Date: September 12, 2013

To: Jackie J. Livesay, Vice President, Compliance

From: Mary Mitchelson, Inspector General


We initiated this examination in response to complaints of alleged violations by Radio Catskill, WJFF-FM (WJFF), of terms and eligibility requirements for Corporation for Public Broadcasting (CPB) grants, for the period October 1, 2010 – September 30, 2011. The objectives of this examination were to determine whether WJFF: a) claimed Non-Federal Financial Support (NFFS) on its Financial Summary Reports (FSR) in accordance with CPB Financial Reporting Guidelines (Guidelines); b) complied with the Certification of Eligibility requirements and the statutory provisions of the Communications Act of 1934, as amended (the Act); and c) expended Community Service Grant (CSG) funds in accordance with grant agreement requirements.

During our examination we determined that WJFF claimed NFFS in accordance with CPB Guidelines; however, WJFF did not fully comply with the Act or CSG requirements. Specifically, WJFF did not:

- comply with the requirement for quarterly on-air announcements for open meetings;
- have evidence that open meeting announcements for the Community Advisory Board (CAB), Board of Trustees, or the committees of the Board of Trustees were made seven or more days prior to the meetings;
- maintain records of CAB members attendance at public meetings;
- always provide written statements explaining the reasons for closing a meeting to the public; and
- prepare written implementing policies on open meetings, open financial records, CAB, EEO, or donor list and political activities requirements of the Act.

We recommend that CPB management require WJFF to fully comply with all Communications Act requirements and provide CPB with documentation of its compliance. We also recommend that CPB penalize WJFF for not taking appropriate corrective actions to address all Act requirements after being instructed to do so by CPB in November of 2011.
We performed our examination in accordance with Government Auditing Standards for attestation engagements. Our scope and methodology is discussed in Exhibit D.

In response to the draft report, WJFF management agreed with our findings on the Communication Act compliance and stated that it had initiated corrective actions to address those issues. Further, WJFF requested CPB to refrain from penalizing the station for not complying with these requirements. WJFF’s new Board of Trustees and management are committed to bringing the station into full compliance with CPB requirements. WJFF’s written response to the draft report is presented in Exhibit E.

The findings and recommendations contained in this report do not necessarily represent CPB management’s final position on these matters. CPB management will make final management decisions on the recommendations in this report in accordance with CPB’s audit resolution procedures.

Based on WJFF’s response, we consider recommendations 1-4 resolved but open pending CPB’s acceptance of WJFF’s corrective actions. Recommendation 5 remains unresolved and open pending CPB’s final management decision.

BACKGROUND

According to WJFF’s website the station is a locally owned, independent, non-commercial, member supported, community radio broadcaster for the New York, Catskill Mountains area and a public service provider carrying out a range of educational and charitable activities. WJFF strives to make available to the community a broad range of ideas and ideals, education, information, entertainment, analysis, and inspiration useful to a full and enlightened life. It also aims to involve the community in preserving and transmitting its own cultural heritage and artistic expressions in addition to those of the global community, and to promote understanding among people of diverse social and cultural backgrounds.

In August 2010, WJFF management informed the (CAB) that their term had expired and station management would be soliciting new members. The station received numerous protests from its volunteers and donors for dismissing the CAB. Subsequently, in October 2011 OIG received a complaint from a listener alleging violations of the Act by WJFF. The OIG referred the complaint to CPB’s radio department which counseled WJFF in November of 2011 to comply with the Communications Act requirements per CPB guidelines. Subsequently in 2013, CPB received additional complaints that alleged continued violations of CAB requirements, as well as other requirements of the Act. In response to these complaints, this examination was undertaken to determine WJFF’s compliance with Act requirements, including CAB operations. In addition, we reviewed claimed NFFS and the expenditure of CSG funds.
Community Service Grant

CSG award amounts are determined by the NFFS reported by a station on its Financial Summary Report (FSR). The CSG calculation process starts with amounts appropriated for the radio CSG pool adjusted by the base grant, distance, and local grant amounts. The funds that remain are called the Incentive grant pool. The Incentive Rate of Return (IRR) is calculated by dividing the Incentive grant pool by the total amount of NFFS claimed by all radio stations in the system. The IRR is then multiplied by the station’s reported NFFS to calculate the incentive award amount of the station’s total CSG.

