

# The Center for Civic Innovation and the NPU Initiative: a blueprint for civil society-driven analysis of civic and democratic engagement initiatives developed in Atlanta, Georgia

## **ABSTRACT**

How can a city government initiative focused on neighborhood-level civic and democratic engagement be properly assessed to determine its effectiveness, restorativeness, equitability, and accountability? Is there an effective, replicable approach to assessing civic and democratic engagement initiatives that can be applied to other programs in other communities?

Civic and democratic engagement initiatives are only as effective as the scope of their impact. However, determining "impact" can be a difficult endeavor. How can cities determine if these initiatives are delivering? Initiatives that promote civic and democratic engagement require frequent and regular assessments for their efficacy and impact. Developing an apparatus for doing so, however, is a challenge. Civil society can occupy a unique role to address this.

At the intersection of the public and non-profit sector, the Center for Civic Innovation (CCI), an Atlanta, Georgia-based consortium of advocates seeking to amplify community voices and develop more equitable approaches to community development, has built a unique model to assess one such community engagement initiative in Atlanta: the Neighborhood Planning Unit (NPU) system. Through CCI's NPU Initiative, CCI leveraged its position as a community-based non-profit charitable organization in order to examine the history of the NPU system, articulate the system's current challenges, and develop a series of meaningful recommendations that both confront the Atlanta city government's approach to the NPU and provide community members a clearly-defined agenda to encourage lasting reforms. This program provides an effective and duplicable approach that can be applied to other civic and democratic engagement programs in cities beyond Atlanta.

#### INTRODUCTION

It is essential for city governments to create new spaces that foster and develop robust civic engagement in the communities they serve. However, how can citizens be sure that these spaces are serving their intended purpose and actually encouraging civic and democratic engagement in their communities? Oftentimes, city governments create new civic and democratic engagement initiatives without assessing pre-existing ones or developing an apparatus where these initiatives can be regularly inspected for their efficacy. This can create a system of initiatives that could become bloated, inconsistent, redundant, and ill-equipped to handle the complex challenges each neighborhood faces. It is simply not enough to create these new spaces; it is important to regularly evaluate if each part of a city's civic and democratic engagement apparatus is both intentional and productive for the citizens it serves.



Such is the case for the city of Atlanta, Georgia. Long considered one of America's most unequal cities, Atlanta's haphazard and inconsistent approach to civic and democratic engagement-centered policy making has reinforced the very place-based and class-based inequality that has long plagued the city. A <u>census data analysis by the Brookings Institute</u>, using income data from the 2016 American Community Survey, found that the top 5 percent of Atlanta households earn more than \$306,000 a year whereas the bottom 20 percent earn on average less than \$17,000 a year. That gap – a ratio of 18 to 1 – is the largest of any major city (municipality w/ pop > 250,000) in the United States.

The prioritization of civic and democratic engagement initiatives has long been subject to the whims of the mayoral office, and the placement of neighborhood-centered departments in the city's administration has shifted dramatically throughout the years, leading to often erratically-set priorities. The Center for Civic Innovation (CCI), through its Neighborhood Planning Unit (NPU) Initiative, seeks to change this paradigm. By leveraging its unique position at the intersection of both the public and non-profit realms, and by developing an effective process to identify, assess, and address systemic deficiencies in Atlanta's community engagement apparatus, CCI is aiding civil society in its efforts to provide lasting systemic change that encourages effective, restorative, equitable, and accountable civic and democratic engagement. When it comes to assessing and analyzing the impact of civic and democratic engagement initiatives, CCI's NPU Initiative provides a useful blueprint for cities and urban communities across the United States.

#### **SUMMARY OF THE NPU INITIATIVE**

Atlanta is divided into 25 Neighborhood Planning Units (NPUs), which are the City's formal avenue for resident input and engagement. While well-intentioned, it is falling short of fulfilling many of its own stated goals while being chronically underutilized, limiting its long-term potential. The NPU Initiative is a concerted, multi-year, civil society-driven effort initiated and led by the Center for Civic Innovation created to "study and provide community-driven policy recommendations on improving the effectiveness and equity of this formal system of community participation." The NPU Initiative developed a novel, multi-faceted approach to assessing and analyzing the function and impact of the NPU system, by (1) incorporating community members and stakeholders from a broad swath of Atlanta's citizenry and (2) developing multiple modalities for collecting data in partnership with data analysts at DataWorks, a consortium created in partnership with the Georgia Institute of Technology. Throughout the process of constructing the report and its associated recommendations, the NPU Initiative also sought to accumulate feedback on how Atlanta residents want to engage with their city writ large, and inform those same Atlanta residents about how the NPU system can work for



them and their communities. Ultimately, the NPU Initiative sought to aggregate their data into a series of ten easy-to-read, actionable recommendations that can be easily implemented by policymakers and clearly articulated by advocates.

## THE CENTER FOR CIVIC INNOVATION (CCI)

The Center for Civic Innovation (CCI) markets itself as Atlanta's "home for good trouble." For CCI, civic education matters: their programming strives to develop unique innovations that not only inform community members on their agency as urban citizens, but also provide resources on how they can foster effective civic engagement in their neighborhood. More specifically, CCI doesn't focus on voter *turnout*; rather, it helps foster voter *engagement* with the political process.

CCI's currency is investment and amplification; by investing in community leaders and growing the work these leaders are already doing, they help further advance the interests of civic grassroots organizations and entrepreneurs who are already doing crucial work for the neighborhoods they serve. The focus of this case study centers on another important aspect of CCI's work; through the development of comprehensive research, CCI advocates for important structural reforms and policy changes to the city of Atlanta and its approach to the neighborhoods that comprise it. By identifying key structural challenges within Atlanta's systems, and by engaging in long-term, comprehensive research modalities, CCI publishes reports with clear and concise analyses and an action plan of specific, measurable, and attainable recommendations. These efforts are further bolstered by the culture of CCI itself; most individuals working on CCI's team are from Atlanta, and CCI as an organization prioritizes incorporating individuals with meaningful connections to Atlanta's diverse communities. Not only does this extend opportunities to native Atlantans, it also allows the organization to effectively employ authentic relationships that can simultaneously advance and bolster the Atlanta-centered work conducted by CCI.

#### THE NEIGHBORHOOD PLANNING UNIT (NPU) SYSTEM

Like all urban communities, neighborhoods are the center of Atlantans' daily interactions with the city, and each neighborhood contributes its own unique identity, history, amenities, and assets to the greater city community. Despite Atlanta's major-city reputation to the outside world, many Atlantans still see their city as "small" and heavily neighborhood-centric. Many long-time residents, especially in majority-minority neighborhoods with deep rooted communities are known to go directly to their neighbors, local restaurants, or their go-to barbershop to find answers to local problems, rather than employ common tools such as Google. This extends to everyday needs; when finding the best options for local services, many Atlantans often prefer to leverage their face-to-face community relationships instead.



