



Suzanne Smith
Management Company

P.O. Box 10278, San Antonio, Texas 78210
(210) 531-0577 FAX (210) 531-0580 TDD/TTY # 1-800-545-1833 ext. 881

June 28, 2018

To: The City of San Antonio, Code Enforcement Services
Attn: Phil Laney, Senior Special Projects Manager
RE: Senior Living Facilities CCR Stakeholders Meeting

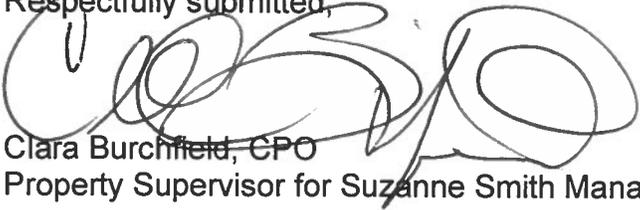
Dear Mr. Laney,

Listed below are my suggestions concerning "Proactive Inspections."

- First, don't do proactive inspections as it is a waste of resources;
- Second, if proactive inspections are required then only inspect conventional apartment programs; and,
- Third, the best use the resources is not to do proactive inspections but to educate the frontline people such as:
 - Owners;
 - On-site Management; Management can educate tenants
 - Provider Agencies;
 - Service Agencies (ex: APS, AACOG); and,
 - Tenants/Tenant Families;
 - Interested Community Members.

We are willing to provide the meeting space for educational meetings at our apartment programs for our Tenants and their respective Provider Agencies.

Respectfully submitted,



Clara Burchfield, CPO
Property Supervisor for Suzanne Smith Management Company



Suzanne Smith Management Company does not discriminate against persons with disabilities in the admission or access to, or treatment or employment in, its federally assisted programs and activities. Suzanne Smith has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's regulations implementing Section 504 (24CFR, part 8 dated June 2, 1988).





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It seems the meetings are not very productive because the discussion gets lost on tenant issues and/or tenant advocacy.

For the City, the issue at hand is how to better protect vulnerable citizens from living in sub-standard housing and their remedy is to have Proactive Inspections.

For our Company, the issue at hand is whether the affordable housing industry that is already regulated by a State or Federal agency needs additional regulation at the City level.

My opinion has always been that the additional regulations or oversight is redundant and possibly conflicts with existing regulations, and may increase project operating costs. It's uncommon for an affordable housing community to provide sub-standard housing due to the regulations and inspections already in place. Other than the isolated incident of infestation at the Aurora Apartments that seems to be the catalyst for the Proactive Inspections, which I would argue was a result of tenant issues, the Proactive Inspections are a good plan for the conventional housing industry where regulation and oversight is at a minimum.

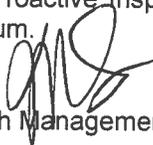
My big concern with the last meeting is that the City doesn't agree with REAC's inspection scheduling that is merit based on inspection scores. In particular, it was discussed that the 3 year inspection schedule for high scoring inspections concerned the City because problems could arise before the next scheduled inspection. It's my understanding that this time-frame between inspections is reason enough for the City to require inspections during the off years which I consider punitive. Of course problems will arise at any time during any year, and then management resolves these problems within their continued maintenance. I don't know of any project where maintenance halts for long periods of time.

Perhaps, the solution to Proactive Inspections is submitting to the City our documentation of REAC inspections, not the full inspection report but the cover letter, the inspection snapshot, and the score summary (please see attached REAC insp sample). If there are Exigent Health & Safety inspection findings then perhaps documentation of these corrections can also be submitted to the City. I write "perhaps" because I'm not in favor of submitting inspection documents to the City but I'm less in favor of Proactive Inspections. Assuming we submit documentation, this would provide the City with third-party verification that the project meets HUD's requirement of "decent, safe and sanitary" which should meet the City's housing standard, too. Also, HUD investigates tenant complaints to include drop-in inspections of the project and then management must provide HUD with documentation that the tenant complaints were resolved.

We know that at anytime the City can do a drive-by inspection to look at the condition of property grounds and exterior of the buildings, and if the drive-by inspection indicates maintenance and/or health and safety concerns then the City will perform a Reactive Inspection. And, it's only the Reactive Inspection that should apply to the affordable housing industry, if necessary.

Once again, my position is that the Proactive Inspections are a good plan for the conventional housing industry where regulation and oversight is at a minimum.

