



Corporation  
for Public  
Broadcasting

Office of the Inspector General

August 30, 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: 2023.08.30  
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Subject: Evaluation of WOJB-FM Compliance with Selected Diversity Requirements Included  
in Radio Community Service Grants General Provisions and Eligibility Criteria, Report  
No. ECR2310-2311

We have completed an unannounced evaluation of compliance with selected diversity requirements of the 2023 Corporation for Public Broadcasting (CPB) Community Service Grant (CSG) awarded to WOJB-FM, licensed to the Lac Courte Oreilles Ojibwa Public Broadcasting Corporation, Hayward, Wisconsin. The Communications Act (Act) requires CPB to support diverse non-commercial educational content for unserved and underserved audiences. Our specific objectives were to verify compliance with five diversity requirements for applicable Radio Community Service Grants General Provisions and Eligibility Criteria (General Provisions) as presented in Exhibit A. Background information on the station and CSG program can be found in Exhibit B.

Based on our review of WOJB-FM's website on April 6, 2023, we found the station was compliant with one of the five applicable requirements. We concluded that the station was not compliant with the following Diversity Statement requirements:

- the available Diversity Statement was annually reviewed and current;
- the Diversity Statement was approximately 500 words;
- the Diversity Statement (a) reported on the extent to which the station's staff and governance reflect such diversity; (b) reported on the progress the Grantee has made to increase its diversity in the last two to three years; and (c) clearly identified the Grantee's diversity plans for the coming year; and
- the station's management annually meet with the Governing Board or licensing official to review the diversity goals and revisions.

In response to the preliminary observations, the station rewrote its Diversity Statement and posted the rewritten Diversity Statement to its website. We found that the rewritten Diversity Statement was approximately 500 words and reported on the extent to which the station's staff and governance reflect such diversity; reported on the progress the Grantee has made to increase its diversity in the last two to three years; and identified the Grantee's diversity plans for the coming year. We found the rewritten Diversity Statement is now compliant with CPB's diversity requirements.

In response to our draft report, WOJB-FM management found the conclusion of the report to be accurate. They noted that all of our recommendations have been applied to WOJB-FM's website pertaining to the station's Diversity Statement and the station is now compliant with CPB guidelines. They stated that the station will continue to periodically review and update all public information on its website. The station's full response to the draft report and updated Diversity Statement is presented in Exhibit D.

We recommend that CPB management require WOJB-FM to identify the corrective actions and controls it will implement to ensure future compliance with CPB's General Provisions requirements for diversity. Based on WOJB-FM's response to the draft report, we consider our recommendations resolved but open pending CPB's management decision accepting the station's corrective actions.

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.

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. GENERAL PROVISIONS COMPLIANCE

#### *Diversity Statement*

Our evaluation found that WOJB-FM had a Diversity Statement on its website. However, we found that WOJB-FM was not fully compliant with the following CPB requirements:

- the available Diversity Statement was annually reviewed and current;
- the Diversity Statement was approximately 500 words;
- the station’s management annually meet with the Governing Board or licensing official to review the Diversity goal and revisions; and
- the Diversity Statement reflects the following:
  - the extent to which the station’s staff and governance reflect such diversity;
  - the progress the Grantee has made to increase its diversity in the last two to three years; and
  - the Grantee’s diversity plans for the coming year.

The posted Diversity Statement, only identified the following statement for the elements and goals that are important to the station:

Our emphasis focuses on promoting its cultural history and language preservation, providing general information on Tribal Government / Cultural Affairs, Safety, and Health concerns.

While this statement identifies the elements of diversity the station finds important, the statement was fifty-five words, was not reviewed with the Governing Body, and did not report on the extent to which the Grantee’s staff and governance reflect diversity, the Grantee’s diversity plans for the coming year, or the progress the Grantee has made to increase its diversity in the last two to three years.

In WOJB-FM’s response to our preliminary observations, WOJB-FM rewrote its Diversity Statement and posted it to its website. The rewritten Diversity Statement was approximately 500 words and reported on the extent to which the station’s staff and governance reflect such diversity; reported on the progress the Grantee has made to increase its diversity in the last two to three years; and identified the Grantee’s diversity plans for the coming year.

Further, the rewritten Diversity Statement also addresses the annual review of the Diversity Statement and goals going forward. It states that “Diversity Statement and future goals shall be reviewed annually by management along with WOJB Board of Directors and Tribal Governing Board and revised as deemed necessary.” In response to our Preliminary Observations a station official stated that they could not find any recorded instances of conversations with the WOJB Board of Directors and Tribal Governing Board that specifically addressed the Diversity Statement or discussed diversity.

