

CORPORATION FOR PUBLIC BROADCASTING

OFFICE OF INSPECTOR GENERAL

**AUDIT OF CPB RADIO RESTRICTED FUND EXPENDITURES,
COMMUNICATIONS ACT, TRANSPARENCY, AND DISCRETE
ACCOUNTING REQUIREMENTS AT SELECTED GRANTEEES
FOR FISCAL YEAR 2014**

REPORT NO. ACR1506-1508

September 29, 2015




Corporation
for Public
Broadcasting

Office of Inspector General

Date: September 29, 2015

To: Jackie J. Livesay, Vice President, Compliance
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From: Mary Mitchelson, Inspector General 

Subject: Audit of CPB Radio Restricted Fund Expenditures, Communications Act, Transparency, and Discrete Accounting Requirements at Selected Grantees for Fiscal Year 2014, Report No. ACJ1506-1508

We have completed an audit of Corporation for Public Broadcasting (CPB) Radio Community Service Grants (CSG) for Fiscal Year (FY) 2014 at ten selected grantees. The specific objectives of this audit were to determine whether selected grantees: a) spent CPB restricted radio funds on national programming; b) discretely accounted for CPB revenues and expenditures in their accounting systems; c) complied with the Communication Act (Act) requirements for open meetings, open financial records, Community Advisory Board (CAB), equal employment opportunity (EEO) reporting, and donor lists and political activities prohibitions; and d) complied with website transparency grant requirements. The scope of our audit covered FY 2014 expenditures.

Our audit found that all ten stations spent CPB restricted radio funds on national programming and related activities and generally complied with Act, transparency, and discrete accounting requirements, except for the following instances:

- 8 of 10 stations were not in full compliance with selected aspects of the open meetings, open financial records, or CAB requirements of the Act;
- 9 of 10 stations were not in full compliance with specific aspects of the transparency requirements of the CPB FY 2014 Radio Community Service Grant General Provisions and Eligibility Criteria;
- 4 of 10 stations did not discretely account for CPB CSG grant revenues and expenditures in their accounting systems; and
- 4 of 10 stations did not accurately report CPB restricted expenses on their 2014 Annual Financial Reports (AFR), Schedule E, Expenses.

As a result, station meetings, financial records, CAB activities, accounting for CPB funds, and reporting of CPB restricted expenses of these stations were not as transparent as required by the Act and grant requirements.

We made eight recommendations to CPB summarized as follows:

- require the stations to take corrective actions to bring themselves into full compliance with Act and CPB CSG requirements for transparency, discrete accounting, and AFR expense reporting (recommendations 1-3 and 6-8); and
- revise its transparency guidance to: i) require that CPB's AFR or Financial Summary Report (FSR) and instructions for how to obtain other CPB non-CSG financial reports be posted on the website (recommendation 4); and ii) specify dollar thresholds for reporting compensation for key employees and contractors for institutional stations, in lieu of Internal Revenue Service (IRS) Form 990 reporting (recommendation 5).

In response to the draft report, all 10 stations were generally in agreement with our findings, and they have already taken corrective actions or initiated actions to bring their stations into full compliance with Act and CPB requirements. Their official responses are presented in Exhibits D – M.

Based on the grantee responses, we consider recommendations 1, 2, 3, 6, and 8 resolved but open pending CPB's receipt of documentation from the grantees that corrective actions have been fully implemented. We consider recommendation 7 to be resolved and closed. Recommendations 4 and 5 addressing revising grant requirements remain unresolved.

This report presents the conclusions of OIG and the findings reported do not necessarily represent CPB's final position on these issues. Accordingly, the report contains recommendations OIG believes would be appropriate to resolve these findings. CPB officials will make final determinations on the reported findings in accordance with established CPB audit resolution procedures.

We performed our audit in accordance with *Government Auditing Standards* for performance audits. Our scope and methodology is discussed in Exhibit A.

BACKGROUND

In our past audits of CSGs awarded to smaller radio stations we have found instances where the stations did not spend radio restricted funds on national programming. Over the last eight years, we have audited nine small radio stations and found questionable restricted fund expenditures in 5 of the 9 stations (55 percent). To assess whether these were isolated instances or more systemic in nature, we conducted this audit of smaller radio stations. With this audit, we double our past audit coverage of smaller radio stations' use of restricted funds to give CPB feedback on compliance and whether additional policy guidance is warranted.

To target smaller stations, we grouped the FY 2014 radio grantees into three strata based on our prior audit work, as follows.

Radio CSG Award Amount Strata

Level ¹	No. of Grantees	Total Restricted Funds	Strata of CSG Grant Awards					
			No. of Grantees	> \$211,950	No. of Grantees	\$211,950 - \$141,300	No. of Grantees	\$141,299 - \$70,650
A	12	\$416,320	0	\$0	8	\$312,240	4	\$104,080
B	45	\$1,040,819	0	\$0	12	\$357,267	33	\$683,552
C	119	\$5,209,618	33	\$2,281,767	61	\$2,280,635	25	\$647,216
D	232	\$16,028,956	79	\$10,750,716	58	\$2,550,005	95	\$2,728,235
Totals	408	\$22,695,713	112	\$13,032,483	139	\$5,500,147	157	\$4,163,083

We selected ten stations from the two strata that received less than \$211,950 in CSG awards. We also identified stations that had not been recently audited by our office. Using these selection criteria we judgmentally selected the following ten stations to conduct our limited scope audit.

Audit Sample

Level	Grantee	Type	Strata of CSG Grant Awards			
			\$211,950 - \$141,300		\$141,299 - \$70,650	
			CSG Grant	CSG Restricted	CSG Grant	CSG Restricted
B	WOUB-FM	University	\$204,443	\$46,803		
B	WFHB-FM	Community			\$72,313	\$18,816
C	KCND-FM	Community	\$197,306	\$44,780		
C	KEDT-FM	Community	\$193,586	\$40,781		
C	WRVS-FM	University	\$160,618	\$32,203		
C	WMKY-FM	University			\$134,681	\$28,651
D	WBJC-FM	University	\$147,673	\$38,425		
D	WMNF-FM	Community			\$139,266	\$36,238
D	WUOT-FM	University	\$162,232	\$42,213		
D	WLCH-FM	Community			\$72,449	\$18,852
Totals			\$1,065,858	\$245,205	\$418,709	\$102,557

Our sample included three joint radio and television stations (WOUB, KCND, and KEDT) and seven radio stations. We sampled five community stations and five institutional stations; the institutional stations were all universities.

Public broadcasting stations receiving a CSG from CPB must annually certify to CPB that they comply with the requirements of the Communications Act of 1934, 47 U.S.C. §§ 396, et seq., as amended, as a condition of accepting the CSG. CPB *Certification Requirements for Station Grant Recipients*, in effect during our audit period, explained the Act requirements and CPB

¹ Levels are determined by several factors including population density (PD = people/sq. km.) served by the station and the amount of its Non-Federal Financial Support (NFFS). Level A indicates the station is the only broadcast signal within the coverage area. Level B applies to any PD with a minimum NFFS of \$100,000. Level C has a ≤ 40 PD and a minimum NFFS of \$200,000. Level D has a > 40 PD and a minimum NFFS of \$200,000.

interpretations that recipients must satisfy to receive a CSG. CPB currently requires each CSG recipient to certify its continued compliance with these requirements, in the following five areas:²

- meetings must be open to the public (§ 396(k)(4));
- financial information must be made available to the public (§ 396(k)(5));
- CABs must be established by certain stations (§ 396(k)(8));
- EEO regulations and reporting requirements must be followed (§ 396(k)(11)); and
- donor list and political activities requirements must be followed (§ 396(k)(12)).

The annual certification is input directly into CPB's Integrated Station Information System on the Certification of Eligibility form stations complete to receive their annual CSG. The certification form also requires recipients to certify that they comply with CPB's discrete accounting requirements. The certification form must be signed by an authorized official of the licensee responsible for executing grants for the licensee and by the official in charge of station operations, e.g., president, general manager, or station manager.

Under CPB's Grantee Non-Compliance Policy (April 2013), failure to comply with the Act and CPB's certification requirements may result in penalties, including forfeiture of all or part of a recipient's funding, and temporary suspension or disqualification from the CSG program.

RESULTS OF REVIEW

Based on our audit of restricted expenditures, discrete accounting, Act, and transparency requirements, we identified a reportable rate of non-compliance with discrete accounting, Act, and transparency requirements. Additionally, we found errors in AFR reporting of CPB restricted fund expenditures. We attribute these conditions to stations not fully understanding CPB's requirements and not establishing internal controls or operating procedures to ensure compliance with CPB grant requirements. Further, CPB's Guidelines could more clearly explain requirements to facilitate improved understanding and compliance.

Our audit found that all ten stations spent CPB restricted radio funds on national programming and related activities and generally complied with Act, transparency, and discrete accounting requirements, except for the following instances:

- 8 of 10 stations were not in full compliance with selected aspects of the open meetings, open financial records, or CAB requirements of the Act;
- 9 of 10 stations were not in full compliance with specific aspects of the transparency requirements of the CPB FY 2014 Radio Community Service Grant General Provisions and Eligibility Criteria;
- 4 of 10 stations did not discretely account for CPB CSG grant revenues and expenditures in their accounting systems; and
- 4 of 10 stations did not accurately report CPB restricted expenses on their 2014 AFRs, Schedule E, Expenses.

² CPB revised these guidelines in May 2015, so the earlier version that was in effect during our audit period is not posted on CPB's website.

In response to our draft report, all 10 stations have already taken corrective action or initiated actions to bring their stations into compliance with Act and CPB requirements.

FINDINGS AND RECOMMENDATIONS

Communications Act

Our audit found that all ten stations generally complied with Act requirements, except for eight stations that did not meet specific components of the open meetings, open financial records, and CAB requirements, as presented by station in Exhibit B. While the eight stations have either completed or initiated actions to address our findings as identified in Exhibit B, we did not evaluate the adequacy of their reported completed actions.³

This high level of noncompliance is consistent with our past experience auditing compliance with Act requirements. While all ten stations certified to CPB that they complied with all Act requirements in applying for their FY 2014 CSG, 8 of the 10 were not fully compliant.

Open Meetings Requirements

Our audit found that 5 of 10 stations did not meet at least 1 of 3 different components of the open meeting requirements. More specifically:

- three stations (KCND, KEDT, and WLCH) did not provide adequate advance notice of the CAB and/or subcommittee meetings of the governing boards;
- four stations (WOUB, KEDT, WMNF, and WLCH) did not make quarterly on-air announcements of the stations' open meetings policies; and
- WMNF did not provide written explanations for closed public meetings.

Section 396(k)(4) of the Act provides that funds may not be distributed to the licensee or permittee of any public broadcasting station, unless its governing body, any committees, or advisory body of the organization holds open meetings preceded by reasonable notice to the public. The minimum compliance requirements for "reasonable notice" to the public as stated in CPB's explanation of the Act require stations to "give reasonable notice to the public of the fact, time, and place of an open meeting at least one week (7 days) in advance of the scheduled date . . ."

CPB's explanation of the Act requires stations to provide three types of notice:

1. Notice placed in the "Legal Notices" or the radio and television schedules section of a local newspaper in general circulation in the station's coverage area; or, notice is available through a recorded announcement that is accessible on the station's phone system; or, notice is available through an announcement that is accessible on the station's web page; and

³ In Exhibits B and C we identified corrective actions implemented based on documentation provided with station responses to the draft report. For stations who only reported they had implemented corrective actions, we did not verify what was done.

2. Notice communicated by letter, e-mail, fax, phone, or in person to any individuals who have specifically requested that they be notified; and
3. The station makes on-air announcements on at least three consecutive days once during each calendar quarter that explain the station's open meeting policy and provide information about how the public can obtain information regarding specific dates, times, and locations.

CPB Certification Requirements for Station Grant Recipients, Open Meeting Requirements, III Minimum Compliance Requirements, C. "reasonable notice"

The statute also provides exceptions to the open meeting requirement. Closed sessions can be conducted to consider matters relating to "...individual employees, proprietary information, litigation, and other matters requiring the confidential advice of counsel, commercial or financial information obtained from a person on a privileged or confidential basis, or the purchase of property or services whenever the premature exposure of such purchase would compromise the business interests of any such organization." If a session is closed to the public pursuant to these statutory exceptions, a written statement containing an explanation of the reasons for closing the meeting must be made publicly available within a reasonable period of time.

Personnel at the five stations with open meeting issues stated that staff turnover, lack of awareness of open meeting requirements, and in three instances, the lack of written policies caused these omissions. Instituting governance oversight mechanisms prior to the annual certification to CPB of the station's compliance with these requirements would help eliminate future noncompliance.

Without adequate advance notice of upcoming public meetings on their websites or other authorized notice and without quarterly on-air announcements of the stations' open meeting policies, the public's opportunity to learn about upcoming meetings is limited and the Act's requirement to provide "reasonable notice" is not achieved.

In response to our findings, WOUB implemented new on-air announcement procedures; KCND adopted a policy to address preparing a written statement explaining the reasons for closing a public meeting; KEDT clarified its on-air announcement and is redesigning its website content; WMNF officials explained they made the required on-air announcements but could not document them, however, in the future they will document on-air announcements; and WLCH will post all of its public meeting dates on the website.

Open Financial Records Requirements

Our audit found that five stations (WOUB, KEDT, WRVS, WMKY, and WMNF) did not make the stations' AFRs available to the public, one component of the open financial records requirements. Further, three of these stations (WOUB, WRVS, and WMKY) also did not indicate on their websites how the public could obtain copies of their AFRs, as discussed further in our finding on transparency.

Section 396(k)(5) of the Act establishes that funds also may not be distributed under the Act unless a station makes available “for public examination copies of the annual financial and audit reports, or other information regarding finances, submitted to the Corporation” CPB considers a station in compliance if it makes its current year audited financial statements available for public review at its primary office, as well as its current year’s AFR or FSR, and any other financial reports submitted to CPB during the current year, including interim and final financial reports for any non-CSG CPB grants (active or completed) awarded to the station.

Further, the CPB’s *Certification Requirements for Station Grant Recipients* provides suggestions for making financial reports such as the AFR available to the public. This reference provides that:

The basic question is how to make the reports available. Because all stations must maintain a public inspection file by FCC rule, one alternative would be for a station to include publicly available financial records in the same location as this public file. If this information is kept in a different location, the documents should be maintained in a readily accessible location. Another alternative would be for a station to make this financial information available on the station’s website, with arrangements available for providing individuals with this information if they are unable or unwilling to use the Internet to access this information.

Four stations indicated they were unaware the AFR needed to be provided to the public and their websites needed to explain how these reports could be obtained, as discussed in the following transparency finding. The fifth station said the AFR omission was an oversight. Further, we noted that three of these stations did not have written operating procedures to address open financial records requirements. Without a copy available in the public file or information on a station’s website, the public would not be aware that the AFR is available.

In response to our findings, WOUB added the AFR to its public paper file; KEDT said that it was sure that the information would have been provided; WMKY placed a copy of its AFR in its public file; and WMNF added the AFR to its website.

CAB Requirements

Our audit found that four stations did not meet at least one of three different components of the CAB requirements. Two of the stations (WFHB and WMNF) did not have CABs that met during FY 2014. Both stations are reconstituting their CABs. WMNF’s CAB met in April 2015 and WFHB’s CAB did not meet in FY 2015 and is not scheduled to meet until FY 2016 (November 19, 2015). Two other stations’ CABs (KCND and KEDT) did not specifically advise their governing boards whether the stations’ programming was meeting the educational and cultural needs of their communities. The fifth community station in our sample (WLCH) did not have minutes for its CAB, so we were unable to determine whether the CAB advised its governing board about the station’s programming meeting community needs. Finally, KCND’s

radio CAB did not operate independently of the governing board, because a member of the Board of Directors served on the radio CAB as its chair.⁴

Section 396(k)(8) of the Act provides that CSG funds may not be distributed to any public broadcast station (other than any station which is owned and operated by a state, political, or special purpose subdivision of a state or a public agency) unless such station establishes a CAB. The CAB is intended to review the programming goals established by the station, the service provided, and significant policy decisions rendered by the station. The board shall also advise the governing body of the station on whether the programming and other policies of the station are meeting the specialized educational and cultural needs of the communities served and may make recommendations as it considers appropriate to meet such needs.

Further, CPB's interpretation of the Act states:

The composition of the community advisory board must reflect its independent role, and may not include members of the station staff or governing body in anything other than an ex officio or administrative capacity.

CPB Certification Requirements for Station Grant Recipients, Community Advisory Board, II. Interpretations, D. Composition of Community Advisory Board

Regarding the lack of CAB meetings, discussion with station officials disclosed that the new WFHB station manager discontinued the CAB due to a misinterpretation of the requirements. Additionally, during that time the station did not have formal operating procedures governing the operations of the CAB. The WMNF station manager said that he had been actively recruiting new members since his arrival in early 2015, and the new CAB recently held its first meeting in April 2015.

