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## Memo

**To:** David Rubedor, Director  
**From:** Robert Thompson  
**re:** Use of Community Feedback in Development of Community Participation  
Program Guidelines  
**Date:** November 1, 2010

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### **Background**

On January 22, 2010, The Minneapolis Neighborhood and Community Engagement Commission established a Committee of the Whole charged with developing the new Community Participation Program (CPP) for providing funding to Minneapolis neighborhood organizations, and two additional funding programs to follow after development of the CPP. The Committee of the Whole began its work on February, 17, 2010, and met on 15 additional occasions.

During May, June, and July 2010, Commissioners and staff from the Neighborhood and Community Relations (NCR) Department met with more than 60 neighborhood organizations throughout Minneapolis to gather input prior to developing a draft set of guidelines for the CPP. The draft guidelines were sent to neighborhood organizations for a 45 day review and comment period starting on August 27, 2010.

NCR staff relied on several sources in revising the draft guidelines. Those sources included guidance and direction from the NCEC during committee of the whole meetings as well as regular meetings of the NCEC; original source documents including the Framework for the Future; input from neighborhoods gathered during the May to July meetings; and comments received during the 45-day review and comment period.

### **Principles and purposes of the Community Participation Program**

Feedback on the principles and purposes of the CPP ranged from broad support of the program purposes to suggestions that the purposes be limited to providing administrative funding only. Much of this feedback included suggestions to eliminate some or all of the three major purposes of the program: (1) impacting city decisions and priorities; (2) identifying and acting on neighborhood priorities; and (3) increasing involvement.

Some feedback stated conditional support contingent on neighborhood organizations being allowed to use funds for a broad variety of activities.

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The Committee of the Whole in selecting the three purposes indicated a preference for allowing neighborhoods a broad range of activities related to community engagement, rather than just limiting to administrative funding. Initial input from neighborhood organizations during meetings in May, June and July of this year also indicated a strong preference by organizations for allowing a wider range of activities rather than a narrow range.

The guidelines intend allowing neighborhood organizations broader latitude in community engagement activities. Revisions were made in several sections of the draft Guidelines to clarify this intent.

### **Requirements of the CPP**

A lot of feedback expressed concerns about perceived requirements of the CPP. These concerns centered around requirements for submissions, organizational activities, and reporting. For example some comments expressed concern about requirements for monthly reporting, or required submissions within 60 days (although the guidelines have no such requirements). Other comments expressed concern that there were no enumerated evaluation criteria for reporting or on “judging” neighborhood performance. Some comments expressed concern that the guidelines required additional planning by neighborhood organizations (there are no such requirements).

The Committee of the Whole and input from neighborhood organizations during May, June and July made it clear that the CPP should not overburden neighborhoods, but at the same time should provide for a certain level of accountability. Requirements of the guidelines include demonstration of eligibility (see below), submissions, and reporting.

However, the structure and amount of content was likely confusing and misleading. For example, the initial structure of the document started with a statement of the City of Minneapolis’ adopted core principles of engagement, then discussed eligibility, a description of core services for participation, a description of the purposes of the program, a description of eligible expenses, and more. This cumbersome structure likely lead to confusion about the purposes and expectations of the program.

As a result of comments received during the 45-day review and comment period, the guidelines were re-structured, moving some sections to appendixes, and focusing more on what organizations needed to know in order to apply and fulfill expectations.

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### Language and Tone

Many comments in the feedback addressed concerns about language and tone in the document. Some general areas addressed by comments:

- **Requests or suggestions for clarification.** Many of these suggestions were followed up in revisions to the document. An entire section was added to help clarify the contracting and reporting process.
- **Concerns about bureaucratic feeling of document.** Some of these concerns may be addressed by restructuring and reformatting the document to make it more accessible. After content is approved by the City Council, the Guidelines will be reformatted in a handbook layout (with table of contents, each section starting on a new page, appendixes, and text-boxes and sidebars with additional information to provide guidance, contact information, etc.).
- **Confusion about purposes or requirements of program.** As noted above, a confusing structure may have contributed in part to misunderstanding about the purposes, expectations, and requirements of the program. Language and tone of the content were also identified in comments received. NCR staff worked closely with the NCEC to revise language to simplify the document and clarify intent.
- **Objectionable language.** Some comments objected to the use of some terms, such as references to “ethics,” or “self-interest.” Such references were eliminated or revised.

### Eligibility

There were many questions by Commissioners and comments received about eligibility requirements. Major concerns were that eligibility requirements might disqualify some currently recognized neighborhood organizations on the one hand, or would too broadly open the door to other organizations. Commissioners were particularly concerned that the guidelines should be clearly focused on neighborhood organizations recognized under the Minneapolis Neighborhood Revitalization Program or the City’s existing Citizen Participation Guidelines.

In response to these concerns, the eligibility section was refined with changes to language, as well as relocating some of the eligibility requirements to the new “Standards and Expectations” section. Additionally, the guidelines were clarified to state that invitations for proposals in the first year would be sent to those organizations currently recognized as contracting neighborhood organizations for the Minneapolis NRP or the City of Minneapolis’ Citizen

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Participation Program, and in following funding cycles to neighborhood organizations already contracting with NCR.

