

Texas State Affordable Housing Corporation Compliance Review Observation Report

Peoples El Shaddai and St James Manor 2836 E. Overton Road and 3119 Easter Ave, Dallas, TX 75216

Owner: Steele St. James Peoples LLC

Date Built: 1969 (St James) 1970 (Peoples El Shaddai)

Management Company: Monroe Group Ltd .

Property Manager: Jamelah Silas and Christopher Edwards

Inspection Date & Time: December 6, 2023, at 9:00 a.m. **Inspector's Name:** Mercedes Dunmore

Number of Units: 100 (Peoples) **Number of required LI units:** 40 (Peoples) **Number of required ELI units:** 5 (Peoples)

Number of Units: 100 (St. James) **Number of required LI units:** 40 (St. James) **Number of required ELI units:** 5 (St. James)

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
105B3	60%	Saint James Manor
142B16	60%	Saint James Manor
165A15	30%	Peoples El Shaddai
112A3	30%	Peoples El Shaddai
115A4	60%	Peoples El Shaddai
129A7	60%	Peoples El Shaddai

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		
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:

Observation:

- Per Section 4 of the Asset Oversight and Compliance (AOC) Agreement, the owner/manager is reminded to submit annual Fair Housing Sponsor Reports on or before March 31st. The form can be found here: <https://www.tsahc.org/property-managers/property-manager-downloads>.

Finding:

- Management failed to submit the Annual Resident Service Program Plan due on December 1st. Management must submit the Program Plan that outlines what services the property will provide in the next calendar year no later than 2/16/2024. Please review Appendix B of the AOC Agreement for example of services.

Note: Per Appendix C of the AOC agreement failure to submit report timely will result in a Compliance penalty fee of \$250 for every 30 days of non-compliance.

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 and TSAHC required forms?	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 – see comment		

COMMENTS: The tenant file review was in good condition overall as there were no findings that resulted in ineligible households. However, there were a few issues noted that can be found below. , however, the following issues can be found below.

Observation:

- The Housing Opportunities through Modernization Act (HOTMA) passed in 2016 and must be implemented on 1/1/2024. The owner/manager is encouraged to attend industry HOTMA training and is reminded to implement eligibility changes (household members and income/asset changes, etc.). TDHCA posted a free training that can be located here: <https://www.youtube.com/watch?v=X4Gx4iks4Xs>

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

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verifications, the executed Income Certification, and the 1st page of the lease for the new household occupying the unit.

Unit	Finding	Corrective Action Requirement
103A1	The tenant file and Unit Status Report (USR) reflects inaccurate information.	<ul style="list-style-type: none"> - Management must update the unit designation on the Tenant Income Certification (TIC) to match the USR. - The housing assistant payment does not match the USR and the rent roll. Management must review the tenant file and update to the corrected payment amount.
138A9	The tenant file reflects inaccurate information.	<ul style="list-style-type: none"> - Household Member #2 is listed on the TIC as a full-time student. A full-time student is defined as a Kindergarten or higher. Management must correct the TIC to reflect the corrected student status.
159A14	The tenant file and Unit Status Report (USR) reflects inaccurate information.	<ul style="list-style-type: none"> - The income on the TIC and USR do not match. Management must update the USR to reflect the correct income and rent amount. - The Child support affidavit was not completed entirely, the amounts for child support are missing. Management must have the tenant complete the Child support affidavit. - Child support payments are not included, management must include payments received in the past 120 days. Management must update the TIC with the updated income.
186A21	The 2023 AEC missing from the file.	<ul style="list-style-type: none"> - Management must submit the 2023 AEC for review.
Units 206B3, 261B20, 207B4	The Unit Status Report (USR) reflects inaccurate information.	<ul style="list-style-type: none"> - The USR doesn't reflect the correct rent amounts. Management must update the USR to reflect the correct rent amounts

COMMENTS:

Finding:

- The corrective actions for the findings listed in the chart above are due to TSAHC no later than 2/16/2023.

SUMMARY OF FINDINGS AND OBSERVATIONS

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