

# Texas State Affordable Housing Corporation Compliance Review Observation Report

**AHA! at Briarcliff Apartments**  
1915 Briarcliff Blvd., Austin, Texas 78723

**Owner:** Accessible Housing Austin!, Inc      **Date Built:** 2020  
**Management Company:** Accessible Housing Austin!, Inc      **Property Managers:** Jolene Keene and Kristen Davis  
**Inspection Date & Time:** November 19, 2021 at 8:30 a.m.      **Inspector's Name:** Celina Stubbs

**Number of Units:** 27      **Number of required LI units:** 11      **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

Unit #	USR Designation	Comments
113	60%	
232	N/A	This is a new construction property. This unit has not been occupied by an eligible household.
235	N/A	This is a new construction property. This unit has not been occupied by an eligible household.

**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		
3)	Is management monitoring the following:			

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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:** Management is consistently offering a minimum of 5 resident services at this time and must continue to do so throughout the year. As a reminder, management must submit a Resident Service Plan and the Fair Housing Sponsor Report to TSAHC on February 1, 2022, and annually thereafter.

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:** The office does have the required Equal Housing Opportunity (EHO) logo and the Fair Housing posters and Tenant Qualification displayed in the management office; however, they are not located in the best area of the office. Management stated they provide tenants with a property magnet that displays the emergency phone number.

**Observations:**

- **TSAHC recommends the EHO logo, the Fair Housing posters and the Tenant Qualifications be moved to a full-view area for better visibility for residents and applicants. In addition, TSAHC recommends the emergency phone number be posted on the office door to ensure people without a magnet can have access to the emergency number.**

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:** Based on a review of the tenant files, it was apparent that management is not completing required forms thoroughly. In addition, the reviewer noticed that management was listing the housing voucher utility allowance amount listed in the utility allowance column of the unit status report (USR). Prior to the issuance of this report, Management removed the amounts as instructed. No further action is required for that item.

**Observation: Management is reminded of the following:**

- **Applications need to be completed to its entirety and reviewed by management thoroughly to ensure program eligibility. All supporting documentation must be dated within 120 days from the Income Certification effective date at the time of move in and at the time of annual recertification.**
- **Student Status must be obtained at the at the time of move in and at the time of annual recertification.**
- **Asset Under \$5,000 Certification forms must be obtained at the time of move in and at the time of annual recertification. Third party verification of assets is required for assets over \$5,000.**

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*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	Corrective Action Requirement
111	Unable to determine household eligibility.	<p>The following items are required to be verified, corrected, and submitted for review:</p> <ul style="list-style-type: none"> <li>• Make sure the application is thoroughly completed and verified.</li> <li>• Obtain paystubs that are within 120 days from the initial Income Certification effective date, recalculate and update Income Certification form.</li> <li>• Clarify cash deposits noted in the checking account. If it is a consistent contribution, please add the income to the household's total income.</li> <li>• The October checking account bank statement is duplicated, please remove one.</li> <li>• Thoroughly complete all 3 pages of the Income Certification form.</li> </ul>
124	The initial Income Certification is incomplete.	<p>The following items are required to be corrected and submitted for review:</p> <ul style="list-style-type: none"> <li>• Thoroughly complete the Income Certification form.</li> <li>• The TSAHC Health and Safety form needs to be signed.</li> </ul>
132	The initial Income Certification is incomplete.	<p>The following items are required to be corrected and submitted for review:</p> <ul style="list-style-type: none"> <li>• Thoroughly complete the Income Certification form.</li> <li>• Submit supporting documentation for the checking account amount listed on the Income Certification form.</li> </ul>
222	The initial Income Certification is incomplete, and assets need to be verified.	<p>The following items are required to be verified, corrected, and submitted for review:</p> <ul style="list-style-type: none"> <li>• Thoroughly complete the Income Certification form.</li> <li>• Obtain the supporting documentation for the file calculation sheet using bi-weekly payments.</li> <li>• Clarify/verify the cash deposits noted in the checking account for the months of January, March, April and December. If it is a consistent contribution, please add the income to the household's total income.</li> <li>• Add the Saving account current statement balance to the Income Certification form.</li> </ul>
224	The initial Income Certification is incomplete, and assets need to be verified.	<p>The following items are required to be verified, corrected, and submitted for review:</p> <ul style="list-style-type: none"> <li>• Thoroughly complete all 3 pages of the Income Certification form.</li> <li>• Obtain paystubs that are within 120 from initial Income Certification effective date, recalculate and update Income Certification form.</li> <li>• Verify checking account for possible household income. There appears to be a monthly transfer into the account.</li> </ul>
234	The initial Income Certification is incomplete.	<p>The following items are required to be verified, corrected, and submitted for review:</p> <ul style="list-style-type: none"> <li>• Thoroughly completed Section 1 of the application Intake form.</li> <li>• Thoroughly complete the Income Certification form.</li> <li>• Update the Unit Status Report to reflect the household income listed on the Income Certification form.</li> <li>• There are two calculation sheets in the file, remove one.</li> <li>• Complete the Under \$5,000 Asset Certification form.</li> <li>• Add a copy of the tenant's voucher to the tenant file.</li> </ul>

**COMMENTS:** If the correction to the Findings noted above result in a change of household income, management is advised to update the Unit Status Report.

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### SUMMARY OF FINDINGS AND OBSERVATIONS

#### Observations:

- TSAHC recommends the EHO logo, the Fair Housing posters and the Tenant Qualifications be moved to a full-view area for better visibility for residents and applicants. In addition, TSAHC recommends the emergency phone number be posted on the office door to ensure people without a magnet can have access to the emergency number.
- Management is reminded of the following:
  - Applications need to be completed to its entirety and reviewed by management thoroughly to ensure program eligibility. All supporting documentation must be dated within 120 days from the Income Certification effective date at the time of move in and at the time of annual recertification.
  - Student Status must be obtained at the at the time of move in and at the time of annual recertification.
  - Asset Under \$5,000 Certification forms must be obtained at the time of move in and at the time of annual recertification. Third party verification of assets is required for assets over \$5,000.

#### Findings:

- The corrections to the tenant file Findings noted above are due to TSAHC no later than 01/29/2022.