

Texas State Affordable Housing Corporation

Compliance Review Observation Report

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: The property is properly 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. Resident services involving crowds of more than 10 people are suspended until further notice. Management is advised to take good health and safety precautions for resident services such as book club meetings and crime watch meetings. We encourage each property to increase the cleaning of all common areas, restrooms, doorknobs, and handrails. Please continue to submit the Resident Services you provide. TSAHC will take these limitations into consideration as we review the monthly requirements.

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: This annual review was conducted virtually. While the Inspector did not physically see the Occupancy Qualification and Fair Housing Poster, the Property Manager confirmed that it was posted in the management office.

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 – see comment		
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 comment		

COMMENTS: A thorough review was completed on 5 tenant files that were submitted for review. The reviewer identified incomplete forms, missing forms, and/or missing verification in all 5 files. Based on the review and the property manager being new to the property, management is encouraged to conduct peer-reviews of tenant files moving forward. TSAHC believes this will help eliminate the issues that were identified and help ensure program eligibility. A peer review will also ensure tenant files and documents are thoroughly completed, reviewed, and verified. Below is a list of general observations. Finding can be found at the bottom of this report.

Observation: Management is encouraged to thoroughly review tenant file documents to ensure they are completed in its entirety and verify information properly. The following issues were noted throughout the file review.

- Applications: Not completed or verified properly and/or missing manager initials/signatures.
- Employment Verification forms: Unable to determine third-party method (i.e., faxed, emailed, etc.)
- Health and Safety Form was backdated. TSAHC does not encourage this practice.
- Asset Certification form: Questions 2-4 were consistently not answered and \$0 was listed in each asset type line item on the form. TSAHC recommends the manager put a strike, N/A, or leave the spaces blank moving forward.

Findings are listed in the chart below.

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If a new household moves into 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
Unit 5	The household income was calculated incorrectly. The child support income included a stimulus check and a tax-return payment which should not have been included. In addition, the bank statement showed deposits (\$5,965) that need to be clarified. The Tax-Exempt Bond Addendum was not in the tenant file, the marital status form was not completed properly, and the tenant screening was not submitted for review.	Management must recalculate the total household income and correct the Income Certification and submit completed and/or missing documents. The corrected and signed Income Certification, along with the other corrected documents must be submitted to TSAHC for review. Corrective action must be submitted to TSACH no later than 05/12/2021.
Unit 11	The Income Certification (IC) is incomplete. Page 1 of the IC is missing the disclosed asset, Page 2, Part V of the IC is incomplete. In addition, the Tenant Selection Plan is missing the tenant's printed name on the signature page, and the Asset Certification form is incomplete (questions 2-4 not answered). The Tax-Exempt Bond Addendum is missing owner representative signature, and the Tenant screening was not submitted for review.	Management must correct all the missing or incomplete documents and submit them to TSAHC for review. Corrective action must be submitted to TSACH no later than 05/12/2021.
Unit 15	Management did not conduct an annual recertification for this household (due on 1/1/2021). In addition, there were several incomplete documents in the files for the initial Income Certification. The applicant listed a home address as her previous residence and listed a life insurance policy on the application, yet the file did not contain clarification/verification on the two items. The Tenant Selection Plan is missing tenant signature, the Income Certification form, Page 2, Part V, is not complete. The Asset Certification is incomplete (missing insurance policy if applicable and questions 2-4 are not completed). In addition, the Tax-Exempt Bond Addendum is missing owner representative signature, and the Tenant screening was not submitted for review.	Management must complete an annual recertification of income and assets. The executed Income Certification and all supporting documents must be submitted for review. In addition, management must correct all the missing or incomplete documents and submit them to TSAHC for review. Corrective action must be submitted to TSACH no later than 05/12/2021.
Unit 28	The tenant file contained incomplete documentation. The Income Certification, Page 2, Part V is not complete, the Asset Certification Form is incomplete (questions 2-4 not complete). In addition, the Tax-Exempt Bond Addendum is missing owner representative signature, and the Tenant screening was not submitted for review.	Management must correct all the missing or incomplete documents and submit them to TSAHC for review. Corrective action must be submitted to TSACH no later than 05/12/2021.
Unit 32	Management did not conduct an annual recertification for this household (due on 2/1/2021). In addition, there were several incomplete documents in the files for the initial Income Certification. The file is missing the consent and release form, and the tenant screening was not submitted for review. In addition, it appears this unit's rent payment needs to be updated on the Unit Status Report.	Management must complete an annual recertification of income and assets. The executed Income Certification and all supporting documents must be submitted for review. In addition, the missing form/documents specific to the initial Income Certification must be completed and submitted To TSAHC for review no later than 05/12/2021.

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COMMENTS:

SUMMARY OF FINDINGS AND OBSERVATIONS

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- Employment Verification forms: Unable to determine third-party method (i.e., faxed, emailed, etc.)
- Health and Safety Form was backdated. TSAHC does not encourage this practice.
- Asset Certification form: Questions 2-4 were consistently not answered and \$0 was listed in each asset type line item on the form. TSAHC recommends the manager put a strike, N/A, or leave the spaces blank moving forward.

Findings are noted in the chart above. All requested documentation must be submitted to TSHAC no later than May 12, 2021.