I. COMMUNITY PARTICIPATION PROGRAM

A. Program Purposes

The Community Participation Program (CPP) provides funding to encourage and support participation through Minneapolis neighborhood organizations. These guidelines direct how at least $3,000,000 per year will be provided to recognized Minneapolis neighborhood organizations for neighborhood-determined community engagement activities in the following key areas: (1) identifying and acting on neighborhood priorities; (2) influencing City decisions and priorities; and (3) increasing involvement.

1. **Identifying and Acting on Neighborhood Priorities**
   As partners in building a better city and creating vibrant, safe, welcoming and livable spaces, neighborhood organizations and the City each have unique roles in identifying and acting on neighborhood priorities. Neighborhood organizations may from time to time prepare and submit Neighborhood Priority Plans as a way of directing neighborhood CPP project funds or providing input to City plans and budgets (see Section V: Neighborhood Priority Plans, below.)

2. **Influencing City Decisions and Priorities**
   City decision-making is improved when we involve those most affected by these decisions. The City's core principles of community engagement state that those who are affected by a decision have a right to be involved in the decision-making process. Through partnering with neighborhood organizations, the City of Minneapolis can better reach—and be informed by—the people who are most affected by City decisions.

- Influencing City/Departments – How will NCR help us with that? Isn't it all about elected leadership and their definition as to whether or not community engagement, citizen directed development and participation are important?

  Additionally, feel free to use the **401 Oak Grove** City staff report, where justification for NOT following the city-approved NRP plan is that it is only "visionary". In the early days, planning staff were assigned to neighborhoods – departments reviewed the NRP Plans – capital expense goals and goals of city were reviewed per neighborhood driven goals – City staff helped and **ENSURED** implementation of these plans. They did not call them "visionary and with no bearing on City decisions."

- 2. Because neighborhoods have been organized around NRP, we already participate in voicing our positions to the city. The city is not bound to recognize our positions any more under NCR than it was under NRP. NCR could really add value to our work by instituting some kind of requirement that community voices be heard and given specific weight.

- The guidelines place many, often inappropriate, requirements on neighborhood organizations while offering little from the City in return. "Influencing city decisions and priorities" is a nice goal, by there is no commitment that the city will, in fact, change any decisions based on the input of residents and others. The goal is meaningless without such as commitment.

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- #2 "……The City's core principles of community engagement state that those who are affected by a decision have a right to be involved in the decision-making process…." As a City Dept, NCR should be advocating to CPED and the City Planning dept and insisting that n'hood have the opportunity to review proposals prior to getting into the City pipeline. This is how the NCR could support the City's community engagement commitment. It should be a Planning & Licensing dept POLICY (not a suggestion as it is now) to refer applicant for zoning changes, CUPs, variances, licenses, developments, etc to the n'hood before an application is accepted in order for the City to fulfill their "core principle of community engagement."

3. **Increasing Involvement**
   The City and neighborhood organizations are better able to develop meaningful strategies—and successfully implement those strategies—when more people are informed and involved. The City and neighborhood organizations will work to maximize the involvement of residents and other stakeholders.

- Further, only one of the three program purposes relates to the core purpose of NRP – that of neighborhood improvement. A key requirement in the NRP legislation is to invest 52.5% of the funds in housing. The guidelines do not discuss how this requirement will be met.
- 3. The best participation happens when we are doing something. We get more community participation when we are creating a plan to spend our capital, than we do when we give away free ice cream. Both are good, but one has better and more lasting results for building relationships and improving our community.

Neighborhood Organization Activities (Sidebar)

While it is understood that neighborhood organizations and the City are jointly responsible for success in these three key areas, the purpose of funding through the Community Participation Program is to help neighborhood organizations to:

- Facilitate communication and connections among neighborhood residents and stakeholders to:
  - Gather input;
  - Inform and educate neighborhood residents and stakeholders on pending City or neighborhood issues and opportunities that affect them and their neighborhood;
  - Identify, act on, and advance neighborhood priorities;
  - Identify emerging issues within the neighborhood;
  - Build connections between neighborhood stakeholders;
  - Hold neighborhood-wide gatherings and utilize other means of increasing involvement;
  - Encourage and strive for the participation of everyone in the neighborhood regardless of their demographic group; and
  - Give neighbors a united voice.
- Collaborate with the City to establish city-wide goals, policy and budget priorities;
- Generate new ideas to address current issues in creative ways;
- Convene and collaborate with partners (public and private) on projects;
- Leverage funds to increase investment in neighborhood priorities;

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- Encourage everyone to volunteer—to get involved and help accomplish outcomes that improve their quality of life;
- Support block clubs including co-recruiting efforts and encouraging activities in addition to crime prevention.

❖ Page 1 side bar 'Neighborhood Organization Activities" 3rd bullet point: City Staff is not obligated to inform neighborhoods of pending or filed application. N'hoods frequently get only the public hearing date which limits the n'hood ability to review, comment, give input and collaborate with the applicant and the city for the most advantageous outcome.

❖ I read the section in green and can't help but think that these are things we already do well through NRP. On whole it seems that we are dismantling a better organization than we are creating. What's more, we seem to be doing it with great haste. Neighborhoods are not ready for NRP to close down and NCR is not ready to take over. Nobody seems to know what is going on. Why, again, are we doing this?

❖ p. 1 – Neighborhood Organization Activities column:

- Last sub bullet under Facilitate communications says:
  Give neighbors a united voice – which is nice if there is a united voice. What if there isn't? Don't we have an obligation to give a voice to all voices, whether they are united or not? This seems to be counter-intuitive to the whole approach of making sure everyone is involved.
- Last main bullet – support block clubs….. Are we taking over the responsibility of block clubs from CPP/SAFE? If we are, then this needs much more definition somewhere – this document or elsewhere. If we're not, then why not say – work with CPP/SAFE. Or maybe that's what is meant by *co-recruiting efforts*. Co-recruiting with whom? Why not identify CPP/SAFE in the document?

❖ Page 1-A-3-Last sentence. - "Support block clubs including co-recruiting efforts and encouraging activities in addition to crime prevention."

- This is a redundancy. Programs within the Minneapolis Police Department presently support Block clubs and neighborhood crime prevention.

B. Neighborhood Priorities: Organize, Plan, Partner, and Implement

The three program purposes identified above will be accomplished using CPP funds to organize, plan, partner and implement. Neighborhood organization can direct the use of funds through either CPP submissions for organizing, planning, and partnering, or through implementation of projects as identified in Neighborhood Priority Plans.

Organize: The CPP submission outlines the process a neighborhood organization will use to inform and involve residents and others in addressing issues and opportunities, and to develop and implement a Neighborhood Priority Plan.

Plan: Neighborhood Priority Plans (see Section V, below) identify preliminary neighborhood priorities, as identified by the neighborhood. Neighborhood Priority Plans may be undertaken

by single neighborhoods or several (such as a corridor initiative). A neighborhood may be involved in one or more plans. Plans may be submitted for each priority identified by the neighborhood, subject only to the neighborhood's capacity to work on addressing solutions to those priorities. Neighborhood Priority Plans can be of any duration.

Partner: The neighborhood organization will work with the Neighborhood and Community Relations Department (NCR) to identify any jurisdictional partners and develop formal agreements to begin implementation of Neighborhood Priority Plans. Partnerships with City departments and jurisdictions will help address neighborhood priorities and shape City priorities and decisions.

Implement: Neighborhood organizations and partners will work to implement, evaluate, and report on activities. Neighborhood projects may be identified in agreements between the neighborhood organization and jurisdictions, and may take the form of neighborhood CPP funded and directed projects; Memoranda of Understanding with City departments (and other jurisdictions); or inclusion of neighborhood priorities in City department budgets and priorities.

- These proposed Guidelines appear to require extensive NEW organizing and planning activity. The Guidelines section I.B, "Neighborhood Priorities: Organize, Plan, Partner, and Implement" should be rethought and redone, along with Section IV, "Requests for Written Submissions."
- #8N'hood priorities: Organize, Plan, Partner, and Implement Organize: lighten up!!! Each n'hood knows how best to reach their populations Partner: The language used in this paragraph sounds very controlling the NCR/city should be a resource for partnerships and a have a pool of potential partners that can be accessed by neighborhoods.
- Neighborhood Priority Plans (NPP) Requirements (Section I): SCNA holds that Neighborhood organizations must be able to easily reference aspects of adopted Phase II, or Phase I, neighborhood action plans, especially in consideration of the City's capture and use of Phase II uncontracted funds to fund the City program from July 2012-December 2013. Initial drafts of the guidelines indicated that NPP's are discretionary, but NCR staff have subsequently communicated that at least a single NPP per neighborhood organization is mandatory.
- B. Again, this all looks like objectives that have been better met under NRP than they will under NCR. There is one positive possibility here, a commitment to facilitating jurisdictional partnerships. The city could have made a better effort of that under NRP. If NCR finds a good way to help make those connections, that will be an improvement.
- Page 1-I-A-1.-"Neighborhood organizations may from time to time prepare and submit Neighborhood Priority Plans as a way of directing neighborhood CCP project funds or providing input to City plans and budget…"
    - Is this optional?
    - "Neighborhood Priority Plan is not defined anyplace in this document but I would think that the priorities should be set at the beginning of the fiscal year or on a set basis.
    - Is this plan needed prior to funding?
- Page 2-B-First Paragraph

- Define "CPP submissions for organizing, planning and partnering". How is it different from the "Neighborhood Priorities Plan"?

