November 21, 2011

To: NCR and City Council Members

From: Shirley Yeoman, Neighborhood Coordinator

SENA – Standish-Ericsson Neighborhood Association

Re: Comments on Proposed 2012-2013 CPP Guidelines, draft dated 10/6/11

Because of the timeline of our meetings (our Annual Meeting was held in October, so there was no regular Board meeting that month) and the way they related to the release of the draft, the SENA Board did not have time to review and discuss the document as a group. This kind of discussion would have been necessary to produce an "official" statement from the organization.

Instead, we have collected comments from staff and board members who wished to submit them and will submit those comments in whole.

Comments from Shirley Yeoman, Neighborhood Coordinator:

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.
- 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.

### Additional comments:

- 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.
  - 2. 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?

#### p. 5 - C. Staff

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 gualifies for independent contractor status

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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".

p. 11 - Allocation Formula
 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?

# Comments from Susan Fall, SENA Board member:

- 1. The document should contain a glossary to identify the meaning of all of the acronyms, documents, committees, programs, etc.
- 2. 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?
- 3. 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.
- 4. Page 2-B-First Paragraph
  - Define "CPP submissions for organizing, planning and partnering". How is it different from the "Neighborhood Priorities Plan"?
- 5. 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.
- 6. 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......
- 7. 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.
- 8. 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?
- 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?

The document is vague on exact procedures, timelines and consequences.

# Comments from Chris Lautenschlager, SENA Board member:

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.

# Comments from Amy Lawler, SENA Board member:

- 1) 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 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.
- 2) 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.
- 3) 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.