

Texas State Affordable Housing Corporation Compliance Review Observation Report

Peoples El Shaddai and St. James Manor

2836 E. Overton Road and 3119 Easter Ave., Dallas, TX 75216

Owner: Steele Saint James Peoples LLC

Date Built: 1969 (St James) 1970 (Peoples)

Management Company: Monroe Group Ltd.

Property Manager:

Inspection Date & Time: September 26, 2019 @ 8:30 a.m.

Inspector's Name: Celina Mizcles Stubbs

Number of Units: 100 (Peoples) 100 (St James)	Number of required LI units: 40 (Peoples) 40 (St James)	Number of required VLI/ELI units: 5 (Peoples) 5 (St James)
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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) Is there any discriminatory language on the Application for Tenancy or Occupancy Qualifications?		X	
6) Does the lease or rental agreement inform the resident of Extremely Low, Very Low Income or 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	New Designation	Comments
Peoples El Shaddai			
	60%	N/A	
	60%	N/A	
	60%	N/A	
St James Manor			
	60%	N/A	
	60%	N/A	
	60%	N/A	

COMMENTS:

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RESIDENT SERVICES	YES	NO	N/A
1) Do the resident services appear to cater to the resident profile of the property?	X		
2) Do the resident services appear to be effective? Discuss your observations in the comments section below.	X		
3) Is the property meeting the Resident Service requirements as required by the Regulatory Agreement and Asset Oversight and Compliance Agreement?	X		
4) 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		
5) Is management properly submitting monthly Resident Service reports through the Compliance System?	X		
6) Did TSAHC provide any Technical Assistance regarding Resident Services?		X	
COMMENTS: Management was reminded to ensure they are providing at least four (4) resident services each month at each property.			

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 (see comments)	

St James Manor:

Comments: There were a few inconsistencies found in 6 of the 8 files as noted below. The reviewer was informed that the site is without a manager. The review understands that multiple hands in a tenant file can lead to some of the minor issues noted below. It is imperative to ensure files are being maintained while the manager position is being filled. It is apparent that these minor inconsistencies are a result of not have a manager in place for the last 3 months. Management is advised to correct the items listed below including the Finding.

Observations:

- 124B11: Signature missing on the Under \$5,000 Asset Form. It also appears that someone complete the form for the tenant.
- 140B15: Update the rent and housing assistance amounts on the Unit Status Report (USR).
- 205B3: Update the number of household members on the USR. In addition, the household transferred into this unit on 3/1/2018, however the file did not contain supporting documents to verify the total income and assets for this household. See Finding.
- 220B10: Update the number of household members on the USR. In addition, the file contained a duplicate Income Certification (IC) reporting \$0 income. The reviewer was able to identify the correct IC form; however management must ensure that the documents in the tenant file are

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accurate and information is verified.

- 250B18: Duplicate Income Certification (IC) in file.
- 260B20: Update the recertification date to 6/22/19, the tenant consent and releases form is not signed and there was not an Under \$5,00 Asset Form in the file for the IC dated in June 2018.

Peoples El Shaddai:

Comments: There were a few inconsistencies found in 5 of the 8 files reviewed as noted below.

Observations:

- 106A2: There are two adults with no income and neither completed the No-Income form. A saving account was disclosed yet there were no assets listed on IC form, and the TSAHC Health and Safety form is not signed.
- 130A7: Non-employment Certification form is not signed.
- 148A11: There are discrepancies with the move-in date and income and housing assistance amounts on the USR.
- 162A15: Update the number of household members and the income on the USR.
- 164A15: the file is missing health and safety form.

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
205B3 (Saint James Manor)	The Income Certification (IC) dated 3/1/2018 did not contain verification supporting the income and assets.	Management must provide supporting documentation, verified within the required timeframe, to support the Income Certification (IC) dated 3/1/2018. If unable to obtain supporting documents during that time frame, management must certify the households under current circumstances to verify eligibility. Documentation must be submitted to TSAHC no later than 11/15/2019.

COMMENTS:

SUMMARY OF FINDINGS AND OBSERVATIONS

See Observation and Findings above.