❖ Page 2-B.-Third paragraph. – "Plans may be submitted for each priority identified by the neighborhood"

- Is this optional?
- This statement makes it sounds like a plan can be initiated without being submitted.

II. ELIGIBLE NEIGHBORHOOD ORGANIZATIONS

Only organizations that meet the eligibility criteria in Section II.A, below, may apply for CPP funds. Organizations that apply for and receive CPP funds must meet the Standards and Expectations of the program identified in section II.B, below.

A. Eligibility

A neighborhood organization must meet all of the following criteria to be considered eligible for Community Participation Program funding. The organization must:

1. Represent a geographically-defined neighborhood (in its entirety) within Minneapolis as identified by the most current Minneapolis Communities and Neighborhoods Map as amended and approved by the City Council (see Appendix C).
2. Provide for the participation of all segments of the neighborhood, including, but not limited to, homeowners, renters, property owners, business owners, immigrants, non-English speakers, low-income residents and communities of color.

❖ II. A. 2. This needs to be clarified. What exactly is this provision's objective? If the intent is to ensure organizations are inclusive, that's great. I don't think you mean that we would need to have a foreign language interpreter for every language spoken in our neighborhood at each meeting in the case that a resident speaking that language happened to attend, but it could be interpreted that way.

3. Ensure that membership in the organization is open to all residents of the geographically defined neighborhood. Neighborhood organizations may not impose membership dues or require attendance at a certain number of meetings before voting rights are conferred.
4. Hold regular open meetings and take positive steps to encourage all interested parties to attend and participate. An organization may only hold closed meetings in cases of labor and legal disputes.

❖ 4. This seems to bar the neighborhood board from holding what we call interim meetings, unless related to labor or legal issues. Sometimes our board meets between public meetings to do board education, catch up on issues, and conduct business allowable under our by-laws in a timely manor.

5. Be incorporated (or identify an appropriate fiscal agent) and have adopted by-laws. The organization must also have a grievance procedure by which its members may have their concerns addressed by the organization, a conflict of interest policy and procedure, an

Equal Opportunity Employment (EOE) or Affirmative Action (AA) plan and policy, and an Americans with Disabilities Act (ADA) plan and policy.

6. Have a board of directors elected, at least in part, annually by the membership of the organization. Neighborhood residents must comprise a majority of the organization's board. An elected board must be in place for a minimum of one year prior to the beginning of the contract year to be considered eligible for funding.
7. Have the capacity to properly manage and account for grant funds. This includes, but is not limited to, being current on all reporting on any previous Community Participation Program grants.
8. Organizations that primarily represent the interests of one segment of the neighborhood or concentrate primarily on one issue are not eligible (such as homeowner associations, rental property owner associations or business associations).

- There is a new requirement for an Equal Opportunity Employment or Affirmative Action plan and policy and an Americans with Disabilities Act plan and policy. Since the ANA does not have any employees, there is not an EOE or AA plan in place. The ANA has a statement on every meeting notice about granting requests for accommodations, but we need clarification on what exactly this means.
- **Policies:** The new guidelines require neighborhoods to have Equal Opportunity Employment, Affirmative Action and Americans with Disabilities plans and policies. Can we be assured that NCR will provide support for neighborhoods to prepare these policies?
- Have the neighborhood maps changed (referenced in Section II A. 2.)? When will the newly amended maps be released?

B. Standards and Expectations

The Neighborhood and Community Relations (NCR) Department encourages all neighborhood organizations to be thoughtful in their submissions for funding. While we encourage every neighborhood organization to make full use of their funding allocation, organizations should also be realistic about their organizational capacity for managing participation activities and the obligations required of community participation organizations. Organizations should be committed to full participation by all stakeholders, openness and transparency in their community participation process, and accountability to the community.

Eligible neighborhood organizations must make good faith efforts to:

- Conduct activities in an ethical manner;
- Build a sense of neighborhood identity within their communities;
- Conduct activities that promote the inclusion of all age, ethnic and economic groups in the neighborhood's community participation efforts and in the decision-making processes of the organization, including renters. Explore new methods to stimulate participation;
- Identify the issues of significance that confront their residents;
- Bring neighborhood residents and stakeholders together to create and implement a vision for their neighborhood;

- Build bridges among neighbors and diverse communities within the neighborhood;
- Work cooperatively on common issues with other neighborhood organizations;
- Encourage leaders and develop new leadership;
- Engage current members and attract new members;
- Maintain an organizational structure and election process that maximizes opportunities for all residents to become involved. The board should make reasonable attempts to make sure the diversity of the neighborhood is represented;
- Expand the organization's capacities through self-assessment and evaluation;
- Ensure that official records of the organization (including financial reports, approved minutes) are available for review by any member of the organization, consistent with State law. An organization may deviate from this rule only in case of labor and legal disputes.

❖ The "standards and expectations" of neighborhood organizations require an impossible level of participation (e.g., "full participation by all stakeholders").

❖ Page 3-B.-Last paragraph – "Bring neighborhood residents and stakeholders together to create ……."

- Residents are stakeholders. This should state "*Bring all stakeholders together to create……*

III. FUNDING ACTIVITIES

The broad description of funding activities reflects that neighborhood organizations may pursue a wide variety of community participation strategies so long as the contracting neighborhood organization demonstrates that the funding activities are consistent with program purposes and standards and expectations stated in Section II.B, above.

CPP funds directed to projects identified in Neighborhood Priority Plans will be subject to policies established by the NRP Policy Board and as allowed by NRP statutes.

A. Eligible Expenses

Eligible budget line items for Community Participation Program funds include:

- Staff, office space, supplies, neighborhood communications, accounting and related services, travel, training or other educational pursuits in connection with participation, and consultant fees that directly relate to participation activities.
- Community organizing and outreach programs and neighborhood planning activities.
- Organization newsletters and newspapers.
- Neighborhood celebrations and events, if the event's purpose is to increase neighborhood awareness and involvement in the organization's planning and implementation efforts.
- Funds may be used for small equipment purchases. In the event of dissolution or insolvency of a contracting neighborhood organization, the City may reclaim equipment purchased with City funds and to retrieve copies of organizational records required to fulfill all City contracts and to help facilitate a new organization to represent the neighborhood.

- Fundraising expenses are eligible if revenues are to be used in support of further community engagement activities consistent with these guidelines, or in support of implementation of neighborhood priority plans or NRP Neighborhood Action Plans.
- Funds may be used to support the administrative costs associated with NRP planning and implementation.
- Funds may be used to support implementation of Neighborhood Priority Plans.
- Other activities consistent with the purposes of the Community Participation Program to identify and act on neighborhood priorities, impact City decisions and priorities, and increase involvement.

❖ Page 4-III-A. – Last sentence. – "Other activities consistent with the purposes of the…"

- This sentence is not complete and does not make sense.
- It looks like this sentence should be part of the previous sentence.

B. Ineligible Expenses

Ineligible budget items include:

- Undefined line items such as "miscellaneous" or "contingency";
- Food;
- Donations;
- Costs of legal action against the City; and
- Penalties and interest charges (such as insufficient fund fees, IRS penalties and interest, and similar fees).

❖ Food should be an eligible expense- it helps to entice people to show up for a meeting or participate in an activity.

❖ Allow newsletter production costs regardless of advertising income. Written communication that is mailed out is the one thing we can be certain is at least getting to every resident. This is just another form of sponsorship, which neighborhoods do frequently. The income from the advertisers only offsets a small portion of the overall production costs.

❖ It would be helpful to have a more detailed list of eligible and ineligible expenses.

❖ It is unclear in the current form, but please allow entertainment expenses to be eligible. Entertainment at our Summer Festival is our biggest draw to get residents to attend. The festival is the best chance for us to bring people together and recruit them to work on other neighborhood projects.

