



Corporation
for Public
Broadcasting

Office of the Inspector General

September 28, 2023

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: 2023.09.28
13:50:15 -04'00'

Subject: Evaluation of KDNA-FM, Northwest Communities' Education Center, Compliance with Selected Communications Act and General Provisions Diversity and Transparency Requirements, Report No. ECR2301-2316

We have completed an unannounced evaluation of compliance with selected requirements of the 2023 Corporation for Public Broadcasting (CPB) Community Service Grant (CSG) awarded to KDNA-FM, licensed to Northwest Communities' Education Center, Granger, Washington. 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 selected provisions of the CSG General Provisions and Eligibility Criteria (General Provisions) for diversity and 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 KDNA-FM's website on February 21, 2023, and additional information and documentation we received from the station on March 21 and April 10, 2023, we found the station was compliant with three of the eleven requirements applicable. KDNA was not compliant with seven requirements and was partially compliant with one requirement. One requirement was not applicable.

Specifically, we found that the station was not compliant with:

- seven-day advance notice of governing body and Community Advisory Board (CAB) meetings during the last fiscal year (two requirements);
- preparing documentation explaining the reasons for closed meetings and making that information available within ten days of the closed meeting (two requirements);
- posting the most recent CPB Annual Financial Report (AFR) and audited financial statement to the station's website (two requirements); and
- making the station's Local Content and Service Report (LCSR) available to the public.

We also found that the station was generally compliant with Diversity Statement requirements, except for:

- including the extent to which Grantee's governance reflects such diversity; and
- conducting an annual review of the Diversity Statement with the governing board or Licensee Official of its diversity goals and revisions.

We recommend that CPB management require KDNA-FM to:

1. fully comply with Act requirements for advance notice for open meetings and for making the reasons for a closed meeting available to the public within 10 days following the closed meeting date;
2. identify the corrective actions and controls it will implement to ensure future compliance with Act requirements for open and closed meetings, as well as making financial information available to the public;
3. update its Diversity Statement to fully address the CPB diversity requirements and have its LCSR available to the public; and
4. identify the corrective actions it will implement to ensure compliance with CPB General Provisions for diversity and transparency, including documenting its review of the updated Diversity Statement with the governing board or licensee official.

In response to the draft report, KDNA-FM management thanked us for the opportunity to respond to the draft report, provided a chart of corrective actions they will take to achieve compliance, and provided documentation to demonstrate the station's current compliance with requirements. KDNA did not dispute any of the evaluation findings.

Based on KDNA's response to the draft report and accompanying documentation, we consider recommendations one, three, and four unresolved, pending CPB's final management decision resolving our findings and recommendations. We consider recommendation two resolved but open, pending management decision to accept KDNA's corrective actions.

As part of this evaluation, we also followed up on the corrective actions taken in response to our prior audit of KDNA-FM issued in 2010. Our previous audit identified similar findings on noncompliance with Act requirements for advance notice of public meetings, providing explanations for closed meetings, and making its CPB AFR and audited financial statement available to the public. Based on this review, the corrective actions taken on the 2010 audit have not been sustained by the station.

The station's response to the draft report and chart of corrective actions is presented in Exhibits D and E. The additional documentation provided with the station's response is available in our office. See Exhibit F.

We initiated this evaluation to address station accountability as identified in our Annual Plan and to address a complaint we received about issues at the station. 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.

cc: Laura Ross, Chair, CPB Board of Directors

Elizabeth Sembler, 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

FINDINGS AND RECOMMENDATIONS

I. ACT COMPLIANCE

Advance Notice of Public Meetings

At the time of our initial examination, we found that KDNA-FM was not compliant with Act requirements for advance notice of open Board of Directors (Board) and Community Advisory Board (CAB) meetings. We reviewed Board and CAB meetings beginning in January 2022 through the date of our examination. We received additional documentation from the station on March 27, 2022 and April 10, 2023, and found that the station held five Board and six CAB meetings during the examined period.

