

# Texas State Affordable Housing Corporation Compliance Review Observation Report

<b>Brooks Manor</b>			
444 E. Jefferson Street, West Columbia, TX, 77486			
Owner: Monroe Group LTD		Date Built: 1983	
Management Company: Monroe Group		Property Manager: Glenda Jones	
Inspection Date & Time: May 17, 2019 at 8:30 AM		Inspector's Name: James Matias	

Number of Units: 50	Number of required LI units: 20	Number of required VLI units: 3	
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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:**

<b>UNITS WALKED</b>
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Unit #	USR Designation	Comments
11	60%	
39	60%	
41	60%	
44	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		

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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	
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	
<b>COMMENTS:</b>			

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		
<b>COMMENTS:</b>			

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	
<b>COMMENTS:</b> Ten files were reviewed during the site visit. The overall condition of the files were found to be worse than last year, which was the initial onsite visit for this property. The files often contained loose or missing documents and the order of the documents was often not uniformed. In addition the files were often missing the calculation tape, which is not required, but is an extremely helpful tool for anyone reviewing or analyzing a file for eligibility. See Observations and Findings below.			

***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/Observation	Corrective Action Requirement
11C	Observation: Unit 11C is a recent move out. The move out took place prior to the submission period for the April USR (May 1, 2019 through May 10, 2019)	In order for your monthly USR to be in compliance please update unit 11C on the May Report due by June 10 <sup>th</sup> , 2019.
19E	Observation: The Annual Eligibility Certification (AEC) was signed by the tenant but was dated incorrectly.	Prior to the submission of this report, Management provided TSAHC with a corrected AEC. No further action is needed.

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33H	Finding: It appears that an asset was missing from the Tenant Income Certification (TIC). The asset does not change the eligibility of the household.	Prior to the submission of this report, Management provided TSAHC with a corrected TIC. No further action is needed.
35H	Finding: Based on a review of the file, an asset account was not verified properly for the Tenant Income Certification (TIC). Proper handling of the asset does not change the eligibility of the household.	Prior to the submission of this report, Management provided TSAHC with a corrected asset verification and TIC. No further action is needed.
40I	Observation: The TSAHC Health and Safety form was not found in the file.	Prior to the submission of this report, Management provided a Health and Safety form signed by the resident. No further action is needed.
43I	Observation: The TSAHC Health and Safety form was not found in the file.	Prior to the submission of this report, Management provided a Health and Safety form signed by the resident. No further action is needed.

**COMMENTS:** Management needs to pay close attention to the proper handling of assets and making sure assets are reflected properly on the TIC. In addition, all files need to have the TSAHC Health and Safety form completed and signed prior to move in.

### SUMMARY OF FINDINGS AND OBSERVATIONS

- See Findings above. (No further action is needed as mentioned above.)
- See Observations above.