The Neighborhood Planning Unit (NPU) system is a natural extension of this phenomenon. In 1974, the Atlanta city government recognized the central role of neighborhoods in Atlanta, grouping Atlanta's 180 unique neighborhoods into 24 Neighborhood Planning Units, or NPUs. Each NPU covers a designated geographic area, and the set of neighborhoods in each area has specific planning and development proposals developed by the City Planning and Budgeting divisions that are tailored to the neighborhoods in that respective NPU. When it was developed in 1974, the NPU system was intended to serve as a bridge between city government and the neighborhoods of Atlanta, alongside the residents and stakeholders that comprise each neighborhood. The NPU system would create formalized, city-sanctioned community organizations that address comprehensive and inclusive city planning initiatives (CCI NPU Report, pp. 23). In addition, each NPU would serve as the primary forum for neighborhoods to establish community plans and interact with various city government departments and administrative organs in order to effectively carry out those plans. In addition, the NPU system was intended to be a forum where residents can receive updates directly from city government officials, and NPUs serve as the official avenue for residents to express concerns and provide input for developing plans that are intended to address the needs of their neighborhood. The NPU system can be considered a highly localized, neighborhood-level community advisory system where Atlantans can engage with their city government in an easily accessible manner.

Since 2014, CCI has examined the potential the NPU system has to serve as a linchpin for a more civically engaged and cohesive Atlanta community. In 2018, after four years of advocating for a stronger, more equitable, and more effectively realized NPU system, CCI launched the NPU Initiative as a "comprehensive study and review of the NPU system, with the goal of strengthening how people in Atlanta are heard and engaged in decisions made by the City of Atlanta" (CCI NPU Report, pp. 12). After advocating for its use for much of the prior decade, CCI decided to examine the NPU program itself in order to determine if the program is being administered effectively and equitably, in order to more fully understand how the NPU system was currently being employed and tangibly articulate where its capacity could be fully realized. The work of this initiative occurred over a two year period and culminated in the publishing of the NPU Initiative Report, which included an accessible set of findings and associated recommendations that was introduced on September 16, 2021.

#### **GROUNDWORK**

Asile Patin, the Community Engagement Manager for the NPU Initiative, believes that comprehensive planning is a necessary and central feature of an equitable and engaged Atlanta. In Patin's view, if a policymaker or city planner interacts with an everyday Atlantan, they would often find that the residents they represent don't fixate on a singular issue facing their community



or daily life. Rather, they fixate on a series of interconnected issues that intersect at various points in their everyday endeavors. For instance, citizens will not just have concerns around the quality of the public school in their neighborhood. They will also be concerned about the safety of the building, the opportunity for meaningful activity for students outside of the classroom, and the reliability of transportation so students can consistently arrive at that school on time. For something as fundamental as schooling, effective policy is not just a matter of education; rather, it also is a matter of health, transit, and community safety. And because neighborhood-level issues are interconnected, city institutions must reflect that interconnectedness to establish a holistic, multi-issue approach to the everyday issues concerning the residents they serve.

The NPU system is an effective manifestation of intersectional planning. Given 21st-century Atlanta's complex web of challenges, CCI took note of the NPU system's niche in the community to be the forum where Atlanta's neighborhoods can meet with a plethora of city organs to address these crucial intersections where multiple complex issues overlap. However, Atlanta's civic and democratic engagement apparatus is disjointed. The NPUs, in particular, are not working to their full potential. According to CCI's analysis of the NPU system, there are many duplicative ad-hoc meetings with specific city government organs that are inconsistent, ill-timed, confuse citizens, and are overall less effective. This disjointedness is especially pronounced in low-income and majority-Black NPUs where, according to Asile Patin, levels of civic engagement are generally lower; all things considered, the actual execution of the NPU system demonstrates that Atlanta does not recognize either the need for intersectional planning nor the NPUs' potential role in addressing that need. Given CCI's stated vision to create a more equitable Atlanta, the challenges surrounding the NPU system could not be ignored.

Because CCI saw the potential for the NPU system to address deep inequities in the civic engagement realm, they found an opportunity to formally assess and analyze the NPU system to determine ways the NPU system can play a more central role in the planning of neighborhood development initiatives. The need for this became more acute when CCI's efforts to encourage the Atlanta city government to utilize the NPU system more effectively had not yielded much progress (CCI NPU Report, pp. 65). Asile Patin stated that early conversations at CCI surrounding the NPU Initiative centered on the desire to provide an effective blueprint for Atlanta's civil society to assess community engagement and policy initiatives promoted by the city government writ large, especially as the city grows and takes on new challenges to keep their residents involved. As a result, the NPU Initiative was created to seize upon this well-positioned opportunity to set a general "baseline" for how the NPU currently stands in the community and develop modalities that can effectively and properly assess the NPU system in the long term.

#### DATA COLLECTION AND EXECUTION



The research, development, and production of this report fit into three alliteratively named phases: (1) "learn", (2) "listen", and (3) "lead". Each phase proceeded as follows:

- 1. LEARN this primary phase comprised three components: (1) all 25 NPUs were toured in-person at least once before the COVID-19 pandemic; each tour was designed to consist of an in-person meeting sit-in where researchers passively observed the functionality and conduct of the meeting. Questions concerning how the NPUs functions and responds to community concerns in real time, as well as the quality of the NPU meeting's venue, comfort level (i.e. temperature), and communication quality (i.e. mics) would be duly noted. (NOTE: due to the COVID-19 pandemic, this information was not collected for all NPU meetings; however, it was CCI's intention to gather this information. As of this writing, there is still local interest in collecting this for every NPU in a post-pandemic environment as individual NPUs consider returning to in-person meetings or hosting hybrid meetings.) (2) Monthly sessions were hosted in order to determine how each NPU can individually best approach assessing the system, and addressed a series of questions such as: What should these assessments look like? What is the best modality to deliver these assessments? Would a survey-based format be an effective approach? What types of survey questions should be asked of both the NPUs and the stakeholders that support and interact with the NPU system? What is the most effective manner these questions should be approached, developed, and ultimately written? Finally, (3) primary source documents were analyzed to understand the past history of the NPU, including its past performance, its historical relationship with other city administrative organs, and how often the NPU system's recommendations were considered in the administrative decisions of City Council, the mayor's office, or the Board of Zoning Adjustment.
- 2. <u>LISTEN</u> through a series of 65 stakeholder interviews with parties that interact with the NPU systems in any capacity, semantic data was collected and aggregated. This was supported by the launch of a citywide civic engagement survey via SurveyATL.org to collect and aggregate resident feedback on their own personal experiences with the NPU system, and a series of pre-surveys that primed interview participants with quantifiable responses.
- 3. <u>LEAD</u> when the necessary data was aggregated and the important patterns were targeted and isolated, the NPU Report was subsequently assembled. CCI then went back to the community to communicate the report's findings and articulate what was observed. Specific items surrounding the NPU system's challenges in structure and function, communication, transparency, leadership and capacity were highlighted. Then, utilizing aggregated anecdotal, semantic, and primary source data, a series of specific, measurable, attainable, relevant, and timely recommendations were articulated. The



