

# Texas State Affordable Housing Corporation Compliance Review Observation Report

**Villa Rodriguez Apartments**  
3270 Nacogdoches, San Antonio, Texas 78217

**Owner: San Antonio Low Income Housing, LLC**      **Date Built: 1982**  
**Management Company: Cesar Chavez Foundation**      **Property Manager: Lorraine Plata**  
**Inspection Date & Time: March 13, 2024 at 8:00 am**      **Inspector's Name: Celina Stubbs**

<b>Number of Units: 346</b> (322 with 24 down units)	<b>346</b>	<b>Number of required LI units: 80%</b> (80% of 322 units)	<b>242</b>	<b>Number of required VLI units:</b> (50% from 322 units)	<b>65</b>
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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
10607	80%	Vacant (1x1): Broken pipe in water heater closet, see comment.
10911	80%	Vacant (2X2): Ready
11312	80%	Occupied (1x1): Ready
11407	80%	Vacant (2X2): Ready
20319	80%	Vacant (1x1): Ready
20805	50%	Occupied (2X2): Ready
20906	50%	Vacant (1x1): Ready
20914	80%	Vacant (1x1): Ready

**COMMENTS:** A broken pipe was found in the water heater closet during the unit inspection. The maintenance team corrected the issue the day of the review and provided photos of completed work to TSAHC.

RESIDENT SERVICES	YES	NO	N/A
1) Do the resident services appear to cater to the resident profile of the property?	X		

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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:**

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:** Office was clean and very inviting.

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:** Fourteen files were selected for review; the following observations and findings (in chart below) were identified.

**Observations:**

- **Over income units (OI):** Units 10410 & 11006 are OI units. Management followed the next available unit rule (NAUR); however, management must now designate these units as Market on the Unit Status Report (USR).
- **TSAHC Form:** TSAHC's Fair Housing Choice Disclosure Notice was found in each tenant file. The form is no longer required. Management is advised not to use this form moving forward.
- **Paystub Calculations:** Paystub calculations are not consistent among the files. Management states they use 6 paystubs to calculate weekly earnings, yet the file review disclosed some tenant files used 4 or 5 paystubs to calculate weekly earnings. Management must ensure they apply company policy and procedures consistently to ensure program compliance. This will be monitored closely moving forward.

*If a new household moves into 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 1<sup>st</sup> page of the lease for the new household occupying the unit.*

Unit	Finding	Corrective Action Requirement
10406	USR not updated with correct amounts	Management must update the rent (tenant portion and housing assistance amount) to match the Rent Roll.
20318	Page 2 of the TIC does not include mandatory fee.	Management needs to add the mandatory fees to Page 2 of the TIC and submit corrective action to TSAHC no later than 05/12/2024.
21118	USR information is not accurate.	The USR indicated the Annual Recertification was completed for April 1, 2024, however the recertification was not in the file and not yet due. Management must update the USR to reflect accurate information.
<b>COMMENTS:</b>		

## SUMMARY OF FINDINGS AND OBSERVATIONS

**Observations:**

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**Findings:** Corrective action for the Findings listed above are due to TSAHC no later than 05/12/2024.