Regarding the lack of feedback from the CABs to their governing boards on whether programming was meeting the educational and cultural needs of their communities, we did not find any evidence that KEDT's CAB specifically addressed this responsibility, although it was spelled out in the station's bylaws. We found a similar situation at KCND, where specific programs were discussed in the meeting minutes, but we didn't find evidence that the CAB provided the governing board with specific feedback that the station's programming was meeting the specialized educational and cultural needs of the community. We were unable to determine whether the WLCH CAB provided any feedback, because the CAB did not have any meeting minutes.

In response to this finding, KEDT said it had taken steps to improve communications between the CAB and governing board; and KCND officials felt they were substantially in compliance because a radio report was presented at each Board of Directors meeting. Additionally, KCND adopted a resolution to formally present to the Board of Directors at each meeting a formal advisory from the CAB to explain whether the station's programming was meeting the

⁴ KCND's radio CAB is the Radio Council for Prairie Public Broadcasting, Inc., (PPB) the licensee of KCND. The Radio Council was established by agreement among PPB, the University of North Dakota, and North Dakota State University to provide advice to the management of PPB and serve as the CAB.

educational and cultural needs of the community. Finally, KCND drafted a resolution to change the radio CAB's structure and by-laws to meet CPB requirements and the CEO and board member, who both serve on the radio CAB, will be designated as non-voting members and operate as ex-officio members.

Recommendations

We recommend that CPB require the stations to:

- 1) provide documentation of corrective actions implemented and those planned with an estimated completion date and evaluate their adequacy; and
- 2) identify internal controls instituted (e.g., documenting that the requirement was met) to ensure future compliance with open meetings, open financial records, and CAB requirements.

Grantee Responses

In response to recommendation 1, the grantees indicated they had already taken or were in the process of taking corrective action to comply with Act requirements. WOUB's, WMKY's, and WMNF's responses provided copies of screen shots of AFR information posted to their websites, quarterly on-air announcement logs, and/or CAB meeting minutes to demonstrate their corrective actions. WMNF's response did not provide an example where it explained the basis for closing a public meeting, but we do not know whether a closed meeting has occurred since this practice went into effect. WFHB's response contended that although it didn't have a CAB it had two Board committees, the News and Public Affairs Committee and the Music Committee, which independently performed the same function, reviewing station programming. Each committee is made up of a combination of volunteers, Board members, listeners, and ex-officio staff members from relevant departments. During the audit station officials suggested combining meetings of the two annually, without Board members, to comply with the grant requirements in amore straightforward manner.

In response to recommendation 2, four grantees responses identified internal controls they have instituted (WOUB, KCND, KEDT, and WMNF) to ensure compliance with Act requirements. WMNF said it had formed an internal CPB compliance committee that meets quarterly to assure compliance and maintains a CPB compliance book that documents its compliance.

OIG Review and Comment

Based on the grantee responses, we consider recommendations 1 and 2 resolved but open pending receipt by CPB of documentation that corrective actions have been implemented from WFHB, KCND, KEDT, WRVS, WMNF, and WLCH.

Transparency Requirements

Our audit found that all ten stations generally complied with CPB's new transparency requirements to post information to their websites; even though 9 of 10 stations were missing at least one of the required documents. The most frequently missing documents related to how to

obtain CPB AFRs and the posting of upcoming meetings dates of the CAB and/or committees of the governing board. Exhibit C presents our findings by type and the status of stations' corrective actions. These issues can be readily addressed by clarifying CPB's transparency requirements.

Additionally, we noted some confusion at the five university stations tested over the reporting of compensation information comparable to the IRS requirements on Form 990. This confusion can also be eliminated by clarifying CPB's reporting requirements on compensation and independent contractor information.

CPB's FY 2014 Radio Community Service Grant General Provisions and Eligibility Criteria, Section J Transparency, states that:

each Grantee must have on its website, if it has one, or make available through another affiliated website (public media related or Licensee related) if it does not have a standalone website:

1. A list of station senior/executive management (names and titles) and contact information;
2. A list of the members of its Board of Directors;
3. A list of the members of its CAB (for stations that maintain a CAB either by requirement or by choice);
4. The date, time, and place of all open meetings as determined by the Communications Act (*see* 47 U.S.C. § 396(k)(4));
5. Its most recent Audited Financial Statements;
6. Information about how to obtain copies of annual financial reports;
7. If Grantee files its own IRS Form 990, the most current IRS Form 990;
8. If Grantee is not required by the IRS to file an IRS Form 990, compensation information, unless prohibited by law, comparable to the information outlined in the IRS Form 990 Part VII A, and contractor compensation in IRS Form 990 Part VII B; and
9. Its annual report on local content and services included in the Grantee's 2013 SAS (to be completed in early 2014) on its content and services that serve local needs, and analysis about the reach and impact of the local services in its community.

Disclosing Financial Information

All ten stations reviewed posted their audited financial statements on their websites, but five (WOUB, WRVS, WMKY, WBJC, and WUOT) did not have specific information on how to obtain copies of CPB's AFRs. One station (WLCH) had posted its 2013 financial statement audit report and 2012 Form 990 to its website but could not update its website to post the more recent 2014 financial statement audit and 2013 Form 990. The station had to hire a contractor to redesign its website to allow the station to update it as necessary.

Discussions with several station managers disclosed they did not post CPB AFRs because of an oversight or they misunderstood CPB's guidance that stations must provide "information about

how to obtain copies of annual financial reports.” For example, some officials indicated they did not understand the phrase “annual financial reports” meant CPB’s AFR or a financial report submitted to CPB for a non-CSG CPB grant. One manager believed that by posting the audited financial statement his station complied with the transparency requirements.

There was also confusion among the stations that did provide information on their websites about how to obtain annual financial reports. Of the five stations that did provide information on how to obtain copies of “annual financial reports” WFHB mentioned both the AFR and FSR. The KCND website provided information regarding how to obtain “Annual Financial Reports to CPB or other financial reports submitted to CPB.” The remaining three (WMNF, WLCH, and KEDT) only indicated that “annual financial reports” could be obtained or “other reports” were available upon request, but none of these three specified which annual financial reports were available, e.g., the CPB AFR. As a result, when requesting financial information from these three stations, the public would need to first ask what additional reports were available or know that stations submit an AFR to CPB in order to specifically request the CPB AFR.

Based on our discussions with station officials, CPB’s guidance on obtaining AFRs and other financial reports submitted to CPB needs to be more specific. CPB’s transparency guidance now cites only a generic reference to “annual financial reports.” This wording does not provide the same type of transparency that can result from requiring the posting of CPB’s AFR or FSR on the website, or specifying that the CPB’s AFR or FSR is available upon request, as well as other CPB financial reports for non-CSG grants. All CSG recipients are required to annually file an AFR or FSR

Because of this review and our discussions with station personnel, these stations have a better understanding of CPB’s transparency requirements. Several of the stations posted their CPB AFRs on their websites or initiated action to revise their websites while we were still at the stations.

Disclosing Upcoming Public Meeting Dates

While the stations provided information about upcoming governing board public meeting dates, four stations (WFHB, KCND, KEDT, and WLCH) did not provide upcoming meeting dates of their CABs and/or committees of their governing boards on their websites.⁵ Two of the stations (WFHB and KCND) have stated that they have already completed corrective actions, and the other two (KEDT and WLCH) have indicated that they initiated corrective actions.

Reporting Compensation Information

During our audit, we noted confusion at the university stations over the reporting of compensation information of their employees. One of the five university stations (WOUB) tested has reported compensation information on highest compensated employees, comparable to the Form 990 compensation information. The remaining four university stations in our sample did not report any compensation information because the compensation of station personnel and independent contractor payments did not meet the dollar threshold for reporting under the IRS

⁵ WLCH did not post current upcoming meeting dates because of website issues.

guidelines. While we have no finding of noncompliance on this issue, our discussion with station officials at some of the universities found confusion over this requirement in CPB's guidelines. We believe this confusion could be easily clarified by specifying the IRS dollar thresholds for reporting officer, key employees, highest compensated employees, and contractor compensation thresholds in future grant requirements.

Recommendations

We recommend that CPB management:

- 3) require the ten stations reviewed to provide documentation demonstrating their corrective actions to achieve compliance with transparency requirements, (e.g., website screen shots or similar evidence to show that omissions we reported are corrected);
- 4) revise CPB's transparency guidance to specifically require stations to post on their websites the station's AFRs or FSRs and to specify how to obtain other financial reports submitted to CPB for non-CSG CPB grants; and
- 5) revise transparency guidance for reporting compensation for institutional stations (government and university stations) in lieu of Form 990 by specifying the dollar thresholds for reporting compensation for officers, key employees, highest compensated employees, and independent contractors, consistent with IRS guidance.

Grantee Responses

In response to recommendation 3, grantees indicated that they had already taken or were in the process of taking corrective actions to comply with CPB transparency requirements. WOUB's and WMKY's responses provided copies of website posting to demonstrate their corrective actions. WOUB's documents included a "Reports to the Public" website page which displayed all the CPB transparency requirements. WLCH's redesign of its website plans a similar web page titled "WLCH Community Page," where all of CPB's transparency requirements will be displayed. WFHB said that since the audit it had placed the upcoming CAB meeting on its website calendar.

In response to recommendations 4 and 5, KCND agreed with recommendation 4 to revise the transparency guidance to make it absolutely clear what must be posted to be in compliance, and WUOT said it particularly agreed with recommendations 4 and 5. It was among the stations confused about posting the AFR to the website. It said current CPB guidance language is not specific and clarification was definitely needed. Finally, KEDT's response made a general statement recommending CPB put more resources into on-going training programs related to these issues. Additionally, it said that every station had some level of confusion with the CPB policies and suspects that most station managers would find some annual station compliance training useful.

OIG Review and Comment

Based on grantee responses, we consider recommendation 3 resolved but open pending CPB receipt of documentation (e.g., website screen shots or similar evidence to show that omissions

we reported are corrected) of corrective actions taken by KCND, KEDT, WRVS, WBJC, WUOT, and WLCH. WOUB, WMKY, and WFHB provided evidence in their response or during fieldwork that they completed their corrective actions regarding recommendation 3. We believe WUOT's "Reports to the Public" and WLCH's proposed "WLCH Community Page" web pages represent best practices for displaying CPB's transparency requirements.

Recommendations 4 and 5 address revising CPB grant agreement terms and remain unresolved.

Discrete Accounting

Our audit found that 4 of 10 stations' accounting systems did not discretely account for CPB restricted revenues and/or expenses in accordance with CSG grant requirements. One station (WFHB) did not have an accounting code to identify CPB revenues and expenses. A second station (WMNF) had accounting codes to identify CPB restricted and unrestricted revenues, but did not have a code to identify CPB restricted and unrestricted expenses. WMNF commingled CPB expenses with non-CPB expenses in its accounting system. Two other stations (WOUB and WBJC) had separate CPB accounts but comingled unrestricted and restricted funds within one revenue account. WOUB had one CPB expense account and WBJC had a national programming account that CPB restricted funds were spent on, neither separately tracked CPB restricted or unrestricted expenditures. As previously discussed in the Act finding, each of the stations certified that it complied with CPB's discrete accounting in its Fiscal Year 2014 Community Service Grant – Certification of Eligibility.

A fifth station (WMKY) had established discrete CPB accounts in its accounting system for both unrestricted and restricted funds, however, it mistakenly posted its CPB Rural Grant (unrestricted funds) to the restricted account and its CSG restricted funds to the CPB unrestricted fund accounts (revenues and expenses).

CPB's FY 2014 General Provisions and Eligibility Criteria Radio CSGs, Section 4.D. requires stations to provide discrete accounting and proper documentation to support all CSG revenues and expenditures.

Discrete accounting requires a unique code that identifies CSG revenues and expenses, restricted and unrestricted, so that both the grantor and the auditor can discretely track those funds within the accounting system. There is no requirement to segregate CSG funds in separate bank accounts. Co-mingling funds is allowable as long as the accounting system can easily identify transactions associated with a major activity (i.e., department, grant, contract or other project).

CPB's website, For Stations and Producers, Station Guidelines and Resources

During our fieldwork, station officials at WFHB and WBJC stated they were not aware that they had to establish discrete accounts to record CPB revenues and expenses (restricted and unrestricted). WMNF officials explained that its lack of discrete accounting for CPB expenses was an oversight. The WOUB operations official stated that the station annually budgets and expenses the restricted funds to pay NPR dues. The WMKY accounting official mistakenly

accounted for the CPB Rural Grant funds as restricted funds and did not properly post the CSG restricted funds to the restricted accounting code.

As a result, we could not independently identify CPB restricted fund expenditures in the accounting systems of these stations without the assistance of station officials. In each instance, they provided information identifying CSG restricted expenditures and supporting documentation to verify that expenses were incurred for national programming and related services in accordance with grant requirements. For this audit, we accepted managements' assertions that these expenses were paid with CPB restricted funds. However, we could not independently verify what expenses were paid from what funding source in the accounting system.

In response to our preliminary findings station officials have taken the following specific actions.

- WFHB officials stated they had made adjustments to their accounting system to account for restricted expenses. They did this by creating a subcategory of programming fees called "CPB Restricted."
- WMNF officials initiated action to revise their accounting system to discretely account for CPB restricted and unrestricted expenses.
- WOUB officials indicated that they are addressing this finding to correct their system for this year's financial statement audit.
- WBJC officials referred the matter to university accounting officials to address in the university's system.
- WMKY accounting officials stated they agreed with the finding and are making corrections on future grants and AFR statements.

Recommendations

We recommend that CPB require:

- 6) WFHB, WMNF, WOUB, and WBJC to comply with CPB's discrete accounting requirements and provide documentation identifying the account codes to be used to record CSG unrestricted and restricted revenues and expenses.
- 7) WMKY to put controls in place to ensure CSG unrestricted and restricted funds are recorded in the proper accounts.

Grantee Responses

In response to recommendation 6 all four grantees (WOUB, WFHB, WBJC, and WMNF) indicated that they had taken actions to establish appropriate codes in their accounting systems to ensure the proper recording and reporting of CPB restricted fund revenues and expenditures. WOUB's response identified the accounting code in its system that accounts for CPB restricted fund activities in FY 2015. In response to recommendation 7, WMKY indicated that it would provide an explanation to the University's accounting department on the use of the funds each time grant funds are received.

OIG Review and Comment

Based on grantee responses, we consider recommendation 6 resolved but open pending CPB's verification that new codes have been implemented and are being used to record FY 2015 restricted fund activities for WFHB, WBJC, and WMNF. WOUB's response identified the accounting codes to discretely account for CPB grant funds. Based on WMKY's response, we consider recommendation 7 resolved and closed.

Reporting Restricted CSG Funds on Schedule E

Our review of restricted expenses reported on AFR, Schedule E found that four stations did not accurately report their CPB restricted expenses. Two stations (WFHB and WMKY) reported their CPB restricted expenses across all five functional expense categories when both stations used those funds on programming and production. One station (WRVS) reported all of its CSG expenses (both restricted and unrestricted) in the restricted broadcasting and engineering expense category, when the station spent all its restricted funds on only programming and production. The fourth station (KEDT) overstated its CPB restricted expenses by reporting all of its programming expenses as CPB expenses, including amounts funded with non-CPB funds.

CPB's Financial Reporting Guidelines for Preparing the Annual Financial Report (Guidelines) requires grantees to report all expenses on Schedule E. These Guidelines explain that Schedule E is designed to show expenses by functional category. Schedule E provides that functional expenses be reported by funding source, i.e., CPB restricted, CPB unrestricted, other CPB, and non-CPB funds.

Accounting officials at each of the four stations generally acknowledged that CPB restricted expenses had not been properly reported on the AFR. They indicated that CPB CSG expenses would be properly reported in the future.

While our audit found that the stations properly spent their restricted funds on national programming and related activities, erroneous reporting does not provide CPB with accurate information on how the CPB restricted funds were spent.

Recommendation

We recommend that CPB require:

- 8) WFHB, WMKY, WRVS, and KEDT to explain what internal controls they will institute to ensure accurate reporting in the future.

Grantee Responses

In response to recommendation 8 all four grantees (WFHB, KEDT, WRVS, and WMKY) indicated that they had taken actions to ensure the proper reporting of CPB restricted fund expenditures in future AFR reporting. WFHB and WMKY said they had established the appropriate accounts in their accounting systems to facilitate the accurate reporting of CPB expenditures. WRVS said they would establish the appropriate accounts. KEDT indicated that its accounting service was fine with the recommendation and will correct in future reporting.

