

# Texas State Affordable Housing Corporation Compliance Review Observation Report

<b>White Rock Apartments</b>			
3110 Thousand Oaks Drive, San Antonio, Texas 78247			
Owner: Commonwealth Multifamily		Date Built: 2003	
Management Company: Orion Real Estate, Inc.		Property Manager: Donna Carraghan	
Inspection Date & Time: June 22, 2021 at 11:30 a.m.		Inspector's Name: Celina Stubbs	

Number of Units:	336	Number of required LI units (80%AMI):	252	Number of required VLI units (50% AMI):	68
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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) 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:**

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		

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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:** The tenant files, including the required tenant documentation, were maintained in an organized manner. There were a few discrepancies noted, see below:

- **Assets:** The disclosed asset amounts were incorrectly listed on the Income Certification. This was noted for units 926, 1515, and 1538. Management submitted corrections for these files prior to the issuance of this report. Eligibility was not affected therefore no further action is required.
- **Unit 114:** The new household member was properly screened and income and assets were properly verified; however, the income was not added to the recent Income Certification. Management submitted supporting documents to show the income was added to the Income Certification and the Unit Status Report (USR) was updated. Eligibility was not affected therefore no further action is required.
- **Unit 1938:** The tenant applied using the Spanish version of the TAA application. This action requires the English signature page which was missing. Management submitted a copy of the signature page. No further action is required.

**Observation:**

- **Currently, management is not using an application or annual questionnaire at the time of annual recertification. TSAHC highly recommends the use of an annual questionnaire at the time of annual recertification to ensure management captures any and all changes in the households' composition, income and assets, and student status.**

*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
N/A		

**COMMENTS:**

### SUMMARY OF FINDINGS AND OBSERVATIONS

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**No Findings.**