initial round of aggregation and recommendation construction yielded 89 distinct recommendations; for the sake of accessibility, those 89 recommendations were then subsequently sorted and consolidated into 10 recommendations that now serve as the basis for the NPU Report.

In broad terms, the NPU Initiative was a comprehensive review of the NPU system as it stands. In order to make this initiative happen, CCI had to construct a robust, grassroots apparatus centered on relationship building in order to build direct lines of communication with the NPUs and neighborhood stakeholders and - by extension - determine the "anchors" of a neighborhood that carry greater weight in neighborhood's decision-making. CCI proactively formed focus groups and attended additional NPU meetings across Atlanta's neighborhoods in order to intentionally develop meaningful connections that can provide more nuanced information and real-world insight. At the start of the Initiative, CCI focused its in-community one-on-one meetings with a variety of people who demonstrated an interest in the NPU system, even if they weren't active participants themselves. Through these connections, a network of stakeholders - community leaders, business owners, advocates, NPU officials, and residents - were contacted to participate in a series of 65 stakeholder interviews as part of a top-down evaluation of the various parties that regularly interact with the NPU system.

Much of CCI's work was not completed in isolation. Third party community organizations (listed on page 9 of the NPU report) played a critical role in the execution of these stakeholder interviews and the overarching development of the NPU Report. These third party community organizations formed the bread and butter of the NPU Initiative's "advisory boards" groups consisting of a diversity of stakeholders who are engaged with the NPU in different ways, whether as participants in the NPU system or those who help execute it on the ground. The community organizations that made up these advisory boards served as liaisons who examine the language of the report and its associated recommendations and provide important suggestions for improvement. In addition, the third party organizations that were involved in the NPU Initiative's advisory boards played an additional role by enhancing communication and ensuring that community interests were involved in the process of constructing the NPU Report. Each third-party organization did not have a unique or pre-designated role; rather, each organization worked with the other organizations that constitute the NPU "advisory boards" to effectively represent the interests, thoughts, and opinions of the community organizers in each NPU writ large. In a sense, they served as the "umbrella voice" for each NPU, helping craft survey questions for stakeholder interviews.

One-on-one meetings, focus groups, and city-wide surveys were structured in an intentional manner. With respect to focus groups, data analysts worked with CCI and the NPU



"advisory boards" to craft questions that targeted the functions and structures of the NPU systems and sorted them into discrete categories. The five most applicable categories were subsequently chosen and relevant stakeholders who have a role in maintaining and interacting with the NPU system in a way analogous to each category were determined. In 1985, a nationwide 51 city study was published, evaluating neighborhood engagement systems that were newly formed at the time. The baseline questions were inspired by this study and were adopted as starting points for the multiparty development of questions between CCI, the NPU "advisory boards," and their data analyst partners. These five categories of CCI's interviewees were outlined as follows:

- 1. <u>NPU leaders</u> generally, the NPU chair and at least one other member of the executive board.
- 2. <u>City Council members</u> individual members, with the involvement of a council staff member, if desired.
- 3. <u>NPU planners</u> generally, small groups of Department of City Planning staff members assigned to work with an NPU on a part-time basis *in addition to* the core "NPU team" of full-time staff who work exclusively with the NPUs themselves.
- 4. <u>City staff</u> for a better understanding of other City departmental staff, CCI held a session with the six "zone commanders" from the Atlanta Police Department's Field Operations Division. These "zone commanders" generally deliver a presentation at the commencement of each NPU meeting and at sessions with members of the Atlanta Department of Watershed Management's NPU Ambassadors team, who also engage with the NPU system on a monthly basis.
- 5. <u>Stakeholders</u> colloquially referred to as "<u>presenters</u>"; CCI conducted these sessions with 3 groups of stakeholders who often interact with NPUs. They are called "presenters," because they are typically placed on NPU agendas as "presentations" that address issues of "mutual concern." These organizations include: Community Improvement Districts (CIDs), Community Development Corporations (CDCs), and advocacy non-profits such as Trees Atlanta, the Atlanta Bicycle Coalition, and the Metropolitan Atlanta Rapid Transit Authority Army.

With the support of the "advisory board", Asile Patin led and conducted the strategy for each interview as the Community Engagement Manager. For many stakeholder interviews and focus groups, a pre-survey with scale-based questions (i.e. "From a scale of 1 to 5...") was sent out as "pre-work" for participants in the interview process (see APPENDIX B and APPENDIX C). CCI utilized QuestionPro for their citywide public survey, and used a simpler Airtable form for data collection from interview and focus group participants prior to their conversations with CCI. That way, during the interview, CCI could effectively tailor questions in such a way as to



elicit responses that emphasized the participant's own reasoning, rather than a pre-packaged opinion.

For instance, a question might be framed so that the participant would be asked "We noticed that you said X number on the scale during your pre-survey. Why did you make that choice? What factors did you consider when you placed this item on the scale?" These pre-survey questions operated as a useful benchmark by which people can assess their own perceptions and contextualize their thoughts in a more quantifiable manner.

To compile more quantitative data, questions were primarily framed in the context of a sliding scale. An example of this can be found in discussions surrounding the perceived purpose of the NPU system chart (CCI NPU Report, pp. 12). During focus groups and individual stakeholder interviews, subjects were asked questions such as: "In your opinion, what is the purpose of the NPU system?" Then, based on the data analysis of each subject's individual responses, an aggregated summary was compiled by detecting the key phrases or common terms that were frequently employed in subjects' responses. The data was never whittled down to simplistic metrics, such as percentages. Rather, patterns were communicated in raw numbers: "we asked 9 people about their thoughts on X, and 6 people provided a response with Y theme or Y phrase." This approach enabled CCI to more adequately determine what stakeholders view the ultimate goal of the NPU system to be.

