



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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December 22, 2025

Writer's direct phone # (512) 475-4065
Email: shay.erickson@tdhca.texas.gov

PFC User/Operator & Other Responsible Parties

EHF APV Haven at Main Propco, LP

Boston, MA

crios@aogliving.com; legal@aw.com; mike.lebrun@aw.com; krystle.muise@aw.com;
dylan.swaebe@aw.com

RE: Haven at Main

Dear PFC User/Operator & Other Responsible Parties:

The Texas Department of Housing and Community Affairs (Department) received documentation on May 7, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Sanchez Compliance & Consulting, LLC on February 17, 2025. Corrective action was due on June 3, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Households above the income limit** affecting units 1106, 1144, 1206, 1302, 1403, 1410, 1416, 2403, and 2407, **Gross rent exceeding the highest rent allowed under the Regulatory Agreement** affecting unit 1302, **Failure to comply with §10.1104(a)**, and **Failure to comply with the Public Facility Corporation Regulatory Agreement** requiring thirty-four (34) one-bedroom units at 60% AMI, fifty-four (54) one-bedroom units at 80% AMI, and twenty-six (26) two-bedroom units at 80% AMI. The documentation also corrected noncompliance with **Failure to comply with the Public Facility Corporation Regulatory Agreement** affecting unit 1428 and the requirement for lease provisions applicable to Low Income Units. Please see the attached Finding Report for details.

If you have any questions, please contact Shay Erickson toll free in Texas at (800) 643-8204, directly at (512) 475-4065, or email: shay.erickson@tdhca.texas.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shay Erickson".

Shay Erickson
PFC Compliance Monitor

CC:jessica.wheeler@greystar.com; taryn.merrill@greystar.com; kristin.krohn@greystar.com;
tkeenan@aogliving.com; crios@aogliving.com; darlenes@aogliving.com; haven@aogliving.com;
crios@aogliving.com; juanita@sanchezcompliance.com



TEA1:R129XAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION
PFC PROGRAM
Corrective Action Response

PFC User: EHF APV Haven at Main Propco, LP c/o AEW Capital Management, LP
Property Name: Haven at Main
Address: 8700 S. Main Houston, TX 77025
RA Date: 7/27/2022

Audit Report Date: 2/17/2025
Program: PFC

Corrective Action Due Date: 6/3/2025

Corrective Action Received Date: 5/7/2025

PROGRAM: PFC

PROPERTY FINDINGS

Unit # 1106

Finding Household above the income limit
Noncompliance Date 7/22/2023 Correction Date: 5/7/2025
Reason Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$63,613, which exceeds the applicable 80% AMI income limit of \$59,680.
Corrective Action To correct, designate unit 1106 to an non-program unit since their income exceeds the 80% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 80% AMI limit. Owner may survey existing vacant non-program units to replace unit 1106 and reserve as a program-unit to be occupied with a household that income qualifies at 80% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement.

Unit # 1302

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement
Noncompliance Date 4/28/2023 Correction Date: 5/7/2025
Reason Per the Rent Roll submitted during the Audit Report, the tenant portion rent should be \$1,258, with a housing payment of \$1,027 for a total of \$2,285. However, the rent roll also indicates a second rent charge for the tenant in the amount of \$1,216. The two rent charges to the tenant in the amounts of \$1,258 and \$1,216 equals \$2,474, which exceeds the rent limit of \$1,492.

Corrective Action Submit documentation such as a tenant ledger and Lease Contract to evidence that the tenant portion rent does not exceed the limit. If the tenant was overcharged rent, please allow the tenant to elect to either receive a credit on the account or a check in the amount of total overcharged rent, reduce the tenant rent, issue the elected credit or check. Submit to the Department for review the election made by the tenant, a copy of the tenant ledger and Lease Contract to evidence the reduction and credit, if elected or a copy of the check to evidence the refund.

Unit #
Finding Household above the income limit
Noncompliance Date Correction Date: 5/7/2025
Reason In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) conduct a consumer credit search; (4) obtain an income verification from the applicant's current employer; (5) obtain an income verification from the Social Security Administration; or (6) if the applicant is unemployed, does not have income tax returns or is otherwise unable to provide other forms of verification as required above, obtain another form of independent verification.

The household reported income was being received from employment on the application but file does not contain any income verification documents. Auditor reports income cannot be determined or verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Finding Failure to comply with §10.1104(a)
Noncompliance Date 2/17/2025 Correction Date:
Reason Audit requirements under §10.1104(a) require the file sample size used by the Auditor must contain at least twenty percent (20%) of the total number of Restricted Units for the Development but no more than a total of fifty (50) household files. File sample size of Restricted Units shall consist of primarily be new move-ins but also contain/include at least ten percent (10%) sample of all household files that have recertified.

The total number of Restricted Units for the Development is one hundred thirty (130) and requires a sample size of twenty-six (26) household files. Development only submitted nineteen (19) household files of which were all new-move ins.

Corrective Action Please submit copies of the application(s), verifications of income/assets, the executed Income Certification, lease contract and applicable lease addendums for four (4) new move in files and three (3) recertified files to comply with 10.1104(a) for Department review. Any new noncompliance will be addressed under separate cover.