OIG Review and Comment

Based on grantee responses, we consider recommendation 8 resolved but open pending CPB's verification that each grantee accurately reported CPB restricted fund expenditures on the FY 2015 AFR. CPB should review the CPB restricted fund expenses reported on Schedule E and determine whether reported expenses are in agreement with the FY 2014 award amounts. CPB should resolve any differences in reported expenses and award amounts before closing this recommendation.

Scope and Methodology

The objectives of this audit were to determine whether ten selected grantees: a) spent CPB restricted radio funds on national programming; b) discretely accounted for CPB revenues and expenditures in its accounting system; c) complied with the Act requirements for open meetings, open financial records, CAB, EEO reporting, and donor lists and political activities prohibitions; and d) complied with website transparency grant requirements.

Our tests included verifying that CPB radio restricted expenditures were spent on national programming and related activities authorized in CPB FY 2014 Radio Community Service Grant General Provisions and Eligibility Criteria. We traced detailed CPB restricted expenditures to station trial balances and verified 100 percent of the CPB restricted expenditures to vendor invoices or payroll records of employees who worked on programming that was put into national programming distribution. We also verified whether stations' accounting systems discretely accounted for CPB restricted revenues and expenditures. Finally, we compared CPB restricted funds awarded to each station to amounts reported on the stations' FY 2014 AFR as CPB restricted expenses.

We gained an understanding of stations' written policies (internal controls) for complying with Act requirements that included: open meetings, open financial records, CAB, EEO, and donor lists and political prohibitions. We used this information to plan our substantive tests of Act and transparency grant requirements, as well as to identify contributing causes for non-compliance with these requirements. We interviewed station officials and reviewed web postings, operating policies, meeting notices, meeting minutes, and other records containing Act compliance documents.

Our fieldwork was conducted from March 2015 through August 2015. Our audit was performed in accordance with the *Government Auditing Standards* for performance audits.

Exhibit B

Compliance with Communications Act Requirements

Stations	Level	Open Meetings			Open Financial Records	CAB		
		Advance Notice Committee Meetings	Quarterly On-Air Announcements	Closed Meeting Explanation	AFR Available to the Public	Meets Regularly	Advises Governing Board Programming Meets Needs	Operates Independent of Governing Board
WOUB	B		No (1)		No (1)	n/a	n/a	n/a
WFHB	B					No (3)		
KCND	C	No (2)					No (2)	No (2)
KEDT	C	No (2)	No (2)		No (2)		No (2)	
WRVS	C				No (2)	n/a	n/a	n/a
WMKY	C				No (1)	n/a	n/a	n/a
WBJC	D					n/a	n/a	n/a
WMNF	D		No (1)	No (2)	No (1)	No (1)		
WUOT	D					n/a	n/a	n/a
WLCH	D	No (3)	No (2)				unable to determine (4)	
Totals		<i>3 of 10</i>	<i>4 of 10</i>	<i>1 of 10</i>	<i>5 of 10</i>	<i>2 of 5</i>	<i>2 of 5</i>	<i>1 of 5</i>

(1) station implemented corrective actions and provided documentation of actions taken

(2) station stated it had implemented corrective actions

(3) station agreed to take corrective actions

(4) no minutes were taken at CAB meetings

Exhibit C

Compliance with Transparency, Discrete Accounting, and AFR Reporting

Stations	Level	Transparency			Discrete Accounting			AFR Reporting
		CAB/ Committee Meeting Dates	How to Obtain CPB AFR	Financial Statement & 990	Discrete CPB Accounting Codes	Discrete Restricted Unrestricted Codes	Discrete Codes Not Followed	
WOUB	B		No (1)			No (1)		
WFHB	B	No (1)			No (2)			No (3)
KCND	C	No (2)						
KEDT	C	No (2)						No (3)
WRVS	C		No (2)					No (3)
WMKY	C		No (1)				No (2)	No (3)
WBJC	D		No (2)			No (2)		
WMNF	D				No (2)			
WUOT	D		No (2)					
WLCH	D	No (3)		No (3)				
Totals		4 of 10	5 of 10	1 of 10	2 of 10	2 of 10	1 of 10	4 of 10

(1) station implemented corrective actions and provided documentation of actions taken

(2) station stated it had implemented corrective actions

(3) station agreed to take corrective actions

Exhibit D

WOUB-FM response to the draft report

Tom Hodson
Director and General Manager
WOUB Public Media
35 S College Street
Athens, Ohio 45701

September 1, 2015

William J. Richardson III
Deputy Inspector General
Office of Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

Mr. Richardson,

WOUB Public Media in Athens, Ohio would like to thank you for providing the draft audit report, "Audit of CPB Radio Restricted Fund Expenditures, Communications Act, Transparency, and Discrete Accounting for Fiscal Year 2014, Draft Report No. ACR1506-XXXX."

Earlier this year, we reviewed all of CPB's preliminary observations provided by the Office of Inspector General (May 8, 2015) and as a result of those observations have implemented changes and added documentation that result in greater compliance within the guidelines of Community Service Grant recipients, as well as within the Communications Act.

WOUB is pleased to provide additional documentation and comment as a result of the current draft report. It remains our intention to be in full compliance with all of the CPB Grant General Provisions and Eligibility Criteria as our response to the draft report indicates.

Thank you for providing us the opportunity to respond.



Thomas Hodson
Director & General Manager

Findings and Recommendations for WOUB Public Media

Images referenced within this document can be viewed online.
woub.org – select “About WOUB” – select “**Click Here for Reports to the Public**”

Communications Act

Open Meetings Requirements

- *WOUB did not make quarterly on-air announcements of the stations open meetings policies*
- *In response to our findings, WOUB implemented new on-air announcement procedures.*

The minimum compliance requirements for “reasonable notice” to the public as stated in CPB’s explanation of the Act requires stations to “give reasonable notice to the public of the fact, time, and place of an open meeting at least one week (7 days) in advance of the scheduled date”

CPB’s explanation of the Act requires stations to provide three types of notice:

1. Notice placed in the "Legal Notices" or the radio and television schedules section of a local newspaper in general circulation in the station's coverage area; or, notice is available through a recorded announcement that is accessible on the station's phone system; or, notice is available through an announcement that is accessible on the station's web page; and
2. Notice communicated by letter, e-mail, fax, phone, or in person to any individuals who have specifically requested that they be notified; and
3. The station makes on-air announcements on at least three consecutive days once during each calendar quarter that explain the station's open meeting policy and provide information about how the public can obtain information regarding specific dates, times, and locations.

.....

WOUB Response

Currently, all three types of notices are provided on the station website, woub.org. In Figure 1.0 below, note #1 “Future Meetings and Locations of Meetings,” #2 “Minutes of Previous Meetings/Sign Up for Meeting Materials,” and #3 “WOUB Announcements of Trustee Meeting Policy.”

The first two links go directly to Ohio University Board of Trustees pages as show in Figure 1.1, “Board Meeting Dates and Locations,” and Figure 1.2 “Sign up to Receive

Electronic Material” or how to contact the Secretary to the Ohio University Board of Trustees to receive other forms of communication.

Fig. 1.0 woub.org/reports-to-the-public

Woub.org/reports-to-the-public

Nelsonville Music Festival 2015 Summer Activities Guide About Woub Listen Learn Search

Woub Digital News Sports Culture Perspectives Woub Now Support

REPORTS TO THE PUBLIC

Woub operates within the reporting requirements of the Federal Communications Commission and the Corporation for Public Broadcasting (CPB) and publishes a number of documents online to meet those requirements. CPB is the agency that provides federal funding for public television and radio stations. Rules require that every public media entity should be as transparent as possible in its governance and finances. Therefore, Woub Public Media is providing the following information to comply with CPB policy for transparency in our finances and governance, and in the public interest.

Reports are available at the links below, or by visiting the main office of Woub Public Media at 35 S. College Street, Athens, Ohio (3rd floor complex) during normal business hours 8:00 am – 5:00 p.m. Monday through Friday.

- [Staff List](#)
- [2014 Woub Local Content Report](#)
- [EEO Policy](#)
- [2015 Woub EEO Report](#)
- [Information on Closed Captioning](#)
- [2013-2014 Audited Financial Statement](#)
- [2014 Radio CPB AFR](#)
- [2014 Television CPB AFR](#)
- [IRS Form 990 FY '14](#)
- [Political Activities Policy](#)
- [Diversity Statement](#)
- [Woub Donor List Policy](#)

Woub Public Media is licensed to Ohio University. Use the links below for additional information regarding the Ohio University Board of Trustees.

- [List of Members](#)
- [#1 - Future Meetings and Locations of Meetings](#)
- [#2 - Minutes of Previous Meetings/Sign Up for Meeting Materials](#)
- [#3 - Woub Announcements of Trustees Meeting Policy](#)

Contact information for Woub Public Media:

Woub Public Media
35 S. College Street
Athens, Ohio 45710

740-593-1771
800-456-2044

Figure 1.1 Board Meeting Dates and Locations

The screenshot shows the Ohio University Board of Trustees website. At the top, there is a navigation bar with links for 'Future Students', 'Current Students', 'Parents/Families', 'Alumni/Friends', and 'Faculty/Staff'. Below this is the Ohio University logo and a search bar. The main content area features a large banner with the text 'BOARD OF TRUSTEES' and a scenic image of a campus path. A 'Welcome' section follows, with a sidebar on the left containing links for 'WELCOME!', 'BOARD NEWS', 'AGENDAS/MINUTES', 'MEMBERS', 'MEMBERSHIP SELECTION', 'GOVERNANCE/BYLAWS', 'HISTORY', 'OFFICE OF THE PRESIDENT', and 'CONTACT'. The main text area lists 'BOARD MEETINGS' with the following dates and locations:

Date	Location
October 16, 2015	
January 22, 2016	
March 11, 2016	
June 24, 2016	Zanesville

Below the meeting dates, there is a paragraph describing the Board's role and a section for 'BOARD NEWS' with a link to 'View more Board News'. A paragraph explains the website's purpose as an information source for the University's constituencies. Contact information for the Board of Trustees office is provided: 740-593-1804 or trustees@ohio.edu. A group photograph of the Board of Trustees members is shown, followed by a caption listing their names: 'From Top Left: N. Vister Goodman, Janice Johnson, J. Patrick Campbell, Cary Cooper, Sandra J. Anderson, Keith Wilbur, Peggy VanWeghe, Peter Mathre; From Bottom Left: Janetta King, Sharmaine Wood, Vice Chair David A. Wolford, President Rodens J. McDavis, Chair David Brayshaw, Julie Mann Keppeler, David Sittel'.

At the bottom of the page, a dark grey box contains the following contact information:

Ohio University Board of Trustees
 Culler Hall 110 - Athens OH 45701
 Office: 740.593.1804 - Fax: 740.593.9196
trustees@ohio.edu

Figure 1.2 Sign up to Receive Electronic Material or receive other forms of communication

The screenshot shows the Ohio University Board of Trustees website. At the top, there is a navigation bar with links for Future Students, Current Students, Parents/Families, Alumni/Friends, and Faculty/Staff. Below this is the Ohio University logo and a search bar. The main content area is divided into two columns. The left column contains a list of links: WELCOME, BOARD NEWS, AGENDAS/MINUTES, MEMBERS, MEMBERSHIP SELECTION, GOVERNANCE/BYLAWS, HISTORY, OFFICE OF THE PRESIDENT, and CONTACT. A grey box with white text in the left column says "Sign-up to receive electronic notification of the posting of meeting materials". The right column features a "Contact" section with two sub-sections: "Secretary to the Board of Trustees" and "Assistant to the Secretary of the Board of Trustees". Each sub-section lists the name, title, address, phone number, and fax number. At the bottom of the page, there is a footer with contact information for the Ohio University Board of Trustees, including the address, phone number, fax number, and email address. On the right side of the footer, there is a copyright notice for 2015 Ohio University, All Rights Reserved, and a link to ADA Compliance.

Future Students Current Students Parents/Families Alumni/Friends Faculty/Staff

OHIO UNIVERSITY [etour](#) | [My OHIO Portal](#) Ohio.edu

BOARD OF TRUSTEES

WELCOME
BOARD NEWS
AGENDAS/MINUTES
MEMBERS
MEMBERSHIP SELECTION
GOVERNANCE/BYLAWS
HISTORY
OFFICE OF THE PRESIDENT
CONTACT

Sign-up to receive electronic notification of the posting of meeting materials

Contact

Secretary to the Board of Trustees
Dr. Peter C. Mather
Cutler Hall 110
matherp@ohio.edu
P: 740-593-2958
Fax: 740-593-9196

Assistant to the Secretary of the Board of Trustees
Shawnee C. Meek, M.A.
Cutler Hall 108
meeks1@ohio.edu
P: 740-593-2572
Fax: 740-593-9196

Ohio University Board of Trustees
Cutler Hall 110 - Athens OH 45701
Office: 740.593.1804 - Fax: 740.593.9196
trustees@ohio.edu

Ohio University
Athens, Ohio 45701
Tel. 740.593.1000

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[ADA Compliance](#)

The third type of notice, indicated by #3 on Figure 1.0 is a link that goes directly to WOUB's Open Meetings of the Ohio University Board of Trustees Policy that includes the language to be utilized during on-air announcements for at least three consecutive days, and at least one week ahead of the scheduled meeting. (See Figure 1.3.) The language of the announcement also indicates how the public can obtain information regarding specific dates, times, and locations. Figures 1.4 and 1.5 are the affidavits for radio and television announcements of the most recent meeting of the Ohio University Board of Trustees.

Fig. 1.3 Open Meeting Policy



WOUB Public Media Open Meetings of the Ohio University Board of Trustees Policy

As the broadcast license holder of WOUB Public Media, a unit of Ohio University, all board meetings held by the trustees will be announced on-air and through woub.org

On-air, (radio and television) announcements will occur on at least three consecutive days at least one week (7 days) in advance of the scheduled meeting date. Announcements will be labeled as discrete objects in order for proper affidavit reports to be run indicating elements are broadcast in compliance of Open Meeting requirements of the Communications Act. These affidavit reports should be placed into the public file quarterly. On-air copy will follow the template listed below.

Online at woub.org, links will be maintained for the trustee meeting schedules, current list of trustee members, minutes from previous meetings, as well as instructions on signing up for meeting notices.

May 1, 2015

:60 Copy for TV/Radio OU Board of Trustees Meetings

Ohio University is the license holder for W-O-U-B Public Media. The Ohio University Board of Trustees are fiscally responsible for the university and its activities. The Trustees will hold their next scheduled board meeting on _____ (date) at _____ (location). The members of the Board are charged with the responsibility to be accountable to the institution's mission and cultural heritage, the transcendent values and principles that guide and shape higher education and the public interest - as well as the legitimate and relevant interests of the institution's various constituencies.

Per Ohio Revised Code Section one-twenty-one POINT twenty-two, meetings of the University Board of Trustees are open to the public, although some portions may be held in closed executive session.

More information about the Board of Trustees, including the members, future meeting dates and locations, minutes of past meetings or to sign up to receive notification of the posting of meeting materials - go online to W-O-U-B dot O-R-G and click on the "About W-O-U-B" tab.

Fig. 1.4 Radio Public Meeting Notice Affidavit

Affidavit for Open Meeting Announcements for Board of Trustees Meeting

For the meeting August 28th, 2015, the following announcement was made on WOUB-FM Athens OH; WOUC-FM, Cambridge OH; WOUL-FM, Ironton, OH; WOUZ-FM, Zaneville, OH, and WOUH-FM, Chillicothe, OH:

Ohio University is the license holder for WOUB Public Media. The Ohio University Board of Trustees are fiscally responsible for the university and its activities. The Ohio University Board of Trustees have scheduled a retreat for August 28, 2015 on the Ohio University Dublin campus.

The members of the Board are charged with the responsibility to be accountable to the institution's mission and cultural heritage, the transcendent values and principles that guide and shape higher education and the public interest - as well as the legitimate and relevant interests of the institution's various constituencies.

Per Ohio Revised Code Section one-twenty-one POINT twenty-two, meetings of the University Board of Trustees are open to the public, although some portions may be held in closed executive session.

More information about the Board of Trustees, including the members, future meeting dates and locations, minutes of past meetings or to sign up to receive notification of the posting of meeting materials - go online to WOUB dot ORG and click on the "About WOUB" tab.