In general, it was observed that stakeholders have markedly different views and inconsistent ideas of what purpose the NPU system is actually designed to fulfill. All too often, some stakeholders developed a more myopic purpose of the NPU system; for instance, some had purpose statements that were very project specific or action-based, i.e. "The NPU makes X happen by Y date." Given that CCI recognizes that the NPU system was designed to fulfill multiple purposes, and occupies a niche that would enable it to take on a more comprehensive role in the community, this disparity provided the foundation for the first purpose-centered recommendations.

## Planning With Neighborhoods:

https://docs.google.com/document/d/1avCTbdlhKQTsNLQDD0TTU3L\_nIrD\_g27npiqOQe0mQc/edit?usp=sharing

Beyond testimony- and survey-collected data, Patin worked alongside her CCI colleague Kyle Kessler, CCI's Policy and Research Director, to collect important historical information from the Atlanta History Center's historical archives, as well as the archives and special collections of Georgia State University, the Atlanta University Center, and Emory University,



along with digital access to newspaper archives for the Atlanta Constitution (now the Atlanta Journal-Constitution, Atlanta's "paper of record"), the Atlanta Daily World (a significant Black newspaper), and the *Great Speckled Bird* (an alternative newspaper active in the 1970s). This information included NPU voting records, city council voting records, and the voting records of the Board of Zoning Adjustment, the Zoning Review Board, and the License Review Board (the City board that delivers recommendations to the mayor on alcohol licenses). In addition, the Atlanta History Center archives provided crucial primary source documents on the ordinances that established the NPU, to contextualize the city at the time of the NPU system's inception while determining how the NPU system's original purpose was articulated upon its inception. Another important primary source from the Atlanta History Center's archives were documents related to Atlanta's City's Charter Commission that set expectations for citizen participation as part of a complete reorganization of the Atlanta city government in 1974. This was especially useful when asking big-picture questions surrounding city policies and unpacking the disconnect between the recommendations created by the NPU system and the decisions policymakers ultimately make. This extended to examining archival city budget and employment records to determine pieces of information such as the number of people working for the NPU system. It wasn't always simple to compile primary source information, however; for instance, NPU votes are public record, but they are not easily accessible and the quality of information varies considerably between different NPUs over time. Towards the conclusion of the project, as part of CCI's work related to municipal elections, CCI's community partners engaged in canvassing, including a survey that asked a limited number of questions related to CCI's broad citywide online survey.

## **ADMINISTRATIVE VARIABILITY**

The NPU system is currently housed within the Department of City Planning. The NPU system, and these two departments, have seen their administrative relationships to each other change over the years. In order to determine why City Planning was relegated to a department level position, or why the Budgeting Office was separated entirely, examining historical records enabled CCI to better contextualize decision making processes and fully recognize how the values and priorities of elected officials' in the city council and the executive at any given time are reflected in their administrative approach, which has yielded variable impacts on the effectiveness of the NPU system. For instance, some mayors had not fully valued or prioritized comprehensive planning, and this was reflected in their relationship with the NPU system and the increase in distance between the mayor's office and City Planning and the NPU system. By 2021, the Atlanta administrative organizational chart separated the Budget Commission and Planning Commissioner into two discrete departments, when before they were aligned under a single cohesive umbrella. The current organizational structure offers very little engagement between the NPU system and the Atlanta City Budget Commission, and this exists in spite of a



close administrative alignment being noted on historical administrative organizational charts from past decades. This high level of administrative variability, with its dependence on the policy whims of the mayor, is a significant contributor to Atlanta's disjointed approach to building meaningful civic and democratic engagement. Understanding the nature of the Atlanta community's interaction with the city is integral to decision-making and to ensure engagement is no longer treated as a checkbox on a to-do list.

The Atlanta Planning Advisory Board (APAB) was designed to be the collective voice of the NPUs that comprise the NPU system. In a sense, APAB can be seen as a sort of "umbrella organization" to the NPU system. Within the APAB, each NPU sends one delegate and a respective alternative representative to represent the interests of each NPU, in order to facilitate citywide matters that do not pertain to a specific NPU. The APAB was created in conjunction with the NPU, but it was not utilized until a few years after, because the NPU system itself needed to be functional before APAB representatives could exist and the ordinance creating APAB was not explicit on certain structural matters (i.e. how NPU appointments to APAB should be conducted); whether or not APAB's relationship to the NPU system can be best defined as a liaison between the city and the NPUs or a central assembly of NPU representatives has not fully answered or agreed upon. As a consequence, it is difficult to compile a common vision for the NPU system and its associated organs, including the APAB; every component needs to be aligned to the overarching vision and purpose of the NPU system.

#### **DATA ANALYSIS**

Upon assembling the overarching narrative of the NPU system's performance, there needed to be a set of keywords that best illustrated indicators that could help assess the NPU system's future performance and long-term success. Between phases 2 ("learn") and 3 ("lead"), four words were chosen: effective, equitable, accountable, and restorative. These four words were chosen from the aggregate semantic data collected from stakeholder interviews, because they best outlined the characteristics of an ideal NPU system from the perspective of the stakeholders and NPU officials who were participants in NPU Initiative interviews. Each word needed to be defined clearly and applicably; to facilitate their application, each of the four words had their four respective definitions articulated in phrases that connected them in the context, communication, and capacity of the NPU system as it currently stands, and how it could potentially develop in the long term (i.e. "effective communication", "equitable capacity", "restorative communication", etc.) This created a useful thought exercise for the data analysis and eventual recommendation construction for the NPU Report, because it helped CCI best organize the thoughts of the hundreds of participants into a manageable data set that could be best utilized for the creation of an accessible and concise platform.



As implicitly stated before, a core part of CCI's work in constructing the NPU Report involved aggregating large amounts of information in order to glean quantitative data that would be easily understood for the development of the report and its associated recommendations. The need for quality data analysis was further warranted given the vast scope of the NPU Initiative's data collection, which was conducted in a highly multi-faceted manner with numerous modalities ranging from interviews to focus groups. The Center for Civic Innovation leveraged a pre-existing partnership with DataWorks (<a href="https://dataworkforce.gatech.edu/">https://dataworkforce.gatech.edu/</a>), a Georgia Institute of Technology-based consortium of individuals recruited and hired to utilize data analysis talents for neighborhoods and communities without the resources to independently employ resources to do data analysis on their own. DataWorks generally employs young, Black college graduates, and many of them have a background in Atlanta. CCI had already established this partnership through their "Serve, Learn, and Sustain" program, which utilizes community and civic engagement work as a medium to encourage students to get involved in the Atlanta community and the neighborhoods they call home.