For three Board meetings held in 2022,¹ the station provided an undated web page notice with the dates, times, and a contact to obtain zoom information, but it provided no screen shots to document when the notice was posted nor on-air announcement scripts to establish timely advance notice. A fourth 2022 board meeting (September 6, 2022) was mentioned in the minutes of a 2023 meeting and the station did not provide any documentation for it. A fifth board meeting was held on January 3, 2023, and the station provided an undated web notice for its 2023 meetings, but we were unable to determine if it was posted timely. An on-air announcement provided by the station for the January 2023 meeting established seven days advance notice. The station stated that the web notices had been posted and then removed from the station's web page. Based on the information we examined, we determined that one of the five Board meetings held in the review period received adequate advance notice.

After receiving our Preliminary Observations on March 14, 2023, the station updated its website to include past and future advance notices for open Board meetings for calendar years 2022 and 2023 as well as minutes of past meetings, bringing the station into compliance with this requirement for the balance of 2023.

For the six CAB meetings during the review period, three were closed meetings and did not require advance notice. We found an undated web notice for 2023 CAB meetings at the time of our initial review, but we were unable to determine if it was posted timely to provide advance notice for the January 2023 CAB meeting. The balance of the CAB meetings posted to the website met the 7-day advance notice requirements. The station is currently compliant with this requirement. Two of the open CAB meetings in the period received seven days advance notice on the air, but one other CAB meeting received only 6 days advance notice and was not compliant with the advance notice requirement. Based on our review, we found that two of three CAB meetings that needed advance notice were compliant; one was not.

The station's signed CSG agreements for 2022 and 2023 indicate that it provides advance notice of board meetings by placing advance notice on the website and by making on air announcements at least seven days in advance. (Note: either method of notice would be sufficient.) By signing the 2022 and 2023 CSG agreements and certifications of eligibility, station and licensee officials certified that meetings of the Grantee's governing body and its committees are open to the public and that seven days' advance notice is given.

¹ Board of Directors meetings held on January 4, 2022, April 4, 2022, and June 7, 2022.

The Act requires that stations make reasonable advance notice of open meetings to the public. Further, CPB's Communications Act Compliance requirements clarify that stations may satisfy the reasonable notice requirement by doing the following:

Stations may satisfy this requirement by providing at least seven days advance notice of an Open Meeting, including time and place of meeting by:

1. Posting notice on the station's website;
2. Broadcasting notice on-air between 6 a.m. and 11 p.m., as shown by station's log;
3. Placing notice in the "Legal Notices" section of a local newspaper in general circulation in the station's primary coverage area; or
4. Giving notice through recorded announcement accessible on the station's phone system.

CPB's Communications Act Compliance requirements, I Open Meetings, E. Notice of Open Meetings (June 1, 2021).

As previously mentioned, our 2010 audit of KDNA also identified that the station was not compliant with the seven-day advance notice requirement for public meetings of the Board of Directors and the CAB. At the time of our review in February 2023, the station was not compliant with open meeting advance notice requirements and may be subject to penalties under CPB's CSG Non-Compliance Policy.

Closed Meeting Documentation

At the time of our review, we found no evidence of closed meetings or documentation identifying reasons for closed meetings on the station website. After we issued our Preliminary Observations, on March 21, 2023 the station informed us that it had held two closed CAB meetings on January 24, 2022 and March 8, 2022. Their response stated that the same process was used for both meetings: KDNA-FM posted the information for closure with the reason within 10 days of the closed meetings and it was removed after the meetings were held. They also stated that the written statement is in the station's office. In a subsequent email, station officials provided one undated web posting identifying that the March 8, 2022 CAB meeting was closed, but did not provide a reason. The station did not provide any documentation about the closed January 24, 2022 CAB meeting. Finally, minutes from an April 2022 CAB meeting indicate that a third closed CAB meeting was held on February 2, 2022, but the station provided no information about that closed meeting having been held or the reason it was closed.

The Act and CPB's Communications Act Compliance requirements identify when stations may close a meeting:

When may a meeting be closed? The Act allows stations to hold Closed Meetings, or to close an Open Meeting, when discussing any of the following:

1. matters concerning individual employees;
2. proprietary information;
3. litigation and other matters requiring confidential advice of counsel;

4. commercial or financial information obtained from a person on a privileged or confidential basis; or
5. the purchase of property or services, if the premature disclosure of the transaction would compromise the station's business interests.

§396(k) CPB's Communications Act Compliance requirements, 2. Closed Meetings, B. When may a meeting be closed? (June 2021).

