



Corporation
for Public
Broadcasting

Office of the Inspector General

December 2, 2022

To: Jackie J. Livesay, Deputy General Counsel and Vice President, Compliance
Kathy Merritt, Senior Vice President, Radio, Journalism and CSG Services

From: Kimberly A. Howell, Inspector General

Digitally signed by
Kimberly Howell
Date: 2022.12.02
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Subject: Evaluation of KUNR-FM, Board of Regents of the Nevada System of Higher Education, Compliance with Selected Communications Act and Transparency Requirements, Report No. ECR2216-2301

We have completed an unannounced evaluation of compliance with selected requirements of the 2022 Corporation for Public Broadcasting (CPB) Community Service Grant (CSG) awarded to KUNR-FM, licensed to the Board of Regents of the Nevada System of Higher Education, Reno, Nevada. Our specific objectives were to verify compliance with twelve requirements of the Communications Act of 1934, as amended (Act) for open and closed meetings and open financial records, as well as the CSG General Provisions and Eligibility Criteria (General Provisions) for transparency as presented in Exhibit A. Background information on the station and CSG program can be found in Exhibit B.

Based on our review of KUNR-FM's website on September 26, 2022, we found the station was compliant with six of the six requirements applicable. The remaining six requirements were not applicable.

We initiated this evaluation to address station accountability as identified in our Annual Plan. We conducted our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*. Our scope and methodology are discussed in Exhibit C.

The station's response to the draft report is presented in Exhibit D.

cc: Laura Ross, Chair, CPB Board of Directors
Robert Mandell, Chair, Audit and Finance Committee, CPB Board of Directors
U.S. Senate Committee on Homeland Security and Governmental Affairs
U.S. House of Representatives Committee on Oversight and Government Reform
U.S. Senate Committee on Commerce, Science and Transportation
U.S. House of Representatives Energy and Commerce Committee
U.S. Senate Committee on Appropriations

U.S. Senate Labor-HHS-Education Appropriations Subcommittee
U.S. House of Representatives Committee on Appropriations
U.S. House of Representatives Labor-HHS-Education Appropriations Subcommittee

**Summary of KUNR Website Review
as of September 26, 2022**

Requirements	Met	Not Met	Unable to Determine
Station reviewed: KUNR			
1) Seven-day advance notice of governing body meeting: (Board of Regents of the Nevada System of Higher Education)			
a) available on website	N/A		
b) available by other means			
2) Seven-day advance notice of board committee meetings:			
a) available on website	N/A		
b) available by other means			
3) Seven-day advance notice of CAB meetings:			
a) available on website	N/A		
b) available by other means			
4) If closed meetings were held, was documentation prepared explaining the basis for closing meeting in accordance with the Act:	N/A		
a) available on website			
b) available at central office			
5) If closed meeting documentation was prepared, was it available within 10-days of the closed meeting	N/A		
6) Most recent AFR available on website	X		
7) Most recent audited financial statements or unaudited financial statements on website	X		
8) Senior/executive management information on website	X		
9) Governing body members on website	X		
10) CAB members on website	N/A		
11) Diversity Statement:			
a) available on website	X		
b) available at central office			
12) Most recent Local Service Content Report (Section 6 of the SAS):			
a) available on website			
b) available at central office	X		

Background

KUNR-FM, Reno, Nevada, is a public broadcasting station licensed to the Board of Regents of the Nevada System of Higher Education, which sets policies and approves budgets for Nevada's entire public system of higher education.

The station's website states that its mission is to strengthen the community through trusted journalism, entertainment, and human connection and its vision is to become an inclusive hub for enriching content and community connection.

CPB's Community Service Grant Program

The Act provides that specific percentages of the appropriated funds CPB receives annually from the United States Treasury must be allocated and distributed to licensees and permittees of public TV and radio stations. CPB distributes these funds through its CSG program. Grant award amounts are based in part on the amount of Non-Federal Financial Support (revenues) claimed by all stations on their Annual Financial Reports (AFR) and Financial Summary Reports (FSR) submitted to CPB.

In addition to the annual filing of a station's AFR(s) or FSR for radio and/or television, the chief executive of the station and a licensee official annually certify to CPB the station's compliance with Act requirements and selected General Provisions requirements in the legal agreement awarding the station CSG funds.

These certifications specifically address open and closed meetings; open financial records; Community Advisory Board; CPB Employment Statistical Report; and donor information requirements under Section IV Communications Act Compliance of the agreement. Station officials responsible for closed meetings and the CPB Employment Statistical Report requirements are identified in the grant agreement. The certification also includes website postings required under Section V. Selected General Provisions Requirements of the agreement.

Scope and Methodology

We performed an evaluation of KUNR-FM's compliance with selected CSG provisions of the Act and grant certification requirements. Our specific objectives were to verify compliance with selected Act requirements for open and closed meetings and open financial records, as well as Radio Community Service Grants General Provisions and Eligibility Criteria for Transparency. The scope of the evaluation included review of the information posted on the station's website as of September 26, 2022, as well as information provided in response to our Preliminary Observations issued on November 1, 2022.

We reviewed documents supporting the station's compliance with the Act requirements to provide advance notice of public meetings; notice of closed meeting reasons; and make financial information available to the public. We also reviewed the station's website and processes to determine its compliance with CPB's transparency requirements for eligibility. We informed station management of our evaluation on November 1, 2022, and we requested additional information to support the station's compliance, including as applicable transparency information maintained at its central office for documents that was required to be made available to the public at its central office if not posted on its website.

We also reviewed CPB's Integrated Station Information System (ISIS) to determine if the evaluated information made available to the public was the most recent information submitted to CPB. In addition, we verified with station management that board and management listings posted to its website were current.

Our fieldwork was conducted from September through November 2022 and our evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*.



Kimberly A. Howell
Inspector General
Corporation for Public Broadcasting, Office Of Inspector General
401 Ninth Street, NW
Washington, DC 20005-2129

Dear Ms. Howell,

We are pleased your evaluation of KUNR Public Radio found our station is in compliance with all requirements, as applicable, for meetings, financial records and transparency.

As noted in Exhibit B of your report, our website states KUNR's "mission is to strengthen the community through trusted journalism, entertainment, and human connection and its vision is to become an inclusive hub for enriching content and community connection." Indeed, providing quality public service journalism, information and cultural content for our broadcast and digital audiences has remained our core mission for nearly 60 years.

Our ability to fulfill that mission is dependent on the Corporation for Public Broadcasting and Community Service Grants. That funding is directly responsible for our station's continued ability to provide this critical public service for Northern Nevada and the Eastern Sierra. We take these audits seriously and appreciate the feedback from your office. On a personal note, since I am new to public radio, I thank you for taking the time to explain the process to me and for being friendly and easy to work with. I look forward to our continued work with CPB/CSG personnel in the years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Duggan'.

Brian Duggan
General Manager
KUNR, KNCJ and KNCC

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