



Commonwealth of Massachusetts  
**DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lieutenant Governor ♦ Chrystal Komegay, Undersecretary

## Public Housing Notice 2016-33

To: LHA Executive Directors  
From: Amy Stitely, Acting Associate Director, Division of Public Housing & Rental Assistance  
Subject: New AIMM Program Rules and Application  
Date: October 27, 2016

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With this Public Housing Notice, DHCD is alerting all Local Housing Authorities (LHAs) that the Accelerated Independent Modernization and Management (AIMM) program requirements have been revised. New eligibility requirements and duties are described below.

As of the date of this Notice, all previous AIMM designations are nullified.

- Previously designated AIMM LHAs that are participating in the Regional Capital Assistance Team (RCAT) program are no longer enrolled and are ineligible for re-designation; and
- Previously designated AIMM LHAs that are not participating in the RCAT program must reapply to the program for a continued enrollment.

DHCD will accept AIMM applications on a rolling basis. However, previously-designated AIMM LHAs that are eligible to seek re-designation should send in application materials as soon as possible to avoid any break in the receipt of AIMM benefits (the 13% administration fee on projects).

### **ACCELERATED INDEPENDENT MODERNIZATION AND MANAGEMENT (AIMM) APPLICATION**

#### **PROGRAM DESCRIPTION:**

DHCD'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 process including compliance with all statutory and regulatory requirements.

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

- Create, revise, and update the LHA's 5-year Capital Improvement Plan, without assistance from DHCD or an RCAT.
- Update CPS at project completion and to reflect changes to component conditions without assistance from DHCD 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 DHCD or an RCAT.
- Draft all Work Orders and Scopes of Services for all projects less than \$500,000 in estimated construction costs, without assistance from DHCD or an RCAT.
- Draft Requests for Services for DHCD review and approval for all projects more than \$500,000 in estimated construction costs.

**Each AIMM LHA will receive from DHCD:**

- Limited project management involvement: supports necessary to process invoices and for budget and phase approvals.
- Simplified and time-bound architectural and engineering review by DHCD:
  - Review of Requests for Services that AIMM LHA drafts;
  - 1 review at schematic design; and
  - 1 review at 100% construction documents (CD) to check for adherence to DHCD's guidelines and standards and procurement rules based on LHA review. In some cases, DHCD may elect to conduct a post completion audit review following construction completion.
- An AIMM LHA may allocate up to 13% of their formula funding and/or other capital resources for documented capital project related implementation costs (the non-AIMM limit is 10%).

**AIMM ELIGIBILITY CRITERIA:**

Only LHAs with 500 or more state-aided units or with waivers from participating in the Regional Capital Assistance Team (RCAT) program are eligible for the AIMM program.

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

1. Staff Capacity:
  - a. LHA has an appointed **licensed** design professional on staff 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) qualified to oversee design and construction projects.
2. Capital Benchmarks: In the past 3 years, LHA has demonstrated good capital program performance, by:
    - a. Spending 80% of total awarded Formula Funding for the past 3 fiscal years (FY 14-16).
    - b. Submitting its most recent CIP within the same month that it was due, with no reporting errors. If DHCD requested modifications, LHA resubmitted within 45 days of notice.
  3. Vacant Units: Currently, less than 5% of the LHA's state-aided units are vacant beyond 60 days, not including those with a DHCD-approved waiver.
  4. Management Capacity: LHA has routinely stayed up to date with all reporting and certification requirements over the past year, including:
    - a. Vacancy Reports
    - b. Monthly Energy Reports
    - c. Board Attendance Reports
    - d. Budget
    - e. Budget Certification
    - f. Operating Statements
    - g. Operating Statement Certifications
    - h. Lead-Based Paint Compliance Certification
    - i. Top 5 Highest Paid Housing Authority Salaries Certification
    - j. Capital Improvement Plan (CIP)
    - k. Quarterly Modernization Cost Reports

In addition, DHCD 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 notify Andrew Clinton, Capital Project Coordinator, in writing at [Andrew.Clinton2@MassMail.State.MA.US](mailto:Andrew.Clinton2@MassMail.State.MA.US) or by regular mail of their desire to obtain AIMM status. The letter should include the following attachments:
  - 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 licensed design professional to 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 in writing within 30 calendar days of their AIMM status. At any point in the process, if DHCD determines that an LHA is not eligible for AIMM status, DHCD 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 DHCD site visit.

**AIMM DURATION AND CONDITIONS:**

AIMM designation will be granted for a term of 3 years. DHCD may rescind an AIMM designation in the following situations:

1. LHA has a change in Executive Director, or no longer has a licensed design professional performing modernization services.
2. LHA falls below the 3-year, 80% Formula Funding spending threshold.
3. LHA neglects to submit CIP on time.
4. A DHCD 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 3 year period.