

# Texas State Affordable Housing Corporation Compliance Review Observation Report

**Willow Green Apartments**  
**8301 Willow Place Drive, Houston, TX 77070**  
**Owner:** Dalcor Affordable Housing I, LLC      **Date Built:** 1995  
**Management Company:** Dalcor Management, LLC      **Property Manager:** Gayle Harris  
**Inspection Date & Time:** April 13, 2016 at 8:30 a.m.      **Inspector's Name:** James Matias

<b>Number of Units:</b>	<b>336</b>	<b>Number of required affordable units:</b>	<b>336</b>	
COMPLIANCE AUDIT		YES	NO	N/A
1)	Are procedures that ensure compliance with the set aside requirements and rent requirements effective?	X		
2)	Is the property accepting Section 8 households?	X		
3)	Is the income to rent ratio for Section 8 households less than 2.5?	X		
4)	Are the rent increases smaller than 5%?	X		
5)	Is there any discriminatory language on the Application for Tenancy or Occupancy Qualifications?		X	
6)	Does the lease or rental agreement inform the resident of Very Low Income/Low Income Recertification requirements?	X		
7)	Is additional monitoring by TSAHC recommended?		X	
<b>COMMENTS:</b>				

SET-ASIDES		YES	NO	N/A
1)	Is the property meeting all occupancy restrictions required by the property's Regulatory Agreement and Asset Oversight and Compliance Agreement?	X		
2)	Are the set-aside units evenly distributed?			
a)	No more than 60% of the set-aside requirements consist of one unit type?			X
b)	No less than 20% of the set aside requirements consist of any particular unit type?			X
3)	If either of the set asides have not been met, are any units:			
a)	Rented for less than 30 days, not including month-to-month?		X	
b)	Utilized as a hotel, motel, dormitory, fraternity house, sorority house, rooming house, nursing home, hospital, sanitarium, rest home, or trailer court or park?		X	
c)	Leased to a corporation, business or university?		X	
d)	Owned by a cooperative housing corporation?		X	
e)	Not available for rental on a continuous basis to members of the general public?		X	
<b>COMMENTS:</b>				

UNITS WALKED			
Unit #	USR Designation	New Designation	Comments
210	60%	60%	N/A
816	60%	60%	N/A
1814	60%	60%	N/A
2211	60%	60%	N/A
<b>COMMENTS:</b>			

RESIDENT SERVICES		YES	NO	N/A
1)	Do the resident services appear to cater to the resident profile of the property?	X		
2)	Do the resident services appear to be effective? Discuss your observations in the comments section below.	X		

# Texas State Affordable Housing Corporation

## Compliance Review Observation Report

3) Is the property meeting the Resident Service requirements as required by the Regulatory Agreement and Asset Oversight and Compliance Agreement?	X		
4) Is management monitoring the following:			
a) Resident attendance	X		
b) Frequency of service provided	X		
c) Notification to residents of services	X		
d) Number or type of services	X		
e) Survey of residents	X		
5) Is management properly submitting monthly Resident Service reports through the Compliance System?	X		
6) Did TSAHC provide any Technical Assistance regarding Resident Services?		X	
<b>COMMENTS:</b>			

OFFICE	YES	NO	N/A
1) Is the office neat, the desk uncluttered?	X		
2) Are accurate office hours posted?	X		
3) Are the following displayed in full view:			
a) Occupancy Qualifications?	X		
b) Fair Housing Poster?	X		
<b>COMMENTS:</b>			

RESIDENT FILE REVIEW	YES	NO	N/A
1) Does the owner maintain all records relating to initial resident income certifications, together with supporting documentation?	X		
2) Does the Owner/Agent make an effort to determine that the income certification provided by the resident is accurate	X		
3) Does the file audit establish that residents are being recertified on an annual basis?	X		
4) For mixed (low-income and market units) developments, are there any Next Available Unit Rule Violations?			X
5) Does the file audit indicate that staff needs additional training?		X	

**COMMENTS:** The following issues were noted during resident file review:

- **Documents not executed:** Several documents were not executed by resident and/or management.
  - Tenant Income Certification (TIC): Units 1103, 1806 and 2613 (**see findings below**)
  - Lease and/or Lease Addendums: Units 213, 706, 715, 1014, and 1806
- **Units Status Report:** The information listed on the Unit Status Reports (USR's) for rent, income, and the number of residents was not a reflection of the information in the tenant files.
  - Number of residents: Units 213 and 508
  - Income: Units 508 and 715
  - Rent: Units 604, 1014, and 1406
- **Student Status:** Clarification of student status was unclear during the file review for unit 604. Management was informed of the potential findings that would be administered if the proper exemptions were not proven with tax returns. Prior to the submission of this report Management provided a clarification showing that the initial and subsequent student status form were incorrectly completed and the head of the household is not a full time student.
- **Child support:** Management is reminded that all amounts awarded by the court, including cash medical and any arrearages, must be included in the annual income calculation.

**Observation:**

- **TSAHC suggests Management implement peer-reviews to ensure all forms are executed properly, the USR is kept up-to-date, and that verifications are properly reviewed for annual income calculation.**

*If a new household moves in to any of the units with Findings (listed below), instead of submitting the required Corrective Action documents, submit with your response: the application for tenancy, all income and asset*

# Texas State Affordable Housing Corporation Compliance Review Observation Report

*verifications, the executed Income Certification, and the 1<sup>st</sup> page of the lease for the new household occupying the unit.*

Unit	Finding	Corrective Action Requirement
1103	The TIC is not signed and dated by a Landlord representative.	The Income Certification must be signed and dated by all adult members of the household and by a Landlord representative. Please submit an executed and dated TIC. Do not back date for these corrections.
1806	The TIC is not signed and dated by a Landlord representative or the residents. The effective and move in dates are also left incomplete.	The Income Certification must be signed and dated by all adult members of the household and by a Landlord representative. Please submit an executed and dated TIC. Do not back date for these corrections.
2613	The TIC is signed by all parties but the signatures by the residents are not dated.	The Income Certification must be signed and dated by all adult members of the household and by a Landlord representative. Please submit an executed and dated TIC. Do not back date for these corrections.
<b>COMMENTS:</b>		

## SUMMARY OF FINDINGS AND OBSERVATIONS

**Observation:**

- TSAHC suggests Management implement peer-reviews to ensure all forms are executed properly, the USR is kept up-to-date, and that verifications are properly reviewed for annual income calculation.

**Findings:**

- Corrective Action for the findings listed above and for the items noted in the Resident File Review section were submitted to TSAHC prior to the issuance of this report. No further action is needed.