❖ There should be no change in eligible expenses from the previous year's Community Participation Guidelines. Specifically, neighborhood publications should continue to be able to take paid advertising and food should remain an eligible expense. Neighborhood publications are critical to keeping people informed with what's happening in their communities and provide an excellent way for local businesses to connect with potential customers in their area.

❖ Neighborhood organizations should be able to use these funds to support the implementation of their NRP Phase I and NRP Phase II Plans.

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- Food should be an eligible expense- it helps to entice people to show up for a meeting or participate in a community building event.
- It would be helpful to have a more detailed list of eligible and ineligible expenses.
- It is important to the ANA to allow entertainment expenses to be eligible. Entertainment at our Summer Festival is a big reason why residents attend. The festival allows us to bring people together to share neighborhood accomplishments and recruit residents to work on other neighborhood projects.
- **Eligible expenses:** Eligible expenses should include food, festivals, events, and newsletters – all items typically used to engage community.
- Offering food at community events helps engage residents. Why allow food as an eligible expense in 2011 but remove it in 2012? Get creative with the funding so that a small percentage of the CPP can go toward food or find a way to ease that NRP restriction.
- Funding is subject to NRP rules. The program needs to be amended to ensure that eligible expenses include areas commonly used for community engagement: festivals, events, newsletters and FOOD.
- **Ineligible Use/Donations –** Clarify what this means? Can we not then "buy a brick" in memory of folks with CPP funds?

C. Staff

Staff are considered to be employees of, or self-employed persons contracted by, the neighborhood organization. Each organization is responsible for budgeting an adequate amount to cover obligations in its employment agreement(s) (e.g., FICA, workers' compensation, unemployment, withholding, health insurance). Paid staff members or contractors may not be members of the Board of Directors.

- This seems like a perfect place to address a problem I see with some neighborhood organizations which could cause serious financial problems. I have seen some organizations inappropriately paying staff as independent contractors. The IRS has some very definite guidelines about who qualifies for independent contractor status and who must be paid as an employee. This would be a great opportunity to educate organizations. Perhaps just adding a statement saying "make sure you are in compliance with IRS regulations".

D. Funding Adjustments

Neighborhood organizations may reallocate funds within their contract budgets following neighborhood organization Board approval, and by submitting revised budgets in writing to staff within the NCR Department administering the contract. NCR staff will review for neighborhood Board approval and consistency with the Community Participation Program Guidelines and will notify the neighborhood organization when the adjustment has been approved.

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IV. REQUESTS FOR WRITTEN SUBMISSIONS

The NCR Department will request submissions from neighborhood organizations prior to the beginning of each funding cycle (see Appendix A, below). Submissions will be for the full funding cycle, and should review the organization's community participation activities for the past year and describe the organization's plans for the coming years. Reviews of past year activities and any proposed changes to the submission will be submitted for each of the following years of the funding cycle. These annual reports will be due by the end of the year. (See Section IV.B. Contracting and Reporting, below.)

The following areas must be addressed in an organization's submission:

1. Evidence of the organization's eligibility, as identified in Section II.A above.
2. Community participation efforts. Organizations should discuss: (1) the proposed outreach activity in the neighborhood, and (2) the proposed methods to involve residents and other stakeholders in one or more of the three key program purposes from Section I.A, above):
   - Identifying and acting on neighborhood priorities. Organizations should identify how they will engage residents and other stakeholders of their neighborhood in developing Neighborhood Priority Plans (see Section V Neighborhood Priority Plans below).
   - Impacting City decisions and priorities. Organizations should discuss their proposed efforts to (1) review and comment on City decisions and priorities that affect their neighborhood and (2) involve those residents and other stakeholders most affected by those decisions in the decision-making process.
   - Efforts to increase involvement. Organizations should discuss their proposed efforts to maximize the involvement of residents and other stakeholders in the organization's decision-making processes and other activities.
3. Building organizational capacity. Organizations should discuss their proposed efforts to: (1) provide opportunities for the direct involvement of members, (2) build their membership and volunteer base, (3) encourage and develop new leadership, and (4) expand the organization's capacity through self-assessment and other activities.
4. Building neighborhood relationships. Organizations should discuss their proposed outreach, networking, and inclusivity efforts to: (1) build a sense of a whole neighborhood among residents, (2) build bridges among neighbors and diverse communities within the neighborhood, (3) work with other neighborhoods and organizations on issues of common interest, (4) build partnerships with private and public entities, and (5) benefit the neighborhood as a whole.
5. Involve under-engaged stakeholders. Organizations should discuss which stakeholder groups are typically un-engaged or under-engaged in their work, and how they will work to involve those groups. Organizations should also discuss how the NCR Department can help with this work.

❖ CPP and Under Engaged Stakeholders (Section IV): SCNA recommends that the language in Part 5 be replaced to read, "The NCR Department will conduct outreach to the Neighborhood

Organizations on how the NCR can assist with outreach to under engaged stakeholder groups in each of the neighborhoods."

- Inherent in the guidelines are assumptions about neighborhood associations that are highly questionable, and disrespectful of the work of countless volunteers and neighborhood staff. The guidelines **presume** that neighborhoods have not made good faith efforts to include or involve certain categories of people because they are "underrepresented" on their boards; they even imply that a lack of participation by some groups of people, such as renters, is because they have been excluded. NCR needs to accept the fact that **not everyone is interested in volunteering or participating in their neighborhood organization**, and there is nothing wrong with that. Participation is not compulsory, nor is membership in one's neighborhood organization. While there is always room to improve the level of participation, NENA does not believe that neighborhood organizations have underperformed. In fact, an area where neighborhoods have done an outstanding job is in participation by people of all economic means – within neighborhoods and across neighborhoods.
- 5. SNO has tried many different avenues over the years to engage under represented groups, with very limited success. NCR could help by researching and helping communities implement effective strategies for outreach to different under represented groups.

6. Housing Activities. Neighborhood organizations should discuss their work on housing and housing related activities. Organizations should estimate the percentage of time to be spent on these issues.

- Housing: Please provide more information about the requirements for housing activities to be included in the submission (Section IV, #6).

7. Unused funds. Organizations should discuss how they plan to use unused funds from the previous cycle for community engagement or implementation of neighborhood priorities.
8. Budgets. Submissions should include a budget showing how Community Participation Program funds will support the organization's community participation work and an amount set-aside for implementation of Neighborhood Priority Plans (specific information on the use of these set-aside funds will be provided through the Neighborhood Priority Plans process described in Section V, below). An annual budget for the organization should also be provided.
9. New organizations. If an organization was not funded in the previous year, a report on the previous year's activities will be required.

A. Evaluation/Recommendation

Evaluation of submissions from neighborhood organizations will be conducted by the NCR Department. The City will fund only one organization to provide community participation services for a neighborhood, however, organizations that represent several neighborhoods may apply for funds for all of the neighborhoods that they represent. Submissions first will be evaluated to determine eligibility as in Section II.A, above. If more than one submission should be received for any neighborhood, the NCR staff will review and evaluate all submissions.

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All submissions from organizations determined to be eligible will be evaluated based on how well they meet the Community Participation Program guidelines. The formula discussed in Appendix A: Determining Funding Levels will determine the maximum funding level for each neighborhood.

The NCR Director will make a final determination on approval within 45 days of receipt of the submission.

An organization not approved for funding may file an appeal with the Neighborhood and Community Engagement Commission (NCEC). Such an appeal must be received within thirty calendar days of the notice of the Director's decision by submitting it to the City's Development Finance Division (DFD). DFD will prepare a report on the appeal for the NCEC. The NCEC may uphold the original decision or change the decision.

Challenges to existing organizations will be considered only in the context of the current request for submissions. This in no way hinders any organization or individual from filing a grievance concerning the contracted neighborhood organization in accordance with the grievance procedure outlined in Section VII, below. Such a grievance may be filed at any time during the year.

If a neighborhood organization is applying for recognition and first-time funding in a neighborhood that does not have an existing neighborhood organization, the NCR Director may waive portions of the eligibility criteria in Section II.A above to allow for funding of the new organization.

