

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: March 9, 2017 at 8:30 a.m. **Inspector's Name:** James Matias

Number of Units:	336	Number of required affordable units:	336	
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	

COMMENTS:

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	

COMMENTS:

UNITS WALKED

Unit #	USR Designation	New Designation	Comments
213	60%	60%	N/A
1108	60%	60%	N/A
1213	60%	60%	N/A
1303	60%	60%	N/A
2502	60%	60%	N/A

COMMENTS:

RESIDENT SERVICES		YES	NO	N/A
1)	Do the resident services appear to cater to the resident profile of the property?	X		

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2) Do the resident services appear to be effective? Discuss your observations in the comments section below.	X		
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	

COMMENTS:

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		

COMMENTS:

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: Management did a great job correcting all compliance observations and findings prior to the issuance of the Compliance Report.

The discrepancies corrected included the following:

- Unit 116: The Tenant Income certification (TIC) needs to have 1 household member added and one deceased household member removed.
- Unit 611: The Annual Eligibility Certification (AEC) had no date on the signature block. The income, rent, and number of household members needed to be updated on the Unit Status Report (USR).
- Unit 815: The AEC's most recent effective date, rent, and number of household members needed to be updated on the USR.
- Unit 902: The move in and effective dates were missing on the most recent AEC. The USR needed to have the rent updated with the most recent tenant and subsidy split.
- Unit 1009: The resident was due for a recertification and the file did not contain an AEC.
- Unit 1403: The most recent AEC in the file did not have the top section completed. The USR needed to have the effective date on the most recent AEC added and the most recent rent amount updated.
- Unit 1602: The USR needed to have the rent updated with the most recent tenant rent and the adjusted amount of household members.
- Unit 2103: The resident was due for a recertification and the file did not contain an AEC.
- Unit 2105: The income, rent, and effective date needed to be updated on the USR
- Unit 2113: The TIC was missing monetary support that was disclosed at initial certification.
- Unit 2301: The initial TIC was calculating food stamps.

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- Unit 2401: The resident was due for a recertification and the file did not contain an AEC for the last 2 years. The income, rent, and effective date needed to be updated on the USR.
- Unit 2406: This unit was a transfer and the original move in date should be used. The effective date needed to be updated on the USR.
- Unit 2504: The TIC and USR needed to have the rent updated with the accurate rent amount for the tenant.

Observations:

- **The USR is not being updated accurately. Please ensure the USR is completed fully and accurately with the most current household information. The USR must reflect actual household information to ensure that all applicable set asides are being met. It is recommended that each column for all households is reviewed and updated regularly with accurate information.**
- **A total of 7 units did not have an accurately completed AEC or a missing AEC. To comply with reporting requirements, once every calendar year, the development must collect a self-certification from each household that reports the following: the number of household members, age, ethnicity, race, disability status, rental amounts and rental assistance (if any). Moving forward, management must ensure that AEC forms are completed correctly, thoroughly, and timely.**

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 verifications, the executed Income Certification, and the 1st page of the lease for the new household occupying the unit.

Unit	Finding	Corrective Action Requirement
COMMENTS:		

SUMMARY OF FINDINGS AND OBSERVATIONS

No Findings.

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