The announcement ran at the following times:

8/19/2015:	7:49am; 5:19pm
8/20/2015:	6:19am; 4:19pm
8/21/2015:	8:19am; 5:19pm

Rusty Smith
WOUB Public Media
Director of Radio

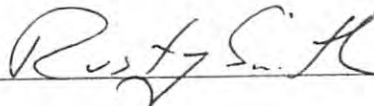
 8/30/2015

Fig. 1.5 Television Public Meeting Affidavit

WOUB DT									
Report date: 08/26/2015						Log Performance Report (OTH)			
Report time: 13:38:56		From: 08/17/2015 To: 08/26/2015				Page: 1			
Search Criteria: ITEM TITLE *OPEN*MEET*									
Video Source	CART	Title		Available	Notes				
Audio Source	Tape/Cut	Type	Sub-Title	Length	From/To	DAYS			
FI_OPENAUG15		FI	DO NOT DELETE - OPEN MEETING ANNOUNC	01:00:00	08/19/15	3MTWTF5			
FI_OPENAUG15	0000/00		AIR 2X/DAY ALL STATIONS DAY&PRIME A		08/21/15	YYYYYY			
Wed	08/19/2015	at	19:57:01:00	for	00:01:00:00	on	20WBHD		
Wed	08/19/2015	at	22:56:46:00	for	00:01:00:00	on	20WBHD		
Thu	08/20/2015	at	18:58:47:00	for	00:01:00:00	on	20WBHD		
Thu	08/20/2015	at	21:56:46:00	for	00:01:00:00	on	20WBHD		
Fri	08/21/2015	at	19:56:46:00	for	00:01:00:00	on	20WBHD		
Fri	08/21/2015	at	21:56:47:00	for	00:01:00:00	on	20WBHD		
This item appeared 6 times between 08/17/2015 and 08/26/2015.									

Open Financial Records Requirements

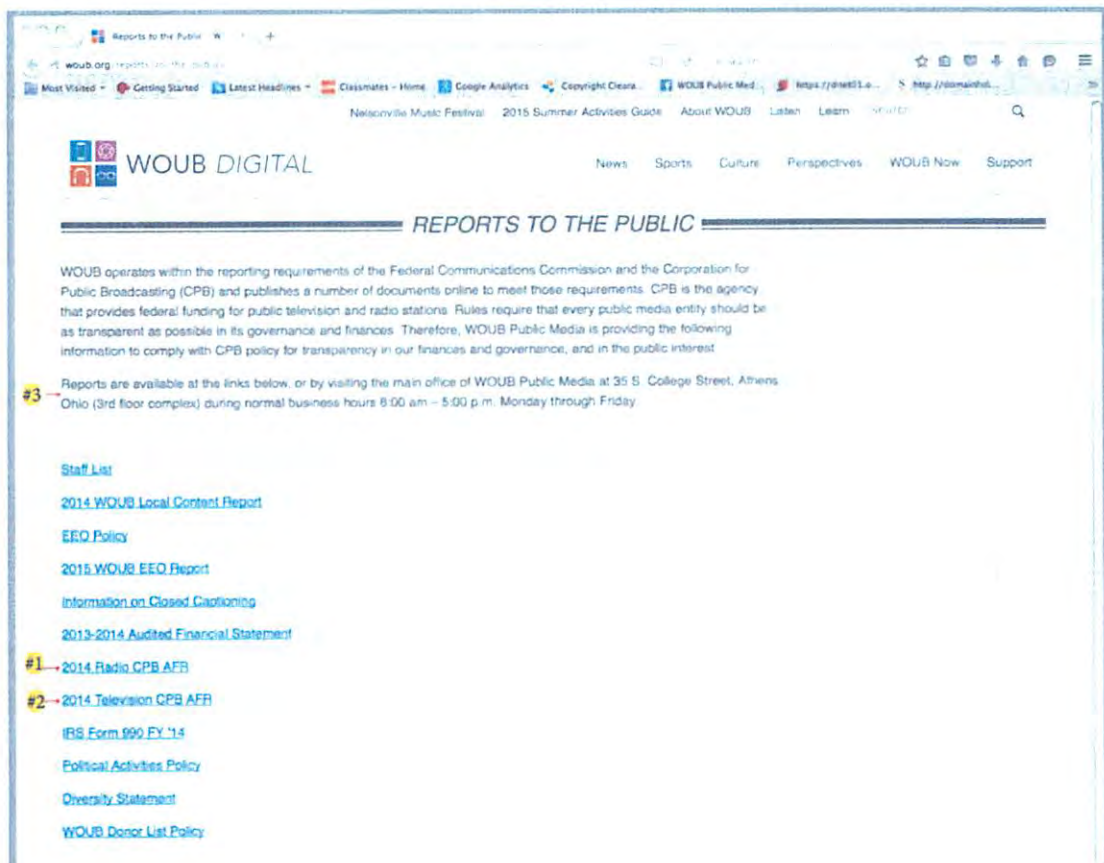
- *WOUB did not make the stations' AFRs available to the public, one component of the open financial records requirements*
- *WOUB also did not indicate on their websites how the public could obtain copies of their AFRs, as discussed further in the following finding on transparency*
- *In response to our findings, WOUB added the AFR to its public paper file*

WOUB Response

Although the draft report indicates that WOUB has added the AFR to its public paper file, (which is correct), radio and television AFRs have also been added to the station website as shown by #1 and #2 on Figure 2.0.

Also indicated on Figure 2.0 is #3, instructions on how the public could obtain copies of the AFRs outside of utilizing the station website.

Fig. 2.0 Station AFRs



Transparency Requirements

CPB's FY 2014 Radio Community Service Grant General Provisions and Eligibility Criteria, Section J Transparency, states that each Grantee must have on its website, if it has one, or make available through another affiliated website (public media related or Licensee related) if it does not have a standalone website:

- 1. A list of station senior/executive management (names and titles) and contact information;*
- 2. A list of the members of its Board of Directors;*
- 3. A list of the members of its CAB (for stations that maintain a CAB either by requirement or by choice);*

4. *The date, time, and place of all open meetings as determined by the Communications Act (see 47 U.S.C. § 396(k)(4));*
5. *Its most recent Audited Financial Statements;*
6. *Information about how to obtain copies of annual financial reports;*
7. *If Grantee files its own IRS Form 990, the most current IRS Form 990;*
8. *If Grantee is not required by the IRS to file an IRS Form 990, compensation information, unless prohibited by law, comparable to the information outlined in the IRS Form 990 Part VII A, and contractor compensation in IRS Form 990 Part VII B; and*
9. *Its annual report on local content and services included in the Grantee's 2013 SAS (to be completed in early 2014) on its content and services that serve local needs, and analysis about the reach and impact of the local services in its community.*

.....stations reviewed posted their audited financial statements on their websites, but...WOUB... did not have specific information on how to obtain copies of CPB's AFRs.
.....

WOUB Response

In response to the identified transparency requirements, WOUB has confirmed that all of the required Transparency Requirements identified above are included on the station website.

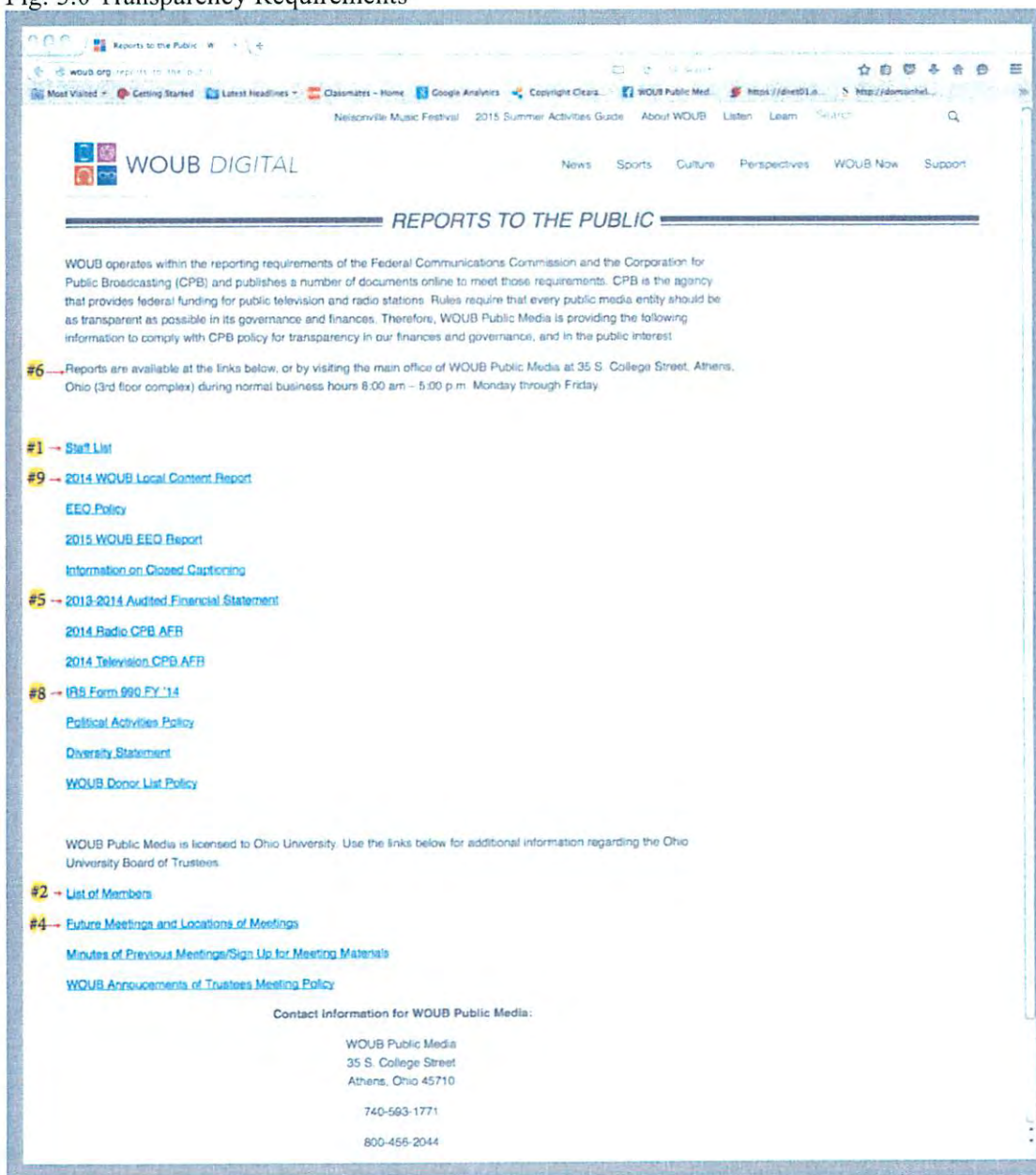
Figure 3.0 highlights:

- #1. A staff list that identifies and includes senior/executive management (names and titles) with contact information
- #2. A list of the members of the Ohio University Board of Trustees
- #3. <WOUB is not required to maintain a CAB>
- #4. The date, time, and place of open meetings of the Board of Directors as determined by the Communications Act (see 47 U.S.C. § 396(k)(4))
- #5. The most recent Audited Financial Statement (2013-2014)
- #6. Information on how to obtain copies of annual financial reports (or any other document listed online at "Reports to the Public" including address and hours, phone (local and 800), or direct link)
- #7. <WOUB does not file its own IRS Form 990>
- #8. Comparable information as outlined in the IRS Form 990 part VII A
- #9. Most recent Local Content Report

Located at the back of this response report are PDFs or other information found by clicking each link identified in the Transparency Requirements above. The only exceptions are:

- #5, the most recent Audited Financial Statement (2013-2014) where only the cover sheet is provided in this report as demonstration of availability, (rather than the entire thirty-page document, which is available in full via the link or request as noted) and,
- #6, information on how to obtain copies of annual financial reports (or any other document listed online at "Reports to the Public" including address and hours, phone (local and 800), or direct link), as that information is identified directly on Figure 3.0.

Fig. 3.0 Transparency Requirements



Discrete Accounting

Discrete accounting requires a unique code that identifies CSG revenues and expenses, restricted and unrestricted, so that both the grantor and the auditor can discretely track those funds within the accounting system.

- WOUB had separate CPB accounts but comingled unrestricted and restricted funds within one revenue account and one expense account.*
 - The WOUB operations official stated that annually she budgets and expenses the restricted funds to pay NPR dues.*
 - In each instance they provided information identifying CSG restricted expenditures and supporting documentation to verify that expenses were incurred for national programming and related services in accordance with grant requirements.*
 - WOUB officials indicated that they are addressing this finding to correct their system for this year's financial statement audit*
 - Require WOUB comply with CPB's discrete accounting requirements and provide documentation identifying the account codes to be used to record CSG unrestricted and restricted revenues and expenses*
-

WOUB Response

While WOUB was able to identify the expenses related to the restricted portion of CPB Fund Expenditures and determine that all funds had been utilized appropriately, at the time of the review the unrestricted and restricted funds were comingled within one revenue account and one expense account.

Once that information was identified in the preliminary report in May 2015, WOUB and Ohio University took immediate steps to address the situation and corrective measures were implemented without delay, as shown below.

Figure 4.0 indicates discrete accounting for FY '15, with GR011130E (highlighted in yellow) as "CPB Radio Community Service Grant – Restricted" (also identified by description in Figure 4.1).

Moving into FY '16, Figure 4.0 again identifies discrete accounts created within the Ohio University and WOUB Public Media systems, insuring that an auditor can discretely track restricted and unrestricted funds within the revenue and expense accounting system. (FY '16 has a start date of October 2015.)

Fig. 4.0 WOUB FY '15 Discrete Accounting

Report ID: FMS-M210 Financial Account Analysis Report Page 1167 of 2615
Project Account Summary 20-JUL-15 19:50:56
 Month: June, 2015

Planning Unit: 00000	Planning Unit Head: Titworth, Brian Scott (Scott)	Contract No:
Project: GR011130E CPB RADIO COMMUNITY SERV	Organization: 17010 WOUB CENTER PUBLIC MEDIA	CFDA No:
Project Manager: Brewer, Mark S	Org Manager:	Customer:
Start Date: 01-OCT-14	End Date: 30-SEP-16	

ITD Budget	ITD Expenditures	Encumbrances	Available Balance	Percent Obligated	Task Expenditure Category	Current Month	Fiscal Year To Date
15							
FY15 CPB RADIO RSTR							
Active Date: Begin 01-OCT-14 End 30-SEP-16							
49,030.00	49,030.00	0.00	0.00	100.0	COMMUNICATION	49,030.00	49,030.00
49,030.00	49,030.00	0.00	0.00	100.0	Sub-Total Task 15	49,030.00	49,030.00
49,030.00	49,030.00	0.00	0.00	100.0	Total Task 15	49,030.00	49,030.00
49,030.00	49,030.00	0.00	0.00	100.0	Total Project	49,030.00	49,030.00

FY 16 CPB Radio Community Service Grant – Restricted will be identified in Task 16 as shown below:

16
 FY16 CPB RADIO RSTR
 Active Date: Begin 01-OCT-15 End 30-SEP-17

Fig. 4.1 GR011130E Identified as Restricted Funds

Project Information (Ohio University Operations) - GR011130E

Number: GR011130E	Name: CPB RADIO COMMUNITY SERV
Type: PRIVATE INDIRECT	Organization: 17010 WOUB CENTER PUBLIC
Trans Duration: 01-OCT-2014 - 30-DEC-2016	Status: Approved
Description: Radio Community Service Grant Restricted	Public Sector
Product Source	Last Summarized
Source Reference	Date: 27-AUG-2015
	PA Period: AUG 2015-16
	GL Period: AUG 2015-16

Classifications Customers Key Members

Category	Class Code	Code Description
PRIVATE	NON-EXCHANGE	Non-Exchange

Conclusion

WOUB Public Media has a long history of service to the local region thanks in large part to the Community Service Grants provided through the Corporation for Public Broadcasting.

It is certainly the intention of WOUB to be in full compliance with all of the CPB Grant General Provisions and Eligibility Criteria as our response to the draft report hopefully indicates.

We appreciate the thorough efforts of the Inspector General's Office and the opportunity allowed to provide information and documentation to identify corrective actions made at WOUB Public Media.