The Act requires that stations document the reason(s) for closed meetings and make the reason(s) available to the public within a reasonable time after the closed meeting. Further, CPB's Communications Act Compliance requirements state that stations may satisfy the reasonable notice requirement by posting within ten days of the meeting:

C. Closed Meeting Documentation: The Act requires stations to document and make available to the public the specific reason(s) for closing a meeting within a reasonable time after the meeting. CPB also requires that the written statement be made available for inspection, either at the CSG recipient's central office or posted on its station website, within 10 days after each closed meeting.

CPB's Communications Act Compliance requirements, 2. Closed Meetings, C. Closed Meeting Documentation (June 2021).

As previously mentioned, our 2010 audit of KDNA also identified that the station did not provide an explanation of the reasons for closing public meetings. At the time of this review in February 2023, the station was not compliant with requirements for creating and retaining closed meeting documentation or for making the information available to the public within 10 days of the closed meeting. As a result, the station may be subject to penalties under CPB's Non-Compliance Policy.

Financial Information Available to the Public

We found that KDNA-FM was not compliant with the Act requirements for open financial records to be available on the station's website. As of the date of our review, we found that KDNA-FM had posted its fiscal year (FY) 16 audited financial statement and FY 16 AFR on its website but not the most recent financial reports, the required FY 2022 audited financial statement and AFR.

The Act provides:

Funds may not be distributed pursuant to this subsection to any public telecommunications entity that does not maintain for public examination copies of the annual financial and audit reports, or other information regarding finances, submitted to the Corporation ...

47 U.S.C. Section 396 (k)(5). CPB's compliance guidance restates the requirement:

The Public's Access to Financial Information: The Act requires stations to make available to the public their annual financial and audit reports and other financial

information they are required to provide to CPB. CPB also requires that each CSG recipient post the following documents on its station website:

- 1) its most recent audited financial statement or un-audited statement for stations exempt from providing audited financial statements; and
- 2) its most recent annual financial report (AFR) or annual financial summary report (FSR) (whichever is applicable).

CPB Act Compliance 2021 - III. Open Financial Records, Section E.

After receiving our Preliminary Observations on March 13, 2023, the station took immediate corrective action to post both documents to its website and brought the station into compliance with these requirements. The station explained that the financial reports were not on the website but were available at the station in paper format, noting that most of their listeners have limited access to technology and printed materials are preferred.

As previously mentioned, our 2010 audit of KDNA also identified that the station had not made its audited financial statements and CPB AFR available to the public. Our review of this requirement in February 2023 found that the station was not compliant with Act open financial records requirements and may be subject to penalties under CPB's Non-Compliance Policy.

Recommendations:

We recommend that CPB management require KDNA-FM to:

- 1) fully comply with Act requirements for advance notice for open meetings and for making the reasons for a closed meeting available to the public within 10 days following the closed meeting date; and
- 2) identify the corrective actions and controls it will implement to ensure future compliance with Act requirements for open and closed meetings, as well as making financial information available to the public.

KDNA Response

In response to our draft report, KDNA management submitted a general letter without any specific comment on reported findings, a chart labeled KDNA Response/Actions, and documentation to demonstrate current compliance. For the finding that the station had not posted notice of open meetings on the KDNA website, the station's corrective action chart noted that the station's website manager will ensure that notices are posted and screenshots with dates and times will be retained. For the finding that the station did not have evidence of closed meetings or documentation of the reasons for closed meetings, the station's corrective action chart noted that the website manager will post notices of closed meetings and reasons for closing within 10 days. For the finding that the station did not create and retain closed meeting documentation or make it available to the public within 10 days, the station's corrective action log stated that an administrative assistant will create and file documents and information with that work to be checked by the Director of Operations. For the finding of non-compliance with open financial records requirements, the station's corrective action log identified that the

Director of Operations will be responsible for ensuring the two required financial reports are available on the station website. In addition, the station provided its FY 2022 audited financial statement and AFR.

OIG Review and Comment

Based on our evaluation of KDNA's response to the draft report, we consider recommendation one unresolved and recommendation two resolved, but open pending CPB's management decision accepting the station's corrective actions. Regarding recommendation one, we verified current compliance with advance notice and financial reports requirements, but we were unable to verify current compliance with closed meeting requirements because a closed meeting has not been held.

