, and rental assistance. Through these and other funds, HUM can provide assistance to help homeless and those with disabling conditions.

HUM will provide an on-site supportive services coordinator to help with the specific needs of the special needs residents, and they will be on site in the community building. HUM considers this a "first line of defense" in preventing homelessness by freeing up funds for rent and utilities. They also offer referrals and case management to families for self-sufficiency. HUM's Bridge of Hope Daily hot meal Programs provide balanced lunches 363 days a year. These are all available to our residents in need only 1.5 miles from Brentwood Village.

Physical and Behavior health and wellness access is provided through the HUM Feed-a-Family Homeless Prevention Program. Through this program HUM fights hunger and food insecurity by providing 500 tons of food each year to help the nutrition needs of those most in need. Bridge of Hope Daily Hot Meal Program provides approximately 100,000 meals annual to homeless and those in need. Each meal is balanced with protein, vegetables, fruits, salads, a starch, dessert, and a beverage. Special needs residents of Brentwood Village will have access to these and other programs provided or brought to the residents through a referral program that works hand in hand with property management.

Self-sufficiency services and activities are provided through the HUM Hope Place that provides for emergency housing for up to 3 months for over 100 families with children each year. In this program, individuals and families are provided a safe place to stay, day care for children, three meals a day, tutoring, life skills and budgeting classes, and case management. HUM also has the Barracks of Hope that provides transitional housing for up to 9 months to male and female veterans who have struggled with homelessness, addiction, and mental health. It is anticipated that Brentwood Village residents may have come through either of these programs and onto Brentwood Village. Services including mental health counseling and case management will continue for those still in need after they have shown they are ready for permanent supportive housing and can be successful in that endeavor with the appropriate supports. New residents at Brentwood will have access to financial assistance, tutoring, life skills, budgeting classes, and case management directly through HUM as our resident community-based services coordination provider and the skilled individual hired and serving the residents on site at Brentwood Village.

The goal is to foster a sense of community by bringing residents together on a regularly scheduled basis by providing activities such as holiday and special occasion parties, community picnics, newsletters, special functions, etc. The full-time Resident Services Coordinator develops a customized Resident Services plans based on community needs and the desires of the residents. The coordinator puts together resident surveys, plans activities, coordinates with facilitators, provides professional flyers and annual activity calendars, and generally assists to ensure that the programs are implemented.

Medical services are specifically available through the Volusia Medical Center just .7 miles from Brentwood Village, a full-service hospital offering family and pediatric care . We also have services through Halifax Medical Center just 1.1 miles, a full-service hospital and named a 50 top cardiovascular care center. SMA Healthcare specializing in comprehensive care for mental illness and addiction and behavior healthcare needs is just .87 miles from Brentwood.

Public transportation is provided through Voltran, a service of the Volusia County government. Routes can be accessed through a free app call MyStop Mobile. Two bus stops are adjacent to our site, one on Brentwood Drive and one on Derbyshire Road. There are 8 bus stops within .16 miles of the site. These offer multiple bus routes and take residents through the city.

3. Assist Intended Residents in Meeting their Housing Stability and Self-Sufficiency Needs, Goals and Expectations (Maximum 20 Points)

a. Permanent Housing Stability (Up to 10 points)

As further explained in Section Four, describe in detail how the Applicant has worked to assist households to meet their permanent housing needs, goals and expectations to create housing stability over the 18 months prior to the RFA issuance.

The Applicant's description is limited to no more than two typed pages within the text box below.

Turnstone Development Corporation (TDC) is a not-for-profit 501(c)(3) development corporation incorporated in 1979 to facilitate the creation and preservation of affordable housing. Space for social and supportive services are found at all of our communities. TDC believes that providing a financially stable developer and owner, capable of handling predevelopment through and including the asset management of a property, promotes the best chance of success for affordable and supportive housing communities. In being that developer and owner, TDC works continually on all of our existing communities and prospective communities to identify local service and support agencies in need of permanent supportive housing that would benefit from a partnership or relationship with TDC. These relationships help to address those local needs and determine what goals and ideas most fill that local need and mesh with the communities we provide. By providing inclusive communities, we do not have to rely solely on government funding. By providing family and other units at a higher than ELI rent, we are still providing affordable housing to those in need and provide inclusive communities with a variety of residents that can grow in meeting their housing needs and goals for their futures.

