

# Texas State Affordable Housing Corporation Compliance Review Observation Report

**Vista Rita Blanca**  
701 Maynard, Dalhart, Texas 79022

**Owner:** Guadalupe Economic Services Corp. (GESC)      **Date Built:** 2014  
**Management Company:** JL Gray Company      **Property Manager:** Rosalinda Davila  
**Inspection Date & Time:** June 7, 2018 at 9:00 a.m.      **Inspector's Name:** James Matias

<b>Number of Units:</b> 28	<b>Number of required LI units:</b> 28 at 80%AMI	<b>Number of required VLI units:</b> 6	
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		
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Unit #	USR Designation	Comments
3B	50%	
A1	80%	
F2	80%	
G1	50%	

**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		

# Texas State Affordable Housing Corporation Compliance Review Observation Report

3) 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	
4) Did TSAHC provide any assistance regarding Resident Services based on the review conducted during the onsite visit?	X (see observation)		
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 (see observation)		

**COMMENTS:**

**Observations:**

- On the day of the site visit Management did not have a resident services binder or any other method for tracking services. It is strongly suggested that Management keep a binder or folder to help keep track of flyers being passed out, signup sheets, or any other documentation associated with services provided.
- Over the last several months the only services provided by the community are a food and diaper pantry and a library. While performing the site visit, the reviewer was not shown the pantries or a library. It is evident that Management is doing the minimum when it come to the Resident Services program. Management is strongly encouraged to provide services related to personal and career development, financial skills, medical and health support, community awareness and children services. Examples of service can be located here: [http://www.tsahc.org/public/upload/files/general/Resident\\_Services\\_Guidelines.pdf](http://www.tsahc.org/public/upload/files/general/Resident_Services_Guidelines.pdf).

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 (see comment)		
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 (see comment)	

**COMMENTS:** Management did a great job correcting Unit Status Report (USR) inconsistencies prior to the issuance of the Compliance Report. During the tenant file review, the reviewer noticed a few discrepancies between the incomes, tenant paid rent, and assistance payment amounts listed on the Tenant Income Certification (TIC) versus the USR. The discrepancies were noted for units 1B, 2F, 4F and 4B (more than half of the file sample reviewed). It was apparent that this was an oversight as management is aware of updating these amounts as they change. Management was instructed to update the USR each time a rent change is made and not to update the income when it is calculated annually. For this property, which is 100% affordable, the original income calculated and entered on the TIC is the income that should be on the USR.

**Observations:**

- Management is instructed to update the USR each time there is a change in the income, tenant paid rent, and/or assistance payment amounts so that the information listed on the Tenant Income Certification (TIC) and USR match moving forward. Management was reminded that for this property, where 100% of the units are affordable, the initial income calculated and entered on the TIC is the income that should be on the USR.

# Texas State Affordable Housing Corporation

## Compliance Review Observation Report

- The TSAHC Health and safety Form was missing for files 1D, 2D, and 4F. Prior to the submission of this report, the signed forms were provided. In order to meet TSAHC compliance, it is imperative that the form be provided to residents at move in and stay in the file. Since 43% of the files reviewed did not have the form, it is recommended that all files be checked to determine if the form was provided.

*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 1<sup>st</sup> page of the lease for the new household occupying the unit.*

Unit	Finding	Corrective Action Requirement
N/A		
COMMENTS:		

### SUMMARY OF FINDINGS AND OBSERVATIONS

**Observations:**

- On the day of the site visit Management did not have a resident services binder or any other method for tracking services. It is strongly suggested that Management keep a binder or folder to help keep track of flyers being passed out, signup sheets, or any other documentation associated with services provided.
- Over the last several months the only services provided by the community are a food and diaper pantry and a library. While performing the site visit, the reviewer was not shown the pantries or a library. It is evident that Management is doing the minimum when it come to the Resident Services program. Management is strongly encouraged to provide services related to personal and career development, financial skills, medical and health support, community awareness and children services. Examples of service can be located here: [http://www.tsahc.org/public/upload/files/general/Resident\\_Services\\_Guidelines.pdf](http://www.tsahc.org/public/upload/files/general/Resident_Services_Guidelines.pdf).
- Management is instructed to update the USR each time there is a change in the income, tenant paid rent, and/or assistance payment amounts so that the information listed on the Tenant Income Certification (TIC) and USR match moving forward. Management was reminded that for this property, where 100% of the units are affordable, the initial income calculated and entered on the TIC is the income that should be on the USR.
- The TSAHC Health and safety Form was missing for files 1D, 2D, and 4F. Prior to the submission of this report, the signed forms were provided. In order to meet TSAHC compliance, it is imperative that the form be provided to residents at move in and stay in the file. Since 43% of the files reviewed did not have the form, it is recommended that all files be checked to determine if the form was provided.