## Texas State Affordable Housing Corporation Compliance Review Observation Report

## White Rock

3110 Thousand Oaks Drive, San Antonio, Texas 78247

Owner: Commonwealth Multifamily Date Built: 2003

Management Company: Orion Real Estate, Inc. Property Manager: Donna Carraghan

Inspection Date & Time: May 10, 2018 at 8:30 a.m. Inspector's Name: Celina Mizcles Stubbs

ınspe	ection Date &	z 1 ime: Ni	iay 10, 2018 at 8:30 a.m.	Inspe	ector's Name: C	elina Milzci	es Studds	
Nur	nber of Units:	336	Number of required LI units:	252	Number of requir	ed VLI units:		
			COMPLIANCE AUDIT			YES	NO	N/A
1)	Are procedures effective?	s that ensure	compliance with the set aside requirement	nts and ren	t requirements	х		
2)	Is the property a	accepting Sec	tion 8 households?			Х		
3)	3) Is the income to rent ratio for Section 8 households less than 2.5?			X – see comment				
4)	4) Are the rent increases smaller than 5%?			х				
5) b	5) Does the Application for Tenancy or Occupancy Qualifications exclude language that may appear to be discriminatory?			х				
6)	Does the lease Recertification r		ement inform the resident of Very Low In	come/Low	Income	х		
7)	Is additional mo	nitoring by TS	SAHC recommended?				X	

**COMMENTS:** Based on conversation with management, the income to rent ratio requirement for section 8 household is properly being followed however the property's Rental Criteria does not clearly state the requirement. Prior to the issuance of the report, management provided the reviewer with a revised copy of the Rental Criteria that included the income to rent ratio for Section 8 households. Management is advised to utilize the revised Rental Criteria moving forward.

	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?	х		
2)	Are the set-aside units evenly distributed?			
	a) No more than 60% of the set-aside requirements consist of one unit type?	Х		
	b) No less than 20% of the set aside requirements consist of any particular unit type?	Х		
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?		Х	
	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?		Х	
	d) Owned by a cooperative housing corporation?		Х	
	e) Not available for rental on a continuous basis to members of the general public?		Х	
СОМІ	MENTS:			

UNITS WALKED					
Unit #	USR Designation	Comments			
238	60%				
932	60%				
1011	60%				
1927	60%				
COMMENT	COMMENTS:				

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

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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?	х		
3) Is management monitoring the following:			
a) Resident attendance	Х		
b) Frequency of service provided	Х		
c) Notification to residents of services	Х		
d) Number or type of services	Х		
e) Survey of residents	X		
4) Did TSAHC provide any assistance regarding Resident Services based on the review conducted during the onsite visit?		х	
5) Is management properly submitting monthly Resident Service reports through the Compliance System?	Х		
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.		х	
COMMENTS:			

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

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

COMMENTS: There were a couple of discrepancies between the tenant income and tenant rent/housing assistance amounts that were listed in the tenant files and the Unit Status Report (USR). In addition, the reviewer requested addition clarification for two tenant files (units 834 and 914) to support information noted on the tenant applications. Prior to the issuance of this report, management provided the reviewer with all of the requested supporting documentation. The submitted documentation supported the information in the tenant files therefore no further issues, observations or findings were issued.

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
N/A		
COMMENTS:		

	SUMMARY OF FINDINGS AND OBSERVATIONS	
No Observations or Findings.		