



# Texas State Affordable Housing Corporation

## Compliance Review Observation Report

Unit #	USR Designation	Comments
6303	60%	
11302	60%	
11303	60%	
12303	60%	This unit has been vacant for 203 days and is not made-ready. See comment.

**COMMENTS:** Units 6303, 11302, 11303 are made ready, however they have been sitting vacant for an extended period of time. In each unit, the floors, restroom, kitchen and patios need to be cleaned thoroughly. Unit 12303 has been designated as a Down Unit as it was not made ready for the general public within 180 days. Please refer to the Finding located in the "Vacant/Make Ready Units" section of the Asset Oversight Report.

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:			
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:** Management is reminded the Annual Resident Service Program Plan is due December 1<sup>st</sup> of each year. Annual resident program plans should be submitted here: [compliance\\_reporting@tsahc.org](mailto:compliance_reporting@tsahc.org). Please refer to Section 4 of the Asset Oversight and Compliance (AOC) agreement.

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		

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5) Does the file audit indicate that staff needs additional training?		<b>X</b>	
<p><b>COMMENTS:</b> Based on a review of tenant files, management properly maintains income certification along with supporting documentation. A few Findings were identified and are listed in the Findings chart below. Additionally, management was reminded of HOTMA requirements as it pertains to tax-exempt bonds.</p> <ul style="list-style-type: none"> <li>• <b>HOTMA:</b> Per HOTMA final rule, at the time of initial certification and every third year, all assets must be verified for tax-exempt bond purposes. Owners are required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts. If a property is required to complete annual income recertifications, in the intervening years, if a household has combined assets meet the annual Asset Certification Threshold or less, the assets and income from assets can be documented with an Asset Certification Threshold form. If a Waiver is submitted and approved assets only need to be verified at the time of move in. Management is advised that findings will be issued if HOTMA is not implemented by July 1, 2025. Please refer to the following free training materials:             <ul style="list-style-type: none"> <li>○ TSAHC's updated Compliance Manual effective 1/1/2024 located here: <a href="https://www.tsahc.org/property-managers/propertymanager-downloads">https://www.tsahc.org/property-managers/propertymanager-downloads</a></li> </ul> </li> </ul>			

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 1<sup>st</sup> page of the lease for the new household occupying the unit.

Unit	Finding	Corrective Action Requirement
Property-wide	Unit Status Report (USR) is not being updated.	Management must submit signed, written certification that monthly USRs will be submitted with accurate information moving forward.
4104	Tenant file missing lease	Management must submit the current lease contract for review.
8104	Tenant files contain an outdated lease contract.	Management must submit the current lease contract for review.
8206	Unable to determine eligibility.	The tenant file contained paystubs dated June 2024 for a household member (Fermina) that were not included in the total household income calculation. Management must submit the Income Certification packet including all supporting income and asset verification for review.
12101	Applicant disclosed a home sale on the application that was not verified in the tenant file.	Management must verify the disclosed home sale and submit documentation to TSAHC for review, along with any documents that were revised based on the verification (i.e., updated Income Certification with supporting documentation of income and assets).

**COMMENTS:** Corrective action to the Finding identified above are due to TSAHC no later than 12/22/2024.

SUMMARY OF FINDINGS AND OBSERVATIONS
<p><b>No Observations.</b></p> <p><b>Findings:</b> Corrective action to the Finding identified in the chart above are due to TSAHC no later than 12/22/2024.</p>