

Texas State Affordable Housing Corporation Compliance Review Observation Report

Las Palmas Villas Apartment
2211 Del Rio Blvd. Eagle Pass, Texas 78852

Owner: Las Palmas Housing Partners LP	Date Built: 1972
Management Company: United Apartment Group	Property Manager: Greogorio Arrambide
Inspection Date & Time: June 29, 2024, at 9:00 AM	Inspector's Name: Mercedes Dunmore

Number of Units: 64	Number of required LI units: 26	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		
Unit #	USR Designation	Comments
1C	60%	
7B	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:

Finding:

- **The annual Resident Services Program Plan was not submitted to TSAHC as required. Per Section 4 of the Asset Oversight, Compliance, and Security (AOC) Agreement, management is required to submit the Resident Services Program Plan (a document explaining the resident services to be provided the following calendar year) no later than December 1st of each year. To correct this Finding, management must submit a resident service program plan for the remaining months in the 2024 calendar year (September 2024 – December 2024) no later than 08/26/2024.**

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		
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: During this year's onsite review, there were no eligibility infractions and the tenant files were well organized. However, there were several Unit Status Report (USR) discrepancies. Moving forward, management must review the USR for accuracy prior to monthly submission. See Findings below

Observation:

- **Unit Status Report (USR):** When comparing tenant data from the Tenant Income Certification (TIC) form to the USR it is apparent that the USR had not been updated to reflect the new tenant rents and housing assistance payments. Management must complete a full review of the rent roll update all tenant rent and housing assistance payment changes and update the information accordingly. TSAHC reviewed the July 2024 USR submission and confirmed management has properly updated the USR.

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.

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Unit	Finding	Corrective Action Requirement
1F	The USR reflects inaccurate information and the Under \$5,000 Asset Certification is not accurate.	- Management must update the tenant rent and subsidy on the USR to reflect the rent roll. No further action required. - Management must have the tenant update the Under \$5,000 Asset Certification to reflect the Cash App account. No further action required.
3B	The USR and Tenant Income Certification (TIC) reflects inaccurate information.	- Management must update the tenant rent and subsidy on the USR to reflect the rent roll. No further action required.
5C	The USR and TIC reflects inaccurate information.	- Management must update the subsidy on the USR to reflect the rent roll. - Management must update the social security income to \$3,127 on page 1 of the TIC. No further action required. - Management must have Household member #2 sign the TIC and added to the application. Additionally, management must have the resident add the demographics on page 3 of the TIC. No further action required.
5E	The USR reflects inaccurate information.	- Management must update the tenant rent and subsidy on the USR to reflect the rent roll.
6A	The non employment affidavit is missing from the tenant file.	- Management must have the Head of Household complete a non-employment affidavit. No further action required.
7B	The USR and TIC reflects inaccurate information.	- Management must update the USR to reflect 4 household members. - Management must update the income limit on page 2 of the TIC to \$45,000. No further action required. -Management must have the resident complete page 3 of the TIC or initial declining to report. No further action required.
9E	The USR reflects inaccurate information. The Under \$50,000 Asset Certification is incomplete.	- Management must update the tenant rent on the USR to reflect the rent roll. No further action required. - Management must have the resident update the Under \$5,000 Asset Certification to include \$0 under the net assets at the bottom of the page. No further action required.
COMMENTS: Corrective action for units 5C, 5E, and 7B, are required to be submitted to TSAHC no later than 08/26/2024.		

SUMMARY OF FINDINGS AND OBSERVATIONS

Observation:

- Unit Status Report (USR):** When comparing tenant data from the Tenant Income Certification (TIC) form to the USR it is apparent that the USR had not been updated to reflect the new tenant rents and housing assistance payments. Management must complete a full review of the rent roll update all tenant rent and housing assistance payment changes and update the information accordingly. TSAHC reviewed the July 2024 USR submission and confirmed management has properly updated the USR.

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Note: Per Appendix C of the AOC agreement, failure to correct Findings under the Asset Oversight and/or Compliance Reports may result in a penalty fee of \$500 per 30-day period of non-compliance.