There is a two year lag between the reported NFFS and CPB’s calculation of the fiscal year’s CSG award amount. CPB used the NFFS that WJFF claimed on its FY 2009 FSR to determine the amount of the FY 2011 CSG awarded to the station. WJFF’s annual CSG award for FY 2011 totaled $90,837 and is itemized in Exhibit A. Each CSG grant can be spent over a two-year period.

WJFF’s FY 2011 FSR reported total revenues of $373,697 per Exhibit B and claimed total NFFS of $282,185 as presented in Exhibit C.

RESULTS OF REVIEW

We examined WJFF’s management’s assertions of compliance with CPB’s CSG grant agreement terms, Certification of Eligibility requirements, Act requirements, and NFFS financial reporting guidelines for the one-year period ending December 31, 2011. Management is responsible for compliance with these requirements. Our responsibility is to express an opinion on management’s assertions about its compliance based on our examination.

Our examination was conducted in accordance with the Government Auditing Standards for attestation engagements and, accordingly, included examining, on a test basis, evidence about WJFF’s compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on WJFF’s compliance with specified requirements.

Our examination disclosed WJFF claimed NFFS in compliance with CPB’s Guidelines. Furthermore, we determined the following material noncompliance issues with CPB’s Certification of Eligibility requirements and Communications Act requirements applicable to the period ending December 31, 2011. More specifically WJFF did not:

- make quarterly on-air announcements explaining the station’s open meeting policy;

1 Compliance with Certification of Eligibility and Communications Act requirements also included WJFF’s procedures in effect at the time of our review during June 2013.
• have evidence that open meeting announcements for the CAB, Board of Trustees, or the committees of the Board of Trustees were made seven or more days prior to the meetings;
• maintain records of CAB members attendance at public meetings held prior to June 2013 to verify a quorum was present;
• always provide written statements explaining the reasons for closing meetings to the public; and
• develop documentation or written procedures to explain how the station complied with the open meeting, open financial records, CAB, EEO, or donor list and political activities requirements of the Act.

Similar concerns over the operations of the CAB were previously raised by CPB to the former Station Manager in November 2011.

In our opinion, except for the material noncompliance issues described above, WJFF has complied with the aforementioned requirements for the period ending December 31, 2011.

FINDINGS AND RECOMMENDATIONS

Compliance with the Communications Act

Our examination found that the WJFF was not in full compliance with the open meetings and CAB requirements of the Act, as well as CPB Certification Requirements for CSG recipients. Further, the WJFF had not established operating procedures to document how the radio station complied with open meetings, open financial records, EEO reporting, as well as donor list and political activities, as required by CPB’s CSG grant agreement terms and the Act.

Procedures for Announcing Public Meetings Need Improvement

Our examination of WJFF’s procedures for compliance with the open meeting requirements found that the station did not: (1) have evidence that advance notice requirements were met, (2) make quarterly announcements of its open meetings policies, and (3) always document its reasons for closing public meetings.

Specifically, we found that WJFF did not have evidence that open meeting announcements for the CAB, Board of Trustees, or the committees of the Board of Trustees were made seven or more days prior to the meetings, as required. In addition, the station did not make on-air announcements at least three consecutive days each calendar quarter that explained the station’s open meeting policy and how the public could obtain information on the dates, times, and locations of upcoming meetings. While WJFF indicated that recently it has been documenting on-air announcements that explained the station’s open meeting policy, these announcements were not broadcasted for at least three consecutive days. Finally, WJFF did not always provide
written statements explaining the reasons for closing a meeting to the public pursuant to statutory exceptions, as required.

Section 396(k)(4) of the Act, 47 U.S.C. §396(k)(4) prohibits the distribution of federally appropriated funds to the licensee of a public broadcasting station unless the governing body of the organization, any committees of such governing body, or any advisory body of any such 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 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.

