Commonwealth of Massachusetts
EXECUTIVE OFFICE OF HOUSING & LIVABLE COMMUNITIES
Maura T. Healey, Governor ◆ Kimberley Driscoll, Lieutenant Governor ◆ Edward M. Augustus, Jr., Secretary

Public Housing Notice 2023-11

To: All Local Housing Authority Executive Directors

From: Fatima Razzaq, Director, Bureau of Housing Development and Construction

Subject: Updated Accelerated Independent Modernization and Management (AIMM) Program

Date: July 20, 2023

Link to Application: https://massgov.formstack.com/forms/aimm

Program Description:

EOHLC's Accelerated Independent Modernization and Management (AIMM) Program provides eligible Local Housing Authorities (LHA) greater flexibility and autonomy in undertaking capital planning and capital project implementation. AIMM LHAs take full responsibility for capital improvement planning and modernization processes including compliance with all statutory and regulatory requirements.

Each AIMM LHA must perform the following functions independently and up to EOHLC's standards:

- Create, revise, and update the LHA's 5-year Capital Improvement Plan, without assistance from EOHLC or an RCAT.
- Update CPS at project completion and to reflect changes to component conditions without assistance from EOHLC or an RCAT.
- Execute all projects under $50,000 in compliance with M.G.L. chapters 7C, 30 section 39M, 30B, and 149, without assistance from EOHLC or an RCAT.
- Draft Work Orders and Scopes of Services on the most up to date Cap Hub planning templates for projects less than $800,000 in estimated construction costs and solicit designers for all projects under $800,000 through the EOHLC Cap Hub process. The EOHLC A/E assigned staff will review and the House Doctor Administrator will send out requests for fee proposals for projects over $50k. Perform all project design reviews to ensure compliance procurement and with the EOHLC design guidelines.
- Draft Requests for Services on the most up to date RFS Template for EOHLC review and approval for all projects more than $800,000 in estimated construction costs. Projects will be advertised through the EOHLC Designer Selection Process. Perform all project design reviews along with assigned EOHLC A/Es to ensure compliance with procurement and with the EOHLC design guidelines.

- Review and address budget shortcomings with the project team; understand potential funding from LHA Formula Funding or special EOHLC funding programs and recommend available solutions.
- Complete the M.G.L. mandated designer evaluations on the Designer Selection Network.

Each AIMM LHA will receive from EOHLC:

- Limited project management involvement; supports necessary to process invoices and for budget and phase approvals.
- Waived EOHLC design reviews on Work Orders unless project is deemed complex by EOHLC or the LHA requests technical assistance.
    - Upon review of work order at the time of design consultant fee approval, EOHLC will determine if project is complex and requires EOHLC reviews. If yes, architectural and engineering reviews will be completed by EOHLC within two weeks of design submittal.
- Review of Requests for Services (RFS) that AIMM LHA drafts and design review.
- Review Work Orders if the House Doctor Administrator deems the project is complexed.
- EOHLC may elect to conduct a post completion audit review following construction completion.
- Procurement services by the EOHLC procurement officer for projects over $50k, including review of bids, identification of lowest responsible bidder, and private conferences for contractor disputes.
- Construction administration services provided by assigned EOHLC CA, including review of change orders, requisitions, CSC, CFC, and assistance with contractor disputes.
- Periodic Cap Hub training for AIMM LHA work functionality for all phases of the work or video instruction.
- An AIMM LHA may allocate up to 13% of their formula funding and/or other capital resources for documented costs directly related to state-aided capital projects (the non-AIMM limit is 10%). (Cf. LHA Admin Costs policy)

AIMM Eligibility Criteria:

In order to qualify for AIMM, an LHA must meet all of the following threshold criteria:

1. LHAs is not participating in the Regional Capital Assistance Team (RCAT) either because it is an LHA with 500 or more state-aided units, or it has a waiver from participation.
2. Staff Capacity (may all be the same person and may also be the Executive Director):
    a. LHA has an appointed modernization staff member to perform modernization services.
    b. LHA has an appointed Chief Procurement Officer who has already obtained Massachusetts Certified Public Purchasing Official (MCPPO) certification.
    c. LHA has a designated full-time staff person (Maintenance or Modernization Director) to oversee design and construction projects.
3. Capital Benchmarks: In the past 3 years, LHA has demonstrated good capital program performance, by:
    a. Returning Contracts for Finance Assistance (CFAs) within 8 weeks of issuance. Submitting its most recent CIP within the same month that it was due, with no reporting errors. If EOHLC requested modifications, LHA resubmitted within 45 days of notice.

Management Capacity: The authority has scored over 65 on their most recent PMR and has less than 10 AUP findings.

In addition, EOHLC will also take into consideration: (1) recent changes in staffing and (2) the LHA's past demonstrated ability to complete projects on schedule and in compliance with procurement laws.

Application Process:

1. Interested LHAs should complete an application in FormStack at https://massgov.formstack.com/forms/aimm and upload the following information by Friday September 18, 2023 at 5pm:
    a. Copy of annual preventative maintenance plan.
    b. Resume of LHA's Chief Procurement Officer and copy of his/her Massachusetts Certified Public Purchasing Official (MCPPO) certificate
    c. Resume of appointed modernization staff who will perform modernization services, or narrative describing feasible plan for acquiring these services.
    d. Resume of full-time staff person responsible for capital planning and construction project oversight.
2. LHAs will then be notified by email within 30 calendar days of their AIMM status. At any point in the process, if EOHLC determines that an LHA is not eligible for AIMM status, EOHLC will provide a detailed written explanation of the reason(s) for such determination. An LHA which has been denied AIMM status can request reconsideration in writing together with relevant documentation to support the request. Reconsideration may include a EOHLC site visit.
3. Selected LHAs will need to attend a mandatory program onboarding training, to be held after receiving their acceptance notices.

AIMM Duration and Conditions:

AIMM designation will be granted for a term of 2 years. EOHLC may rescind an AIMM designation in the following situations:

1. LHA has a change in Executive Director, or no longer has the qualified staff to perform modernization services.
2. LHA fails to meet their Capital Benchmarks.
3. LHA neglects to submit CIP and Annual Plan on time.
4. A EOHLC site visit or Agreed Upon Procedures financial review indicates that an LHA would benefit from some assistance in the areas of property maintenance, unit occupancy, and/or procurement.

The LHA may reapply for AIMM designation at the end of the 2-year period.