



Hope for the Generations

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December 31, 2024

Mr. Cody Campbell
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, TX 78701-2410

Re: Village Apartments (2025 9% HTC Development)
Waiver of Rules

Dear Mr. Campbell:

On behalf of FFL Best Life Village Waco, LP (the “Applicant”), please accept this letter as a request of waiver for 10 T.A.C. §1.15 – Integrated Housing Rule which requires that in Developments with 50 or more Units, that no more than 25% of the total units in Development can be for Households with Disabilities. Village Apartments is a 9% Housing Tax Credit Application proposing 93 total Units of which 47 units are requested to be set-aside for Households with Disabilities which represents 50% of the total units in the Development. This waiver is requested per 10 T.A.C. §1.15(e) which allows the Board to waive the requirements of this rule if the Board can affirm the waiver of the rule is necessary to serve a population or subpopulation that would not be adequately served without the waiver and the Development, even with the waiver, does not substantially deviate from the principle of Integrated Housing.

About the Applicant

FFL Best Life Village Waco, LP is a to-be-formed limited partnership with Friends for Life as the sole and managing member of the General Partner. Friends for Life is a 501(c)(3) charity that was founded in Waco, Texas, in September of 1989 to improve the quality of life for seniors and people with disabilities, particularly those who are without family to care for them. With a mission to help the most vulnerable live the fullest life possible, Friends for Life provides an array of impactful service programming including independent living assistance, quality of life enhancements, guardianship, money management, life skills training and adult day care. A recently launched Telephone Reassurance Program recruits volunteers to call homebound seniors all over Texas once a week to reduce loneliness and isolation making a Phone Friend in the process. When a senior in need is discovered, they are referred to a Lifelines Program that can connect them with resources to help.

On a daily basis, Friends for Life is overwhelmed by the critical need for safe, decent and affordable housing for households with disabilities. Village Apartments was birthed as a solution to provide a housing resource to people with disabilities in the Waco area. The goal of this development is to house the greatest number of households with disabilities in need. Under the Integrated Housing Rule, the Development could only set-aside 23 units for households with disabilities, by granting this waiver the Development would double that number to 47 households with disabilities.

Not only does granting the waiver allow more households to be served, it creates a more efficient service delivery model. The greater number of residents with disabilities will allow Friends for Life to dedicate full-time, on-site staff to implement more robust programming to meet the needs of the residents.

Finally, allowing for a greater number of units set-aside for households with disabilities will also be important for the building design. Designing housing for persons with disabilities involves incorporating features that ensure accessibility, safety, and comfort. These features include wide doorways and hallways, accessible bathrooms, ramps or level access, lever handles, lower light switches and outlets, Universal Design Principles, adequate space for approach and use, simple and intuitive use, tolerance for error, and low physical effort. These features would apply to all common areas and units, and therefore, it would be useful to allow these benefits to assist as many households with disabilities as possible.

There have been similar housing developments funded with Low Income Housing Tax Credits across the country:

Baytown Apartments in Florida is a 9% LIHTC funded development for people with intellectual or developmental disabilities by a non-profit organization named CDS Monarch. Out of the total of 30 units, there are 15 set-aside for persons with disabilities.

https://www.invictusdev.com/?page_id=719

Inglis Gardens in Philadelphia has 80 total units with 40 units for people with disabilities also developed with a non-profit service provider

<https://www.inglis.org/programs-and-services/housing-corporation/properties/inglis-gardens-at-belmont>

In 2023, there was Federal legislation proposed – VISIBLE Inclusive Tax Credits for Accessible Living (VITAL) Act – to increase investment in the Federal Low Income Housing Tax Credit Program to address the needs of aging people and individuals with disabilities. There is a recognition of the widespread need for a greater amount of safe, accessible, and affordable housing for persons with disabilities across all levels of government. By approving this waiver, TDHCA will further support their existing programs targeted to this population and remain at the forefront of creating innovative housing models that provide deep impact.

Population or Subpopulation Not Adequately Served Without the Waiver

In 2023, Friends for Life served 2,231 people with services aimed at achieving independent living and quality of life. To place persons with disabilities in safe, accessible and affordable housing is almost an impossible task due to the lack of housing choice or availability. This task becomes even more challenging when an individual has no family or support. The need for high-quality, supportive housing for persons with disabilities is dire. Village Apartments will not solve the problem, but it will definitely move the needle on housing availability for this population. By granting this waiver and increasing the number of units for persons with disabilities from 23 units to 47 units, TDHCA will more adequately serve this population who have extremely limited housing options available to them.

By granting the waiver, it better serves the policies and purposes articulated in Tex. Gov't Code §§2306.001, 2306.002, 2306.359, and 2306.6701 than not granting the waiver for the following reasons:

- Waiving the integrated housing rule requirement for a mission-based nonprofit focused on improving the quality of life for seniors and persons with disabilities, allows the Applicant to make their time, effort and funds go further to serving their target population.
- There is no financial upside or motivation for the Applicant to apply for this waiver and therefore there is no risk to the Board for approval. The waiver is a means necessary to increasing the housing availability for persons with disabilities who are the target population served by the nonprofit embarking on this development. Granting the waiver does not set an unwanted precedence, as supportive housing developments for this target population are most always proposed by a nonprofit already serving the target population in their community.

We appreciate the thoughtful consideration of this waiver as it allows this critical housing opportunity to move forward to provide more housing and services that will improve the life of Texans with disabilities. Please feel free to contact me at (254) 749-3000 with any questions.

Best,



Inez Russell
Executive Director
Friends for Life