Transparency Requirements Documents

Transparency Document: Staff list that identifies and includes senior management (names and titles) with contact information

NAME	TITLE
Hodson, Thomas hodson@ohio.edu	Director and General Manager
Brewer, Mark brewer@ohio.edu	Chief Operating Officer
Skidmore, Steve skidmore@ohio.edu	Chief Technology Officer
Baidya, Atish baidya@ohio.edu	Multimedia Content Editor
Barnes, Robin barnesr@ohio.edu	Public Radio Announcer
Borchard, Suzanne Roberts roberts1@ohio.edu	Ready-To-Learn Coordinator
Butcher, Joan pittmanc@ohio.edu	Director of Program Services/Chief of Staff
Cash, Ken cashk@ohio.edu	Transmission Supervisor
Cyransue, Sue cyransue@ohio.edu	Director of Business Operations
Douds, Terry doudsterry@ohio.edu	Broadcast Operations Supervisor
Flowers, Caitlin flowersc@ohio.edu	Traffic & Promotions Coordinator
Gibson, Bryan gibson1@ohio.edu	Arts and Entertainment Content Manager
Hawk, Dwayne hawkd@ohio.edu	Broadcast Engineer
Hellenberg, Mark hellenbe@ohio.edu	Music Producer
Hunter, Allison hunteral@ohio.edu	Editor-in-Chief
Jeffers, Jeannie jeffersd@ohio.edu	Director of Development and Communications
Kasler, Holly n/a	WOUB Support Staff
Kyle, Ann kylea@ohio.edu	Administrative Associate
Lovett, Loring lovettl@ohio.edu	Corporate Support Representative
Malesick, Kathy malesick@ohio.edu	Director of Corporate Support
Martin, Kelly martink1@ohio.edu	Public Information Coordinator
Morman, Yvonne britey@ohio.edu	Accounting Specialist - Technology & Operations
Myers, Tim myerst@ohio.edu	Director of Digital Delivery
Neimayer, Alex neimayer@ohio.edu	Broadcast Technician
Nohl, Doug nohl@ohio.edu	Equipment Room Mgr. and Midday Studio Tech
Pack, Terry pack@ohio.edu	Broadcast Technician
Palmer, Jonathan (J.P.) palmerj1@ohio.edu	Telecommunications Senior Specialist
Palsa, Soozan palsa@ohio.edu	Director of Graphic Design
Price, Kevin pricek1@ohio.edu	Education and Media Supervisor
Proffitt, Deena proffitt@ohio.edu	Records Management Coordinator / Membership Coordinator
Rich, Adam richa1@ohio.edu	Audio Supervisor
Riddle, Chris riddlec@ohio.edu	Public Radio Announcer
Rodriguez, Mike rodrigum@ohio.edu	Director of Production Services & Student Development
Romine, Kayla rominek@ohio.edu	On-Air Coordinator
Ross, Ted rosst@ohio.edu	Director of Engineering
Shaw, Evan shawe@ohio.edu	Electronic Media Editor / Videographer
Smith, Rusty smithma@ohio.edu	Director of Radio
Sorden, Dave sordend@ohio.edu	Broadcast Engineer
Tebben, Susan tebben@ohio.edu	News Assignment Editor
Tumblin, Zach tumblinz@ohio.edu	Manager of Distance Learning Operations
Wallace, Haven wallaceh@ohio.edu	Broadcast Engineer
Williams, Jason willij13@ohio.edu	Accountant

Transparency Document: List of the Members of the Ohio University Board of Trustees

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BOARD OF TRUSTEES

WELCOME
BOARD NEWS
AGENDAS/MINUTES
MEMBERS
MEMBERSHIP SELECTION
GOVERNANCE/BYLAWS
HISTORY
OFFICE OF THE PRESIDENT
CONTACT

Members

Board of Trustees Members
Sandra J. Anderson, *Chair*
David A. Wolford, *Vice Chair*
Cary Cooper
N. Victor Goodman
Janetta King
Kevin B. Lake
Dave Scholl
Janelle Simmons
Peggy Viehweger
Julie Mann Keppner, *alumni representative*
Patrick Roden, *student trustee*
Sharmaine Wilcox, *student trustee*

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Peter C. Mather, *secretary*

Faculty Representatives
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David Thomas, *faculty representative*

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Patrick Roden
David Thomas
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University Resources Committee
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Kevin B. Lake
Julie Mann Keppner
Janelle Simmons
Ben Stuart
Sharmaine Wilcox

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Janetta King
Julie Mann Keppner
Patrick Roden
Dave Scholl

Executive Committee
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Janetta King
Dave Scholl
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Janelle Simmons, *chair*
Cary Cooper
Kevin B. Lake
Peggy Viehweger
Sharmaine Wilcox

Ohio University Board of Trustees

Transparency Document: Date, time, and place of open meetings of the Board of Directors as determined by the Communications Act (see 47 U.S.C. § 396(k)(4))

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BOARD OF TRUSTEES

WELCOME

BOARD NEWS

AGENDAS/MINUTES

MEMBERS

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GOVERNANCE/BYLAWS

HISTORY

OFFICE OF THE PRESIDENT

CONTACT

Welcome

BOARD MEETINGS

- October 16, 2015
- January 22, 2016
- March 11, 2016
- June 24, 2016 Zanesville

BOARD NEWS

Ohio trustees hear updates on budget

Ohio University celebrates new medical school campus in northeast Ohio

[View more Board News](#)

The Ohio University Board of Trustees serves the public trust. The members of the Board are charged with the responsibility to be accountable to the institution's mission and cultural heritage, the transcendent values and principles that guide and shape higher education and the public interest as well as the legitimate and relevant interests of the institution's various constituencies.

This Web site has been created as an information source for the University's constituencies and the general public. This site contains information about the Board's membership, organizational structure, and policies and procedures. In addition, a database is available with historical content including meeting agendas and minutes.

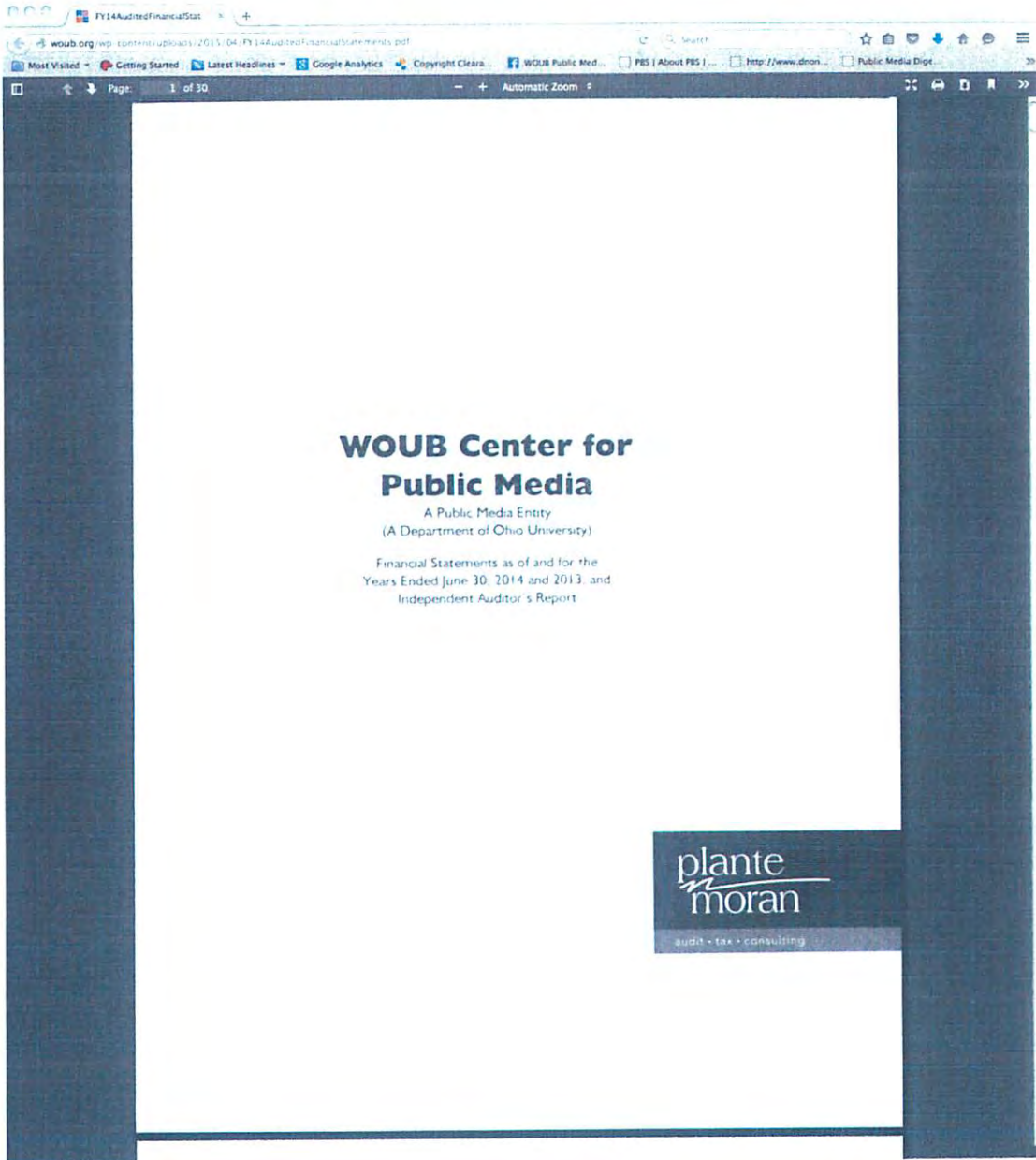
If you have any questions or would like more information, please contact the Board of Trustees office at 740-593-1804 or trustees@ohio.edu

Board of Trustees Members

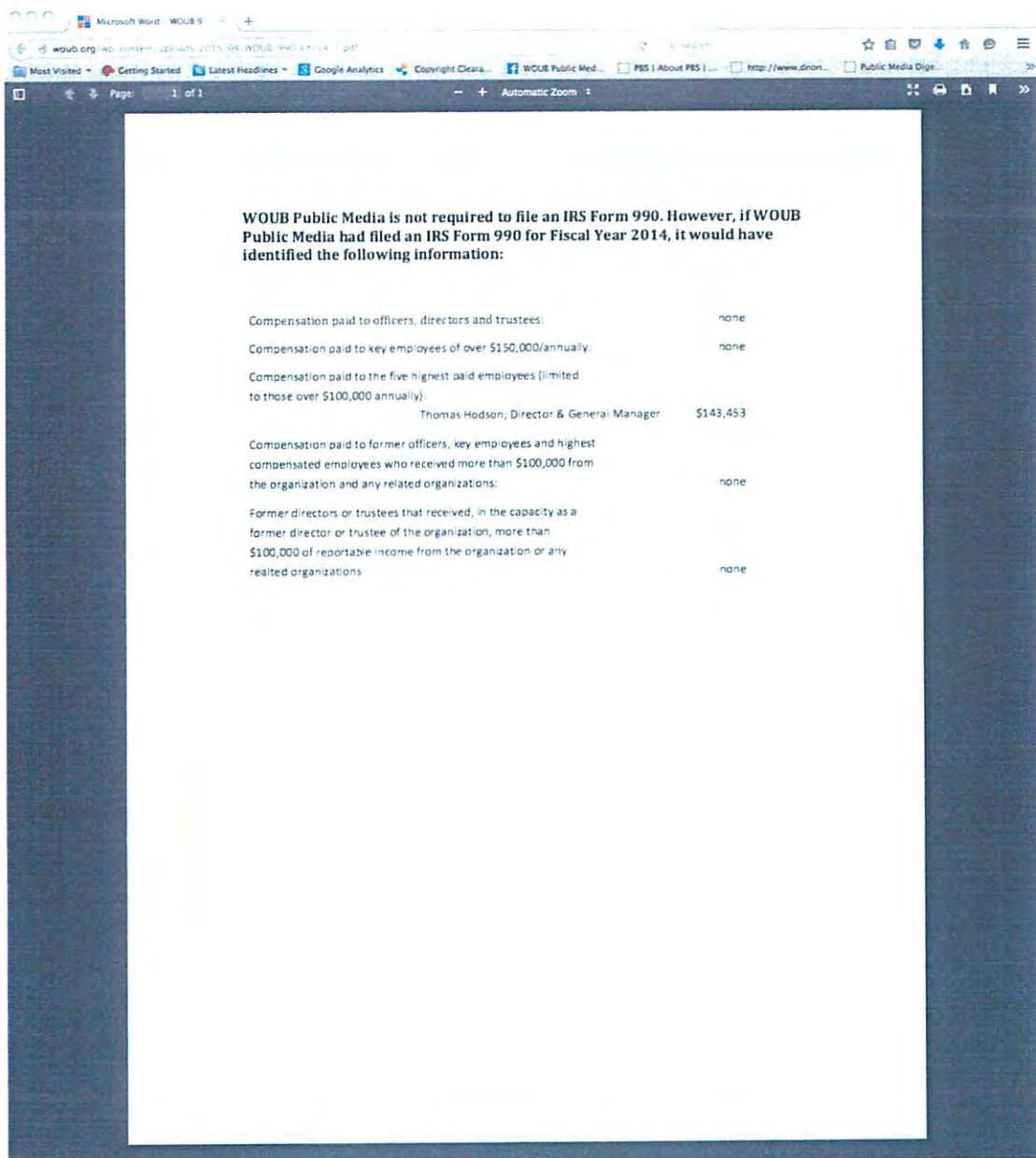
From Top Left: N. Victor Goodman, Janette Simmons, J. Patrick Campbell, Gary Cooper, Sandra J. Anderson, Keith Rivoli, Peggy Verweyer, Peter Hatcher. From Bottom Left: Janelle King, Shamaine Woods, Vice Chair David R. Wolford, President Rebecca J. McDevitt, Chair David Brightbill, Julie Mann-Krohn, Dave Smith.

Ohio University Board of Trustees
 Cluder Hall 110 - Athens OH 45701
 Office: 740.593.1804 | Fax: 740.593.0195
trustees@ohio.edu


Transparency Document: The most recent Audited Financial Statement (2013-2014), only the cover sheet is provided in this report as demonstration of availability, (rather than the entire thirty-page document, which is available in full via the link or request as noted)




Transparency Document: Comparable information as outlined in the IRS Form 990 part VII A



Transparency Document: Most recent Local Content Report

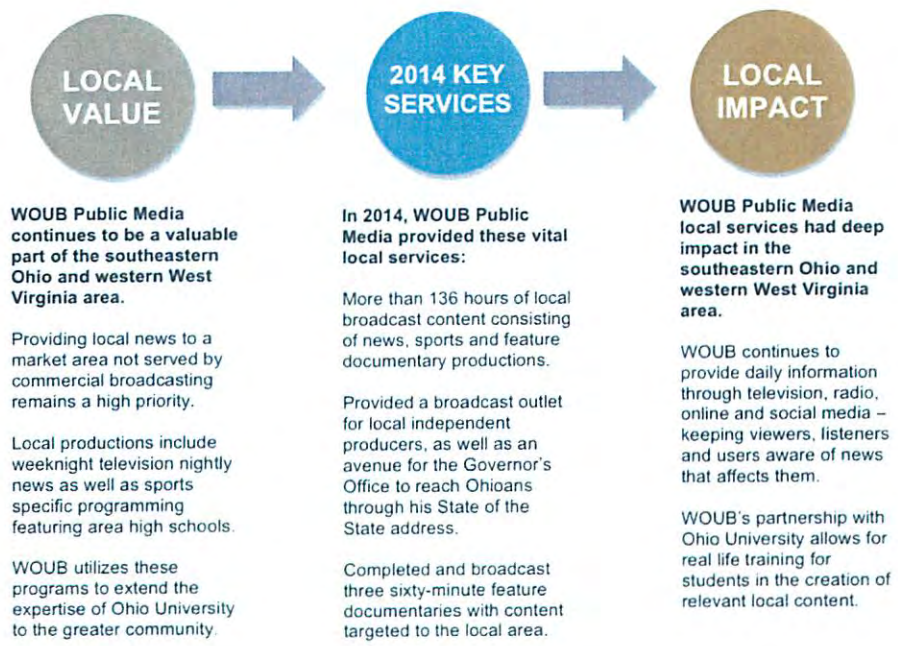




2014 LOCAL CONTENT AND SERVICE REPORT TO THE COMMUNITY

The Eastern Eagle girls claimed the school's first girls basketball title in school history. The 26-1 Eagles were featured every week in the WOUB production "Hardwood Heroes."

WOUB Public Media at Ohio University, through public television, public radio, and non-broadcast facilities, provides excellence in programming to meet the ascertained needs of its various audiences. WOUB provides continued leadership in the fields of distance education, community outreach, and online services. It also offers a quality program of professional development in support of Ohio University students. In doing so, WOUB maintains, enriches, enhances and expands the horizons of all involved.





2014 LOCAL CONTENT AND SERVICE REPORT IN THE COMMUNITY



In 2014, WOUB Public Media continued with its longest running local production, through the broadcast of 214 unique episodes of *Newswatch*. Focusing on an area with little to no commercial news coverage, *Newswatch* is often the only source for local video and stories and is a valuable community asset for local news, weather, sports and community experts. The program is also a valuable source of information during election cycles and topped off a full night of election coverage in 2014. Also in 2014, *Newswatch* received an Honorable Mention in the National Academy of Television Arts & Sciences (Ohio Valley Chapter) awards, as well as Honorable Mention for a feature story.

WOUB Public Media's online activities continue to attract users as a place for local information as well as video content developed specifically for woub.org. In 2014, WOUB's website experienced 787,167 visits from 480,790 unique users accessing 1,498,935 page views.