- CPP Plan Approval (Section IV): SCNA opposes the transfer of approval authority to the NCR Director and away from the NCEC. The NCEC is a 16- member commission that includes 8 members directly selected by Neighborhood Organizations, whereas the NCR Director is a city employee, not hired, appointed, or supervised by the NRP Policy Board or the Neighborhood Organizations. Further, there is no common sense logic to the role of the NCEC to hear appeals of funding matters on which original jurisdiction is proposed to shift from the NCEC to the NCR Director, or to the "new" NRP Policy Board to be re-established by the City in 2012. It follows that the NCEC, not the NCR Director, shall retain authority to waive portions of the eligibility criteria.
- Regarding the appeal path for any funding denial: I strongly urge assigning those appeals to the NRP Policy Board, NOT assigning them to the NCEC or to the City Council. It seems much more appropriate for the Policy Board to have direct interactions with the neighborhood/s involved. Obviously, NCR staff would be very involved in any such process, as well.
- Page 6-A. Evaluation/Recommendation
  - How often do neighborhood organizations need to submit a renewal?
  - How often are neighborhood organizations evaluated?
  - Is the neighborhood organization evaluated on their performance after the initial evaluation?

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- Does a neighborhood organization receive a warning if it looks like their performance does not warrant a renewal or are they just cut-off on the expiration date?

B. Contracting and Reporting

Following NCR approval of submissions, NCR staff will prepare appropriate contracts with each neighborhood organization based on the organization's submission. City standard form contracts consistent with these program guidelines will be used and the scope of services will delineate neighborhood organization responsibilities consistent with the approved program guidelines and their submission for funding. Contract timing may be based on either a calendar year or the organization's fiscal year, at the option of the funded organization. Contracts may be originated, extended or amended on an annual basis within each funding cycle (i.e., for the second and third years of the funding cycle).

Prior to a contract extension, NCR staff will confirm that the neighborhood organization has submitted an annual report and a budget for the upcoming year.

Upon approval of contracts, each neighborhood organization may opt to receive an advance on its allocation of up to $10,000, but not more than 25% of the approved submission (not including funds set aside for future implementation of Neighborhood Priority Plans). An organization may request a waiver for a larger advance in extraordinary circumstances. A request must be approved by the neighborhood organization board and submitted in writing to NCR and approved by the NCR Director.

Reimbursement requests for Community Participation Program related expenses may be submitted on an as-needed basis. Reimbursements are requested by submitting a standard Community Organization Report Form.

Annual reports to NCR will include a final accounting of use of Community Participation Program funds (using the standard Community Organization Report Form) and a narrative report of the neighborhood organization's Community Participation Program activities. The annual report should include an account of efforts the organization made to meet the standards and expectations outlined in Section II.B, above, and a report on the extent of the neighborhood organization's work on housing related activities. The neighborhood organization may additionally choose to submit a report documenting its experiences working with the City of Minneapolis.

NCR will make an annual summary report and assessment of Community Participation Program activities and outcomes, as well as make all neighborhood reports available, to the NCEC and the NRP Policy Board.

❖ I'm disappointed at the amount and complexity of the reporting and contracting requirements. Contracting is a confusing and cumbersome process for neighborhoods with little staff capacity. As I understand it, in addition to submitting CPP and possibly NPP plans and conducting all the work around those, neighborhoods will also have to submit annual reports on CPP and Implementation Agreements (which appear to be the same as "contracts" under NRP) in order to access funds.

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- Proposed solution: Clarify language to allow neighborhoods to enter into one implementation agreement for all activities of NPP and CPP, rather than individual agreements for each activity.
- City funds require accountability, but the levels of reporting and accounting proposed by the NCR are burdensome and bureaucratic. Whether with paid or volunteer staff, neighborhood organizations do the work of the neighborhood to build a better community, respond to the residents and businesses, and are more nimble than the City. The NCR guideline recommendations for reporting, applying, reviewing, adjusting, etc, etc, etc. will take away from the real work of the neighborhood. Simplify the reporting, budgeting and –neighborhoods want to respond to their neighbors, not the City.
- NPP Reporting (Section V): SCNA requests that the two reports to be generated annual by the NCR Department pursuant to this section shall be distributed to all recognized Minneapolis Neighborhood Organizations in a timely manner.
- In addition, the submission process, pre-determined outcome measures, and reporting requirements are excessive, particularly when considering the limited funds available to accomplish them.
- What is meant by "annual" contracting? If a neighborhood, or a community collaboration of several neighborhoods embarks on a 2-year project, how can that work?
- Section V (B) requires organizations to submit two annual reports, both of which would be extremely time-consuming to draft, and would in no way directly benefit the community. The city should not require this unless it allocates additional funds to cover the staff time that would be devoted to this paperwork.

V. NEIGHBORHOOD PRIORITY PLANS

A neighborhood organization may submit one or more Neighborhood Priority Plans to communicate neighborhood priorities to the City and other jurisdictional partners. There is no deadline for submission of Neighborhood Priority Plans.

A Neighborhood Priority Plan identifies preliminary neighborhood priorities (as identified by the neighborhood) and potential partners. It should focus on the problem to be addressed, not necessarily the solution to that problem. It can be as simple or as comprehensive as the neighborhood organization desires, covering a single issue, or several. A Neighborhood Priority Plan may also be submitted jointly by more than one neighborhood.

Neighborhood Priority Plans must be developed and adopted through a thorough neighborhood participation process. Plans approved by a neighborhood will be submitted to the NCR for review. NCR staff will then present the Plans to the NRP Policy Board for approval. The NRP Policy Board will then forward those plans to the City Council or other appropriate jurisdiction for action. Approval by the City Council or participating jurisdiction will provide authority to NCR and City Departments or jurisdictional staff, as appropriate, to work with the neighborhood to address the priority outlined by the neighborhood in its Neighborhood Priority Plan.

- Neighborhood Priority Plans – The ANA would like more definition of what "thorough neighborhood participation process" means for the requirement of developing a NPP. With the

limited amount of funding, we would like more specific guidelines about what the requirements are for engagement given the limited budget.

- Neighborhood Priority Plan: We appreciate that the program allows neighborhoods to fund programs; however the process requires neighborhoods to put additional time and resources toward creating a NPP without any guarantee of additional funding for these projects. In addition, the requirements for the NPP are not clearly defined in the guidelines.
- Concerns about the Neighborhood Priority Plans:
  - Requirements for the NPP are unclear.
  - Processes need to be streamlined so neighborhoods administration of the CPP and NPP are commensurate with the funding.
  - If a survey is recent and relevant (only 18 months old) can the results be used for NPP development?
  - How do neighborhoods create a CPP budget if a NPP has not yet been identified?
- CPP and NRP Action Plan Implementation (Section III): SCNA supports guidelines that permit Neighborhood Organizations to use CPP funds for implementation of Policy Board and City Council approved NRP Neighborhood Action Plans from Phase I or Phase II, especially for the CPP funds derived from uncontracted Phase II NRP funds captured and used to fund the City's program.
- The compulsory partnering with NCRD and other "jurisdictional partners" and the "Neighborhood Priority Plans" which require additional approvals from the policy board and City Council, point to a system of excessive control over the expenditure of Neighborhood Revitalization Program funds. In many cases, including NENA's, those funds have already been approved by the NRP Policy Board and City Council through NRP Neighborhood Action Plans. The insistence that funds be set aside for "Neighborhood Priority Plans" opens those funds to endless tinkering and potential re-purposing by any of the required approving bodies (NCR, NCEC, the appointed Policy Board, and City Council).
- I hope you will recognize the continuing efforts of neighborhood organizations to reach out to & effectively represent our communities and allow us to use community input we have already gathered to support our priority plans. Per this document it appears that NCR is purporting to establish communications among neighbors that already exist and is asking neighborhoods to duplicate work many of us have already done for NRP Plans to create the 3 year plans.
- A. What about work with MPRB, Schools or other governmental groups?

A. Implementation of Neighborhood Priority Plans

After the submission and approval of a Neighborhood Priority Plan, a neighborhood organization will work with NCR and jurisdictional staff, as appropriate, to develop implementation agreements.

Implementation agreements are agreements with the neighborhood organization or between the neighborhood and a jurisdiction detailing what needs to be done, when and by whom to achieve the results called for by one or more of the priorities in the Neighborhood Priority

Plans. Implementation Plans will be signed off on by all of the necessary partners and will contain task assignments, schedules, resource allocations (including a budget of any CPP funds or other funds dedicated to implementation of projects) and evaluation criteria.

Implementation Plans will be reviewed and approved by NCR for consistency with Neighborhood Priority Plans and compliance with any legal requirements.

A Neighborhood Priority Plan may result in a single Implementation Plan or one of several, depending on the complexity of the issue.

B. **Reporting**

NCR staff will prepare two reports annually to synthesize this work. The first report will summarize neighborhood priorities submitted through Neighborhood Priority Plans. This report will be used to inform the budgeting and priority-setting processes of the City and other jurisdictions. The second report will describe the outcomes achieved through, or the barriers faced in, implementation of the Neighborhood Priority Plans. This report will focus on how well the City and other jurisdictions are collaborating with neighborhoods.