II. GENERAL PROVISIONS COMPLIANCE

Diversity Statement

Our evaluation found that KDNA-FM was partially compliant with the CPB Diversity Statement requirements because the station had not:

- included the extent to which Grantee's governance reflects such diversity in the Diversity Statement; or
- documented its annual review of its diversity goals with the station's governing board or Licensee Official.

At the time of our website review, the KDNA-FM website had a page identified for the Diversity Statement, but the page was blank. After we contacted the station on March 14, 2023 and issued our Preliminary Observations, on March 21, 2023 the station provided the Diversity Statement maintained at the station. On April 10, 2023, KDNA provided a revision adding information about changes in the NCEC/SeaMar Board of Directors from 2019 to 2022, where there was a reduction in the number of board members and the extent of its diversity.

Also, according to the Diversity Statement, station diversity goals are reviewed annually at the first meeting (January) of the Governing Board. However, the station did not provide any documentation or other evidence of an annual review by the Governing Board in January 2023. We reviewed the meeting minutes from the January 2023 Board meeting and found no reference to a review of its Diversity Statement with the Board at that meeting.

CPB's FY 2023 Radio Community Service Grant General Provisions and Eligibility Criteria, Section 8. Diversity Statement, A. and B. provide:

The Communications Act requires CPB to support diverse noncommercial educational content for unserved and underserved audiences. CPB's goal, therefore, is to support stations in providing a wide variety of educational, informational, and cultural content that addresses the following elements of diversity: gender, age, race, ethnicity, culture, religion, national origin, and economic status. It is appropriate that Grantee engage in practices designed to reflect such diversity of the populations it serves. In support of these objectives, Grantee must comply with the following.

- A. Annual Review:** Annually review and make any necessary revisions to the station's established diversity goal for its workforce, management, and boards, including community advisory boards and governing boards having governance responsibilities specific to or limited to broadcast stations.
- B. Diversity Statement:** Undertake the following to achieve Grantee's diversity goal.
 - 1. Annually review with the station's governing board or Licensee Official:
 - a. the diversity goal and any revisions thereto; and
 - b. practices designed to fulfill the station's commitment to diversity and to meet the applicable FCC guidelines (47 C.F.R. § 73.2080).
 - 2. Maintain on its website or make available at its central office, a diversity statement (approximately 500 words) that reflects on the following points, reviewing and updating the same annually with station management:
 - a. the elements of diversity that Grantee finds important to its public media work;
 - b. the extent to which Grantee's staff and governance reflect such diversity;
 - c. the progress Grantee has made to increase its diversity in the last two to three years; and
 - d. Grantee's diversity plans for the coming year.

Based on our review, we concluded that the station was partially compliant with CPB's Diversity Statement requirements because the statement provided did not include information on the extent to which the station's governance reflects such diversity and because the station did not provide any documentation of the Board's annual review of its diversity goals.

LCSR Available for Public Inspection

During our review of KDNA-FM's website, we were unable to locate the LCSR report. After contacting the station on March 14, 2023, the station did not provide the LCSR, but provided a snapshot of a quarterly issue/program report and later followed up by providing additional quarterly issues reports. After another conversation with the station to explain the transparency requirement, the station had uploaded its LCSR to its website. The station is now compliant with CPB's General Provisions requirement for the report to be available to the public.

CPB's 2023 Radio Community Service Grants General Provisions and Eligibility Criteria require the following transparency requirements (Section 9.C.2)

- C. Documents for Public Inspection: At Central Office or on Station Website:** At a minimum, each Grantee must maintain the following documents for public inspection at its central office, or post the same on its station website: ...
 - 2. LCSR which is Section 6 of the SAS.

KDNA-FM was not compliant with the requirement to make the LCSR available for public inspection. After receiving our Preliminary Observations and additional discussions, the station took corrective action to make the LCSR available for public inspection.

Recommendations

We recommend that CPB require KDNA-FM to:

- 3) update its Diversity Statement to fully address the CPB diversity requirements and have its LCSR available to the public; and
- 4) identify the corrective actions it will implement to ensure compliance with CPB General Provisions for diversity and transparency, including documenting its review of the updated Diversity Statement with the governing board or licensee official.

KDNA Response

In response to our draft report, KDNA's corrective action chart stated that it would have the Diversity Plan on the agenda for the Board's meeting this coming December and in future years. The response also stated that human resources personnel will update the Diversity Statement after the December board meeting and will post the updated statement within 10 days. The station's response did not address the requirement to make the Local Content and Service Report available to the public.

