

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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September 18, 2024

Writer's direct phone # (512) 475 -3907 Email: Christina.Thompson@tdhca.texas.gov

Nick Gonzales DTC SS Coop, LLC Houston, Texas NG@civicap.com

RE: Summer Street Coop

Dear Mr. Nick Gonzales:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Public Facility Corporation (PFC) Audit Report submitted by Novogradac & Company LLP on August 5, 2024. This review was performed as required by Section 303.042 (c) of Chapter 303, the Texas Administrative Code Chapter 10, Subchapter I and the Development's Regulatory Agreement/Deed Restriction.

Events of noncompliance have been identified and corrective action is required. The attached Findings Report details the event(s) of noncompliance and the required corrective action. This notice begins the corrective action period. Please supply all requested documentation no later than **November 17, 2024**, the last day of the corrective action period.

If clarification is necessary to complete the corrective action, contact us as soon as possible. If it is not possible to provide the requested documentation by the corrective action period, correct as much as you can and submit a corrective action plan detailing how and when the remaining issue(s) of noncompliance will be corrected.

The Department recommends submitting a cover letter explaining the documentation submitted to address each event of noncompliance. Submit corrective action to pfc.monitoring@tdhca.texas.gov.

If you have any questions about this monitoring report, please contact Christina Thompson toll free in Texas at (800) 643-8204, directly at (512) 475-3907, or email: christina.thompson@tdhca.texas.gov.



Sincerely,

Christina Thompson

PFC Monitor

CC:

Summer Street Coop

The Texas Department of Housing and Community Affairs provides the following Technical Assistance:

• The Income Certification as provided in Exhibit D of the Regulatory Agreement must be dated prior to the initial occupancy of such Low Income Household in the Development, as specified in Section 3(c) of the Regulatory Agreement.

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION PFC PROGRAM

PFC User: DTC SS Coop, LLC
Property Name: Summer Street Coop

Address: 3275 Summer Street Houston, TX 77007

Audit Report Date: 7/11/2024

Correction Date:

Program: PFC

Corrective Action Due Date: 11/18/2024

Audit Report Review Date: 9/17/2024

PROGRAM: PFC

PROPERTY FINDINGS

Unit # 1-1309

Reason

Finding Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

Noncompliance Date 8/19/2023

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.

Department unable to determine household size and could not reasonably determine income eligibility. The tenant file for unit 1-1309 does not

contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to

verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for

Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-408

Finding Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

Noncompliance Date 10/13/2023 Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-408 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Reason Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-1430

Finding
Noncompliance Date

nce Date 12/1/2023

Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-1430 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-143

Finding
Noncompliance Date

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

10/1/2023

Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-1432 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-504

Finding Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

Noncompliance Date 12/1/2023 Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-504 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-510

Finding Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

Noncompliance Date 12/10/2022 Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-510 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-531
Finding
Noncompliance Date
Reason

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement. 10/1/2023

Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-531 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-534
Finding
Noncompliance Date
Reason

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

9/29/2023 Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-534 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-2206

Finding

Noncompliance Date

Reason

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

10/4/2023 Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-2206 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-2406 Finding

Noncompliance Date

Reason

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

10/30/2023 Correction Date:

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.

Department unable to establish eligibility. The tenant file for unit 1-2406 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-2506

Finding Noncompliance Date

Failure to comply with the Public Facility Corporation Facility Regulatory Agreement.

Reason

10/1/2023 Correction Date: 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.

Department unable to establish eligibility. The tenant file for unit 1-2506 does not contain any acceptable forms of income verification documentation. The Auditor reported the income could not be verified.

Corrective Action

To correct, submit for Department review the income from the time of initial occupancy, and an updated Income Certification, if needed. If unable to verify income from the time of initial occupancy, the household may be certified under current circumstances using current income limits. If verifying under current circumstances, please proved the following for Department review: application, verification of income/assets, and executed Income Certification. If the household remains ineligible, when the unit becomes available lease to a qualified household and submit the following for Department review: application, verification of income/assets and, executed Income Certification and the lease contract.

Unit # 1-1229

Finding
Noncompliance Date

Gross rent exceeds the highest rent allowed under the Regulatory Agreement

11/3/2023

Correction Date:

Corrective Action

Reason

To correct, reduce the household's rent to \$1,492 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit 1-1229 is designated as 80% AMI. The household's rent of \$1,537 exceeds the 80% AMI rent limit of \$1,492 for a 1-bedroom unit.

Unit # 1-1309

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date

8/19/2023 Correction Date:

Reason

Unit 1-1309 is designated as 80% AMI. The household's rent of \$1,492 exceeds the 80% AMI rent limit of \$1,304 for a studio unit.

Corrective Action

To correct, reduce the household's rent to \$1,304 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 1-1408

Finding

Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date 10/13/2023

Correction Date:

Reason

Unit 1-408 is designated as 80% AMI. The household's rent of \$1,537 exceeds the 80% AMI rent limit of \$\$1,304 for a studio unit.