- We would like to see a clarification of "may" submit an NPP plan. Is an NPP required?
- It is unacceptable to tell neighborhoods that they may fund NPP plans, but then not give them any extra funding to implement the plan.
- There is a significant amount of work that will go into generating an NPP. This is too much of an administrative burden on neighborhoods who receive little funding per the allocation formula. This extra work, for a plan that has no funding source attached, takes up a much higher percentage of their CPP funds and is not a financially sound use of their meager allotment.
- The CPP is written if NPPs are discretionary (*may, from time to time, submit,* and *may submit one or more Neighborhood Priority Plans).* This is not the case, and the language should be revised to reflect the mandatory nature of these plans.
- Neighborhood Priority Plans:
  - I am concerned that the process for receiving these dollars—a potentially long and arduous community engagement process—could be out of balance with the amount of money that might be available in this funding pool.
  - It seems like there are a lot of fingers touching, approving and implementing project proposals which appears complicated, messy and unclear. Perhaps the reading about the process makes it sound more complicated than it actually is?
  - Will the priorities remain stable or is this a moving target from year to year making it difficult to continue or grow neighborhood work?
- There needs to be a clearly defined purpose and process for why neighborhood organizations should be completing both Community Participation Plans and Neighborhood Priority Plans. The Community Participation Plans used for this last year, were generally easy to complete and should be where resources are focused over the next 18 months. Under the proposed guidelines it is

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almost impossible to understand what the purpose of Neighborhood Priority Plans is, how they relate to the Community Participation Plans, and how neighborhood organizations' limited resources will be spread between them.

- We would urge that the Neighborhood Priority Plans be removed altogether or at the very least minimized. Neighborhood Organizations are working with very limited resources and adding an extra layer of red tape, will only make it difficult for Neighborhood Organizations to be doing the work in their neighborhoods that is so important to Minneapolis.
- In the draft, it is stated that neighborhoods "may" submit a NPP plan and at meetings we have been told that we "must" submit a NPP plan. Please clarify.
- It makes sense that the purpose of the revised guidelines would be to incorporate the requirements attached to the use of the Neighborhood Revitalization Program funds into the CPP program, given the Council action which took the $10 million of NRP funds and redirected them to the Neighborhood and Community Relations Department. But the guidelines do not do that. They say only that submissions should describe how organizations will identify and act on neighborhood priorities, but the resulting "Neighborhood Priority Plans" are poorly defined, and bear little resemblance to NRP. The implementation of those plans, instead of addressing priorities, are described as agreements with jurisdictions, MOAs with City departments, inclusion of neighborhood priorities in city department plans, or CPP directed projects. This sounds more like the proposed "Neighborhood Investment Fund" and "Community Innovations Fund" that the city has chosen not to fund. It is completely inappropriate to fund those concepts using NRP money that has already been approved and allocated for neighborhood plans.
- **Neighborhood Priority Plans –** This is a NRP Statute Legislative Requirement. Unrealistic, for the little amount of money which CPP provides. The document should be asking about "**how will you engage community**" which was the original intent. We need to know what "housing related uses" will be when 70% of the 2012 and 2013 CPP funds need to be dedicated to housing. **They should just say – implement/develop NRP Phase II plans**. Period. There are still 13 hoods without plans and all but a handful of the 70 hoods still doing Phase II. If folks want to build in additional community engagement, great – but I would hope that NCEC would not suggest that implementing and valuing approved NRP Phase II plans would not be the focus.
- 7. The whole concept of Neighborhood Priority Plans is mushy, since it creates double the amount of work for us to create a PP when we are still working on the priorities we created in our Phase II NRP plans. Since there is no money to implement priority plans other that what we have already budgeted for in our CPP application, it now begins to appear like the triple the amount of work with no realizable gain.
- My major concern with the document has to do with the Neighborhood Priority Plan. I would really like to see the NPP and the expectations for that plan more clearly defined.
    - Throughout the document the language seems to indicate the NPP is optional. That was not the impression I got at the meeting I attended.

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- While I understand the desire to leave things somewhat flexible, I fear that it also leaves the decisions about the NPP (does it qualify, does it meet criteria, etc.?) up to personal interpretation that may change as staff changes.
- I think it should also be said directly, not just implied, that there is no special funding for any extra projects that are presented at NPP's. If we use CPP funds for the NPP (aren't acronyms fun!) then that reduces the amount available to us for the basic functions of the organization.

❖ I felt that the NPP submissions were characterized far too arbitrarily and are ill-defined -- they can be submitted from "time to time" and they can be of "any duration." There are no deadlines and they can be single-issue or composed of several. While meant to be flexible, I just don't entirely buy into the idea of such nebulous boundaries. The later inclusion of "unused funds" also struck me as a bit odd. We could either keep them, or they could be taken from our organization? Really that simple? But it's not simple at all.

VI. SUPPORT AND MONITORING OF CONTRACTING NEIGHBORHOOD ORGANIZATIONS

The NCR Department will monitor organizations' compliance with the contract and provide support in the following ways:

- Maintain regular communication with neighborhood organizations.
- Provide support and assistance to neighborhood organizations in preparing submissions and reports, on an as-needed basis.
- Provide technical assistance to contracting neighborhood organizations as necessary to help guide and support their efforts in carrying out their community participation activities.
- Provide technical assistance to residents, neighborhood organizations, City Departments and participating jurisdictions in the development and implementation of Neighborhood Priority Plans.
- Attend neighborhood meetings to answer questions about the Department, the NCEC, the NRP Policy Board or funding programs of the Department on an as-needed basis.
- Provide support with appropriate documents, templates and training, on an as-needed basis.
- Provide relevant news and information to neighborhood organizations regarding NCR neighborhood program development, and to share information about successful neighborhood organization activities and practices.
- Receive Community Organization Report Forms on a regular basis and approve the release of funds within the terms and conditions defined by the contract.
- Conduct annual performance reviews to determine:
  - Adherence to the terms and conditions defined by the contract; and
  - The organization's assessment of City performance.

❖ This program relies heavily on NCR staff to provide training to neighborhoods regarding the new program, templates for submissions, attend neighborhood meetings, and several staff-generated annual reporting requirements for each neighborhood. It is clear NCR does not have the staff to

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sufficiently provide this support. While in my experience, your current staff is top-notch and high performing, I do not believe it is realistic to promise this level of support to neighborhoods.

- No NRP Staff have been hired to go over to NCR yet, therefore contract management, plan modification, reimbursements more than likely will be delayed until Spring of 2013. There will be no seamless transition in my estimation.
- CIDNA is busy with implementing our Phase II plan. We do not feel confident that a plan is in place to handle our NRP contracts, etc. after the end of the year. What is the department's plan to handle all CPP, NPP and NRP workload for 71 neighborhoods?
- Five NCR staff members working with 71 neighborhoods.
- Proposed solution: Pare down the list in Section V and specify exactly what NCR staff is going to be capable of doing (ie what does it mean to "maintain regular communication with N.O.s" and "attend neighborhood meetings"?)
- Proposed solution: Reduce the amount of "reports" required for staff to prepare for each neighborhood on an annual basis.
- Proposed solution: Offer several trainings per year for staff and board members on the new program (including at the Community Connections conference)
- Proposed solution: Assign NCR specific staff to neighborhood organizations so that neighborhoods know who to contact with questions and to request they attend our meetings, provide templates, etc.
- It is very important that we continue to have access to group rates for Directors and Officers insurance and for audit services.
- It is unclear from the guidelines if NCR will be providing D & O Insurance , Liability Insurance and CPA /Accountant services for preparation of the 990 report.
- No Transition plan yet for the funding of Audits, D & O Insurance, or MTN partnerships. The City in their projected budget has increased cable rates and cut their contribution to MTN, thus no future for a MTN partnership to document neighborhood work at this time.
- Decide whether or not the NCR will provide at no charge to neighborhood organization Directors and Officers Insurance and annual audits of policies and procedures. Decide!

VII. GRIEVANCES AGAINST CONTRACTED NEIGHBORHOOD ORGANIZATIONS

A grievance against a neighborhood organization may be filed with the City if the following conditions are met:

- The grievance is within the jurisdiction of the City's community participation contract with the neighborhood organization;
- The grievance is regarding the process used by the neighborhood organization (but not about decisions or outcomes), or the grievance is regarding the management or use of Community Participation Program funds in a manner that is inconsistent with the program's standards and expectations (see Section II.B Standards and Expectations above);

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- The person filing the grievance is a member of, or eligible for membership in, the organization, or is otherwise directly affected by the actions of the organization;
- The person filing the grievance has formally brought the issue to the attention of the neighborhood organization in a timely manner and the grievance has been addressed through the neighborhood organization's grievance procedure, or if the neighborhood organization has failed to respond to the grievance in a timely manner as addressed in the neighborhood organization's bylaws (but not to exceed 120 days); and
- The person filing the grievance agrees to accept the decision of the NCEC as final.