Many users prefer to get targeted information via push notifications, specifically with their mobile devices. With this increasing demand, WOUB has expanded use of Facebook and Twitter for breaking news, weather related information and local storytelling. Through various targeted Facebook accounts, WOUB Public Media currently shows 8,526 followers. Twitter has seen an even bigger growth with 10,432 followers over several topic specific accounts.

The WOUB service area consists of many small towns that are brought together by their local sporting events, as well as a University that does not receive consistent coverage from commercial media. To assist in filling the gap in coverage, as well as showcasing the efforts of local area high schools, WOUB Public Media produces three weekly local programs to showcase the regions athletic accomplishments. Completing its 16th season, *Gridiron Glory* (high school football highlights) had the privilege of following a local team to a state championship game.

Now in its third season, *Harwood Heroes* (high school basketball highlights), was also able to follow a local team as they captured a state title. Finally, in 2014, *The Bobcat Sports Showcase* wrapped up season three in the spring and began season four in the fall covering all varsity sports at Ohio University. Both *Gridiron Glory* and *The Bobcat Sports Showcase* were recognized with student production awards from the National Academy of Television Arts & Sciences (Ohio Valley Chapter).

WOUB Public Media continues to showcase area events and activities that explore the uniqueness and pride of the local area. In 2014, WOUB partnered with the Nelsonville Music Festival to produce video pieces, audio stories as well as live tweeting the annual event. The four-day event draws between 6,000 - 9,000 people to see 50 acts on four stages. In all, eighteen video shorts were produced receiving more than 9,000 views on WOUB's YouTube channel sharing the event outside of the local broadcast area.

In 2014, WOUB Public Media took the opportunity to share stories of those who are often overlooked. A new blog, *The Journey – Embracing Inclusion*, promotes dialogue on issues of disabilities and inclusion, while a video series *Perspectives* allows individuals to share first hand their challenging stories on issues such as a disability, sexuality, or overcoming personal events or situations.



2014 LOCAL CONTENT AND SERVICE REPORT
STORIES OF IMPACT

Water Quality & Issues

As hydraulic fracturing began in the region, a one hour local production "Glass Half Empty: An American Water War" premiered. This story is about six Pennsylvania families who have been in search of clean drinking water ever since the natural gas industry came to their town. We watch them navigate a complicated landscape in a fierce debate about fracking and its potential impact on drinking water resources.

Also launched in 2014 was <http://ouwaterproject.org> This interdisciplinary digital media website is a public clearinghouse for information related to environmental water issues within the Appalachian Ohio Valley and includes photojournalism, information graphics, video, geography, reporting, and interactive design.



WOUB Provides Live Video Streams for Specialized Coverage

In 2014, live web streams were produced to reach specific audiences, some local – others from a distance interested in local events. Coverage included pre-game for a state high school football game, the 2014 Ohio University Homecoming Parade, the nominations for the Ohio Valley Regional EMMY Awards, and the 2014 Ohio University Student Research & Creative Activity Expo which featured 600 students with more than 500 projects.



"A Beautiful Remedy"

How can the making and viewing of art help participants transform their social and physical realities? How do artful encounters enlarge the scope of traditional medical practices? What are the goals of creative programming in healthcare contexts? *A Beautiful Remedy* is inspired by these questions and illustrates the power of art to foster human resiliency amidst suffering. This one-hour feature is produced in partnership with Lynn Harter, professor in the School of Communications Studies at Ohio University.





2014 LOCAL CONTENT AND SERVICE REPORT
STORIES OF IMPACT

“Our Town” Documentary Premieres with Lancaster, Ohio as Episode One

- “Our Town” is a series of hour-long documentaries produced by WOUB that tell the story of cities and towns in Southeast Ohio. Due to its rich history, Lancaster was chosen for our first episode.
- Each episode will follow the history of the city from its founding to the present day. Featured stories will include notable residents, traditions, local industry, and social change throughout the city’s history.

Reach in the Community:

- A community screening was held in Lancaster prior to the broadcast, and the documentary was shown to a packed house at Ohio University/Lancaster. Later, a local broadcast was held during the television pledge drive and the program had great success with individual interested in personal DVD copies.

Partnerships:

- The program featured 25 historians from the Lancaster area and was supported by ten of the key area organizations including Ohio University/Lancaster, The Decorative Arts Center of Ohio, The Lancaster Chamber of Commerce, the Fairfield County Visitors and Convention Bureau and others.

Impact and Community Feedback:

- This first effort has shown the level of interest of local towns and culture. Many of the communities have never had the opportunity to share their stories – let alone have it broadcast to the wider area. Production is already underway on the next episode in the series.



Photos from the pre-broadcast
screening of
“Our Town: Lancaster”





2014 LOCAL CONTENT AND SERVICE REPORT SUMMARY



Because it reaches such a wide audience and broadcasts diverse programming, faculty donors find tremendous value in giving to WOUN public broadcasting. "The programming available on WOUN-TV and WOUN-FM is very important to me and my family," said Eric McFadden, a technical specialist in the Heritage College of Osteopathic Medicine Office of Medical Informatics, during an email interview. The small amount of money we spend to be members of WOUN is a very small price to pay for the quality of programming we receive in exchange."

Ohio University, Compass

"It was such a joy to see the film, to have the dragon in Cullenin Hall, to enjoy the wonderful reception, and to see the way in which the film inspired our community. It was particularly meaningful to me to have such a strong turnout from the patients and families that were in the film, and to talk with them afterwards and hear how proud and happy they were to be a part of it, and to see their lives and their art on film and in the museum. It was great to be able to point to the dragon and then point up at the work of Picasso and Matisse and say to our patients, your work is in the same museum as the most celebrated artists in history. Families of several of the patients who were in the film, but who have since passed away were in attendance, and they also came up to me with deep gratitude in being able to pay tribute to their children in this special way, and to see the film which, the families told me, showed their kids at their happiest. I am so grateful for you all for your roles in being able to make those types of moments possible."

Ian Cion
Director
Arts in Medicine Program
The University of Texas MD Anderson
Children's Cancer Hospital



WOUN Public Media, an administrative unit of the Scripps College of Communication at Ohio University, provides public broadcast services, student professional development, and non-broadcast educational services in support of the goals of the University. The resources of WOUN support public service, teaching, research and administrative missions, through public radio, public television, online and related technologies. Through these activities, WOUN extends the intellectual resources of the University to its broader community and bolsters the University's service mission in the Appalachian region.

Exhibit E

WFHB-FM response to the draft report



WFHB Draft Report Feedback
September 22, 2015

Discrete Accounting

WFHB Community Radio was found out of compliance with the discrete accounting requirement of the Corporation for Public Broadcasting's (CPB) community service grant (CSG). Stations receiving the CSG must flag revenues and expenses originating from the CSG in their accounting software. Station officials were unaware of this requirement, but have taken steps to correct it since the audit.

Grant revenue and grant expenses now are dedicated subcategories in the station's QuickBooks software. This will enable us to follow more precisely the revenues and expenses associated with CSG and for any future auditor to call them up with relative ease. We believe this change brings us into compliance with this requirement. We are happy to provide further documentation as evidence of compliance.

Communications Act

WFHB Community Radio was found out of compliance with the CSG's Community Advisory Board (CAB) requirement.

The station contended that, though it did not have a working body called a Community Advisory Board, it had two committees that independently performed the same functions. Those committees are the News and Public Affairs Committee and the Music Committee. Each is charged with regular review of station programming, and each is made up of a combination of volunteers, Board members, listeners and ex-officio staff members from the relevant department. The station believes that the spirit of the Communications Act of 1934 on this point is to prevent public radio and television stations from becoming too insular and closed off from the communities they serve. WFHB is especially unlikely to become insulated from the community as more than 70% of its programming is made in-house by nearly 200 volunteers from the communities it serves.

During the audit, WFHB suggested that it could combine the two committees once annually, without the Board members, to comply with the grant requirements in a more straightforward manner. Mr. Richardson asked that the station follow up with CPB to determine if this CAB



structure was permissible. Officials from CPB told the station that they do not advise on statutory matters. In the absence of evidence that the way the station intends to meet the Community Advisory Board requirement is inappropriate, the station intends to push forward with this. The committees will combine for their second meeting in November 2015. Their first unofficial meeting as a combined committee was in November 2014.

WFHB is happy to provide documentation as requested. We understand and value the importance of community input on station programming and activity.

Transparency

The draft report still lists WFHB as out of compliance with transparency requirements owing to not listing the dates and times for upcoming Board committee and Community Advisory Board meetings. All Board committee meetings were already listed on an online Google calendar available at wfhb.org when the audit was done over the summer. The Community Advisory Board meeting has been added since. We believe we are fully in compliance with this requirement. As stated elsewhere in this document, we are happy to provide evidence of compliance as requested.

Reporting Expenses Paid for with Restricted CSG Funds on AFR, Schedule E

WFHB was not in compliance with reporting requirements on the AFR, Schedule E. There was some confusion between the filing of the Annual Financial Report and the audit that led to the station reporting different categories of expenses. This was an error that will not occur again due to the implementation of a flagging system in our accounting software as described above under the "Discrete Accounting" heading. There should be no compliance issue the next time WFHB is required to file an AFR.

Cleveland Dietz
General Manager, WFHB

Exhibit F

KCND-FM response to the draft report



Prairie Public Broadcasting, Inc.
Television
Radio
Educational Services
Enterprise

September 4, 2015

Mr. William J. Richardson III
Deputy Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

RE: Response to Draft Report No. ACR1506-XXXX
Audit of CPB Radio Restricted Fund Expenditures, Communications Act, Transparency, and Discrete
Accounting at Selected Grantees for Fiscal Year 2014

Dear Mr. Richardson:

As requested, this letter is to provide written comment from Prairie Public (Radio, KCND) related to the findings and recommendations as found in the above-referenced audit report.

Prairie Public Broadcasting firmly believes it is important to be in complete compliance with the Communications Act and transparency requirements; therefore, we have already taken corrective actions for all findings in the audit report, as detailed below:

Communication Act and Transparency Requirements

Open Meetings

As noted in the report, Prairie Public has established a policy of posting to our website notices of any and ALL meetings, including committee meetings, regardless of deliberative status, within seven days prior to these meetings. This policy for all meetings was implemented August 1, 2015.

Closed Meeting

A written statement for closing a public meeting on April 24, 2014, is available to the public containing an explanation of the reason(s) for closing the meeting. While this meeting seems to have been properly closed per statute criteria, in essence the meeting was never closed to any members of the public, and several members of the public were present during this brief portion of the meeting (CAB and Radio Council Members). For this particular meeting, our President & CEO chose to dismiss himself from a brief portion of the meeting (7 minutes in duration) as details of his salary and benefits were to be discussed and deliberated by the Board. The meeting was never closed to any members of the public.

No members of the public have ever been asked to leave a meeting of the Prairie Public Board of Directors, as these are all open meetings.

Regardless of this incident, we have written and adopted a closed meeting policy as of August 1, 2015, that includes generating a statement, to be available upon request, if a meeting is ever closed to the public. This statement will include details about when a meeting is closed, and the reason the meeting is closed.

Community Advisory Board

Advising the Board of Directors with specific, formal language.

As noted in the report, we feel that substantively Prairie Public has been in compliance with this requirement because a radio report is always presented at each Board meeting. However, at the Radio Council meeting on July 24, 2015, the Radio Council (CAB) officially adopted a resolution with language to meet CPB requirements that the Radio Council Chairman will formally present and specifically issue at each Board meeting a formal advisory statement to the Board of Directors for Prairie Public (after each Radio Council meeting) addressing whether they feel that Prairie Public Broadcasting's programming is meeting the specialized educational and cultural needs of the community.

Radio Council Bylaws

In 1999, Prairie Public established a radio network with support from the CPB Future Fund. At that time, the Radio Council was established with guidance and direction from CPB, which suggested that the Board appoint one of its members to be on the Radio Council. This governing Board member's capacities were not designated as ex-officio at that time.

CPB's 2014 guidance addresses the composition of the Community Advisory Board and its independent role by stating that the CAB may *not* include members of the station staff or governing body in anything other than an ex-officio or administrative capacity. Therefore, at the Radio Council meeting on July 24, 2015, it was resolved to change the Radio Council structure and, if necessary, change Radio Council by-laws to meet CPB requirements such that any staff persons or Radio Council members specifically appointed by the Board of Directors be non-voting and operate as ex-officio members. This was discussed by Prairie Public's Board of Directors at their meeting on August 14, 2015.

Although Prairie Public was found to be in compliance with CPB's requirements for posting instructions regarding how to obtain the CPB AFR and other non-CSG financial reports, we do agree with the Inspector General recommendation's to revise those guidelines to make it absolutely clear what must be posted to be in compliance.

We appreciate the opportunity to comment on the draft report prior to the finalization of the report for CPB management.

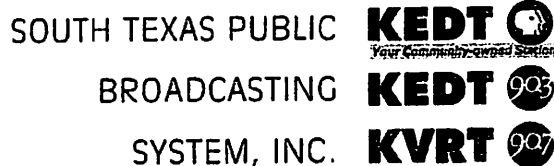
Sincerely,



John Harris
President & CEO
Prairie Public Broadcasting

Exhibit G

KEDT-FM response to the draft report



September 1, 2015

Mr. William J. Richardson III
Deputy Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

Dear Bill,

South Texas Public Broadcasting System, Inc., licensee of public radio station KEDT-FM has taken all of the necessary steps to be in full compliance with the "Communications Act Certifications Requirements for Community Service Grant Recipients". The specific items addressed in the 2015 CPB Audit were quickly addressed and rectified. Additionally, the scope of the CPB Audit findings and the resulting corrective actions taken by KEDT management were reviewed in detail with the Board of Directors of South Texas Public Broadcasting System, Inc. at the Board's August 26, 2015 meeting.

Audit Items concerning KEDT, addressed in the August 2015 CPB Report of 10 NPR Stations

- 1 Advanced notice of committee meetings** - The dates, times and locations for meetings of the Board of Directors and Community Advisory Board were verified on the KEDT website and proper series of advance on-air announces have been scheduled for all future meetings in compliance with CPB policy.
- 2 Quarterly on-air announcements** - KEDT started broadcasting monthly announcements stating that all Board of Directors and Community Advisor Board meetings are open to the public. The announcement reports that all relevant meeting details are available on the station's website, www.KEDT.org, at the station's physical location and by phone. (Note: We elected to air these monthly to be sure we are in compliance with the quarterly requirement existing practice.)
- 3 AFR available to the Public** - KEDT staff was instructed that copies of the CPB Annual Financial Report are available for the public to view within the FCC public file cabinet. Staff was also instructed to provide copies of report to public if requested. (Note: at the time of audit site visit, a new employee was not aware of this established practice when asked by CPB visitor. Management staff was aware of the practice and procedure and would have provided the information if asked.)
- 4 CAB advises Governing Board on Programming meets needs of community** - The quarterly CAB's meetings procedures now include more complete recording of minutes and recommendations regarding programming. The Board of Directors will be provided the enhanced CAB minutes.

5 Transparency CAB Meeting Dates - The meeting dates and locations of the CAB have been posted on the station's website.

6 Donor List and Political Activities – A policy regarding donor lists and political activities has been reaffirmed by KEDT's Board of Directors at the August 26, 2015 meeting. The policy is still on the station's website.

7 AFR Report - KEDT's accounting and financial reporting is done by NETA (National Educational Telecommunications Association). The methodology of the reporting regarding expenditure of the Community Service Grant was reviewed with NETA management. I received the following email back from NETA noting they understand the desired reporting format and will report accordingly in the future.

Here is the note from our accounting manager at NETA.

"Don, I spoke with Bill last week in regards to the allocation of national programming, and it is suggested that we only allocate the grant award amount in expenses so that revenue and expenses will net to zero. We are fine with this recommendation and will correct it in future years. I have copied David Crouch on this email to assist with any additional questions you may have.

Thank you

Albernel Jones "

Bill, I found the review of the CPB policies, their interpretation and implementation reviewed in your field audit to very helpful. We had clearly misinterpreted elements of the language for years. I would recommend that CPB put more resources into an on-going training program for stations related these issues. As you noted in your report, every station had some level of confusion with the CPB policies. I suspect that most station managers would find annual station compliance and review training helpful.

It was good to see you again. I enjoyed working with you on this project. Thanks for sharing your expertise with me and my staff.

Sincerely,



Don Dunlap
President and General Manager
South Texas Public Broadcasting System, Inc.