The newest relationship that TDC has worked with is Halifax Urban Ministries (HUM) to come up with a contract to provide services at Brentwood Village. We are also working with the Volusia/Flagler County Coalition for the Homeless identifying needs and plans to serve those persons in this region and from HUM that are in need of permanent supportive housing. Additional recent work includes work with Talbot House and Lighthouse Ministries in Lakeland, Florida, to identify specific needs for permanent supportive housing assisting those that have gone through programs and may have been temporarily housed while looking for permanent housing. TDC also works with local housing authorities to determine access to programs or services that can benefit our communities. Most recently we have been successful in working with St. Johns County Health and Human Services Department to provide on site personnel that will provide a variety of programs to help support housing stability with our residents in St. Augustine. TDC has also been successful for four (4) years in obtaining funding locally for supportive housing personnel in Ft. Lauderdale and continues to seek opportunities to further offer services to help keep residents in permanent housing.

Specifically for Brentwood Village, our relationship with HUM brings that specific area, not just a city, but a community, identity and need to the forefront. With HUM serving in the intervention and assistance of over 94,000 persons through meals, showers and hygiene, clothes and shoes, food and case management, and sheltering hundreds of persons and families, HUM is in the distinct position of needing permanent supportive housing to further the efforts they have made to prevent homelessness and address mental health needs in this community.

We are seeing that supportive housing for special needs has its best success when are residents are partnered with local providers and work with on-site supportive services persons so that they stay in permanent supportive housing and do not slip back into homelessness or behaviors that may have previously prevented successful integration in permanent housing. TDC also believes in the importance of continuity of management and works exclusively with Royal American Management (RAM) in Florida.

We also recently worked to create a Tenant Selection Plan with RAM to use as a model in our communities serving those with special needs including homeless, disabling conditions, and developmental disabilities to use as a best practices model to help remove barriers to stable permanent supportive housing that can typically face these populations. This plan is currently being looked at specifically for all the TDC communities in Florida to be incorporated into leasing and management practices for those with special needs. This plan helps to eliminate barriers by providing exceptions to remove credit barriers for low-income applications and those with special needs. These measures

include forgiveness of prior landlord debt, and accepting a referral letter from an emergency shelter, hospital, or congregate home, or family member or friend will be accepted if a rental history is not available. Traditional affordable housing credit history eligibility can be waived for applicants that are participating in a program or receive assistance that provides for ability to recover economic losses related to the tenancy. Application fees for ELI household with disabling conditions or homelessness can be waived to help remove these barriers to safe permanent supportive housing. Typical restrictions for an arrest for past criminal activity will not necessarily be the basis for rejection. This does not negate certain violent and felony offenses but provides the needed consideration to help those that have gone through rehabilitation programs and reentry programs to have the ability for permanent supportive housing. TDC's work in these areas helps households to meet their permanent housing needs, goals and expectations and is current and ongoing.

b. Self-Sufficiency (Up to 10 points)

As further explained in Section Four, describe in detail how the Applicant has worked to assist households in meeting their self-sufficiency needs, goals and expectations over the 18 months prior to the RFA issuance. The assistance may be related to a household's income, benefits, education/training, or ability to meet its activities of daily living.

The Applicant's description(s) is limited to no more than two typed pages within the text below.

Turnstone Development Corporation (TDC) is a not-for-profit 501(c)(3) development corporation incorporated in 1979 to facilitate the creation and preservation of affordable housing. Space for social and supportive services are found at all of our communities. Turnstone has entered into an MOU and will enter into a formal contract with Halifax Urban Ministries (HUM) as the service provider for Brentwood Village.

HUM has been administering and providing supportive services including outreach, information and referral services, benefits counseling, local services planning and coordination, and a wide variety of services that work to bring area persons and families support on the road to self-sufficiency. HUM receives grant funding from the Volusia/Flagler County Coalition for the Homeless CoC #FL-504 for Supportive Services, leasing, and rental assistance. Through these and other funds, HUM provides assistance to help homeless and those with disabling conditions reach their goals for self-sufficiency.