2. Notice communicated by letter, e-mail, fax, phone, or in person to any individuals who have specifically requested that they be notified.

3. On-air announcements on at least three consecutive days once during each calendar quarter that explain the station's open meeting policy and provides information about how the public can obtain information regarding specific dates, times, and locations.

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.

**Strengthening Community Advisory Board Procedures**

Our examination of compliance with CAB requirements found that the WJFF had not maintained records of CAB members attendance at public meetings (e.g., CAB meeting minutes). However, WJFF did maintain some agendas for CAB meetings. The only CAB meeting documented by minutes was held in June 2013 with only four of the eight
members present. As a result, even this session did not meet CPB’s definition of a “meeting” because a quorum was not present. Without records of attendance or meeting minutes recording the CAB’s deliberations and that a quorum was present we could not independently substantiate that the CAB was operating in accordance with CPB guidelines.

CPB’s minimum compliance requirements addressing meetings of the CAB require stations to undertake good-faith efforts to assure that:

a. its advisory board meets at regular intervals;
   b. the members of the board regularly attend the meetings of the advisory board.

Further, CPB’s guidance for open meetings defines a meeting, which requires: 1) a quorum must be in attendance; 2) deliberations must take place; and 3) deliberation must result in joint disposition of the business of the committee related to public broadcasting.

The CAB is intended to provide the public the opportunity to be heard on station programming, community service, and the impact that the station’s major policy decisions have on the community. All community stations are encouraged to establish whatever mechanisms will be most effective, under local circumstances, to accomplish this congressionally established requirement.

*Developing Written Procedures*

Our examination found that the WJFF had not developed documentation or written procedures that explain how it complied with the open meeting, open financial records, CAB, EEO, or the donor list and political activities requirements of the Act.

CPB’s Certification Requirements for Station Grant Recipients provides guidance to establish written procedures addressing, open meetings, open financial records, CAB, EEO, and donor list and political activities requirements. This documentation should explain how the station complies with these requirements and the public’s access to this information (e.g., the methods used to give reasonable notice to the public for meetings; the types of financial and EEO information to be made available to the public; and donor list and political activity restriction requirements). This documentation shall be kept by each station at a reasonable location and made available to CPB, upon request, to determine the fact and extent of compliance with the Act.

These procedures not only provide operating guidance for station officials, but also provide the public with information about how the station complied with these grant requirements.

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In November of 2011, the previous station manager was advised by CPB that the station needed to have an operating CAB in accordance with CPB Certification Requirements as posted on CPB’s website. In subsequent grant years, WJFF officials continued to certify its compliance with the Act in applying for new CSG grants, but our examination found that in fact, WJFF was not conducting open meetings, was not complying with CAB requirements as required by the Act, and had not established written policies explaining the station’s procedures for complying with the Act. WJFF officials did not provide the public the transparency envisioned by CPB guidelines, and this non-compliance could have disqualified WJFF from receiving the CSG.

In April 2013 the previous station manager and eight of the nine members of the Board of Trustees resigned. The assistant station manager was appointed interim manager and in June 2013 eleven new Board members were elected. Our discussions with the interim station manager found that he was not fully aware of all of the Act’s requirements, but he agreed to establish procedures and began implementing corrective actions while we were on site.

**Recommendations**

We recommend that CPB management require WJFF management to fully comply with all requirements of the Communications Act and provide CPB documentation of its compliance with the following requirements:

1) Make on-air announcements for at least three consecutive days once each calendar quarter that explain the station’s open meeting policy and provide information on how the public can obtain information regarding specific dates, times, and locations of public meetings. Have the station provide copies of announcements aired, as well as the date and time of each airing over the next four calendar quarters.

2) Announce all open meetings for seven days prior to the meeting and provide documentation of these announcements to CPB over the next four quarters.

3) Establish written implementing policies that explain how the station will comply with open meeting, open financial records, CAB, EEO as well as, donor list and political activities requirements.

4) Ensure that when a meeting is closed in accordance with the exceptions recognized by the Act, WJFF makes a written statement containing the reasons for closing the meeting available to the public within a reasonable time after the closed meeting.