Cc Mr. Steve Hipes, Chairman of the KEDT Board of Directors

Exhibit H

WRVS-FM response to the draft report



1704 Wee k s v i l l e R o a d
E l i z a b e t h C i t y , N C 27909
(2 5 2) 3 3 5 - 3 5 1 7
w w w . e c s u . e d u / w r v s

September 8, 2015

Mr. William J. Richardson III
Office of the Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

Re: Audit of CPB Radio Restricted Fund Expenditures, Communications Act,
Transparency, and Discrete Accounting at Selected Grantees for Fiscal Year 2014, Station
Response

Dear Mr. Richardson:

In response to the Limited Scope Audit for WRVS's Fiscal Year 2014 performed by the
Corporation for Public Broadcasting's Office of the Inspector General, please observe the
following:

WRVS's website now includes the radio station's most recent annual financial report and audit.
WRVS is working with Media Relations to update the website with the additional transparency
requirements and anticipates a completion date of November 15, 2015.

Pertaining to the Reporting Restricted CSG Funds on Schedule E:

To improve controls for reporting restricted Community Service Grant (CSG) Funds, the
Contracts & Grants Department at Elizabeth City State University will now create two separate
funds within the accounting general ledger. The general ledger change will ensure the accurate
reporting of restricted and unrestricted funds in the future.

Thank you for your continued support.

Melba Y. Smith

Melba Y. Smith
Director of Radio & Television Services/
WRVS-FM, 89.9 & W18BB-TV
Elizabeth City State University

Exhibit I

WMKY-FM response to the draft report



Morehead State Public Radio
132 Breckinridge Hall | Morehead, KY 40351
P: 606-783-2001 | F: 606-783-2335

www.moreheadstate.edu

September 7, 2015

Mr. William J. Richardson III
Deputy Inspector General
Corporation for Public Broadcasting

Re: CPB Draft Audit Radio Restricted Fund Expenditures & Compliance

Mr. Richardson,

I am writing regarding WMKY's response to the CPB Draft Audit Radio Restricted Fund Expenditures & Compliance report sent by your office on August 14, 2015. My response is on behalf of WMKY, Morehead, Kentucky.

The findings in the draft report of the limited scope audit appear to be fair and accurate. WMKY management agrees with the findings and measures needed for adjustment.

WMKY management has reviewed the open records policy provided by the CPB and has completely addressed each requirement. WMKY's public file is properly maintained and accessible. In addition, WMKY's website (www.wmky.org) is exhaustive in open records content devoted to CPB documents and information including, but not limited to, WMKY's Financial Statements, Donor Privacy Statement, Community Advisory Board, Station Activities Report, Board of Regents (Morehead State University), Diversity Policy, FCC Forms 990 and EEO, Biennial Ownership Report and Contact Information.

Prior to the on-site audit, WMKY's Financial Statement & Supplementary Information was provided in the public file and posted on WMKY's website. The interpretation by WMKY management of the CPB criteria regarding the Annual Financial Report (AFR) was that since WMKY uses the audited Financial Statement to submit WMKY's AFR; and since that Financial Statement is more in-depth than the AFR; and since the Financial Statement was made available to the public, then this satisfactorily meet the CPB requirement.

WMKY management has now corrected this misunderstanding and placed a copy of WMKY's latest AFR in the public file, in addition to the audited Financial Statement. A statement has also been posted on WMKY's website on how the public may view the AFR. The statement reads as follows (screenshot also attached):



Morehead State Public Radio
132 Breckinridge Hall | Morehead, KY 40351
P: 606-783-2001 | F: 606-783-2335
www.moreheadstate.edu

"WMKY's Audited Financial Statements, Annual Financial Reports and other financial documents relating to the Corporation for Public Broadcasting and WMKY's Community Service Grant, are available for public inspection during Morehead State Public Radio's (MSPR) regular business hours, weekdays from 9:00AM to 4:00PM. MSPR's studios are located at 132 Breckinridge Hall on the campus of Morehead State University in Morehead, Kentucky."

In regards to discrete accounting, Mr. Jeremy Withrow, MSU's Assistant Director of Accounting and Reporting, has made the proper adjustments regarding use of CSG funds and adjusted accordingly for future AFR statements. To assist in use of CSG funds for accounting purposes, WMKY management will provide an explanation of use of CSG funds to the appropriate personnel at Morehead State University each time CSG funds have been received by WMKY. In addition, WMKY will recommend a review of AFR reporting guidelines and to participate in CPB's online training seminars when available and as needed.

In conclusion, WMKY is committed to being a good steward of the support received from the Corporation for Public Broadcasting. Any preliminary observations in this limited scope audit not meeting expectations were not on purpose or with malice. All observations regarding WMKY listed in the final draft have been addressed and resolved.

Feel free to contact me directly at (606) 783-2334 or by e-mail if you have questions or need further information.

Most sincerely,

Paul W. Hitchcock, General Manager
Morehead State Public Radio (WMKY)
132 Breckinridge Hall
Morehead State University
Morehead, KY. 40351

E-mail: p.hitchc@moreheadstate.edu
Phone: 606.783.2334 (office), 606.783.2001 (main)
Web: www.wmky.org

WMKY Financial Statement

View Edit

WMKY Financial Statement

WMKY's Audited Financial Statements, Annual Financial Reports and other financial documents relating to the Corporation for Public Broadcasting and WMKY's Community Service Grant, are available for public inspection during Morehead State Public Radio's (MSPR) regular business hours, weekdays from 9:00AM to 4:00PM. MSPR's studios are located at 132 Breckinridge Hall on the campus of Morehead State University in Morehead, Kentucky.

Donor Privacy Statement

Morehead State Public Radio (MSPR/WMKY) is committed to maintaining the privacy of our underwriters and donors. Personal information (address, phone numbers and e-mail) will not be shared, exchanged or sold to any third party or outside organization. This information is

11:19 AM
9/8/2015

The screenshot shows the WMKY-FM website interface. At the top, there is a navigation bar with a logo and the text "NEWS, MUSIC AND MUCH MORE. WMKY 90.3 FM | MOREHEAD, KY". A "Donate" button is visible on the right. Below the navigation bar is a live stream player for "Listen Live - WMKY Classical Music". The main content area features a large article titled "President William McKinley Show" by Tully Weaver, 5 hours ago. The article includes a logo for "HEALTHMATTERS" and a partial text snippet: "William McKinley was the 25th president of the United S... led the nation to victory in the Spanish-American war, an Hawaii, and protected American workers with protective and trade negotiations. At the time of his assassination o September 6, he was arguably the most popular sitting pi in our nation's history. We salute him with a very unconf show involving avalanche burials, airplane poop, female sexual desire, and toxic potato sali". Below this is another article titled "Rowan Clerk Kim Davis To Be Released From Jail" by Arlo Barnette, 7 hours ago. The article includes a small image of Kim Davis and a text snippet: "Rowan County Clerk Kim Davis will be released from the Carter County jail today, where she's been held since Thursday on a contempt of court charge." On the right side of the page, there is a sidebar with a list of links: "About Us", "Directions", "Contact Information", "Instructions for Submitting an Event to WMKY", "Contests, Giveaways, Lotteries and Raffles Policy", "Station Awards History", "Student Awards History", and "CPB Station Activities Report". At the bottom of the page, there are two news items: "Organization registration is open for MSU's Fall Career Fair" and "Homecoming banquet slated for Oct. 9". Another item, "'Abstractions' art exhibition opens Sept. 9", is partially visible. The final item, "Low impact blasting to start Sept. 10", is also partially visible. The browser's taskbar at the bottom shows "Mail - Paul Wilson ..." and "WMKY | Morehead ...".



z.org #streamy0

Kim Davis Supporters Rally In Front Of Detention Center

By EIDER PERALTA | SEP 9, 2015



A couple hundred people gathered for a rally to free Kim Davis on Saturday in front of the Carter County Detention Center.

The Rowan, Ky., County clerk has spent three days there because she has defied the Supreme Court and refused to issue gay marriage licenses.

The protesters assembled in a field under a blazing summer sun.

Alan Hoyle, 54, stood near the stage and flew an American flag upside down.



© 2015 WMKY [WMKY Financial Statement](#) [Community Advisory Board](#) [2014 MSPR Station Activities Report](#)

[MSU Board of Regents](#) [Diversity Policy](#) [FCC Form 990 and EEO Report](#) [Biennial Ownership Report](#) [Contact Us](#)

Taskbar: Mail - Paul Wilson ... WMKY | Morehead ...

Exhibit J

WBJC-FM response to the draft report



September 14, 2015

Corporation for Public Broadcasting
Attn: William J. Richardson III / Deputy Inspector General
401 Ninth Street, NW
Washington, D.C. 20004-2129

Dear Mr. Richardson,

First, let me thank you for your assistance in helping us to interpret the findings from the CPB limited scope FY14 Audit. After studying the Draft Report, it is my belief that WBJC was in general compliance with most items listed in the Report, however, there were two areas that showed some degree of deficiency; 1) Discreet Accounting and 2) Transparency.

1. **Discreet Accounting** - In the WBJC "Schedules of Functional Revenues and Expenditures", the College (Baltimore City Community College – the licensee) had always listed the CPB grant money under a separate PCA code as required by the Act. Unfortunately, the College/station's interpretation of a discreet code for expenditures was erroneous. The College/station listed all National Programming expenses under a discreet code, but it did not separate the restricted CPB portion of those expenses from any excessive spending in that category. Also, the station did not have a separate code for the unrestricted expenses portion of the CPB grant.
Corrective Actions – The College/station have made changes to the accounting methods beginning with the FY16 Budget. There will continue to be separate, discreet Accounting PCA numbers in the budget for the Restricted and Unrestricted Revenues ... and there are now separate, discreet Accounting PCA numbers in the budget for the Restricted and Unrestricted Expenditures.
2. **Transparency** – Each year, WBJC did include both the AFR and Financial Audit materials in its Public files, but these items were not uploaded onto its web-site.
Corrective Actions – The station uploaded these items shortly after the Audit was completed and will continue to upload all financial records upon completion.

Again, thank you for your help with these matters. If you feel that we have missed any other problems, please call me at your earliest convenience.

Sincerely,

Joseph M. Hutchins / General Manager
6776 Reisterstown Road / Suite 202
Baltimore, Md. 21215
(Gen. Off.) 410-580-5800 ... (Dir. Line) 410-580-5801
jhutchins@bccc.edu

Exhibit K

WMNF-FM response to the draft report



Community Conscious Radio

1210 E. Dr. Martin Luther King, Jr. Blvd.
Tampa, FL 33603
(813) 238-8001

September 4, 2015

William J. Richardson
Deputy Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 2004-2129

Re: Audit of CPB Restricted Fund Expenditures, Communications Act,
Transparency, and Discrete Accounting at Selected Grantees for Fiscal
Year 2014, Draft Report No. ACR1506-XXXX

Dear Mr. Richardson:

WMNF has reviewed the draft audit report of your limited scope audit of restricted radio fund expenditures and compliance requirements. We appreciate the opportunity to respond to some deficiencies unearthed by this audit and would like the following comments, actions and documentation included in the final draft report.

To address the aforementioned deficiencies, WMNF has formed an internal CPB compliance committee to ensure we meet all requirements for restricted fund expenditures, the Communications Act, Transparency, and Discrete Accounting. This committee will meet quarterly to assure compliance and will maintain a CPB compliance book to assure documentation of compliance.

WMNF has the following responses to specific deficiencies cited in the draft audit report.

Open Meeting Requirements

WMNF did not make quarterly on-air announcements of the stations' opening meetings:

While WMNF believes it did make the quarterly on-air announcements, WMNF could not provide documentation due to missing log pages. We have installed a new computerized logging system to assure tracking and airing of pre-meeting announcements and now make copies of the logs showing three consecutive days of announcements. (See attached from this quarter)

These log copies are now included in our CPB compliance book.

WMNF is also posting all of its public meeting announcements on its website.

Did not provide written explanations for closing public meetings:

WMNF is now announcing the purpose of every executive session on the record and recording the purpose in the public meeting minutes before moving into executive session, using the guidelines for such sessions provided – matters concerning individual employees, proprietary information, litigation and other matters requiring confidential advice of counsel, commercial or financial information obtained from a person on a privileged or confidential basis or the purchase of property and services if the premature disclosure of the transaction would compromise the station's business interests.

Open Financial Records Requirements

WMNF did not make the stations' AFR's available to the public, one component of the open financial records requirements:

WMNF has added the AFR to our website. (see attached documentation)

CAB Requirements

WMNF did not have CABs that met during FY 2014:

WMNF began building a CAB and held the first meeting of FY 2015 in April, before receiving word of the CPB limited audit. Another CAB meeting is scheduled for September 11, 2015 and a third is scheduled for December 11, 2015. WMNF will hold quarterly meetings of the CAB in 2016 and going forward. (See attached CAB minutes April 2015)

Transparency Requirements

WMNF only indicated that "their financial reports were available upon request" but did not specify which annual financial reports were available, e.g. the CPB AFR:

WMNF believes that the CPB guidelines were not clear that CPB AFR needed to be posted. The guidelines only state Annual Financial Reports. We believed that by posting the audited financial statement, we complied with the transparency requirements. We now have the CPB AFR posted to our website.

Discrete Accounting

WMNF comingled CPB expenses with non-CPB expenses in its accounting system:

WMNF is correcting this oversight by adding a class code for CPB expenses in our Quickbooks accounting system.

WMNF appreciates CPB's help in finding and correcting these oversights.

Sincerely,


Craig Köpp
General Manager

WMNF

WMNF IS A 501 (C) (3) NON-PROFIT CHARITABLE ORGANIZATION. WMNF'S SOLICITATION CODE IS SC-00786. A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL -FREE WITHIN THE STATE, 1-800-435-7352. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL OR RECOMMENDATION BY THE STATE. 100% OF EACH DONATION IS RECEIVED BY THE NATHAN B STUBBSFIELD FOUNDATION (WMNF).

http://198.74.54.189/log_days?utf8=✓&date=jul+22&commit=Go

8-9am 07/22/15

Action	Time	Initials
NPR News Headlines	8:01am	JJ
(UNDERWRITING) SOUTHERN SOUL ASSEMBLY	8:06am	JJ
Support for WMNF comes from our members and The Capitol Theater, presenting Southern Soul Assembly February 6, 2016. Southern Soul Assembly is comprised of JJ Grey, Luther Dickinson, Anders Osborne and Marc Broussard. At the Cap dot Com has ticket information		
PRIORITY COPY - OPEN PUBLIC MEETING	8:30am	JJ
WMNF has an open meetings policy. Dates and times of the meetings of the Board of Directors and their committees are on our website -- WMNF.org. All meetings are at WMNF 1210 East Droctor Martin Luther King Junior Boulevard, Tampa, 33603.		
LEGAL ID - WMNF TAMPA COMMUNITY CONSCIOUS RADIO		JJ
Please give legal id plus branding....."WMNF TAMPA COMMUNITY CONSCIOUS RADIO" please add 1 OR 2 OTHER CITIES in our listening area, since we have listeners in 6 different counties. . .		

http://198.74.54.189/log_days?utf8=✓&date=Jul+23&commit=Go

8-9am 07/23/15

Action	Time	Initials
NPR News Headlines	8:01am	RW
(UNDERWRITING) SOUTHERN SOUL ASSEMBLY	8:06am	RW
Support for WMNF comes from our members and The Capitol Theater, presenting Southern Soul Assembly February 6, 2016. Southern Soul Assembly is comprised of JJ Grey, Luther Dickinson, Anders Osborne and Marc Broussard. At the Cap dot Com has ticket information		
CROSS PROMOTE - SOUL PARTY	8:15am	RW
Go to DJ Computer and open up Station Promos. Click on Tab A and go to the Cross - Promotion page. Play Soul Party.		
PRIORITY COPY - OPEN PUBLIC MEETING	8:30am	RW
WMNF has an open meetings policy. Dates and times of the meetings of the Board of Directors and their committees are on our website -- WMNF.org. All meetings are at WMNF 1210 East Droctor Martin Luther King Junior Boulevard, Tampa, 33603.		
LEGAL ID - WMNF TAMPA COMMUNITY CONSCIOUS RADIO		RW
Please give legal id plus branding....."WMNF TAMPA COMMUNITY CONSCIOUS RADIO" please add 1 OR 2 OTHER CITIES in our listening area, since we have listeners in 6 different counties. . .		

http://198.74.54.189/log_days?utf8=-/ &date=jul+24&commit=Go

8-9am 07/24/15

Action	Time	Initials
NPR News Headlines	8:01am	
(UNDERWRITING) SOUTHERN SOUL ASSEMBLY	8:06am	
<p>Support for WMNF comes from our members and The Capitol Theater, presenting Southern Soul Assembly February 6, 2016. Southern Soul Assembly is comprised of JJ Grey, Luther Dickinson, Anders Osborne and Marc Broussard. At the Cap dot Com has ticket information</p>		
PRIORITY COPY - OPEN PUBLIC MEETING	8:30am	
<p>WMNF has an open meetings policy. Dates and times of the meetings of the Board of Directors and their committees are on our website -- WMNF.org. All meetings are at WMNF 1210 East Droctor Martin Luther King Junior Boulevard, Tampa, 33603.</p>		
(PRIORITY COPY) SIDE CAR DOGS MOVIE JULY 28	8:45am	
<p>Go to DJ Computer and open up Station Promos. Click on Tab A and go to the Concerts Events and Timely Page. Play either "Side Car Dogs Movie July 28" promo.</p>		
LEGAL ID - WMNF TAMPA COMMUNITY CONSCIOUS RADIO		
<p>Please give legal id plus branding....."WMNF TAMPA COMMUNITY CONSCIOUS RADIO" please add 1 OR 2 OTHER CITIES in our listening area, since we have listeners in 6 different counties. . .</p>		

(<http://www.wmnf.org/support/donate-now/>)

Listen Now!

