

Texas State Affordable Housing Corporation Compliance Review Observation Report

Jose Antonio Escajeda Apartments
204 Alicia Dr., El Paso, Texas 79905

Owner: RHAC – JAE, LLC **Date Built:** 1951
Management Company: J Allen Management **Property Manager:** Juana Pineda
Inspection Date & Time: May 29, 2024 at 8:30 a.m. **Inspector's Name:** Celina Mizcles Stubbs

Number of Units: 88 **Number of required LI units:** 88 **Number of required VLI units:** N/A

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		
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Unit #	USR Designation	Comments
48	60%	
51	60%	
54	60%	

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:			

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	

COMMENTS: The tenant files were in good order.

Observations:

- **Unit Status Report (USR):** Rent discrepancies in the tenant rent and housing assistance payment amounts were noted on the USR for units 11, 38, 59, 69, and 75. TSAHC utilizes the USR as a tool to ensure all household income and rents meet program requirements. Moving forward, management must review the USR for accuracy prior to submission.
- **HOTMA changes** were required to be implemented by 1/1/2024. TSAHC strongly recommends the owner/management team attend HOTMA training specific to LIHTC and Tax-Exempt Bonds to ensure program compliance as eligibility requirements for tax-exempt bonds have changed (i.e., verification of asset requirements). Please note, Findings will be assessed if changes are not implemented in full by 1/1/2025. See free training opportunities below:
 - TSAHC's Compliance Manual effective 1/1/2024 found here: https://www.tsahc.org/public/upload/files/general/2024_TSAHC_Compliance_Manual.pdf
 - TDHCA's Income Determination Change w/HOTMA: <https://www.youtube.com/watch?v=XbB8i2Hj4IA>
 - TDHCA's Forms Training (Income Certificate training at minute 59:56): <https://www.youtube.com/watch?v=Ahnq07hQAv0>

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
N/A		
COMMENTS:		

SUMMARY OF FINDINGS AND OBSERVATIONS
<p>Observations:</p> <ul style="list-style-type: none"> • Unit Status Report (USR): Rent discrepancies in the tenant rent and housing assistance payment amounts were noted on the USR for units 11, 38, 59, 69, and 75. TSAHC utilizes the USR as a tool to ensure all household income and rents meet program requirements. Moving forward, management must review the USR for accuracy prior to submission. • HOTMA changes were required to be implemented by 1/1/2024. TSAHC strongly recommends the owner/management team attend HOTMA training specific to LIHTC and Tax-Exempt Bonds to ensure program compliance as eligibility requirements for tax-exempt bonds have changed (i.e., verification of asset requirements). Please note, Findings will be assessed if changes are not implemented in full by 1/1/2025. See free training opportunities below: <ul style="list-style-type: none"> ○ TSAHC's Compliance Manual effective 1/1/2024 found here: https://www.tsahc.org/public/upload/files/general/2024_TSAHC_Compliance_Manual.pdf ○ TDHCA's Income Determination Change w/HOTMA: https://www.youtube.com/watch?v=XbB8i2Hj4IA ○ TDHCA's Forms Training (Income Certificate training at minute 59:56): https://www.youtube.com/watch?v=Ahnq07hQAv0 <p>No Findings.</p>