5) Penalize WJFF for not taking appropriate corrective actions to comply with all Act requirements after being instructed by CPB to do so in November of 2011.

**Management Response**

WJFF’s response agreed with our findings and recommendations 1-4 related to compliance with Communication Act requirements. The station’s response explained the corrective actions it has taken. It is now making quarterly on-air announcements on
at least three consecutive days explaining its open meeting policy and how to obtain information on its next public meeting. Additionally, WJFF provided its written policies addressing the five Communications Act requirements for open meetings, open financial records, CAB, EEO and donor lists. WJFF’s response also respectfully requested that recommendation 5 to penalize the station for not fully complying with the Act not be accepted because the new Board of Trustees and management are fully committed to bringing the station into compliance with CPB’s requirements.

**OIG Review and Comments**

Based on WJFF’s response, we consider recommendations 1-4 resolved but open pending CPB’s acceptance of WJFF’s corrective actions. Recommendation 5 remains unresolved and open pending CPB’s final management decision.
CPB Payments to WJFF-FM
October 1, 2010 – September 30, 2011

<table>
<thead>
<tr>
<th>Date</th>
<th>Grants:</th>
<th>Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/26/2010</td>
<td>Community Service Grant – Restricted</td>
<td>$9,154</td>
</tr>
<tr>
<td>6/2/2011</td>
<td>Community Service Grant – Restricted</td>
<td>$9,153</td>
</tr>
<tr>
<td></td>
<td><strong>Sub-Total</strong></td>
<td><strong>$18,307</strong></td>
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<tr>
<td>11/26/2010</td>
<td>Community Service Grant – Unrestricted:</td>
<td>$25,784</td>
</tr>
<tr>
<td>6/2/2011</td>
<td>Community Service Grant – Unrestricted:</td>
<td>$25,784</td>
</tr>
<tr>
<td>7/29/2011</td>
<td>RLAIF Bonus</td>
<td>$20,962</td>
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<tr>
<td></td>
<td><strong>Sub-Total</strong></td>
<td><strong>$72,530</strong></td>
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<tr>
<td></td>
<td><strong>Total Payments</strong></td>
<td><strong>$90,837</strong></td>
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Financial Summary Report  
For the Period Ending December 31, 2011

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>FY 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Corporation for Public Broadcasting (CPB)</td>
<td>$91,512</td>
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<tr>
<td>4</td>
<td>State and local boards and departments of education or other state and local</td>
<td></td>
</tr>
<tr>
<td></td>
<td>government or agency sources</td>
<td>2,962</td>
</tr>
<tr>
<td>6</td>
<td>Foundations and nonprofit associations</td>
<td>23,626</td>
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<tr>
<td>7</td>
<td>Business and Industry</td>
<td>41,201</td>
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<tr>
<td>8</td>
<td>Memberships and subscriptions (net of write-offs)</td>
<td>170,968</td>
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<tr>
<td>9</td>
<td>Net revenue from auctions and other special fundraising activities</td>
<td>33,282</td>
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<tr>
<td>10</td>
<td>Passive income (interest, dividends, royalties, etc.)</td>
<td>9,742</td>
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<tr>
<td>11</td>
<td>Other (Miscellaneous)</td>
<td>404</td>
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<tr>
<td>12</td>
<td>Total Direct Revenue</td>
<td>373,697</td>
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<tr>
<td></td>
<td>Less revenue that does not qualify as NFFS:</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Federal, CPB and public broadcasting revenues</td>
<td>91,512</td>
</tr>
<tr>
<td>15</td>
<td>Total Direct Nonfederal Financial Support</td>
<td>282,185</td>
</tr>
<tr>
<td>17</td>
<td>Total Revenue</td>
<td>373,697</td>
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<tr>
<td>18</td>
<td>Programming and Production</td>
<td>48,230</td>
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<tr>
<td>19</td>
<td>Broadcasting and engineering</td>
<td>30,122</td>
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<tr>
<td>20</td>
<td>Program Information and Promotion</td>
<td>6,760</td>
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<tr>
<td>21</td>
<td>Management and General</td>
<td>205,486</td>
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<tr>
<td>22</td>
<td>Fund Raising and Membership Development</td>
<td>7,086</td>
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<tr>
<td>24</td>
<td>Depreciation and Amortization</td>
<td>26,842</td>
</tr>
<tr>
<td>25</td>
<td>Total Operating Expenses</td>
<td>$324,526</td>
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</table>
Summary of Non-Federal Financial Support  
For the Period Ending December 31, 2011  
Certified by Head of Grantee and Independent Accountant’s Report