OIG Review and Comment

Based on our evaluation of KDNA's response to the draft report, we consider recommendations three and four unresolved, pending CPB's final management decision. The station's corrective action chart identified the positions that will be responsible for compliance with the diversity statement requirements but did not address ensuring compliance with making the annual Local Content and Services Report available to the public.

Summary of KDNA-FM Website Review as of February 21, 2023

Requirements	Met	Partially Met	Not Met
1) Seven-day advance notice of governing body meeting:			X
a) available on website			
b) available by other means			
2) Seven-day advance notice of board committee meetings:	N/A		
a) available on website			
b) available by other means			
3) Seven-day advance notice of CAB meetings:			X
a) available on website			
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:			X
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			X
6) Most recent AFR available on website			X
7) Most recent audited 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	X		
11) Diversity Statement		X	
A. Diversity Statement is available to the public on:			
i. on website			
ii. at central office	x		
B. Annual review of Diversity Statement and statement available to public reflects current goals.	x		
C. Diversity Statement is approximately 500 words.	x		
D. The Diversity Statement reflects each of the following points			
i. the elements of diversity that Grantee finds important to its public media work;	x		
ii. the extent to which Grantee's staff and governance reflect such diversity;			x
iii. the progress Grantee has made to increase its diversity in the last two to three years; and	x		

Summary of KDNA-FM Website Review as of February 21, 2023

Requirements	Met	Partially Met	Not Met
iv. the Grantee's diversity plans for the coming year	x		
E. Does the station's management annually review with the Governing Board or licensing official the diversity goals and revisions?			x
12) Grantee's annual report on local content and services included in the grantee's current 2021 SAS on its content and services that serve local needs; and analysis about the reach and impact of the local services in its community.			X
i. on website			
ii. at central office			

Legend: X designates that the 12 requirements tested were met, partially met, or not met.

x designates that the 5 sub-components of the CPB Diversity Statement requirements were met or not met.

Background

According to KDNA-FM's history page on its website, several Chicano/a leaders formerly involved in el Movimiento in Washington State established Radio KDNA as an activist radio station that educated farm workers, advocated farm worker's organizations, and provided Spanish language programs to non-English speaking families. The station was only the second non-commercial Spanish language radio station established in the United States and was granted its license in 1979. The station's main purpose was to educate, with programs focusing on consumer information, nutrition and food, women's issues, immigration issues, unemployment and labor conditions, youth, and senior citizen issues and more.

Currently, KDNA views its mission to direct its efforts as a minority public radio station in response to the cultural and informational isolation of Hispanic/Latino and other disadvantaged communities and to produce quality radio programming to help such communities overcome barriers of literacy, language, discrimination, poverty, and illness. It works with other organizations on a number of projects including Opioid Project Washington, the Well Being Project, the Stop School Violence Project, and a number of journalism initiatives like access to health care, murdered and missing indigenous women, the destructive presence of gangs in the Yakima Valley, and economic disparity.

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 AFRs and Financial Summary Reports (FSR) submitted to CPB. In addition to the annual filing of a station's AFR(s) or FSR(s) 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 KDNA-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 General Provisions for diversity and transparency. The scope of the evaluation included review of the information posted on the station's website as of February 21, 2023, as well as information provided in response to our Preliminary Observations issued on March 21, 2023 and covered the period from January 1, 2022 through March 21, 2023.

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 General Provisions. We informed station management of our evaluation on March 14, 2023, and we requested additional information to support the station's compliance, including as applicable diversity and transparency information maintained at its central office for documents that are required to be made available to the public at its central office if not posted on its website. Additionally, we requested station management to complete a Diversity Questionnaire to obtain information on the station's actions to annually review and update its Diversity Statement in compliance with CPB requirements.

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 February 2023 through April 2023 and our evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation.



Northwest Communities' Education Center

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September 18, 2023

William J. Richardson III

Deputy Inspector General

401 Ninth Street, NW Washington, DC 20004-2129

brichardson@cpb.org

Dear Mr. Richardson,

Thank you for the opportunity to respond to the draft evaluation of KDNA FM's compliance report with selected Communications Act and General Provisions Diversity and Transparency requirements. Please see the attached response and actions KDNA FM is taking to correct the issues.