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

The Communications Act requires CPB to support diverse non-commercial 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.

At the time of our review, we concluded that the WOJB-FM Diversity Statement did not comply with four of the five reporting points spelled out in CPB's criteria nor did it comply with the requirement to annually review the updated statement with a licensing official.

In response to the noted noncompliance, a WOJB-FM official rewrote the Diversity Statement and posted it on the station's website. He noted that the rewritten statement included the four points as required by CPB and noted there will be an annual review going forward. Based on the station's planned actions, the station will now be compliant with CPB's diversity requirements.

***Recommendation:***

- 1) We recommend that CPB management require WOJB-FM to identify the corrective actions and controls it will implement to ensure future compliance with CPB's General Provisions requirements for diversity.

***WOJB-FM Response:***

In response to our draft report, WOJB-FM management found the conclusion of the report to be accurate. They noted that all of our recommendations have been applied to WOJB-FM's website pertaining to the station's Diversity Statement and the station is now compliant with CPB guidelines. They stated that the station will continue to periodically review and update all public information on its website.

***OIG Review and Comment:***

Based on WOJB-FM's response to the draft report, we consider our recommendation resolved but open pending CPB's management decision accepting the station's corrective actions to ensure future compliance.

**Summary of WOJB-FM’s Website Review  
as of April 6, 2023**

Diversity Requirements	Met	Not Met
<i>Diversity Compliance</i>		
1. Diversity Statement is available to the public on:		
a) the station’s website	X	
b) at the central office.		
2. Annual review of Diversity Statement and available statement is current.		X
3. Diversity Statement is approximately 500 words.		X
4. The Diversity Statement reflects each of the following points:		
a. the elements of diversity that Grantee finds important to its public media work;	X	
b. the extent to which Grantee’s staff and governance reflect such diversity;		X
c. the progress Grantee has made to increase its diversity in the last two to three years; and		X
d. the Grantee’s diversity plans for the coming year		X
5. Does the station’s management annually meet with the Governing Board or licensing official to review the Diversity goal and revisions?		X

**Background**

WOJB-FM, Hayward, Wisconsin, is a public broadcasting station licensed to the Lac Courte Oreilles Ojibwa Public Broadcasting Corporation (LCOOPBC). According to its audited financial statements, the LCOOPBC is a non-profit corporation providing media services to northwestern Wisconsin. The primary purpose of LCOOPBC is to participate in, report on, and reflect upon all aspects of life in northwestern Wisconsin. The station operates on 88.9 FM.

***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 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, including the Diversity Statement.

### Scope and Methodology

We performed an evaluation of WOJB-FM's compliance with selected diversity requirements of the Radio Community Service Grants General Provisions and Eligibility Criteria. The scope of the evaluation included review of the information posted on the station's website as of April 6, 2023, as well as information provided in response to our Preliminary Observations issued on May 9, 2023.

We reviewed documents supporting the station's compliance with selected diversity requirements included in CPB's Radio Community Service Grants General Provisions and Eligibility Criteria. We also reviewed the station's website and processes to determine its compliance with CPB's transparency requirements for eligibility related to diversity. We informed station management of our evaluation on May 9, 2023, and 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.

Our fieldwork was conducted from April through May 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*.





13386W Trepania Road \* Hayward, WI 54843-2186  
Office: 715-634-2100 \* Fax: 715-634-4070  
www.wojb.org

Karl Habeck - General Manager  
WOJB 88.9FM  
13386W Trepania Rd.  
Hayward, WI 54843

07/21/2023

William J. Richardson III  
Deputy Inspector General  
Office of Inspector General  
Corporation for Public Broadcasting  
(202) 879-9661

Letter of Response to Report No. ECR2310-XXXX

After reviewing the final report to be submitted for final recommendation I find the conclusion of the report to be accurate, furthermore all previous CPB recommendations have since been applied to WOJB's website pertaining to the station's diversity statement and is now compliant with CPB guidelines. WOJB will continue to periodically review and update (or correct) all public information found on its website.

WOJB will certainly follow all recommendations the CPB ultimately finds appropriate in this case.

As the station's general manager I would also like to apologize for our negligence in posting a non-compliant diversity statement. As a minority owned radio station that attracts a wide range of listener's we are well aware of the importance of diversity in all aspects of public media.

Sincerely,

Karl Habeck  
General Manager WOJB

CC: Nancy Stancil