

Texas State Affordable Housing Corporation Compliance Review Observation Report

High Plains Apartments
1607 Iola Avenue, Lubbock Texas 79416

Owner: RHAC – High Plains, LLC **Date Built:** 1981
Management Company: J. Allen Management Co., Inc. **Property Manager:** Larry Mendez
Inspection Date & Time: March 8, 2018 at 8:00 a.m. **Inspector's Name:** Celina Mizcles Stubbs

Number of Units: 50	Number of required LI units: 50	Number of required VLI units: N/A	
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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) Does the Application for Tenancy or Occupancy Qualifications exclude language that may appear to be discriminatory?	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	Comments
12	60%	
24	60%	
31	60%	

COMMENTS:

RESIDENT SERVICES	YES	NO	N/A
1) Do the resident services appear to cater to the resident profile of the property?	X		
2) Is the property meeting the Resident Service requirements as required by the Regulatory Agreement and Asset Oversight and Compliance Agreement?	X		
3) Is management monitoring the following:			

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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		
4) Did TSAHC provide any assistance regarding Resident Services based on the review conducted during the onsite visit?		X	
5) Is management properly submitting monthly Resident Service reports through the Compliance System?	X		
6) In the last 12 months, has TSAHC provided any assistance regarding the monthly Resident Service reports submitted through the Compliance System? If so, comment below.		X	

COMMENTS: Management stated there has been an increase in resident participation in monthly social activities. Due to the increase, management is currently working with the local Texas Workforce Center's GED program.

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: The reviewer identified 5 files where the households documentation did not match the information listed on the Unit Status Report (USR).

USR Updates:

- Units 36, 39 and 41: The tenant rent and housing assistance rent amounts did not match the amounts listed on the USR.
- Units 41, 45 and 47: The household's move-in income was not listed on the USR.

Observation:

- **Unit Status Report (USR):** The USR is not being updated accurately. During the files review there were a few units that required updates. It is imperative for management to collect and submit accurate information because the USR is used as a tool to ensure that all applicable set aside requirements are being met. High Plains captures and verified household's income at the time of initial certification and completes annual eligibility certification annual thereafter. Therefore, the initial income should be listed on the USR and should remain the same on the USR. The tenant rent and housing assistance payments should be updated each time there is a change.

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.

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Unit	Finding	Corrective Action Requirement
N/A		
COMMENTS:		

SUMMARY OF FINDINGS AND OBSERVATIONS

Observation:

- **Unit Status Report (USR):** The USR is not being updated accurately. During the files review there were a few units that required updates. It is imperative for management to collect and submit accurate information because the USR is used as a tool to ensure that all applicable set aside requirements are being met. High Plains captures and verified household's income at the time of initial certification and completes annual eligibility certification annual thereafter. Therefore, the initial income should be listed on the USR and should remain the same on the USR. The tenant rent and housing assistance payments should be updated each time there is a change.

No Findings.