Finding Failure to comply with the Public Facility Corporation Regulatory Agreement
Noncompliance Date 12/31/2023 Correction Date:

Reason The Development's Regulatory Agreement requires at least thirty-four (34) one-bedroom units be reserved for or rented to and occupied by Low-Income Tenants at 60% AMI. The Development currently only has twenty-six (26).

Corrective Action As units become available, lease units to households' with 60% AMI or less until the occupancy requirements of the Regulatory Agreement have been met. The owner may also survey existing market rate households and certify them if their income is at or below 60% AMI. Submit copies of eight (8) new move-ins etc. that have been certified at 60% AMI and a current rent roll showing at least thirty-four (34) units are restricted. Provide the Department copies of the following for the new certified households: application(s), verifications of income/assets, executed Income Certification and the lease contract.

Finding Failure to comply with the Public Facility Corporation Regulatory Agreement
Noncompliance Date 12/31/2023 Correction Date:

Reason The Development's Regulatory Agreement requires at least fifty-four (54) one-bedroom units be reserved for or rented to and occupied by Low-Income Tenants at 80% AMI. The Development currently only has fifteen (15).

Corrective Action As units become available, lease units to households' with 80% AMI or less until the occupancy requirements of the Regulatory Agreement have been met. The owner may also survey existing market rate households and certify them if their income is at or below 80% AMI. Submit copies of thirty-nine (39) new move-ins etc. that have been certified at 80% AMI and a current rent roll showing at least fifty-four (54) units are restricted. Provide the Department copies of the following for the new certified households: application(s), verifications of income/assets, executed Income Certification and the lease contract.

Finding Failure to comply with the Public Facility Corporation Regulatory Agreement
Noncompliance Date 12/31/2023 Correction Date:

Reason The Development's Regulatory Agreement requires at least twenty-six (26) two-bedroom units be reserved for or rented to and occupied by Low-Income Tenants at 80% AMI. The Development currently only has eight (8).

Corrective Action As units become available, lease units to households' with 80% AMI or less until the occupancy requirements of the Regulatory Agreement have been met. The owner may also survey existing market rate households and certify them if their income is at or below 80% AMI. Submit copies of eighteen (18) new move-ins etc. that have been certified at 80% AMI and a current rent roll showing at least twenty-six (26) units are restricted. Provide the Department copies of the following for the new certified households: application(s), verifications of income/assets, executed Income Certification and the lease contract.

Unit # 1428

Finding Failure to comply with the Public Facility Corporation Regulatory Agreement

Noncompliance Date 12/13/2023 Correction Date: 5/7/2025

Reason Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit.

Tenant file does not contain an executed copy of the required Exhibit D Income Certification form, required by the Development's Regulatory Agreement.

Corrective Action Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit the Department a copy of the executed Exhibit D Income Certification for review.

Unit # 1144

Finding

Household above the income limit

Noncompliance Date

4/30/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The household reported "other" income was being received from on the application but file does not contain any income verification documents for this source of income. Auditor reports income cannot be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 1206

Finding

Household above the income limit

Noncompliance Date

4/28/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The household reported income was being received from employment on the application but file does not contain any income verification documents. Auditor reports income cannot be determined or verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 1302

Finding

Household above the income limit

Noncompliance Date

4/28/2026

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The tenant file is missing one (1) paystub to meet the minimum required 4 weeks of pay stubs. Auditor reports income could not be determined or verified. Auditor reports income cannot be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 1403

Finding

Household above the income limit

Noncompliance Date

12/22/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

Auditor unable to establish eligibility. The household disclosed that it held assets that were not verified or included in the total household income.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 1410

Finding

Household above the income limit

Noncompliance Date

4/17/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The household reported income was being received from employment on the application but file does not contain any income verification documents. Auditor reports income cannot be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 1416

Finding

Household above the income limit

Noncompliance Date

5/4/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The household reported on the application that child support is being received but file contained no verification documents for this source of income. Auditor reports income cannot be determined or verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 2403

Finding

Household above the income limit

Noncompliance Date

2/10/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The household reported income was being received from employment on the application but file does not contain any income verification documents. Auditor reports income cannot be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 2407

Finding

Household above the income limit

Noncompliance Date

3/30/2023

Correction Date: 5/7/2025

Reason

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The household reported income was being received from employment on the application but file does not contain any income verification documents. Auditor reports income cannot be determined or verified.

Corrective Action	The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form the time of move-in. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and asset verifications and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household. Submit copies of the application(s), income and asset verifications, an executed Income Certification, lease contract and applicable lease addendums to the Department for review.	
Finding	Failure to comply with the Public Facility Corporation Regulatory Agreement	
Noncompliance Date	2/17/2025	Correction Date: 5/7/2025
Reason	Section 3(f) of the Development's Regulatory Agreement states, each lease or rental agreement pertaining to a Low-Income Unit shall contain a provision to the effect that the Development has relied on the Income Certification and supporting information supplied by the Low Income Household in determining qualification for occupancy of the Low Income Unit and that any material misstatement in such certification (whether or not intentional) may be cause for immediate termination of such lease or rental agreement. Each lease or rental agreement shall also disclose that the tenant's income is subject to annual certification.	
Corrective Action	Submit to the Department for review an owner's statement of compliance with the Regulatory Agreement moving forward, along with a blank template of the Lease or Lease Addenda that includes the required language.	