Throughout the process, CCI and DataWorks worked in tandem to sort through the aforementioned 65 stakeholder interviews, which afforded CCI more nuanced information on the challenges of the NPU system and the individual experiences of the stakeholders who engage with it. Given that testimony is relatively subjective, DataWorks worked as full time, paid data wranglers that took and compiled notes during interviews so the interviewer could focus on interviewing. They took recordings of the entire interview, and unpacked notable phrases and the specific words being used and aligned them to look for patterns across the dataset. After doing that, the data was subsequently organized in a spreadsheet where the answers were sorted by question alongside summarized short form synopses of each participants' recorded responses. Using Atlas.ti, a data analytics platform, notable quotations were tagged in order to identify semantic patterns across interview sessions that would have otherwise been unmanageable to detect given the limitations of a spreadsheet-based system. This would be the basis to formulate more accessible and user-friendly modalities to present the data; for instance, words and phrases of significance were compiled into a "word cloud" that provided a simple visual reference for meaningful analysis.

Another aspect of Dataworks' role involved analyzing the way each of the NPUs exercise power. Given that NPUs largely occupy an advisory role, they will primarily issue recommendations on permits, events, and zoning in the neighborhoods under their purview. To more adequately explore this, CCI and DataWorks examined approximately 10 years of NPU votes on the public record alongside and compared it with the city government's corresponding ordinance to determine if the NPU's decision was congruent with the city government's decision,



and draw conclusions about how often the NPU system's recommendations were factored into policymakers' actions.

## RESULTS: RECOMMENDATIONS AND VISION

Each policy recommendation is rooted in the comprehensive research process and is supported by historical primary data and aggregated semantic data. Alongside DataWorks, every new data point is contextualized in the real-world constraints most NPUs work in. With that in mind, CCI constructed ten recommendations in the NPU Report that were centered on three key concepts: (1) strengthening the NPU system's purpose, (2) strengthening the NPU system's leadership and capacity, and (3) strengthening the NPU system's capabilities for transparency, evaluation, and accountability. These concepts were designed to achieve three key aspirations that would further broaden the impact of the NPU system:

- 1. <u>Aspiration #1</u> This report was not intended to be written as a "one off" item, where it would be the sole iteration of an NPU system assessment. The NPU report should be the first of many assessments to be conducted at regular intervals.
- 2. <u>Aspiration #2</u> This report should begin to spark meaningful conversations about the role of the NPU system at a far more fundamental level. These conversations must address questions, such as: What is the explicit purpose of the NPU program? How can it best be articulated? These purpose-centered conversations should be conducted with key city government figures, such as the mayor, city planners, city councilmembers, etc.
- 3. <u>Aspiration #3</u> This report should initiate a renewed commitment to fostering real, long-lasting structural changes to the NPU system that will address many of the recommendations outlined in the report and will construct a firm foundation for the NPU to build upon in its efforts to realize its full capacity.

The power of the NPUs recommendations, as outlined in the <u>CCI NPU Report</u> (as well as APPENDIX E), go beyond simply reforming the structure and changing the execution of the NPU system. Around the time of the release of the NPU report, Atlanta's City Planning division had released their <u>Comprehensive Development Plan (CDP)</u>, a fact-based resource and policy document that addresses the crucial relationships between land use, transportation, housing, economic development, nature, historic preservation, and other aspects to city building developed to define immediate and long-term priorities for the Atlanta community over the next five years. Given that the CDP addresses aspects of planning done at the scale of the city, it seeks to emphasize predictable, well-managed growth and development. This presents a unique opportunity for the NPU system to effectively address and implement the recommendations outlined in the <u>CCI NPU Report</u>. NPUs were intended to have the power, information, and resources to implement many aspects of the Atlanta CDP at the neighborhood level.



CCI developed these recommendations with an ideal NPU system in mind. Starting with an ideal allows for the construction of recommendations that are best adapted to the overarching goals and desires of CCI to strengthen the NPU system in the most effective way possible. From CCI's perspective, the ideal NPU system would work directly with a plethora of city departments to make many of these community development plans a reality. Each NPU would have a dedicated team of volunteers and a clearly defined set of goals that are transparent, specific, measurable, and accessible, all constructed to meet a clearly defined vision for what future success looks like for the neighborhoods within the boundaries of each NPU. NPUs, and the NPU system at large, would be seen by both the city government and Atlanta's neighborhoods as a valuable asset in executing and realizing the city's development plans in full. More concretely, each NPU would be a go-to policy and administrative organ for the City Planning to work with when carrying out its Comprehensive Development Plan.

There is an opportunity for the CDP and the City Planning division to use the NPUs more than they currently do; as it currently stands, many opportunities are not being actualized by City Planning. The CDP could be better utilized if the NPUs took an active role in fulfilling the provisions outlined in the Plan. All things considered, the NPU system would be the nucleus for city and neighborhood planning, rather than a disjointed "rubber stamp" consultative body for city council decisions.

With respect to future assessments, CCI has called upon the city to assess the NPU system at regular intervals through the NPU system itself, as opposed to outside of it. In other words, the next NPU Report should not be done through CCI, but rather a regular internal review conducted by the NPUs within the NPU system. Civil society can provide systems such as the NPU with initial accountability; however, sustained, long-term approaches to effective assessments require comprehensive internal reviews at regular, frequent intervals of time.

The potential for CCI's NPU Report is extensive. It is the first real assessment of the system since shortly after its founding (the City of Atlanta conducted an assessment from 1978 to 1979); the aim is that it becomes the trigger for more similar assessments of the NPU system and other programs designed to emphasize civic and democratic engagement and to bridge divides between city officials and the citizens they serve.

#### **CHALLENGES**

The NPU Initiative and its associated Report provided the city of Atlanta with its first-in-a-generation comprehensive assessment of a city-developed civic and democratic engagement program. According to Asile Patin, the response was generally positive; many were pleased with its accessible format that clearly and concisely articulated a clear list of



recommendations that could be feasibly implemented in a real-world context. As a consequence of this, Atlanta's advocates for the first time possessed an easily accessible resource that can be utilized to tangibly improve the NPU system. However, the long term impacts of the NPU Initiative remain to be seen.

The most significant challenge rests in the determination of metrics for success. For any goal to be achievable, it must first be measurable. The recommendations outlined in the NPU Report call upon necessary parties to develop metrics to measure impacts, but the report itself largely leaves that responsibility to the City of Atlanta, and turns down the opportunity to outline potential ways these largely subjectively defined recommendations can be quantitatively measured. For a city that has long neglected even basic assessments of the NPU system, it may be a tall order to place the onus on city officials to develop workable metrics. In addition, much of the NPU Report's effectiveness lends itself to the robust data analysis that backed up a lot of its semantic choices - more specifically, the language surrounding the NPU's purpose and the role it plays in the greater community.

