

Texas State Affordable Housing Corporation Compliance Review Observation Report

Los Ebanos Apartments			
2133 Barnard Rd., Brownsville, Texas 78520			
Owner: RHAC – Los Ebanos, LLC		Date Built: 1981	
Management Company: J. Allen Management Co.		Property Manager: Erika Gomez	
Inspection Date & Time: March 1, 2019 at 8:30 a.m.		Inspector's Name: James Matias	

Number of Units:	65	Number of required LI units:	65	Number of required VLI units:	N/A	
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
6	60%	
27	60%	
31	60%	
43	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	
COMMENTS:			

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: 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 numbers of residents and the income on Tenant Income Certification (TIC) versus the USR. The discrepancies regarding initial income were noted for units 25, 26, 33, 39, 47, 49 and 53. Management is now aware that the initial income on the TIC is what should be reflected on the USR at all times. Management also corrected unit 25 which had the incorrect number of household members. In addition to these inconsistencies, the improper effective date is being entered on the USR. Management completed corrections for units 4, 25, 26, 33, 39, 43, 47, 49, and 53 regarding improper effective dates.

Observation:

- Management is advised to go through TSAHC's USR for all of its units to ensure that the household's initial income is listed and the anniversary of the move in date is being used as the effective date for recertifications.

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:		

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SUMMARY OF FINDINGS AND OBSERVATIONS

No Findings.

Observation:

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