Texas State Affordable Housing Corporation Compliance Review Observation Report

Los Naranjos Apartments

210 N. Eagle Pass Street, Alton, Texas 78573

Owner: HVM BP A;ton Ret., LLC

Management Company: Hamilton Valley Management, Inc

Property Manager:

Inspection Date & Time: June 11, 2021 at 9:30 a.m. **Inspector's Name:** Celina Mizcles Stubbs

Nur	mber of Units:	30	Number of required LI units:	12	Number	of required VI	_I units:	N/A
			COMPLIANCE AUDIT			YES	NO	N/A
1)	Are procedures that ensure compliance with the set aside requirements and rent requirements effective?					х		
2)	2) Is the property accepting Section 8 households?					Х		
3)	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 – see comment			
5) b	5) Does the Application for Tenancy or Occupancy Qualifications exclude language that may appear to be discriminatory?			х				
6)	Does the lease o Recertification re		eement inform the resident of Very Low In	come/Low Inco	ome	х		
7)	ls additional mon	itoring by T	SAHC recommended?				х	

COMMENTS: This is the first Compliance Repot for Los Naranjos Apartments. According to management, RRHA previously approved a significant rent increase. The rent increase averages \$165 for 1-bedroom and \$130 for 2-bedrooms. The increase was implemented on 5/1/2021.

	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?	х		
2)	Are the set-aside units evenly distributed?	X		
	a) No more than 60% of the set-aside requirements consist of one unit type?			Х
	b) No less than 20% of the set aside requirements consist of any particular unit type?			Х
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?		Х	
	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?		Х	
	d) Owned by a cooperative housing corporation?		Х	
	e) Not available for rental on a continuous basis to members of the general public?		Х	

RESIDENT SERVICES	YES	NO	N/A
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?	х		

Texas State Affordable Housing Corporation

Compliance Review Observation Report

3) Is management monitoring the following:			
a) Resident attendance	X		
b) Frequency of service provided	х		
c) Notification to residents of services	х		
d) Number or type of services			
e) Survey of residents	х		
4) Did TSAHC provide any assistance regarding Resident Services based on the review conducted during the onsite visit?		х	
5) Is management properly submitting monthly Resident Service reports through the Compliance System?	х		
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.		Х	

COMMENTS: The property is providing 4 resident services per month as required. Some of the services were postponed or cancelled due to covid. We encourage management to continue to adhere to federal, state, and local guidance regarding common areas and amenities. In addition, TSAHC intends to start monitoring services on October 1, 2021. This date is subject to change based on the pandemic conditions and CDC guidance at that time. In anticipation of the date, management is advised to stay up to date and adhere to federal, state, and local guidance and adjust resident services, as needed. Management can also refer to CDC guidance for group gatherings by visiting the cdc.gov website. Management is advised to take good health and safety precautions for current and future resident services provided. Please continue to clean all common areas, restrooms, doorknobs, and handrails.

OFFICE	YES	NO	N/A	
1) Is the office neat, the desk uncluttered?	Х			
2) Are accurate office hours posted?	Х			
3) Are the following displayed in full view:				
a) Occupancy Qualifications?				
b) Fair Housing Poster?				
OMMENTS:				

COMMENTS:

RESIDENT FILE REVIEW	YES	NO	N/A
Does the owner maintain all records relating to initial resident income certifications, together with supporting documentation?	х		
2) Does the Owner/Agent make an effort to determine that the income certification provided by the resident is accurate?			
Does the file audit establish that residents are being recertified on an annual basis?	х		
For mixed (low-income and market units) developments, are there any Next Available Unit Rule Violations?			Х
5) Does the file audit indicate that staff needs additional training?		Х	

COMMENTS: Overall, the tenant files were maintained in a consistent order. There were a few observations made and a couple of findings are noted below

Observations:

- Applications: Management is reminded to ensure applications are completed to its entirety. The previous landlord section was incomplete for unit 12 and the student status section was not completed for unit 14.
- Unit Status Report (USR): The number of households members noted on the Unit Status Report (USR) is incorrect for units 12 and 18. Management corrected this issue prior the issuance of this report.
- Bank Statements: TSAHC accepts the use of the Under \$5,000 Asset form however the tenant files contain bank statements. While this
 practice is okay, management is reminded to request and maintain all pages of the bank statement moving froward. This issue was noted in
 tenant files for units 12 and 14
- Unit 14: The Income Certification and the Asset Certification list a checking amount of \$9.55, however the 6-month average of the bank statement is \$11.03. While it is an acceptable practice to use the tenant certified amount, this does not appear to be a management practice. Management is advised to review and report assets consistently. Management corrected this issue prior the issuance of this report.

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Texas State Affordable Housing Corporation

Compliance Review Observation Report

4

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
1 1/		For all back statements in the tenant files, please obtain all pages of the bank statements and submit them for review.
14		For all back statements in the tenant files, please obtain all pages of the bank statements and submit them for review.
COMMENTS:		

SUMMARY OF FINDINGS AND OBSERVATIONS

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- Applications: Management is reminded to ensure applications are completed to its entirety. The previous landlord section was incomplete for unit 12 and the student status section was not completed for unit 14.
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- Unit 14: The Income Certification and the Asset Certification list a checking amount of \$9.55, however the 6-month average of the bank statement is \$11.03. While it is an acceptable practice to use the tenant certified amount, this does not appear to be a management practice. Management is advised to review and report assets consistently. Management corrected this issue prior the issuance of this report.

The corrective action for the Findings noted above must be submitted to TSAHC no later than 7/29/2021.