Over the years, CCI was able to cultivate a meaningful partnership with the data analysis program DataWorks at Georgia Tech that existed before the genesis of the NPU Initiative. However, not all organizations involved in civic engagement work have institutions such as DataWorks that are both accessible and are underpinned by a robust working relationship. If other communities or other organizations desired to implement a similar initiative on a similar scale, they might face the challenges surrounding the search and the construction of such a relationship with data analysts, which may take time and resources that may not be readily available.

Some experimental limitations also exist. Given the limitations of the COVID-19 pandemic, virtually-conducted interviews were a necessity. However, they presented their own set of unique challenges, especially concerning group interviews. Many Zoom-based, online interviews involved participants who had their cameras off or had their participation limited by connectivity and technical difficulties. The lack of direct face-to-face interactions impacted the intangible aspects of the interview process; there was simply a less "human" element to the interviews being conducted over Zoom. However, Asile Patin discussed how these concerns were weighed against the benefits of an online-based interview. Not only are they administratively easier to conduct and logistically more straightforward to organize, each interview was more recordable; this allowed for every detail to be retained and for a more robust sample to be collected for semantic data analysis. Other initiatives may need to weigh both the pros and cons surrounding the various modalities for conducting interviews and collecting testimonials.



Other concerns surrounded the time being spent during the interview process. A lot of interviews were conducted - 65 stakeholders across 33 sessions, some one-on-one "interviews" and some multi-person "focus groups" - and each interview was long, making the interview component of the research process quite time intensive. Patin suggested that making long-term, multi-week schedules with a rotating queue of interviews would allow for a more sustainable approach to a long interview and anecdote collection process. Schedules that alternating one or more weeks of interview-intensive bouts with one week off to reflect and collect data would be a more effective approach. For the NPU Initiative, CCI had conducted every interview, back to back, until every scheduled interview was completed. While it allowed them to "do it all the way" in one continuous bout, it was a drain on the mental capacity of the available staff and a physically exhausting experience for those involved in conducting interviews later in the cycle.

Another concern with the interview process surrounded the novel qualities of some of the questions that were provided. Some of the questions surrounding trust in the NPU system and affiliated government organs were not part of the pre-survey primer, nor were they an expected type of question that stakeholders were prepared to answer. This did, in fact, have an influence on how the participants had responded to these questions; however, the exact nature of these changes were not fully outlined and are subject to other confounding variables that may warrant future investigation.

The geographic boundaries of the constituent NPUs (see APPENDIX A) of the NPU system were brought up as a point to review and research. However, the conversation around these boundaries were seen as more of a means, rather than an end. CCI believed that it would have been presumptuous to recommend boundary changes to the NPUs themselves; after all, CCI's focus wasn't on specific boundaries themselves, but the representation of relevant issues in the NPU space. That said, the municipal geography of Atlanta still presents unique challenges for NPUs that exist on the geographic periphery. NPUs F, N, O, and W on the eastern periphery of Atlanta extend into DeKalb County, and their boundaries have shifted notably as Atlanta has grown by annexation in that direction since the 1970s. NPU O, on the southwest periphery of Atlanta, was created as a new NPU in lieu of further expanding the boundaries of existing NPUs. The non-contiguous nature of the neighborhoods in these NPUs is perplexing and lacks formal data, as the City of Atlanta did not document the procedure by which these areas were annexed. As a consequence, they are surrounded by other municipalities on many sides that are not officially a part of the City of Atlanta. Given that the development of the Atlanta metropolitan region since the genesis of the NPU system has led to the incorporation of many different municipalities without strong regionalized coordination, further examination into how to best



represent areas geographically separated by these municipal lines will be an ongoing challenge for those assessing the NPU system into the future.

Finally, the NPU Initiative is at an unique inflection point, post-introduction. Numerous organizations have already contacted CCI or will likely contact CCI to ask specific details about the process CCI took to make the NPU Initiative a reality. CCI clearly articulating its own methodology in an easily accessible way will allow not only for inter-organizational cooperation to flourish, but also increased transparency and accountability for all.

#### **CONCLUSION**

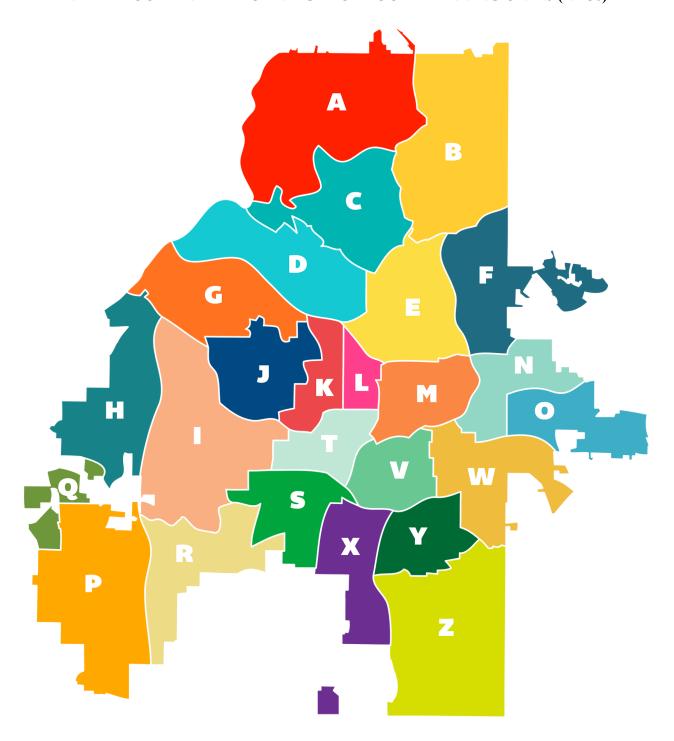
When it comes to launching programs that address long-standing gaps in civic and democratic engagement, the true achievement is not in their creation; rather, it is the effective maintenance and execution of these programs that enables their continued success. If a program is not being effectively analyzed and assessed for its effectiveness, restorativeness, equitability, and accountability, how can a community be certain that it is delivering for them? The Center for Civic Innovation, by leveraging its position as a community-based non-profit charitable organization at the intersection of the public and private space, developed an effective process with the NPU Initiative that identifies, assesses, and addresses systemic deficiencies in Atlanta's Neighborhood Planning System. With this initiative, CCI is aiding civil society in its efforts to provide lasting systemic change by providing a citizen-driven mechanism for encouraging civic and democratic engagement in a manner that is effective, restorative, equitable, and accountable in cities beyond Atlanta.

