



# 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	
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	

**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 rent on Tenant Income Certification (TIC) and the USR. The discrepancies regarding rent were noted for units 125, 326, 333, 433, 513, 523 and 824. Management is now aware that the current rent paid by the household and housing authority is what should be reflected on the USR at all times. Management also corrected unit 231 which had the incorrect number of household members. The file for unit 1032 did not have the TSAHC Health and Safety form in it. Management completed corrections for all discrepancies listed above. There were two Findings identified (unit 323 and 722) as noted below.

**Observation:**

- In a few cases, Management did not appear to be obtaining a consistent amount of check stubs for income calculations. According to management, the policy is to collect 2 months of check stubs. It is imperative that the Compliance staff collects and screen the income of all applicants in a manner consistent with company policy as this may result in household ineligibility.

*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
323	<b>Observation:</b> The file has a checking account that was left off the TIC. The calculation and addition does not affect the eligibility of the household.	Please calculate the imputed income since this is over \$5,000 and add it to the TIC. Proper documentation was obtained for the file and sent to TSAHC prior to the completion of this report. No further action is needed.

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613	<p><b>Observation:</b> On page two of the TIC, the 60% designation was not selected for "Bond". The TIC's are being used for both LIHTC and bond compliance/eligibility, please ensure both items are selected.</p>	<p>Please select the 60% designation on page 2 of the TIC. Proper documentation was obtained for the file and sent to TSAHC prior to the completion of this report. No further action is needed.</p>
722	<p><b>Observation:</b> The file indicates a mortgage for the applicant, however a Real Estate property is not listed in the Asset section of the TIC.</p>	<p>The file needs to provide clarification on why this asset was not included on the TIC or properly calculate the value of the asset and add it to the asset section of the TIC. Proper documentation was obtained for the file and sent to TSAHC prior to the completion of this report. No further action is needed.</p>

**COMMENTS:**

### SUMMARY OF FINDINGS AND OBSERVATIONS

**Observations:**

- In a few cases, Management does not appear to be obtaining a consistent amount of check stubs for income calculations. Management stated the policy is to collect 2 months of check stubs. Please make sure the Compliance staff is diligent and consistent in following the management practice for obtaining the correct amount of check stub for each applicant.
- See units observations above.