

# Texas State Affordable Housing Corporation Compliance Review Observation Report

**Villa Rodriguez**  
3270 Nacogdoches, San Antonio, Texas 78217

**Owner: San Antonio Low Income Housing, LLC**      **Date Built: 1982**  
**Management Company: Cesar Chavez Foundation**      **Property Manager: Lorraine Plata**  
**Inspection Date & Time: May 9, 2018 at 8:30 a.m.**      **Inspector's Name: Celina Mizcles Stubbs**

**Number of Units:** 346      **Number of required LI units:** 260      **Number of required VLI units:** 70

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
10215	50%	
10911	80%	
11005	80%	
11006	80%	
20309	80%	
20602	80%	

**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) 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:			
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 – see comment		
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 – see comment		
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 comment		

**COMMENTS:** The resident services are being provided at the property and it appears that they are catering to the residents. The resident service coordinator was not present during the exit interview however management believes that a resident survey are send out annually. During the exit interview, the reviewer reminded management that monthly Resident Service reports and Unit Status Reports (USR) and are due the 10<sup>th</sup> day of each month. In the last 12 months there have been several instances where one or both reports have not been submitted timely. Specific to the USR, there have been several instances where the report requires corrections and resubmission. Management was also previously asked to provide TSAHC with a monthly Next Available Unit Rule list (i.e., a report to document over-income units) via email. To date, management has not submitted the requested report.

**Observation:**

- According to the Regulatory Agreement, Asset Oversight and Compliance Agreement, and TSAHC procedures, management must submit monthly compliance reports via the TSAHC online system. Monthly reports are due the 10<sup>th</sup> day of the following months. For example, May 2018 reports are due no later than June 10<sup>th</sup>. It is imperative that these reports are submitted accurately and timely. TSAHC uses the monthly reports (USR and Resident Services) as a tool to ensure that all applicable set asides and resident services requirements are being met. Management is reminded to review all household information and submit the monthly USR and Resident Services report accurately and timely. In addition, management should submit a monthly Next Available Unit Rule unit list via email to ensure that we do not run into set-aside issues moving forward.

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 – see observation	
5) Does the file audit indicate that staff needs additional training?		X	

**COMMENTS:** Based on the review of tenant files, management has improved their efforts in clarifying and verifying applicant information and calculating household income. There were a few discrepancies noted on the USR that were specific to updating income and/or tenant rent on 5 files (units 10211, 10502, 10605, 10806, and 20918) that were reviewed. In addition, the TSAHC Health and Safety form was missing in the tenant file for unit 11009. Prior to the issuance of this report, management corrected all file discrepancies and submitted a copy of the signed Health and Safety form.

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*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

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No Findings.