#### **KEY TAKEAWAYS**

- 1. City government-developed initiatives that promote civic and democratic engagement require frequent and regular assessments for their efficacy and impact.
- 2. These assessments can be conducted internally or by the city government, but the Center for Civic Innovation has developed a blueprint that enables civil society to step in, especially in the absence of a government-directed initiative to assess a program.
- 3. Effectively and regularly assessing pre-existing systems for civic and democratic engagement programs can allow for the provision of clearly defined recommendations for systemic reforms, and can even make space to launch new initiatives to improve upon and address existing deficiencies.
- 4. Well-developed assessments require determining if a program is being conducted in a manner that is (1) effective, (2) restorative, (3) equitable, and (4) accountable.



# APPENDIX A - OUTLINE MAP OF NEIGHBORHOOD PLANNING UNITS (NPUs)





**NPU Leaders - resident volunteers:** 

# APPENDIX B - ROLE-SPECIFIC "PRE-SURVEY" QUESTIONS

| 1. | In your opinion, what is the role of the NPU leader? (Check all that apply)  |
|----|--|
|    | ☐ Liaison  |
|    | ☐ Advocate   |
|    | ☐ Technical Assistant  |
|    | ☐ Educator   |
|    | ☐ Mediator   |
|    | ☐ Facilitator  |
|    | ☐ Organizer  |
|    | ☐ Other  |
| 2. | What is/are the role(s) of the neighborhood planner/NPU team in the NPU system   |
|    | (Check all that apply) *   |
|    | ☐ Liaison  |
|    | ☐ Advocate   |
|    | ☐ Technical Assistant  |
|    | ☐ Educator   |
|    | ☐ Mediator   |
|    | ☐ Facilitator  |
|    |  |
|    | □ Other  |
| 3. | On a scale of 1 - 5, how effective do you feel planner's reports/presentations are a NPU meetings for residents? (1 - not effective, 5 - very effective) |
| 4. | On a scale of 1 - 5, can you rate the support you feel you receive from planners? (1 not enough support, 5 - too much support)                           |
| 5. | As an NPU resident/leader, who do you have the most contact with in your role?   |
| 6. | On a 5 point scale, how much support do you get from the NPU team in the city? (1 not enough support, 5 - too much support)                              |



- 7. On a 5 point scale, how much support do you get from the city council? (1 not enough support, 5 - too much support)
- 8. On a 5 point scale, how effective do you think your NPU is in influencing the **decisions of city officials?** (1 - not effective, 5 - very effective)
- 9. Besides city staff or officials, what partnerships have you had with different organizations or community groups?

# <u>NP</u>

| U l | anners - full-time Atlanta city government staff:                               |
|-----|---|
|     | In what capacity have you attended NPU meetings? (Select all that apply)        |
|     | ☐ Resident  |
|     | ☐ NPU Leadership or committee member  |
|     | ☐ City or government staff  |
|     | ☐ Planner   |
|     | ☐ Elected Official  |
|     | ☐ Developer   |
|     | ☐ Applicant (permit, license, variance, etc)                                    |
|     | ☐ Property Owner  |
|     | ☐ Business Owner  |
|     | ☐ Presenter (not requiring a vote)  |
|     | ☐ Neighborhood Representative   |
| 2   | From your perspective, how would you define your role as a neighborhood planner |
|     | in the NPU system? (Select all that apply)                                      |
|     | ☐ Liaison   |
|     | ☐ Advocate  |
|     | ☐ Technical Assistant   |
|     | ☐ Educator  |
|     | ☐ Mediator  |
|     | ☐ Facilitator   |
|     | ☐ Organizer   |
|     | ☐ Other   |
|     |   |

3. On a scale from 1-5, how effective do you feel your reports/presentations are at NPU meetings for residents? (1 - not at all effective, 5 - very effective)



- 4. Besides the NPU meeting, how often do you engage with NPU leaders or residents? (1 rarely, 3 sometimes, 5 often)
- 5. On a scale of 1 to 5, how important is community input in your process or work? (1 not at all important, 5 very important)
- 6. On a scale of 1 to 5, how valuable is the NPU perspective to you? (1 not at all valuable, 5 very valuable)
- 7. Outside of work, do you engage with the community? (Yes/No)

# NPU Presenters - community stakeholders, non-planning city staff, advocacy organizations, community developers, etc.

- 1. Is community engagement a part of your work? (Yes/No)
- 2. Have you ever been to a Neighborhood Planning Unit meeting? (Yes/No)
- 3. On a scale from 1-5, how frequently do you attend NPU meetings? (1 never, 5 very often)
- 4. On a scale of 1-5, how important is community input in your process or work? (1 not effective, 5 very effective)
- 5. Outside of work, do you engage with the community? (Yes/No)

# <u>City Board Members - resident volunteers who receive recommendations from the NPU system</u>

- 1. On a scale of 1-5, how important is community input in your process or work? (1 not important at all, 5 very important)
- 2. On a scale of 1-5, how valuable are NPU recommendations to your decision-making process? (1 not valuable at all, 5 very valuable)
- 3. Has there ever been a situation or scenario where your opinion on an application completely changed after receiving community input?
- 4. Have you ever felt that NPUs have been detrimental or a bottleneck in the application process? If so, provide an example.



- 5. In your opinion, what is the purpose of the NPU system generally and/or specific to your board?
- 6. Do you think NPUs currently fulfill this purpose?
- 7. NPUs have a variety of roles related to other City of Atlanta entities. What do you rely on NPUs to do?
- 8. What do you think it should be?
- 9. What do you wish the NPU system was able to do better?
- 10. More broadly, what would you change about the NPU system?
- 11. How do you communicate with NPUs? How are their desires communicated to you?
- 12. Do you feel like you have enough information about discussions and decisions that happen at the NPU level?
- 13. What would you change about how communication happens?
- 14. Is there anything that the NPUs currently don't do that you think they should? Anything that they currently do that you think they should not?
- 15. In your opinion, is there a place in the NPU system where power currently exists where it shouldn't? Where do you think that power should be instead?
- 16. Outside of your board position, how do you engage with your community?
- 17. Do you have any history of NPU or neighborhood involvement?