To help meet the needs of daily living for those experiencing homelessness and disabling conditions, HUM operates the Feed-a-Family Homeless Prevention Program. Through this program HUM daily fights hunger and food insecurity by providing 500 tons of food each year to help the nutrition needs of those most in need. HUM's Bridge of Hope Daily Hot Meal Program provides approximately 100,000 meals annual to homeless and those in need. Each meal is balanced with protein, vegetables, fruits, salads, a starch, dessert, and a beverage. HUM considers this a "first line of defense" in preventing homelessness by freeing up funds for rent and utilities. Special needs residents of Brentwood Village will have access to these and other programs provided or brought to the residents through a referral program that works hand in hand with property management.

Past and current self-sufficiency services and activities are provided through the HUM Hope Place that provides for emergency housing for up to 3 months for over 100 families with children each year. In this program, individuals and families are provided a safe place to stay, day care for children, three meals a day, tutoring, life skills and budgeting classes, and case management. HUM also has the Barracks of Hope that provides transitional housing for up to 9 months to male and female veterans who have struggled with homelessness, addiction, and mental health. Services including mental health counseling and case management are offered to those in need along with financial assistance, tutoring, life skills, budgeting classes, and case management through HUM.

In 2019 HUM was able to assist households in meeting their self-sufficiency needs, goals and expectations as may be related to household's income, benefits, education/training and ability to meet the activities of daily living specifically through:

Homeless Prevention - Feed a Family - 30,256 bags of 32 lbs of food (484 tons), Food Brings Hope - 8,022 bags of 16 lbs of food (64 tons), Volusia County Summer Camps - 663 bags of 16 lbs of food) (5 tons), and Financial Assistance (rent 235, electric 160, water 54 medical expenses 19, bus passes 591 persons/families).

Shelter Programs - Hope Place Family Shelter - 139 families served, Hope Place Unaccompanied Youth - 30 youth served, Barracks of Hope - 57 veterans served of which 28 transitioned to permanent supportive housing, and Cold Weather Shelter - 241 people on 6 cold nights (i.e. below 40 degrees),

Homeless Intervention & Assistance - Hot Meals at the Bridge of Hope 94,882, Showers & Hygiene Packs 29,853, Clothes & Shoes 10,628, Breakfast & Snack Food Bags 13,112, Bus Passes - 581 served, and Case Management 7,489 served

This clearly demonstrates the specific orientation to persons needs and preferences for each person HUM is serving. All of this experience and assistance will be brought to the residents of Brentwood Village and will be specific to the needs of the disabling conditions and formerly homeless families our community will serve.

Public transportation is provided through Voltran, a service of the Volusia County government. Routes can be accessed through a free app call MyStop Mobile. Two bus stops are adjacent to our site, one on Brentwood Drive and one on Derbyshire Road. There are 8 bus stops within .16 miles of the site. These offer multiple bus routes and take residents through the city.

Supportive Housing is not just housing – it is an environment that allows interactive access to a wide array of “rich services” to enhance the living experience of residents. RAM as the property manager of Brentwood Village and HUM as the on-site services provider will provide and/or facilitate access to an array of supportive services designed to assist the residents in sustaining housing stability and to live productively in the community. Residents will be provided with direct access to a variety of services including adult education, information referral for health and employment services, and crisis intervention. Comprehensive supportive services promote self-care and independence and are coordinated by RAM in conjunction with the on-site case manager and organizations and agencies whose services support this targeted population. These supportive services include but are not limited to:

24-hour Management Contact, on-site Resident Services Coordinator, and Counseling/Case Management-Provided by professionals including Assessments, Resource and Referral to Community Agencies, and Veteran’s Benefits Counseling and follow-up.

Transportation Assistance - Grocery store, doctor’s appointments, social outings, etc.

Daily Social Activities-On-site, supervised, structured activities, at no cost to the residents, at least five days a week.

The Resident Services Plan-Includes activities that empower residents. Residents will be encouraged to participate in activities centered on their interests. This is determined through resident surveys and residents taking ownership in planning activities. Group counseling, Medical Seminars for Post-Traumatic Stress Disorder, Job Readiness/ Vocations skills training, Job Placement, Chemical dependency/ substance abuse counseling, Clothing referrals, Life Skills workshops are offered depending on the resident's interest.