

Texas State Affordable Housing Corporation Compliance Review Observation Report

Las Palmas Villa Apartments	
2211 Del Rio Blvd., Eagle Pass, Texas 78852	
Owner: Apartments of Las Palmas, LLC	Date Built: 1972
Management Company: United Apartment Group	Property Manager: Joe Sanchez
Inspection Date & Time: September 8, 2022 at 8:30 a.m.	Inspector's Name: Celina Mizcles Stubbs

Number of Units: 64	Number of required LI units: 26	Number of required VLI units: N/A
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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) 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
2B	60%	Unit is made-ready.
3B	Temporary Office	This unit should be released to the general public by October 31, 2022.
4B	60%	Unit is made-ready.
5E	60%	Unit is made-ready.

COMMENTS:

RESIDENT SERVICES	YES	NO	N/A
1) Do the resident services appear to cater to the resident profile of the property?			X – see comment
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:			
a) Resident attendance			X
b) Frequency of service provided			X

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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) 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 community room was recently rehabbed and was in the process of being furnished on the day of the site visit. Therefore, resident services have not yet been offered. Management stated they executed an agreement with Resident Portfolio Services to provide the required number of services. Services are scheduled to begin no later than November 2022, if not sooner.			

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	

COMMENTS: This property is layered with tax exempt bonds and project-based section 8 and therefore maintains 2 files for each tenant (HUD file and tax credit/bond file). The tax credit/bond tenant files were reviewed. The issues that were found are listed as Findings below.

Observations:

- **Unit Status Report:** The unit status report is like a monthly snapshot of the property's composition. It is imperative that the report is accurate prior to each submission moving forward.
- **Health and Safety Form:** This form is required to be signed by all adults at the time of move-in and maintained in the tax credit/bond folder.
- **Maintaining two files:** Management is encouraged to complete a file audit on all bond designated units to ensure all required documents are in the tenant file.

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
1C	The required Health and Safety form is not in the file. The tenant rent split (tenant amount and housing assistance payment)	The Health and Safety form must be signed by adult household members at the time of move-in and maintained in the tenant file. A copy of the executed form must be submitted to TSAHC no later

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	needs to be updated on the USR.	than 10/29/2022. The September USR should be updated and submitted no later than October 10, 2022.
5A	The application is over 120 days. The tax credit/bond files did not contain all eligibility documents/forms.	The application should be reviewed and resigned to show it was properly screened for current circumstances prior to eligibility determination for bond purposes. Written certification of this being completed must be submitted to TSAHC no later than 10/29/2022. In addition, the following forms need to be copied from HUD file and placed into the bond file: application, lease and income supporting documentation.
4D	The USR needs to be updated to show the correct rent split, to update the AEC and recertification check box. The tax credit/bond files did not contain all eligibility documents/forms.	Management must update the September USR to make the changes to this unit and submit it no later than October 10, 2022. In addition, the following forms need to be copied from HUD file and placed into the bond file: lease.
7A	The USR needs to be updated to show the correct rent split, the effective date, add update the recertification check box. The tax credit/bond files did not contain all eligibility documents/forms.	Management must update the September USR to make the changes to this unit and submit it no later than October 10, 2022. In addition, the following forms need to be copied from HUD file and placed into the bond file: lease.
8E	The required Health and Safety form is not in the file. The USR needs to be updated for the rent split, AEC date and recertification check box. The tax credit/bond files did not contain all eligibility documents/forms.	The Health and Safety form must be signed by adult household members at the time of move-in and maintained in the tenant file. A copy of the executed form must be submitted to TSAHC no later than 10/29/2022. The September USR should be updated and submitted no later than October 10, 2022. The following forms need to be copied from HUD file and placed into the bond file: application and income supporting documentation.
13C	The required Health and Safety form is not in the file. The income listed on the Income Certification form needs to be updated to reflect \$9,528. This income change should be reflected on the USR as well. The tax credit/bond files did not contain all eligibility documents/forms.	The Health and Safety form must be signed by adult household members at the time of move-in and maintained in the tenant file. A copy of the executed form must be submitted to TSAHC no later than 10/29/2022. A copy of the revised Income Certification showing the corrected income must be submitted no later than October 10, 2022. The September USR should also be updated and submitted no later than October 10, 2022. The following forms need to be copied from HUD file and placed into the bond file: lease.
COMMENTS:		

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SUMMARY OF FINDINGS AND OBSERVATIONS

Observations:

- **Unit Status Report**: The unit status report is like a monthly snapshot of the property's composition. It is imperative that the report is accurate prior to each submission moving forward.
- **Health and Safety Form**: This form is required to be signed by all adults at the time of move-in and maintained in the tax credit/bond folder.
- **Maintaining two files**: Management is encouraged to complete a file audit on all bond designated units to ensure all required documents are in the tax credit/bond tenant file.

Findings: The findings are noted above. Corrective action for USR updates is due no later than October 10, 2022 and all other corrective action is due no later than 10/29/2022.