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>FY 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Summary of Non-Federal Financial Support:</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Direct Revenue (Part I, line 15)</td>
<td>$282,185</td>
</tr>
<tr>
<td>2</td>
<td>In-Kind Contributions (Part I, Line 16a)</td>
<td>0</td>
</tr>
<tr>
<td>3</td>
<td>Indirect Administrative (Part I, Line 16c)</td>
<td>0</td>
</tr>
<tr>
<td>4</td>
<td>Total Non-Federal Financial Support</td>
<td>$282,185</td>
</tr>
</tbody>
</table>
Scope and Methodology

We performed an examination to determine WJFF’s adherence to the requirements of the CPB Financial Reporting Guidelines, provisions of the Communications Act, and CPB grant provisions and certification requirements. The scope of the examination included reviews and tests of the data reported by the station on its FSR and audited financial statements for the year ending December 31, 2011.

The scope of the audit included tests of the data reported on the FSRs for the fiscal year ending December 31, 2011. We tested the allowability of the $282,185 of NFFS claimed on WJFF’s FSR by performing financial reconciliations and comparisons to underlying accounting records (general ledger) and the audited financial statements. We reviewed the allowability of expenses that were charged to the CPB grants. We tested and analyzed the CPB Transaction Report for FY 2011 to determine if the category of expenses charged to the grants were allowable. We also reviewed $27,853 or 29 percent of the $95,424 of CSG funds WJFF expended during FY 2011, to determine if the expenditures were allowable in accordance with the terms of the grant. We reviewed supporting documentation for underwriting agreements, grant agreements, vendor invoices, and other documentation supporting revenues and expenditures tested.

We also reviewed records and documents supporting the station’s compliance with the Act requirements to: provide advance notice of public meetings, make financial and EEO information available to the public, and provide documents supporting compliance with donor lists and political activities prohibitions. Our procedures included interviewing station officials and its independent public accountant.

We gained an understanding of internal controls over the preparation of FSRs, cash receipts, and cash disbursements. We also gained an understanding of WJFF’s policies and procedures for compliance with certification of eligibility requirements, Communications Act, and CPB grant agreement terms for allowable costs. We used this information to assess risks and plan the nature and extent of our testing to conclude on our objectives. We also tested the effectiveness of controls over payment authorizations.

Our fieldwork was performed at WJFF, the week of June 17 – June 19, 2013. Our examination was performed in accordance with the Government Auditing Standards, July 2007 Revision, for attestation examinations.
August 30, 2013

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

Re: Radio Catskill WJFF response to Report no. ASR1303-XXXX

Dear Mr. Richardson:


We understand that WJFF has claimed its NFFS in accordance with CPB Guidelines. However, the recent examination has brought to light several areas in which WJFF was not in full compliance with CPB requirements. The attached response addresses these items in detail.

Please note, we have one request for revision: the term Radio Catskills in paragraph one should be corrected to Radio Catskill.

With the exception of our request that a penalty not be imposed, we have no further additions or corrections to your report. We find the report to be clear and thorough and agree with all other recommendations made by the auditors.

We very much appreciate this opportunity to respond to the audit findings while in its draft form.

Sincerely,

Adam Weinreich
Interim Station Manager
WJFF Radio Catskill 90.5fm
P.O. Box 546
Jeffersonville, NY 12748

Cc: Sonja Hedlund, president Radio Catskill Board of Trustees
ITEMIZED RESPONSES REGARDING COMPLIANCE WITH THE COMMUNICATIONS ACT

a) Make on-air announcements for at least three consecutive days once each calendar quarter that explain the station’s open meeting policy, and provide information on how the public can obtain information regarding specific dates, times, and locations of public meetings. Have the station provide copies of announcements aired, as well as the date and time of each airing over the next four calendar quarters.