I have attached scanned documents that I would like you to consider in finalizing the report. We hope it demonstrates our effort to comply with CPB requirements and expectations.

Thank you again for the opportunity to respond to the evaluation report and for considering the enclosed information. We aim to work with CPB to meet all requirements for KDNA FM.

Respectfully,

A handwritten signature in cursive script, appearing to read "Gilbert Alaniz".

Gilbert Alaniz, Station Manager
Radio KDNA/NCEC

C: Mike Leong, Senior Vice-President
Corporate and Legal Affairs-SeaMar



Not Compliant Area	Report Page/Section	Requirement(s)	Action #1	Action #2
No advance notice of open Board of Directors (Board) and Community Advisory Board (CAB) meetings.	Page 2-4 Findings and Recommendations	1. Post notice of open meetings on the KDNA website	Action: The website manager will complete and take screenshots with date/time.	Action 2: Staff member, [REDACTED] will post records of open meetings-Spanish and English.
No evidence of closed meetings or documentation identifying reasons for closed meetings on the station website	Page 4-5 Findings and Recommendations	1. Post notice of closed meeting and provide the reason to the public on the KDNA website within 10 days of the closed meeting	Action: The website manager will post notices of closed meetings and reason(s) for closing within 10 days of the meeting	
At the time of this review in February 2023, the station was not compliant with requirements for creating and retaining closed meeting documentation or for making the information available to the public within 10 days of the closed meeting	Page 4-5 Findings and Recommendations	1. For NCEC Board: Create and retain closed meetings documentation and make the information available to the public within 10 days of the closed meeting by posting the information on the KDNA website.	Action: After any closed meeting of the NCEC Board, [REDACTED] (Admin. Asst.) will be assigned the tasks of creating and filing documents and information; [REDACTED] will check this within the 10-day window.	

Not Compliant Area	Report Page/Section	Requirement(s)	Action #1	Action #2
<p>Financial Information Available to the Public not compliant with the Act requirements for open financial records to be available on the station’s website; Funds may not be distributed pursuant to this subsection to any public telecommunications entity that does not maintain for public examination copies of the annual financial and audit reports, or other information regarding finances, submitted to the Corporation</p>	<p>Pages 5-6 Findings & Recommendations</p>	<p>Make available to the public KDNA's annual financial and audit reports and other financial information required to provide to CPB. CPB also requires that each CSG recipient post the following documents on its station website:</p> <ol style="list-style-type: none"> 1) its most recent audited financial statement or unaudited statement for stations exempt from providing audited financial statements and 2) its most recent annual financial report (AFR) or annual financial summary report (FSR) (whichever is applicable). 	<p>Action: [REDACTED] will upload the audit. The report was approved on July 14, 2023, and we received it on July 15, 2023</p>	<p>Action: [REDACTED] will upload it to the location in the website files; [REDACTED] will check the website on a monthly basis.</p>

Not Compliant Area	Report Page/Section	Requirement(s)	Action #1	Action #2
I. GENERAL PROVISIONS COMPLIANCE Diversity-Partially compliant	Pages 6-7 Findings & Recommendations	1) Update its Diversity Statement to address the CPB diversity requirements fully	Action: An NCEC Board meeting will be set for December 2023 to review the Diversity Plan. This information and the agenda will be posted	Thereafter, the diversity statement will be a regular agenda item at the first meeting of the year for NCEC/KDNA
		2) Identify the corrective actions it will implement to ensure compliance with CPB General Provisions for diversity and transparency, including documenting its review of the updated Diversity Statement with the governing board or licensee official.	Action: H.R. personnel will update the Diversity Statement based on the December 2023 Board meeting results. The information from the meeting will be posted within 10 days of the meeting.	Thereafter, the diversity statement will be a regular agenda item in the first meeting of the year for the NCEC/KDNA Board

**Additional Documentation Provided by KDNA-FM
In Response To The Draft Report**

The additional documentation provided by KDNA and available at the CPB OIG Office includes:

- Fiscal Year 2022 Audited Financial Statement submitted to CPB and posted to KDNA.org
- Fiscal Year 2022 Annual Financial Report submitted to CPB and posted to KDNA.org
- Meeting notice and on air log of announcements made on air for CAB meeting July 24, 2023
- Meeting notice and on air log of announcements made on air for NCEC Board Meeting September 5, 2023