



Senior Living Facilities CCR Meeting – Questions, Issues & Observations

May 16, 2018 –12:30 p.m.

Cliff Morton Development and Business Services Center, Boardroom – 1st Floor
1901 South Alamo, San Antonio, TX 78204

Issues & Observations: Property owners/managers, associations & governmental entities

- Property owner/manager: why are multifamily properties occupied by seniors the focus of the Council Consideration Request (CCR)? Why wouldn't all multifamily properties be part of a proactive inspection program?
- Property owner/manager: In terms of inspections, it appears that DSD Code Enforcement appears at properties and inspects them whenever the department or officers want to.
- Property owner/manager: The reason that properties dedicated to seniors are the focus of this CCR is because they are a vulnerable population group. The inspection program should be non-intrusive to the business of the property owners and managers. There are regulations that are already in place.
- Property owner/manager: Their multifamily property receives funding from the U.S. Department of Housing and Urban Development (HUD), which has a strict protocol for inspections. If there is also an inspection program in place through the City of San Antonio, there might be overlap and duplication in what the different entities are looking at. The HUD inspection protocol is described in detail in the Real Estate Assessment Center (REAC) Compilation Bulletin for Rapid 4.0 (Version 3). This document provides guidelines on the following: structural, systems (mechanical, electrical), fire prevention, and cleanliness. If during the course of an inspection by HUD an infestation is found, that is considered a serious finding. Inspections are performed annually. However, if an annual inspection by HUD receives a very high score, then that property can delay their annual inspection. For instance, a score of 91 points or more means that property will not be formally inspected for 3 years. A property with an 81 to 90 will not be formally inspected for 2 years. Reversely, if a property fails their annual inspection, then the follow-up reinspection will occur within 60 days.
- Property owner/manager: With HUD having standards set via the REAC Compilation Bulletin, a major concern is if there are competing regulations between HUD and the City.
- Property owner/manager: Most properties undergo two annual inspections: the HUD inspection with the REAC standards and an administrative/management review. If the property is smaller, the multiple inspections can be burdensome.
- Property owner/manager: Recommendation was made to exclude properties that are overseen by HUD.
- Non-Governmental Organization/Seniors Advocate: As an organization that serves as an advocate for seniors, keeping residents in safe living situations is the goal they are dedicated to support and achieve.

- Property owner/manager: All people in multifamily living situations are vulnerable to bad landlords who violate or take advantage of their residents, not just seniors. If the goal of a proactive inspection program is to be a check against these bad actors, then all multi-family properties should be under the program's review.
- Non-Governmental Organization/Seniors Advocate: One source of the problem with infestations or neglectful property maintenance may be that seniors do not know who to call when there is an issue.
- Non-Governmental Organization/Seniors Advocate: Complaints communicated to senior advocates have included mold, bad smells or disagreements with neighbors. As an agency that fields concerns from seniors, their job is to direct people to the appropriate resources to find solutions.
- Property owner/manager: One of the most common reasons that bed bugs appear is people accept donated items that may be infested. If a tenant's room becomes infested, the tenant may not report the issue due to the shame or stigma associated with having them. Most residents have healthcare providers accessible to them who know the appropriate resources to consult if seniors are having issues. Overall, working with seniors can be challenging.
- Property owner/manager: On bedbugs, HUD has provided guidance on how to handle bedbug infestations. It remains the tenant's responsibility to report the issue if it is discovered.
- Property owner/manager: Their property management company performs quarterly inspections of their units to check for any issues, including infestations. In working with a seniors population, mental health issues and resulting behaviors complicate efforts to ensure that tenant spaces are properly maintained. For residents who live in a HUD property, there is a very clear, long process that needs to be followed if eviction is the needed outcome in order to avoid more issues.
- Non-Governmental Organization/Property owner: Some property owners have multiple types of structures – single-family, multi-family, high-rise – that have senior residents supported by HUD. This process needs to define which properties may be subject to an inspection program. In addition, if additional inspections may be a result of this process, property manager wants to access more resident involvement to gauge their willingness to participate.
- Non-Governmental Organization/Seniors Advocate: If the end result of this process is that no inspection program is enacted, there should be a place or number of places where senior residents can voice their concerns and this location or entity addresses these issues until a resolution is achieved.

- Next meeting dates:
 - June 8, 2018 – 1:00 to 3:00 p.m.
 - June 28, 2018 – 1:00 to 3:00 p.m.

For more information on the Senior Living Facilities CCR, please visit www.sanantonio.gov/DSD/Resources/Codes.