A grievance must be submitted in writing to the NCR Department. Upon receipt of the grievance, NCR will undertake an investigation of the complaint and prepare a report of its findings for the NCR Director, and will report the grievance to the NCEC at its next meeting. The NCR Director will issue a formal response to the grievance within 45 days of its initial receipt. This response will include the findings of the investigation and a proposed resolution to the grievance.

If the person filing the grievance or the affected neighborhood organization is unsatisfied with the Director's findings or resolution, they may appeal the matter to the NCEC within thirty days of the official response. The NCEC will convene a grievance committee to review the grievance. The decision of this grievance committee will be final and will be reported to the full NCEC.

❖ Section VII lays out a grievance policy, but does not define the powers of the NCR Department, nor does it specify the remedies that the NCR Department could order. It is too ambiguous.

VIII. UNUSED FUNDS

Community Participation Program funds that are un-contracted within the previous or current funding cycle, or contracted funds that are unspent and not rolled-forward by neighborhood organizations (see Appendix A below), shall be retained by NCR to fund special requests from a neighborhood organization for distinctive projects that are above and beyond the scope of the organization's community participation contract, but still contribute to the organization's participation efforts. Unused funds also may be rolled-forward into the general pool of dollars to be available for future cycles of funding for the Community Participation Program. The NCR shall review and approve reallocation, special requests or roll-forward of unused funds to future funding cycles.

❖ If there is no deadline for NPP (Neighborhood Priority Plans) submissions, the section on unused funds (Section VIII) needs to be revised to more closely reflect a policy that allows for adequate planning of NPPs (like Neighborhood Revitalization Program (NRP) plans). As it is currently written, there is no deadline for NPPs, but if the neighborhood doesn't contract within a certain timeframe (this cycle or next), they potentially lose their allocation. I don't agree with the "contract it or lose it" approach, especially given the changes to make this program fit NRP statutes. It should follow the same, dedicated, promised funding of NRP if NPPs are envisioned, given the time it takes to prepare these plans. Proposed solution: Eliminate the "contract it or lose it" section under *unused funds* and make it match current/NRP process.

- CPP Unused Funds (Section VIII): SCNA requests that in order to provide due process to recognized Minneapolis Neighborhood Organizations, that provisions for notice and some form of appeal process be developed and implemented, for the process for retention of Unused CPP Funds by the NCR. SCNA requests that notice and appeal provisions be incorporated into the final CPP guidelines.
- VIII. Please ensure that policies around the ability to roll over funds do not penalize organizations like SNO that have committed to having an all volunteer organization in order to channel all funds directly into improving the neighborhood. This decision means that we do not spend funds as quickly as other organizations, but we do get a lot of bang for our buck.

  Due to the fact that the guidelines for different years of funding allow for differing uses of the funds, it seems wise to me that SNO would want to reserve some of the year one allocation to, for example, purchase food in future years. Please help us take advantage of the various guidelines and make best use of the money allocated to us. Rollover guidelines should accommodate these considerations.

IX. ADMINISTRATION

Administration of the program will be the responsibility of the NCR Department of the City of Minneapolis. The NCR Director will report annually to the NCEC and the NRP Policy Board about the activities of the Program. The NCEC shall review changes to the guidelines and make recommendations to the NRP Policy Board and City Council.

APPENDIX A: DETERMINING FUNDING LEVELS

A. Funding Cycles

Allocations will be based on a three-year funding cycle.

- The allocation formula will be revised for each three-year cycle, using the most complete and current data available.
- Final allocations based on the three-year funding cycle will be approved by the NCR Director.
- Neighborhood organizations may submit a proposal for funding for the three-year period as described in Section IV of the Community Participation Program guidelines.
- Contracts will be initiated or extended on an annual basis within any three-year period. Balances on contracts may be rolled over to subsequent years within a three-year funding cycle, subject to review of performance by NCR staff.
- Unused funds may be accrued past the three-year funding cycles if the contracting neighborhood organization provides a plan for use of accrued funds.

- How can NCR staff suggest to neighborhoods that they should be planning on a 3-year funding cycle for the active period of these Guidelines (which will not be effective until sometime in 2012), when no funding source is available after the frozen NRP dollars are allocated in 2012 and 2013?
- A1. Are all the funds being distributed to the neighborhoods to implement their priorities? This is good, but a grand departure from the last guidelines. I've been working with neighborhoods and

the city since 1999. In my experience 3 year turn around is to fast. 10 year plans make more sense. Examples: SNO has been actively working with the city and park board on developing a park since 2005. In 2012, I expect we will be about half way to completion. Also, the only reason it didn't take SNO 7-10 years to get our street lights (like Logan) is because we just paid for the whole thing with NRP money.

B. Allocation Formula

Eligible neighborhood organizations will be allocated community participation funds according to the following formula.

- With the current funding formula, neighborhoods in SW Mpls do not have extra funds to apply to an NPP. In Kenny, nearly half of our funds are spent on the newsletter. The remainder is spent on a minimal amount of staff time, operating expenses and the summer festival. One alternative would be to have a neighborhood allocation threshold at which an NPP would be required.
- Lastly, Kenny Neighborhood Association would like NCR to consider a shift in its philosophy with regards to the funding allocation and support. We suggest that you reward neighborhoods for their hard work and livability rather than punishing them for their efforts that result in stability. This is not to say that neighborhoods in need be punished for their instability, but rather that recognizing the neighborhoods doing well have worked hard to achieve their level of stability but still have other needs that never get a chance to be addressed due to low levels of funding. We want to ensure that our neighborhood does not suffer a drop in livability due to relatively meager funding amounts.
- **The Proposed Allocation Formula needs to be reworked**. Missing from the allocation formula is a weighting category that recognizes the predicaments of neighborhoods whose NRP funds were seized by the City following the Council/Mayor's sudden December 2010 *freeze* action. These neighborhoods should receive proportionally more NRP funding than neighborhoods *with similar demographic characteristics* that did NOT lose substantial funding in the December 2010 *freeze*.
- Stop adjusting the funding formula. If neighborhoods need to submit budgets for the funds, there has to be a dollar amount that they can count on.
- NCR staff have indicated that they expect the funding formula to change. If that is the case, neighborhoods should have an opportunity to comment on the formula NCR plans to use, not something with unknown changes coming. Of all things, neighborhoods should at least know what funding level to expect by now. The uncertainty of not knowing is demoralizing and makes budgeting and planning speculative at best.
- **Could have a set-aside pot for Extra Needs –** diversity, crime, foreclosure that folks could apply to for additional funds on top of an annual base fund.
- Appendix A contained many problems. First, it does not say whether neighborhoods will get more or less money for having more non-homesteaded housing units, less racial/cultural diversity, etc. Second, funding is allocated on a three-year cycle, but the U.S. Census is only taken once every ten years. Unless the city holds its own census every three years, funding will be static for every 10-year period. Third, it the criteria imply that neighborhoods should be taking on a great role in

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handling complex problems (like the education of ELL children or the number of low-income residents), without allocating any additional funds for neighborhoods to take on these issues. The neighborhood organizations supplement city- and state-wide programs, but should not duplicate or replace them.

Neighborhood Size (30%)

Population – 20% of a neighborhood's total allocation will be based on the population of the neighborhood. The total number of people residing within all neighborhoods will be divided into the funds allotted to this variable to determine a per capita allocation. The population of each neighborhood will be multiplied by the per capita allocation. **Source: U.S. Census Bureau**

Housing Units – 10% of a neighborhood's total allocation will be based on the number of housing units in the neighborhood. The total number of housing units within all neighborhoods will be divided into the funds allotted to this variable to determine the per unit allocation. This per unit allocation will be multiplied by the number of housing units within a neighborhood. **Source: Minneapolis Assessor's Office**

- **Formula should have points for household units,** our job is to get to the door, talk to each household in the neighborhood – engage community house x house – they then pass it on to folks within their house**.**
- I would like to see the stats used updated as often as possible. The number of housing units in our neighborhood will likely rise by over 200 units in the next year. At what point do those get counted into the formula? Is there a way we could request a reevaluation based on new information?