# APPENDIX C - GENERAL "PRE-SURVEY" QUESTIONS\*

\* (note: the online survey was conducted with a logic/conditional structure with branching questions. For instance, primary question #8 [listed below] would yield questions #9 through #12 if "Yes" was selected.)

| 1. | How do you stay informed about what's happening in your neighborhood? (Check                          |
|----|---|
|    | all that apply.)  |
|    | ☐ Television  |
|    | ☐ Email newsletters   |
|    | ☐ Church, religious, or spiritual organization  |
|    | ☐ Attending public meetings or forums   |
|    | ☐ Bulletin board  |
|    | ☐ Social media (Facebook, Instagram, Nextdoor, Twitter, etc.)   |
|    | ☐ Community or social organization  |
|    | ☐ Radio   |
|    | ☐ Newspaper or news website   |
|    | ☐ Printed newsletters   |
|    | ☐ Word of mouth   |
|    | ☐ Other   |
|    | ☐ I do not stay informed of what's happening in my community.   |
|    |   |
| 2. | How do you attempt to influence what happens in your neighborhood? (Check all                         |
|    | that apply.)  |
|    | ☐ I join an advocacy organization.  |
|    | ☐ I contact a local elected official.   |
|    | ☐ I share my opinion with others.   |
|    | ☐ I contact a neighborhood leader.  |
|    | ☐ I sign a petition.  |
|    | ☐ I attend a protest.   |
|    | ☐ I make public comment at government meetings.   |
|    | ☐ I put a sign in my yard or on my vehicle.   |
|    | ☐ I post on social media.   |
|    | ☐ I vote.   |
|    | ☐ I comment on acciel media mesta   |
|    | <ul><li>☐ I comment on social media posts.</li><li>☐ I contact someone in local government.</li></ul> |



DemocracyCities - Case Study November 2021 - Center for Civic Innovation (Atlanta, GA) ☐ I go to a neighborhood meeting to voice my opinion. ☐ I donate my time (volunteer) or money. ☐ I do something else. (Please describe.) ☐ I do not attempt to influence what happens in my community. 3. Did you vote in the most-recent presidential election in 2020? ☐ Yes □ No ☐ I can't remember. ☐ I was not eligible to vote. 4. Did you vote in the 2017 municipal election (mayor, city council, school board)? ☐ Yes  $\square$  No ☐ I can't remember. ☐ I was not eligible to vote. 5. ATL 311 is the City of Atlanta's primary point of contact for government information and non-emergency services. Do you contact ATL 311? (Check all that apply.) ☐ I call ATL 311 by telephone. ☐ I use the ATL 311 website. ☐ I email ATL 311. ☐ I use the ATL 311 mobile app. ☐ I use Facebook to contact ATL 311.

- ☐ I use Twitter to contact ATL 311.
  ☐ I use Nextdoor to contact ATL 311.
  ☐ I use the SeeClickFix mobile app to contact ATL 311.
  ☐ Other (Please describe.)
  ☐ I don't contact ATL 311.
- 6. What is your top concern in your neighborhood? (Short answer response.)
- 7. What other concerns do you have in your neighborhood? (Short answer response.)
- 8. Do you know what a Neighborhood Planning Unit (NPU) is? (Yes/No)



The City of Atlanta is divided into 25 Neighborhood Planning Units (NPUs) which are citizen advisory councils that make recommendations to the Mayor and City Council on land-use decisions, alcohol licenses, special events, and other planning-related matters. Each NPU consists of a few neighborhoods and has regular meetings where the community can express opinions and concerns relating to these planning issues.

Each NPU's regular meeting takes place one weekday a month, starting between 6 pm and 7 pm, lasts 1 to 2 hours, and is held in a community center (recreation center, school, church, etc.) within the NPU. During COVID-19, NPUs have conducted meetings via telephone and web conferencing.

| 9. Now that you know what a NPU is, would you be interested in attending a meeting? |
|---|
| ☐ Yes   |
| □ No  |
| ☐ Maybe   |
| 10. Do you plan to attend NPU meetings in the future?                               |
| ☐ Yes   |
| ☐ Maybe   |
| □ No  |
| 11. Do you think there should be other forms of participation within the NPU system |
| for residents outside of meetings? Specify what these forms of participation could  |
| <b>be.</b> (Check all that apply.)  |
| ☐ Host social events for communities within NPUs                                    |
| ☐ Have live video feed of meetings and recordings available for the public          |
| ☐ Allow discussion/commenting/voting outside of meetings                            |
| ☐ Organize community improvement projects   |
| Other   |
| 12. Do you follow your local NPU on the internet? (Check all that apply.)           |
| ☐ Yes, I receive updates via email.   |
| ☐ Yes, I regularly check their website.   |
| ☐ Yes, I follow their social media (Facebook, Twitter, etc.).                       |
| ☐ No, I don't get any information about my NPU on the internet.                     |
|   |



#### APPENDIX D - NPU REPORT FINAL RECOMMENDATIONS

Strengthening the NPU system's purpose:

- 1. The Mayor of Atlanta, City Council, and the Atlanta Planning Advisory Board must formally align on and reestablish the purposes, responsibilities, and goals of the NPU system.
- 2. The Department of City Planning must support all NPUs in developing small area and neighborhood plans, including their individual needs in relevant citywide planning and budgeting processes, including, but not limited to, the Comprehensive Development Plan.
- 3. NPU leadership, applicants, and/or City departments in or outside of an NPU meeting must ensure that information provided to NPUs is timely, easily understandable, and tailored for residents to engage with ahead of any key decisions made that impact their communities.
- 4. The Department of City Planning and the Atlanta Planning Advisory Board must lead on a campaign and ongoing effort to increase public awareness about the NPUs and eliminate barriers for anyone and everyone to participate in them.

# Strengthening the NPU system's <u>leadership and capacity</u>:

- 5. The Atlanta Planning Advisory Board (APAB) must facilitate and coordinate citywide matters among the individual NPUs and form a collective voice for all NPUs in their advocacy to the City of Atlanta.
- 6. The City of Atlanta must provide support and money equitably to NPU volunteers, prioritizing already neglected communities and leaders who lack the privilege of time and/or financial resources.
- 7. The Mayor of Atlanta and City Council must prioritize and increase funding for personnel, technical assistance, and support services for the NPU system in our City's fiscal year budget.

## Strengthening the NPU system's transparency, evaluation, and accountability:

- 8. The City of Atlanta must document, transparently coordinate on, and clearly communicate about the legal expectations and standard operating procedures of the NPUs internally between City departments and to all external NPU stakeholders.
- 9. The Department of City Planning, BACEs, and APAB must provide transparent and proper notice and feedback to the NPUs after decisions made on legislation, applications, and policies that directly or indirectly impact an NPU.
- 10. The Mayor of Atlanta, City Council, and the Atlanta Planning Advisory Board must co-design a process to regularly evaluate the NPU system through a clear set of effectiveness and equity metrics.