

**Request for Action**  
**By**  
**Board of Commissioners**

**Approval of Amendment to Engagement of Consultant for Housing Related Research,  
Analysis, and Reporting Services (Mullin & Lonergan Associates)**

**A. Summary of Action**

This Request for Action (“RFA”) is for an amendment to the engagement of Mullin & Lonergan Associates to complete several HUD required housing-related reports, including fair housing planning. This modification will allow RIHousing to expand the fair housing plan to include the six entitlement communities in Rhode Island.

**B. Discussion**

On December 21, 2023, the RIHousing Board of Commissioners approved the engagement of the consultant Mullin & Lonergan for the development of the State Consolidated Plan, the fair housing plan and several related documents. RIHousing contracted with the firm to carry out a scope of work (known as “Statement of Work No. 1 (HUD Planning Activities)” or “SOW 1”) at a cost of \$140,495, of which \$44,440 (plus a share of outreach costs) is for the fair housing plan.

HUD requires all states and entitlement communities administering its Community Planning and Development Programs to produce a fair housing plan. HUD is currently in the process of implementing the Affirmatively Furthering Fair Housing (AFFH) requirements which will replace the previous fair housing plan requirements known as the Analysis of Impediments to Fair Housing Choice (AI). At the time that RIHousing, in collaboration with the Department of Housing, went out to bid for this scope of work, it was not yet clear whether the fair housing plan would be required to follow the AI or AFFH requirements, or exactly what the AFFH requirements would entail. Therefore, SOW 1 was based on the development of the AFFH, since that would require substantially more work and has the longest time frame for implementation. Staff also determined that, due to the much more extensive engagement and enhanced accountability required of each reporting entity under the AFFH draft rules, it would not be feasible to produce a statewide AFFH that covers the entitlement communities of Providence, Warwick, Cranston, Pawtucket, East Providence, and Woonsocket as we have done for the past two planning cycles with the AI.

To date, HUD has not finalized its rules for the implementation of the AFFH and we have passed the timeframe under which RIHousing would be required to utilize that reporting format for our current fair housing plan update. Therefore, we now have the flexibility to submit a fair housing

plan using the AI requirements and replicate the Statewide AI format we have utilized for the past two planning cycles.

Staff requested that Mullin & Lonergan Associates provide a supplemental scope of work for the fair housing plan element of our contract that reflected the additional costs of expanding the scope of that deliverable to a Statewide AI. The additional cost associated with that expanded scope of work is \$49,890. Staff reached out to Rhode Island's entitlement communities to discuss this option, and all expressed their interest in participating in the development of the statewide AI and their willingness to contribute to the cost of that expanded scope of work. The amount of money provided by each entitlement community will be proportional to their populations.

Staff is recommending the approval of an amendment to the engagement of Mullin & Lonergan Associates as described in [Attachment A](#).

### **C. Recommendation**

The attached resolution approving an amendment to the engagement of Mullin & Lonergan Associates is recommended for approval.

### **D. Attachments**

A. Resolution of the Board of Commissioners of RIHousing

**Attachment A**

**Resolution of the Board of  
Commissioners of Rhode Island Housing and Mortgage Finance Corporation  
(Mullin & Lonergan Associates)**

**WHEREAS:** Rhode Island Housing and Mortgage Finance Corporation's ("RIHousing") enabling act provides it with all the power and authority to make and execute contracts necessary to exercise the powers and functions under the act, (R.I. Gen. Laws §42-55-5(6)); and

**WHEREAS:** RIHousing has engaged Mullin & Lonergan Associates to complete several housing related reports, including a Citizen Participation Plan, Consolidated Plan, narrative components of the Consolidated Annual Performance and Evaluation Report, Annual Action Plan, and Analysis of Impediments to Fair Housing Choice (AI) that meet all HUD requirements; and

**WHEREAS:** RIHousing now has the opportunity to expand the scope of work to include the entitlement communities in the development of a statewide AI and those communities have agreed to provide funds to RIHousing covering the full cost of the expanded AI planning process; and

**WHEREAS:** Section 8.5.2 of the RIHousing Purchasing Policies requires Board approval of any change order that would have the effect of increasing the value of a contract by 40% or more;

**NOW, THEREFORE, IT IS HEREBY:**

**RESOLVED:** that RIHousing be, and hereby is, authorized to execute a contract modification with Mullin & Lonergan Associates, at the approximate value of \$49,890, to provide a statewide Analysis of Impediments to Fair Housing Choice that meets all HUD requirements; and

**RESOLVED:** that the Executive Director, Deputy Executive Director, Chief Strategy and Innovation Officer, and Director of Government Relations and Policy, each acting singly, be and hereby are authorized and empowered to negotiate terms and fees of the engagement as he or she may determine are in the best interests of RIHousing, and to execute any and all agreements or documents as he or she deems necessary to carry out the foregoing and to take such further actions as he or she deems necessary to carry out the foregoing resolution.