Marian Smith, BA, PSC, CPO
Property Supervisor for Suzanne Smith Management Company



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REAC insp sample 1 of 4

U.S. Department of Housing and Urban Development
Washington, DC 20410-0100

05/08/2017

REAL ESTATE ASSESSMENT CENTER

594227 / 800021314

Sacred Heart Villa
120 S Trinity St
San Antonio, TX 78207 -3842

Dear Owner:

Enclosed with this letter/electronic file is the latest Physical Inspection Summary Report for your property. An inspector, certified by HUD in the use of the inspection protocol, performed the inspection. The report includes property and ownership profile information and shows each deficiency observed during the inspection. Also enclosed is a short description of the elements of the report to assist you in interpretation.

The physical inspection was completed pursuant to HUD regulations at 24 CFR Part 5 and Part 200. You may review the regulations at any time from the Real Estate Assessment Center (REAC) web site at <http://www.hud.gov/offices/react>. This site provides information about REAC and the physical inspection process and allows you to download a free copy of the inspection software and view deficiency definitions.

If the inspector noted any exigent health and safety (EH&S) deficiencies at the time of the inspection, you or your representative received a report listing those deficiencies. HUD requires you to immediately correct or mitigate all such deficiencies and report your actions within three (3) business days of receipt of the report. If you have not already done so, please provide the local HUD Office of Housing with a certification, on your letterhead, that these exigent items have been corrected. You must use the language in the enclosed certification to report completion of the EH&S deficiencies. If your property is assigned to a Performance Based Contract Administrator (PB-CA), your certification should be sent to the PB-CA and not to the local HUD office. If the loan is under the 232 program, your certification should be sent to the Account Executive with the Office of Healthcare Programs (OHP). Do not send your report to REAC.

Because your property received a score of 60 or above, HUD requires that you note and correct all deficiencies as part of your ongoing maintenance program. If there are any special requirements for your property, the local Office of Housing or PB-CA having jurisdiction will contact you. If, you are still working to complete approved work under an earlier PC or formal Plan of Action (PA), or you have not yet certified completion of a PC or PA, the Office of Housing requires that you contact the local HUD Office of Housing to discuss this inspection and its relationship to work in progress, or, if a 232 loan, the local OHP. If the mortgage on your property is insured by HUD/FHA, please provide copies of all correspondence regarding this inspection to your mortgagee.

If your property had any EH&S deficiencies, and you fail to correct all of these deficiencies within the required timeframe, or falsely certify to repairs made, these noncompliance issues may adversely affect your eligibility for participation in HUD programs. Under HUD's Previous Participation Review and Clearance procedure, these non-compliance issues constitute a standard for disapproval pursuant to 24 CFR Section 200.230(c)(3) and HUD Handbook 4065.1 REV-1, paragraph 2-1(D)(1)(b). Under these circumstances, a flag (disqualifying entry) will be

REAC insp sample 2 of 4

placed in the Active Partner Performance Systems (APPS) in accordance with the textual "NOTE" at the conclusion of paragraph 2-1(D)(1) of the above referenced handbook. This letter is the only notice that you will receive of the placing of a flag in the APPS for noncompliance.

We appreciate your cooperation during the inspection, and remind you of your ongoing responsibility to maintain this property in a manner that is decent, safe, sanitary and in good repair.

Thank you for your cooperation.

Sincerely,

SAMUEL TUFFOUR
PROGRAM MANAGER, PHYSICAL ASSESSMENT
SUBSYSTEM
Real Estate Assessment Center

Enclosures

REAC insp sample 3 of 4

Inspection Summary Report (POA) for Inspection #594227



Inspection ID:	594227	Inspection Time:	10:00 AM - 01:08 PM
Inspection Start Date:	05/08/2017	Inspection End Date:	05/08/2017
Property ID:	800021314	Property Type:	Multi Family
Property Name:	Sacred Heart Villa		
Inspection State:	Successful	Score:	99a

REAC insp sample 4 of 4

Inspection Summary Report (POA) for Inspection #594227

Score Summary

Area	Possible Points	Deductions(Excluding H&S)	Pre H&S Points	H&S Deductions	Final Points
Site	16.15	0.00	16.15	0.00	16.15
Building Exterior	15.06	0.00	15.06	0.00	15.06
Building Systems	20.06	0.00	20.06	0.00	20.06
Common Area	7.38	0.00	7.38	0.00	7.38
Unit	41.34	0.40	40.94	0.00	40.94
Total	100.00	0.40	99.60	0.00	99.60

Score Version: 1

Score Date: 05/08/2017

Final Score: 99a