Under-represented Groups (40%)

Non-Homesteaded Housing Units – 10% of a neighborhood's total allocation will be based on the number of non-homesteaded housing units in the neighborhood divided by the total number of housing units in the neighborhood (the "non-homesteaded housing ratio"). The total number of the non-homesteaded housing ratios within all neighborhoods will be divided into the funds allotted to this variable to determine the per non-homesteaded housing ratio allocation. This per non-homesteaded housing ratio allocation will be multiplied by the non-homesteaded housing ratio for each neighborhood. **Source: Minneapolis Assessor's Office**

Index of Racial/Cultural Diversity – 20% of a neighborhood's total allocation will be based on an index of the racial and cultural diversity within the neighborhood. The Shannon Diversity Index is a statistical formula commonly used in population and biology studies to weigh the relative diversity of a community. The source data is the U.S. Census classes for race (White, Black, American Indian, Asian/Native/Hawaiian and Other, Some other race alone, and two or more races). A neighborhood with equal numbers of individuals from each class would have a higher score than a neighborhood with a large number of individuals from a single class. **Source: U.S. Census Bureau**

English as a Second Language (ESL) Students – 10% of a neighborhood's total allocation will be based on the number of Minneapolis Public School students in the neighborhood for whom a language other than English is the primary language spoken in their home. The total number of

ESL students within all neighborhoods will be divided into the funds allotted to this variable to determine the per ESL student allocation. This per unit allocation will be multiplied by the number of ESL students that live within a neighborhood. **Source: Minneapolis Public Schools**

ESL data will be replaced by the "non-English language spoken at home" data from the American Community Survey once that data becomes available.

Note: under review by NCR Staff

- The use of Minneapolis Public Schools data is an invalid measurement tool for the number of ESL students within a neighborhood. It is a fact that most of the ESL students in the Victory Neighborhood do not attend the Minneapolis Public Schools - they attend either Hopkins, Robbinsdale or a charter schools. In fact there is a Hmong charter school in our neighborhood - Noble Academy.
- The proposed Allocation Formula also includes a category: *English as a Second Language (ESL) Students,* based on the number of *Minneapolis Public Schools'* student-residents in the neighborhood, whose home environment is not primarily English-speaking. Since many "ESL" students residing in Mpls are NOT enrolled in the MPS, and many who attend MPS are not enrolled in the closest school, this is a questionable factor and may not be a valid measure of a neighborhood's level of need.
- No charter schools, alternative schools, private schools, or suburban schools included in this scoring. Many, many folks send their kids outside of Minneapolis or to charter schools. Bloomington, Richfield, Edina all have high levels of Minneapolis students enrolled.– **ESL** only for Mpls. Public School system. **Formula is flawed.**
- **Non-English Speaking** points – Loring is not eligible for points for our Russian speaking population
- I am still unsatisfied on the data which is used to compute the number of people in our neighborhood who are "English as a second language" students, since at least half if not more of our students attend suburban schools through the choice is yours program and so are not counted in the formula.

Income (10%)

Low-Income Residents – 10% of a neighborhood's total allocation will be based on the number of persons in a neighborhood with family incomes less than two-times the poverty rate divided by the population of the neighborhood (the "income ratio"). The total of the income ratios for all neighborhoods will be divided into the funds allocated to this variable to determine the per income ratio allocation. This per income ratio allocation will be multiplied by the income ratio for each neighborhood. **Source: U.S. Census Bureau**

Note: under review by NCR Staff

Neighborhood Livability (20%)

Crime Statistics – 10% of a neighborhood's total allocation will be based on the average number of Part 1 crimes that were committed in the neighborhood over the most current

three-year period. These crimes include homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft and arson. The total average number of these Part 1 crimes committed within all neighborhoods will be divided into the funds allotted to this variable to determine the per crime allocation. This per crime allocation will be multiplied by the average number of these crimes committed within a neighborhood over the most current three-year period. **Source: Minneapolis Police Department**

- **Criteria for Part I Crime –** Loring works to address Part II/Livability crime to deter those crimes rising to a Part I level. Downtown Court Watch, Restorative Justice, Heading Home Hennepin, Downtown Congregations to end Homelessness, Project Homeless Connect, St. Stephens Street Outreach are all tools we created. They benefit the City. It addresses Part I crime, we have no escalation to Part II – **We get no points.**

Foreclosures – 10% of a neighborhood's total allocation will be based on the average number of foreclosed properties in the neighborhood over the most current three-year period divided by the total number of structures in that neighborhood (the "foreclosure ratio"). The total of the foreclosure ratios within all neighborhoods will be divided into the funds allotted to this variable to determine the per foreclosure ratio allocation. This per foreclosure ratio allocation will be multiplied by the foreclosure ratio for each neighborhood. **Source: City of Minneapolis Healthy Housing Indicators**

- Instead, the proportion of neighborhood households/residents with poverty-level incomes; the condition of the neighborhood's housing, including foreclosure rates; along with the crime rates within the neighborhood should be much more heavily weighted. These would be fairer and more reliable indicators of needs for NRP investments. Hopefully, the City has access to recent Census Bureau information that can help to differentiate among neighborhoods in terms of financial needs and population demographics.
- The allocation formula doesn't appear to take into account the fact the while we have had foreclosures, and our population had shrunk by at least one third or more, we are still sitting with a huge number of vacant and board houses, which detract from the neighborhood, reduce market values, and provide a disincentive for people to move into the neighborhood.

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OTHER COMMENTS

New NRP Policy Board:

- Representation of neighborhood elected officials must be part of the new Policy Board.
- We feel strongly that the new NRP Policy Board should have neighborhood- elected representatives serving on the board.
- CPP and NPP Administration (Section IX): SCNA requests that the City Council and Mayor negotiate an agreement with the "new" NRP Policy Board, to be re- established in 2012 for the NRP Policy Board to enter into an agreement for the residents-based city commission (NCEC), which has representatives directly selected by Neighborhood Organizations, to fulfill the Policy Board's purposes, as permitted under Minnesota Statutes, section 469.1831, Subd. 6 (e) (5).
- It is critically important that some portion of the NRP Policy Board (50%) be elected by neighborhoods and not appointed. Neighborhoods will be best represented by those elected to represent them, rather than even community members who are appointed.
- Composition of the reconstituted NRP Policy Board should have the four community members be selected from the elected members of NCEC board. The NRP board is already top heavy with appointed members and selecting additional appointed members would leave extremely limited input from neighborhoods.

Process:

- LNA is concerned that if the proposed guidelines are adopted in their current form they will create confusion and a significant amount of extra work for neighborhood organizations as the Neighborhood and Community Relations Department (NCR) tries to administer a set of guidelines intended for one purpose – community engagement, living under another program's rules - NRP.
- The new program should not blindly adopt existing NRP Policies that were designed to govern NRP Phase I and NRP Phase II, those were different programs designed for different times.
- While LNA would like to see improved relationships, including formal partnerships, between neighborhood organizations and City departments, the layering of signed agreements as a part of Neighborhood Priority Plans seems like a unnecessary addition of bureaucratic morass that is likely to add a significant amount of time and hassle to the process. LNA would encourage the NCEC and NCR to look for other ways to encourage these partnerships.
- In regard to the draft guidelines and overall experience with CPP funding in 2011, the ANA would first like to state appreciation for:
    - the simplicity of the application process
    - quick reimbursement for expenses
    - the allowance of a food budget
    - flexibility and ease of reallocating budget allotments
- Administrative requirements: The program needs to be streamlined for greater efficiencies of neighborhood staff and volunteer time as well as administration at NCR. The guidelines are overly

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bureaucratic and not in proportion to the amount of funding our neighborhood expects to receive from the program.

- The Guidelines processes need to be streamlined. The amounts of funding will be minimal for many neighborhoods.
- NCR, NCEC and CPP are supposed to replace NRP. NRP inspired and empowered neighborhoods to create priority plans and implement them. So far, NCR, NCEC and the CPP burden neighborhoods with onerous processes and meetings to develop a structure to do the same thing as NRP was already doing well. In fact, it seems that the only problem NRP really had was an appropriate revenue stream. This problem has not been addressed by NRC at all. NCR is just being paid for by NRP dollars taken from neighborhood priority plans. Who thought this made sense?
- The document is vague on exact procedures, timelines and consequences.
- Extent of involvement and outreach required given the difficulty the neighborhood group has trying to engage residents.