Corrective Action

To correct, reduce the household's rent to \$1,304 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 1-1432

Reason

Gross rent exceeds the highest rent allowed under the Regulatory Agreement Finding

Noncompliance Date 10/1/2023

Correction Date: Unit 1-1432 is designated as 60% AMI. The household's rent of \$1,164 exceeds the 60% AMI rent limit of \$1,119 for a 1-bedroom unit.

Corrective Action

To correct, reduce the household's rent to \$1,119 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 1-1510

Findina Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date 12/10/2022

Reason Unit 1-1510 is designated as 60% AMI. The household's rent of \$1,502 exceeds the 60% AMI rent limit of \$1,442 for a 1-bedroom unit.

Corrective Action

To correct, reduce the household's rent to \$1,442 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Correction Date:

Unit # 1-1516

Gross rent exceeds the highest rent allowed under the Regulatory Agreement Finding

Noncompliance Date 11/11/2023 Correction Date:

Reason Unit 1-516 is designated as 80% AMI. The household's rent of \$1,502 exceeds the 60% AMI rent limit of \$1,492 for a 1-bedroom unit.

Corrective Action

To correct, reduce the household's rent to \$1,492 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 1-1529

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date Correction Date: 9/1/2023

Reason Unit 1-1529 is designated as 80% AMI. The household's rent of \$1,537 exceeds the 80% AMI rent limit of \$1,492 for a 1-bedroom unit. Corrective Action

To correct, reduce the household's rent to \$1,492 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 1-1531

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date 10/1/2023 Correction Date:

Reason Unit 1-1531 is designated as 80% AMI. The household's rent of \$1,557 exceeds the 80% AMI rent limit of \$1,492 for a 1-bedroom unit.

Corrective Action

To correct, reduce the household's rent to \$1,492 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a

refund is issued).

Unit # 1-1534

Corrective Action

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date 9/29/2023 Correction Date:

Reason Unit 1-1534 is designated as 60% AMI. The household's rent of \$1,164 exceeds the 60% AMI rent limit of \$1,119 for a 1-bedroom unit.

To correct, reduce the household's rent to \$1,119 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a

refund is issued).

Unit # 1-2406

Corrective Action

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date 10/30/2023 Correction Date:

Reason Unit 1-204 is designated as 80%AMI. The household's rent of \$1,537 exceeds the 80% AMI rent limit of \$1,492 for a 1-bedroom unit.

To correct, reduce the household's rent to \$1,492 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a

refund is issued).

Unit # 1-2506

Corrective Action

Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement

Noncompliance Date 10/1/2023 Correction Date:

Reason Unit 1-2506 is designated as 80% AMI. The household's rent of \$1,507 exceeds the 80% AMI rent limit of \$1,492 for a 1-bedroom unit.

To correct, reduce the household's rent to \$1,492 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a

refund is issued).

Unit # 1-510

Finding Failure to comply with the Public Facility Corporation Regulatory Agreement

Noncompliance Date 12/10/2023 Correction Date:

Reason In accordance with the Regulatory Agreement, Section 3(c), annual Income Certification with verification of income must be obtained by the household's anniversary date (occupancy date of the unit) and no less than once in a 12-month period. Unit number 1-510 moved in 12/10/2022,

and a new Income Certification with verifications has not been completed as required.

Corrective Action To correct, complete annual Income Certification with verifications and submit to the Department for review. Submit the following documentation for

review: application, verification of income/assets and an executed Income Certification form.

Unit # 1-506

Finding Householed above the income limit upon initial occupancy.

Noncompliance Date 9/15/2023 Correction Date:

Reason In accordance with the Regulatory Agreement Section 3(c) pay stubs must be for the most recent four week period.

Tenant file contained paystubs more than 120-days prior from the TIC effective date and should not have been used to determine eligibility. The

removal of those paystubs results in the household income exceeding the 60%AMI limit.

Corrective Action Redesignate the household to an 80% AMI unit and lease the next available unit to a 60% AMI household. Submit the new 60% AMI household file

in the Department to review.

Unit # 1-1516

Finding Householed above the income limit upon initial occupancy.

Noncompliance Date 11/11/2023 Correction Date:

Reason Pay stubs in the tenant file inlcluded items in the year-to-date that were not paid in the pay stubs obtained. The inclusion of the additional income

results in the household's imcome exceeding the applicable 80%AMI limit at move-in.

Corrective Action Redesignate the household to a market unit and lease the next available unit to a 80% AMI household. Submit the new 80% AMI household file to

the Department for review.

Unit # 1-1532

Finding Householed above the income limit upon initial occupancy.

Noncompliance Date 12/29/2023 Correction Date:

Reason The Auditor indicated the household's income at 80% AMI exceeds the applicable limit at move-in.

Corrective Action Redesignate the household to a market unit and lease the next available unit to a 80% AMI household. Submit the new 80% AMI household file to

the Department for review.