### **Community Participation Services**

As noted above, the structure and language lead to some confusion about expectations of neighborhood organizations. As part of the restructuring, this section was re-titled as “Standards and Expectations.” Commissioners strongly favored this new title, but expressed concern that some neighborhood organizations would have a difficult time meeting some or most of these expectations, either in the short-term or on an ongoing basis. In response, language was inserted to encourage contracting neighborhood organizations to make “good faith efforts” to meet the standards and expectations.

The three key activity areas of (1) impacting city decisions and priorities; (2) identifying and acting on neighborhood priorities, and (3) increasing involvement were moved to the beginning of the document to more clearly establish these as the guiding purposes of the CPP. In response to concerns raised during the 45-day review and comment period that the guidelines seemed to give precedence to city priorities, the Commission recommended re-ordering these three activities to start with “identifying and acting on neighborhood priorities.”

### **Funding Activities and Eligible Expenses**

There were two major concerns raised under the “Funding Activities” section. First, some neighborhood organizations and Commissioners were concerned that the guidelines seemed to prohibit donations to or membership fees with other organizations (such as business association dues or collaborations on community events). In response to these concerns, this condition was relocated and restated positively as an eligible expense under certain conditions. It should be noted that some donations may still be ineligible (contributions to religious institutions or political organizations, for instance).

The second concern regarded the use of CPP funds “for small equipment purchases,” and the concern that the language implied that the City owned equipment purchased by the organization, and equipment should be returned to the City at the end of each contract period. This language was revised to clarify the intent that equipment purchased by the organization should be returned to the City in the event of dissolution or insolvency of the neighborhood organization. The intent is to preserve community assets (including both equipment and organizational records) for future use by the community.

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Some objections were raised about allowing stipends to Board members for specific activities (such as bookkeeping, etc.). This item was removed as an explicitly allowed expense.

A new subsection was added to consolidate conditions regarding staff expenses. A question was raised whether the guidelines were requiring neighborhood organizations to provide health insurance for staff. The guidelines do not require that neighborhood organizations provide health insurance, but do require that neighborhood organizations budget appropriately to cover any employee benefits agreed to.

### **Special Projects**

Many comments were received questioning the intention or purpose of the “Special Projects” section of the guidelines. It was also noted that the use of the term conflicted with the prohibition of “special projects” as an ineligible expense earlier in the document. The section was re-titled to “Unused Funds” and the language clarified to indicate the process for reallocating CPP funds that were unused or un-contracted by a neighborhood organization. Language was added to identify the NCEC as approving reallocation, special requests, and roll-forward of unused CPP funds. This section was also moved towards the end of the document.

### **Requests for Submissions**

Many comments from Commissioners and comments received during the 45-day review and comment period suggested options for clarifying and improving this section. Questions were raised about the process and authority for approving submissions from neighborhoods, and appealing decisions to deny funding. In response, the language was clarified to indicate that NCR staff review and evaluate submissions, with NCEC having authority to approve funding. Language was also added to clarify that appeals will be heard by the NCEC, with denials of funding being forwarded to the City Council for final action.

Questions were also raised about the stipulation allowing the NCR Director to approve waivers to the guidelines for first-time submissions. The guidelines now state that the NCR Director may recommend such waivers for first time requests, but waivers are approved by the NCEC.

Neighborhood organizations also had questions during the 45-day review period about the requirements for reporting on use of funds. In response a new subsection was added to the guidelines regarding for contracting and reporting.

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**Determining Funding Levels**

Comments indicated that at least some neighborhood organizations perceived the allocation formula as a requirement that neighborhood organizations allocate a specific amount of funds for specific purposes (e.g. a neighborhood organization should dedicate 40% of its work to outreach to under-represented groups). This may in part be due to the structural issues identified earlier. In response, this section was moved to an appendix. Some data sets used for particular variables have been updated in accordance with discussions by the NCEC during committee of the whole meetings.

**Ethical Considerations**

Some objections were raised during the 45-day review and comment period that the title and language of this section was offensive. The section was “demoted” to stand as an introductory paragraph under the new Standards and Expectations section, and the words “and ethical” removed from the first sentence. The NCEC recommended that a statement about ethics be included as a bullet point under Standards and Expectations.

**Support and Monitoring of Neighborhood Organizations**

Questions from Commissioners and comments received during the 45-day review and comment period raised concerns that the “support” by NCR identified in the guidelines was insufficient. In response to these concerns, the “Monitoring and Support” section was expanded to identify other areas of support that could be provided through these guidelines to contracting neighborhood organizations.

In response to comments about the grievance procedures, this section was “promoted” to a stand alone section in the guidelines. The language was clarified to more clearly identify who could file a grievance and under what conditions. Additionally, the new section clarifies the roles and authority of the NCR Director and the NCEC.

Some concerns were raised about provisions of Directors and Officers insurance and other support, or about the process for filing grievances against NCR staff or the NCEC itself. However, the intent of this document is to manage a specific funding program of the NCEC and the NCR. The intent of the document is not (and should not be) to identify or manage other services, programs, or practices of the NCR or the City of Minneapolis. Those services and programs are managed through other governing documents and agreements (such as the NCR Business Plan and the Consolidation Plan, or City labor agreements, etc.).

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