

Texas State Affordable Housing Corporation Compliance Review Observation Report

AHA at Briarcliff			
1915 Briarcliff Blvd., Austin, Texas 78723			
Owner: Accessible Housing Austin		Date Built: 2020	
Management Company: Accessible Housing Austin		Property Manager: Trey Nichols, Nicole Garcia	
Inspection Date & Time: October 29, 2024, at 8:30am		Inspector's Name: Blaire Bigelow	

Number of Units: 27	Number of required LI units (60% AMI): 27	Number of required VLI units (30% AMI): 10	
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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
125	30%	
134	30%	
214	30%	
223	Down	
233	Down	

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		

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3) Is management monitoring the following:			
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 -see comment		
<p>COMMENTS: In the past 12 months, TSAHC has provided training to new staff and offered guidance, along with training resources, to ensure the accurate submission of monthly Resident Service reports.</p> <p>Findings:</p> <ul style="list-style-type: none"> • The Fair Housing Sponsor Report has not been submitted to TSAHC. Per Schedule 8 of the Loan Agreement, the owner must submit the annual Fair Housing Sponsor Reports on or before February 1. The form can be found here: https://www.tsahc.org/property-managers/property-manager-downloads. Management must complete and submit the Fair Housing Sponsor Report to TSAHC no later than 12/21/2024. Management must also submit a signed certification to TSAHC stating the Fair Housing Sponsor Report will be submitted timely moving forward no later than 12/21/2024. • The Resident Service Program Plan has not been submitted to TSAHC. Per the Loan Agreement, the owner must submit the annual Resident Service Program Plan to TSAHC on or before February 1. The Program Plan is an owner-created document that lists the resident services proposed to be provided consistently throughout the following year. Management must complete and submit the Resident Service Program Plan to TSAHC no later than 12/21/2024. Management must also submit a signed certification to TSAHC stating the Resident Service Program Plan will be submitted timely moving forward no later than 12/21/2024. 			

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-see comment	
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: The following observations and findings were identified based on the tenant files review.

- Additional training is required due to new staff.
- Several required forms were missing from the tenant files. TSAHC recommends management implement a standardized file setup sheet. This

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tool will serve as a reference for proper file organization, ensuring uniformity across all files and minimizing errors and inconsistencies.

- Numerous incomplete annual recertifications for the current year were not completed. Note, management worked diligently to address and complete the late renewals.

Observations:

- Unit Status Report (USR):** Management is reminded to update all household changes to include income, tenant rent, and housing assistance payments. Management must also make sure to submit the USR on or before the 10th of each month. For example, January 2025 USR is due no later than February 10th. It is imperative the report is accurate and submitted timely because the system is used as a tool to monitor properties compliance requirements as outlined in the Asset Oversight and Compliance agreement.
- TSAHC's Notice of Health and Safety form:** Management is reminded that the TSAHC Health and Safety form must be signed by the head of the household at the time of initial certification and maintained in the tenant file.

Finding:

- The property does not have an effective method to track annual recertification timelines. Management must create and implement a method to track recertification due dates to ensure timely completion of annual recertifications moving forward. Management must submit a signed, written certification stating a recertification tracker has been implemented to TSAHC no later than 12/21/2024.

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
113	The Tenant file reflects incomplete information.	<ul style="list-style-type: none"> - Management must have the tenant sign and date a Tenant Release and Consent form. - Management must have the tenant complete the TSAHC Health and Safety form. - Management must have the tenant complete the Certification of Student Eligibility form. - Management must update the Unit Status Report (USR) income <p>Management corrected. No further action required for unit 113.</p>
132	The Tenant file reflects incomplete information, and the Tenant Income Certification (TIC) is missing.	<ul style="list-style-type: none"> - Management must have the tenant sign and date a Tenant Release and Consent form. - Management must have the tenant complete the Under \$50,000 Asset Certification form. - Management must complete the TIC and have it signed by the tenant. - Management must have the tenant complete the Certification of Student Eligibility form. -Management must update the USR rent portions. <p>Management corrected. No further action required for unit 132.</p>
133	The Tenant file reflects incomplete information.	<ul style="list-style-type: none"> - Management must have the tenant sign and date a Tenant Release and Consent form. - Management must have the tenant complete the Certification of Student Eligibility form. <p>Management corrected. No further action required for unit 133.</p>
215	The Tenant file reflects incomplete information, and the TIC reflects inaccurate information.	<ul style="list-style-type: none"> - Management must have the tenant complete the TSAHC Health and Safety form. - Management must have the tenant complete the Certification of Student Eligibility form.

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		<ul style="list-style-type: none"> - Management must correct the initial TIC to reflect the correct income on the TIC to \$11,323.20. - Management must update the USR income and move in date. - Fluid Correction was used on the TIC. Management must correct and update the TIC. - Management must have the tenant sign the Initial Application. - Management must have the tenant complete the Renewal Application. <p>Management corrected. No further action required for unit 215.</p>
232	The Tenant file reflects incomplete information, and the Tenant Income Certification (TIC) reflects missing information.	<ul style="list-style-type: none"> - Management must have the tenant complete the Under \$50,000 Asset Certification form. - Management must correct the TIC to reflect the assets. - Management must have the tenant sign and date a Tenant Release and Consent form. - Management must have the tenant complete the Certification of Student Eligibility form. <p>Management corrected. No further action required for unit 232.</p>
234	The Tenant file reflects incomplete information, and the TIC reflects inaccurate information.	<ul style="list-style-type: none"> - Management must have the tenant sign and date a Tenant Release and Consent form. - Management must correct the missing effective date on the TIC to 01/27/2024, correct income on the TIC to \$11,560.80 and add the assets under the savings section in the amount of \$19.01. - Management must have the tenant complete the Under \$50,000 Asset Certification form to reflect the savings account of \$19.01. - Management must have the tenant complete the Certification of Student Eligibility form. - Management must have the tenant complete the Renewal Application. <p>Management corrected. No further action required for unit 234.</p>

COMMENTS: Corrective action for the Findings identified in the chart above are due to TSAHC no later than 12/21/2024. Prior to the issuance of the report, management submitted sufficient corrective action to close the findings. No further action is required

SUMMARY OF FINDINGS AND OBSERVATIONS

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- The Resident Service Program Plan has not been submitted to TSAHC. Per the Loan Agreement, the owner must submit the annual Resident Service Program Plan to TSAHC on or before February 1. The Program Plan is an owner-created document that

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lists the resident services proposed to be provided consistently throughout the following year. Management must complete and submit the Resident Service Program Plan to TSAHC no later than 12/21/2024. Management must also submit a signed certification to TSAHC stating the Resident Service Program Plan will be submitted timely moving forward no later than 12/21/2024.

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