Funding

- Are the NPP monies available to all neighborhoods or only to those that have not used all of their Phase II monies?
- We think that is critical in these times that the City of Minneapolis live up to its commitment to fund neighborhood organizations on an ongoing basis. Neighborhood organizations play a critical role in bringing all of Minneapolis' community members together to help make Minneapolis a great city to work, live, and play in. The funds taken from neighborhood organizations should not be used to pay for City staff.
- With the current funding formula, neighborhoods such as Armatage do not have extra funds to dedicate to developing and implementing a NPP. Please know that it would be difficult if not impossible to engage residents in creating an Armatage NPP without any funding to put behind it.
- The NRP funds available to neighborhoods in 2012 & 2013 are a total of approximately $7.5 to $8M; or $3.75 to $4M in each of those 2 years. No funding source to maintain this program beyond 2013 has been identified. This fact should be stated in the Guidelines, since it gives some sense of proportion and longevity to the activities in which neighborhoods are expected to engage. Minneapolis has more than 70 recognized/designated NRP neighborhood groups. The math demonstrates that the available funds are limited. Moreover, the levels of need in neighborhoods vary greatly within the City as a whole. This leads to a discussion of the **proposed Allocation Formula** in the Appendix of the proposed Revised CPP Guidelines.

Use of NRP Funds:

- We would also like to take the time to register our strong disapproval with the action taken by the Mayor and City Council last December to take $10 million of neighborhood funding from some neighborhoods and reprogram it to fund this program and staffing for the NCR Department for the next two years. This is a direct violation of the commitment the Mayor and City Council made to neighborhood organizations when they adopted the Framework for the Future and has helped to

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create a high level of distrust that is preventing neighborhood organizations from partnering effectively with the City and working to create a better Minneapolis.

- Our committee would like to express our disapproval of the City's decision to take $10 million from neighborhood NRP dollars to fund NCR and the CPP program for the next two years. Neighborhood organizations' trust level with the City was greatly damaged by this action. CIDNA lost $89,000 in Phase II NRP funds, while our CPP allocation for 2011 is $16,000.
- At its outset, this Guidelines document should acknowledge the funding source for the 2012/2013 CPP "grant program": the Phase 2 NRP Funds frozen in December 2010 by City Council/Mayor actions in the context of adopting the City's 2011 budget. These NRP funds have been taken from Mpls neighborhoods that had expected to be able to use these funds to implement their neighborhoods' Phase 2 NRP Action Plans.
- NRP funds are subject to the requirements/restrictions in the Minnesota State NRP statute. The Guidelines document also should clarify which of the proposed revisions relates specifically to that Statute.
- NPP and Resource Allocation/Mitigation of Frozen Phase II Funds (Section V): SCNA requests that the City, through the NCR Department and the NCEC, develop a plan to mitigate financial impacts from the "frozen Phase II NRP funds" and implement the "Equity Directive" through capital improvement program funds or other municipal resources, over and above CPP funds.
- I also thought that NCEC should say no to stealing the Phase II funds and demand from the City that they find another source of funding neighborhoods vs. taking already allocated funds approved by NRP Policy Board, City Council Community Development, Ways & Means Committee and ultimately City Council.
- Since the NRP funds are supporting the CPP in 2012 and 2013 it would appear that all the money we lost from the NRP phase II allocation is being funneled to other more prosperous neighborhoods in the city.
- Community Participation Program (CPP) Plan Approval (Section III): SCNA objects to the City proposed guidelines to bring both NRP-derived and non NRP- derived CPP funds under the NRP Policy Board and NRP Statutes. Consolidated Tax Increment Financing funds from the Transformation Districts were subject to use for neighborhood revitalization purposes, but should not be subject to the more restrictive provisions as those governing NRP program funds.
- They will never pay us back from the stolen Phase II NRP Funds.

Other:

- Frankly, I get so tired of being expected to understand the differences in the programs and the various acronyms and trying to understand how NRP and NCEC fit (or don't fit) together, that I don't think I have much of any useful information to add. If you feel like providing me with a thumbnail sketch of why Minneapolis people should care what goes on with NRP if the city has switched to the NCEC program, I'll read it and think about it. Otherwise, it seems to me like 2 city agencies competing for funds and just not all that relevant to what I do here in my neighborhood. I'm just happy to have a city program that recognizes the value of neighborhood people being involved in their neighborhood!

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- It is very difficult/virtually impossible to envision how all this will work when the future composition of these various bodies (NRP Policy Board; NCEC) is unknown at this time.
- It is important for these Guidelines to acknowledge that Mpls' NRP neighborhoods have been engaged in "organizing, planning, partnering, and implementing" activities for the past 10-15 years, or longer. The proposed new requirements seem unnecessarily bureaucratic, and border on being "makework". Most Neighborhoods whose Phase 2 NRP funds were "frozen" and then "taken" via the City's December 2010 action already had/have clear plans in place that they now are prevented from implementing because the City took their funding. It is unreasonable to expect those neighborhoods to engage in a new, elaborate planning process. At this point, those neighborhoods need funds to carry out at least some of their already-approved priorities and plans.
- In general, these Guidelines imply that Mpls Neighborhood Groups are all starting "from scratch"! This is not only NOT the case, but this sort of unfortunate and instructive approach basically demeans the NRP work that has been ongoing in Mpls neighborhoods since the 1990's!!
- Neighborhood organizations are autonomous non-profits. The NCR guidelines are written in a manner that assumes NCR/City Dept direction over neighborhood activities. And presumes and establishes the neighborhood organization is a localized branch of the city and **only** doing City work. The NRP model of oversight and management was of a benevolent monitor. The NRP model was more trusting, encouraging and productive. The NCR Guidelines seem more restrictive.
- The CPP guidelines need to be re-thought and re-written. Since funding isn't scheduled to start until July 2012, there is plenty of time to revise them based on neighborhood input (the organizations most impacted by them). Barring that, it will be difficult for the City to justify the requirements unless it acts to impose the same on all private, public and nonprofit organizations receiving City funding.
- Is any other class of organization or business that receives funding from the city subject to the same level of scrutiny and expectations? If not, why are neighborhood organizations singled out? Where is the evidence that neighborhood organizations have underperformed in getting people involved, or that their programs have failed to address the needs of a wide range of people?
- The guidelines treat independent non-profit neighborhood organizations as quasi-governmental groups whose primary job is to report to the City instead of the neighborhoods they serve.
- Further evidence of the move toward quasi-governmental status is *Results Minneapolis,* which states that neighborhood organizations will have to report to the City on all income they receive. How is it the City's business to scrutinize revenue that is independent of the City's funding to neighborhoods? This is an unprecedented intrusion into the operations of independent nonprofits.
- The Guidelines should differentiate among neighborhoods that are in different stages along the NRP continuum. Any neighborhood that has NOT yet completed its Phase 2 NRP Action Plan will need help from available City staff to accomplish that work. Dealing with unfinished Phase 2 NRP Plans and priorities will pose major challenges to the affected neighborhoods, to the new City staff hired to assist them, and to the "new" NRP Policy Board that the City plans to establish in 2012.
- Execution seems to be missing in the guidelines.

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- Somehow, these Guidelines should encourage neighborhoods to band together to work collaboratively on community improvement/investment projects. Communications networks have changed radically since the early/mid 1990's when NRP began; more affluent neighborhoods should be encouraged to consider partnering with less affluent neighborhoods to accomplish needed improvements that will benefit the City as a whole.
- **52.5% is inaccurate** – Neighborhoods did not meet the 52.5% threshold, to ensure that it is met through the overall life of NRP, we need to ensure that 70% is dedicated to housing to ensure that at the end of the program we reach the 52.5%. The next 2 years of funding is the "stolen NRP Funds" that were allocated to neighborhoods and now they are being re-allocated. CLPC is losing over $200,000 and getting only $86,000 back in the next 2 years of CPP funds.
- Eliminating the 52% cap on housing seems to defeat the legislative purpose that NRP funds be used to improve the housing stock in Minneapolis.
- Future for neighborhoods?
  - There is no money yet dedicated from the City's to neighborhoods post 2014.
  - Doubtful that additional TIF Districts would be re-certified in 2014, since Property Tax relief will still be an issue in 2014.
  - No general support money dedicated to the City for 2012 and 2013 - $2 million of the stolen $10 million will be dedicated to staff support of the NCEC Dept. No other funds have yet been articulated.
  - The new "Transformation Districts" developed legislatively 2 years ago to save neighborhoods by re-certifying pre-1979 TIF Districts went by Council Action from re-certifying 100% of them to re-certifying only 50% of them. Then, by Council Action, 50% of these funds went to Target Debt and 50% was supposed to go to Neighorhoods. But, end of year 2010, these funds were directed to property tax relief, NRP Phase II funds froze,n and now these frozen NRP Phase II funds are the funds being re-allocated per the 2012 Community Participation Plan proposed Formula.
- The document should contain a glossary to identify the meaning of all of the acronyms, documents, committees, programs, etc.

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