Tip Jar

Public Reports

Public Reports

2014

- [2014 Audited Financial Report \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/wmnf_final_2014_audited_financials.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/wmnf_final_2014_audited_financials.pdf)
- [2014 EEO Report \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/2014_EEO_Report-R.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/2014_EEO_Report-R.pdf)
- [2014 990 Tax Return \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/07/NBSF-990-Tax-Return-2013.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/07/NBSF-990-Tax-Return-2013.pdf)
- [2014 CPB Annual Financial Report \(https://s3.amazonaws.com/wmnf/wp-content/uploads/2015/06/2014_CPB_Annual_Financial_Report.pdf\)](https://s3.amazonaws.com/wmnf/wp-content/uploads/2015/06/2014_CPB_Annual_Financial_Report.pdf)

2013

- [2013 Audited Financial Report \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/wmnf_financial_statement_2013.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/wmnf_financial_statement_2013.pdf)
- [2013 EEO Report \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/wmnf_eeo_report_2013.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/wmnf_eeo_report_2013.pdf)
- [2013 990 Tax Return \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/07/wmnf_2013_990.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/07/wmnf_2013_990.pdf)
- [2013 CPB Annual Financial Report \(http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/2013_CPB_Annual_Financial_Report.pdf\)](http://wmnf.s3.amazonaws.com/wp-content/uploads/2015/06/2013_CPB_Annual_Financial_Report.pdf)

WMNF Community Advisory Council Meeting Minutes

Tuesday, April 28, 2015, 12:00

WMNF Conference Room

In attendance:

Mike Reedy – Equality Florida
Alex Manos – Finance and IT specialist (BOD applicant)
Chimurenga Waller – Uhuru Movement
Gazi Kudzo – Uhuru Movement
Conatance Jimenez – Uhuru Movement
Craig Kopp – WMNF General manager
Richard Manning – NBSFBOD 2nd VP

CK opened with intro on history of fairness doctrine, request for input as to what issues WMNF and other media might be missing in their coverage. Gave example of degree to which police on AA violence that formed background of recent events in Ferguson MO and Baltimore MD was unknown to mainstream. "WE want to get back in touch"

Chimurenga Waller: Uhuru represents perspective of African Internationals. The question of violence of police against black people is never posed. The media take the POV of the state. Black citizens of Ferguson formed their own grand jury which conclude the officer should have been indicted. There was little coverage of this. According to FBI at least 400 AA people were killed by police in 4 year period. Uhuru demonstration in St Pete stopped traffic for 2 hours yet as not covered in the media. Media always talk to the same people. They go directly to the police in the middle of the confrontation getting only state perspective. Voting is useful only as a tactical tool, but not as a general agent of change.

Alex Manos: WMNF balance sheets do not look great. Can the station do a fancy corporate sponsored fund raiser? What % of revenue comes from drives? WMNF needs to get its name out more effectively, and to provide more relevant programming to target new donors. CK will put Alex in touch with Development Committee.

Mike Reedy: Gives credit to WMNF for coverage of local and state news and issues. LGBT programming is good. Yet still various facts and issues get too little news attention. 49% of FL jurisdictions allow discrimination on basis of sexual orientation. The transgender bathroom bill that would allow people to sue

businesses for allowing TG persons to use bathroom of sex with which they identify is not well known. Media need to be educated on TG issues, and then to get out the word. 20+ TG people have been killed in hate crimes since January. 40% of homeless youth identify as LGBTEQ FL's transgender inclusion director is Gina Duncan - would make a good guest for RL's program. We should attend to EQ FL's press releases, and to Uhuru's news serve: Uhurunews.com, and the Burning Speak website, to report breaking activities and issues arising.

Meeting concluded at 1:30, with thanks and invitation to attend further meetings.

Exhibit L

WUOT-FM response to the draft report



September 8, 2015

William J. Richardson III
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

Dear Mr. Richardson:

WUOT management agrees with the recommendations to CPB management noted in the August 14, 2015 draft report by the Office of Inspector General, particularly recommendations 4 & 5. WUOT was among the stations which were confused regarding whether we were required to post the AFR on our website. Current CPB guideline language is not specific and clarification is definitely needed.

In addition, current CPB guidelines specifically pointed us to follow IRS Form 990 regarding compensation reporting of officers, key employees and independent contractors. WUOT followed those guidelines and did NOT post compensation because the \$100,000 threshold mentioned in Form 990 was not reached for officers, key employees or independent contractors. If this particular threshold is not the specific dollar amount to follow, then stations should not be directed to follow Form 990 guidelines.

We believe that WUOT and other stations could more easily comply with CPB directives regarding transparency if CPB gave more specific instruction regarding CPB's AFR and what dollar thresholds to use regarding reporting compensation for key employees and contractors for institutionally-licensed stations.

Thank you for the opportunity to comment on the Draft Report No. ACR1506-XXXX.

Sincerely,

A handwritten signature in blue ink that reads "Regina N. Dean".

Regina N. Dean
Director
WUOT Public Radio

Exhibit M

WLCH-FM response to the draft report

**CENTRO HISPANO
SPANISH AMERICAN CIVIC ASSOCIATION**

545 PERSHING AVENUE
LANCASTER, PA 17602
(717) 397-6267
www.sacapa.org

September 4, 2015

William J. Richardson, III
Deputy Inspector General
Corporation for Public Broadcasting
401 North Lime Street, NW
Washington, DC 20004-2129

Dear Mr. Richardson:

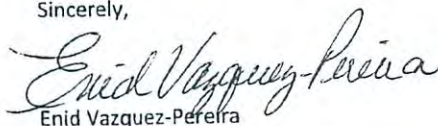
We have received the CPB Audit (ACR1506-XXXX) and have reviewed the findings contained in the report. It has always been the intention of our governing board and staff to be in full compliance with all CPB requirements. The findings in the audit that resulted in WLCH not being in total compliance with the CPB requirements were due primarily to technical issues related to the operation of our website and timely meeting notices.

We have developed a correction plan that will propel WLCH into full compliance with the CPB requirements. The plan includes the following:

- Contracting with Schell Web Design for redesigning our website –This will allow WLCH staff to directly make timely changes/notices (See Attachment 1)
- The new redesigned page will include a “Community Page” that will include content that adheres to CPB requirements – Open Meeting Policy, Access to Financial Reports, Access to Minutes of Governing and Community Advisory Board, Meeting Notices (See Attachment 2 & 3)
- The recorded messages that we will use to promote WLCH’s Open Meeting Policy and Meeting notices have been modified to be in compliance with CPB requirements (See Attachment 4)
- Effective immediately CAB minutes and SACA (Governing Board) minutes will reflect communication and interaction between both groups.

The redesign of the WLCH website has begun, all the content has been submitted to our web designer and we are currently awaiting a draft website for our review. This review should have a quick turn around time, thus allowing WLCHRadio.org to become fully operational in the very near future. Once we become operational we will contact CPB for review and comment.

Sincerely,



Enid Vazquez-Pereira
General Manager



United Way

Cc: Carlos Graupera, CEO



Contract for redesign of SACA & WLCH Radio websites

- Cost for redesign & programming is \$2000.
- Web hosting remains the same at GoDaddy on the SACA account.
- Project includes:
 - There will be only two websites – WLCHradio.org & SACAPA.org
 - Both websites will be constructed with Wordpress, which will allow WLCH/SACA staff to modify content as needed
 - Time will be allotted for the training of staff on use of Wordpress
 - Both websites will have their content condensed (content provided by WLCH/SACA staff)
 - Many of the current pages in each website will be eliminated
 - The WLCHRadio web site will have one page (Community) with content and links to about 10 PDF documents that will be provided electronically by WLCH/SACA staff
 - WLCHRadio website home page will have a section allocated for the eventual streaming of the station's programming
 - Each home page will have within it a section of rotating pictures and/or sponsors logos provided by WLCH/SACA staff
 - The websites will be constructed with Wordpress software
 - Time will be allotted for the training of staff on use of Wordpress
- Estimated timeframe of completion is September 30, 2015. Timeline will vary based on content delivery provided from SACA/WLCH.
- Schell's Web Design will invoice for the project upon completion of tasks associated with the redesign of SACA & WLCH websites.

Dave Schell – Schell's Web Design

dave@imakewebpages.com

Attachment 2- HOME PAGE



HOME
(About Us)

SUPPORT
(Donate Now)
(Become a Sponsor)

COMMUNITY
(Open Meeting Policy)
(Public Documents)

PROGRAM SCHEDULE

CONTACT
(Keep Current Contact Page)

WLCH is the only Latino, full time public and community radio station serving a regional audience that reaches the entire Lancaster area, as well as York and Reading, PA! We are one of only 33 owned and operated Hispanic Public Radio stations nationwide. We broadcast 7 days a week, 24 hours a day. To learn more about WLCH... (Link to Current About Us Page)

**Support Our Corporate Sponsors/
Become a Sponsor** (Link to Current
Become a Sponsor Page)
(Rotating Logos)

What's Happening Now
(Picture – Current On Air Sign and
Linked To Current Program Schedule)

Local News from WGAL
(WGAL News Feed)

DONATE PAGE

(Link Directly to the Current Credit
Card/ Pay Pal Donations
Page)

Our Programs

(Rotating Pictures)

Our Parent Organization

(Link to SACA Website)

WLCH began broadcasting on September 14, 1987 and has provided consistent programming for over 28 years. On August 2, 2005 we began broadcasting in the city of York on the 100.3 FM frequency.

Keep Current Banner

Attachment 3

WLCH (SACA) COMMUNITY PAGE*

WLCH is a component of the Spanish American Civic Association (SACA). It is licensed as a public educational station which offers the community a wide array of programming in Spanish and English. Established in 1987, WLCH/Radio Centro is the voice of Lancaster's and York's Latino community and its preferred source for educational, public affairs and musical entertainment.

WLCH Senior Management

Title	Name	Contact Information
General Manager	Enid Vazquez-Pereira	epereira@sacapa.org
Station Manager	Claudia Galdamez	cgaldamez@sacapa.org

WLCH (SACA) Board of Directors (Governing Board)

Jesus M. Cruz	Hiram G. Martinez	Angel E. Torres	Joanne M. Mathias
Donna M. Chambers	Todd L. Eachus	Carlos E. Graupera	Samuel G. Encarnacion
Jobany Bedoya	Deborah Flores	Cinthia M. Kettering	Paulo Oliveira
Elias Evans			

WLCH Community Advisory Board

Lucciola Gonzalez	Jose A. Rosado	Luz Maria Rodriguez	Nelsy Agramonte
Fatima Marin	Jairo Velasco	Margarita Ayala	Carlos A. Gonzalez
Ingrid Mora-Smith	Sebastian Samaniego	Nadina Feakins	

WLCH (SACA) Open Meeting Policy

It is the policy of WLCH that meetings of the governing board of the organization, its committees, and advisory boards shall be open to the public. Meetings or portions of meetings may occasionally be

closed to the public when considering matters relating to individual employees, proprietary information or litigation. A written statement explaining the reason for closing the meeting will be available on the website within a reasonable period of time.

In keeping with the policy, please be advised of the following open meetings: Board of Directors, Community Advisory Board, and other advisory committee meetings. Below are the dates, times and locations of meetings for 2015.

If you have difficulty in accessing the documents that are contained in this website or if there is a document that is not included in the website that you would like to request, contact Claudia Galdamez at 717-295-7996/cgaldamez@sacapa.org.

Upcoming Meetings:

SACA Board of Directors: January 28, 2015**, March 25, 2015**, May 27, 2015**, July 29, 2015**, September 30, 2015, December 9, 2015, SACA Board Conference Room, 453 South Lime St., Lancaster, PA 17602 – For further information, contact Claudia Galdamez at 717-295-7996/cgaldamez@sacapa.org (**Minutes of the Board meetings are found below).

WLCH Community Advisory Board: September 9, 2015, Student All Purpose Room, Tec Centro, 102 Chester St., Lancaster, PA 17602 – For further information, contact Claudia Galdamez at 717-295-7996/cgaldamez@sacapa.org

Minutes of WLCH/SACA Board of Directors Meetings & WLCH Community Advisory Board:

[WLCH/SACA Board Minutes July 30, 2014 \(PDF\)](#)
[WLCH/SACA Board Minutes September 14, 2014 \(PDF\)](#)
[WLCH/SACA Board Minutes December 3, 2014 \(PDF\)](#)
[WLCH/SACA Board Minutes January 28, 2015 \(PDF\)](#)
[WLCH/SACA Board Minutes March 25, 2015 \(PDF\)](#)
[WLCH/SACA Board Minutes May 27, 2015 \(PDF\)](#)
[WLCH/SACA Board Minutes July 29, 2015 \(PDF\)](#)

[WLCH/SACA Community Advisory Board Minutes, October 16, 2014 \(PDF\)](#)

WLCH (SACA) Financial Statements

WLCH operates on a July 1 - June 30 fiscal year. WLCH's financial statements are audited annually by a certified public accounting firm. Financial statements include a Statement of Financial Position, Statement of Activities, and Statement of Cash in Net Assets and Cash Flows, and should be read in conjunction with the Notes to Financial Statements.

The IRS Form 990, Return of Organization Exempt from Income Tax, is the annual federal information return filed by charitable organizations that are exempt from income tax. The amounts in these statements are presented in accordance with IRS regulations.

The CPB/AFR is the financial report that is submitted to the Corporation for Public Broadcasting by WLCH on an annual basis.

If you have difficulty in accessing the documents that are contained in this website or if there is a document that is not included in the website that you would like to request, contact Claudia Galdamez at 717-295-7996/cgaldamez@sacapa.org.

These Financial Documents are found below -

[SACA Financial Statements June 30, 2014 and 2013 \(PDF\)](#)

[SACA IRS FORM 990, 2013-2014 – \(PDF\)](#)

[SACA Corporation of Public Broadcasting \(CPB\), Annual Financial Report](#)

WLCH (SACA) Diversity Statement

WLCH's commitment to diversity is based on our commitment to public service. WLCH knows that a diverse workforce, management team, governing Board, and Community Advisory Board contribute greatly to our knowledge and understanding of our diverse communities. Therefore, the organization takes specific steps to ascertain community needs and interests; to assure respect and civility in our discussions and impartiality in our coverage of complex matters; and to be accessible, accountable, and transparent to the community as a whole. WLCH's commitment to diversity is expressed in a continuous thread throughout all of our policies and practices.

- I. Programming - WLCH's program content reflect the diversity of our community.
- II. WLCH/SACA Personnel Policies summarizes our EEO and anti-harassment policies. WLCH conducts diversity training for its staff and leadership. WLCH welcomes diverse audiences to tour our facilities. These community groups highlight our commitment to opening our doors to people of all ages, backgrounds, races, abilities, and religions.
- III. WLCH has gradually increased the diversity of its Governing and Advisory Boards, including age diversity.
- IV. WLCH has not had any staff vacancies in over two years, however we maintain continuing efforts to identify potential new staff through our parent organization's (SACA) employment and training program and contacts referred to us from partner higher education entities in our region.

We are committed to exploring new opportunities for achieving and promoting diversity in employment and board service and to monitor and evaluate our success.

SACA Personnel Policies (PDF)

*This is the new Community Page for the redesigned WLCH website.

Attachment 4

Open Meeting Policy (Quarterly, 3 Consecutive Days)

It is the policy of the WLCH/SACA board of directors to provide the public, access to our board, sub-committee and community advisory board meetings. For information regarding the place, date and time of the meetings please (visit our website wlchradio.org or) call 717-295-7996.

Meeting Notice – (7 Days In Advance of Meeting)

To comply with SACA's Open Meeting Policy we want to give notice to the community that the next meeting of the SACA/WLCH Community Advisory Board, will be Wednesday, Sept. 9th, 6:30pm at Tec Centro, 102 Chester St., Lancaster, PA.

For further information (visit our website wlchradio.org or) call 717-295-7996.