Effective immediately WJFF will begin airing the attached announcement (See attached: WJFF Policies and Procedures for CPB Compliance.doc - “On-Air Announcement”) which explains all the information outlined above and recording the date and time of each announcement. This will happen three consecutive days each quarter and documentation will be kept.

b) Announce all open meetings for seven days prior to the meeting, and provide documentation of these announcements to CPB over the next four quarters.

Effective as of the date of the examination, June 17-19 2013, WJFF began announcing all meetings via the upcoming events calendar on its website no fewer than seven days prior to their scheduled date. WJFF will document these announcements by taking and saving screenshots of the meetings as they are announced on the station’s website. (See attached example: 06-05-2013_PC_meeting.jpg). In addition, WJFF will make daily on-air announcements of all open meetings at least seven days prior to their scheduled date.

c) Establish written implementing policies that explain how the station will comply with open meeting, open financial records, CAB, EEO as well as, donor list and political activities requirements.

Effective immediately, WJFF will post written policies covering all items to the “Contact/About Us” section of its website. These policies will also be posted to the public bulletin board at WJFF’s Jeffersonville, NY studios and made available to any individual who requests them. (See attached: WJFF Policies and Procedures for CPB Compliance.doc)

d) Ensure that when a meeting is closed in accordance with the exceptions recognized by the Act, WJFF makes a written statement containing the reasons for closing the meeting available to the public within a reasonable time after the closed meeting.

Effective as of the date of the examination, June 17-19 2013, any of WJFF’s boards or standing committees which enter closed or executive session have been instructed to always indicate the reason for doing so in a clear and thorough statement in the meeting minutes, which become publicly available within a reasonable time after they are approved by a quorum of the board or
90.5fm
committee. These minutes are posted to the station’s website and also to a public bulletin board located at WJFF’s Jeffersonville, NY studios.

e) Penalize WJFF for not taking appropriate corrective actions to comply with all Act requirements after being instructed by CPB to do so in November of 2011.

Radio Catskill respectfully requests that the CPB refrain from imposing a penalty. The manager and trustees who failed to bring WJFF into compliance with CPB requirements after November 2011 instruction have resigned their positions with WJFF as of April 2013. The new board of trustees and management are committed to bringing the station into full compliance with CPB regulations and have taken immediate steps to do so.

As per the recommendations in Report No. ASR1303-XXXX, WJFF will provide documentation of each of its efforts to address items a-d over the next four quarters.
WJFF Policies and Procedures for CPB Compliance

On-Air Announcement:

WJFF will run the following announcement on the air for three consecutive days each quarter. It will be scheduled by the Station Manager:

"WJFF's Board of Trustees and all of its standing committees, as well as the Community Advisory Board meet regularly. These meetings may be attended and observed by members of the public and include a period for public comment. The time, date and location of each meeting will be announced in the "Upcoming Events" section of WJFF's homepage at least one week in advance of the meeting's scheduled date. Complete information about upcoming meetings as well as the station's policies on open meetings, financial statements, community advisory board, EEO and donor lists is available at www.wjffradio.org"

Policy Details (to be posted on the "Contact/About Us" section of WJFF's website)

Open (and closed) Meetings:
Meetings of WJFF's Board of Trustees and all of its standing committees are open to public observation and often include a public comment period. They will be announced in the Upcoming Events section of WJFF's homepage at least one week in advance of the scheduled date (www.wjffradio.org) and will also be announced on-air in the days leading up to the meeting. Minutes from these meetings will be forwarded to station management by each committee's secretary and posted at WJFF's Jeffersonville studios and on the WJFF homepage following their approval and acceptance. If a meeting is to be closed to the public, a written explanation of the reason for closure will accompany the meeting's minutes.

AFR/FSR statements:
WJFF receives substantial amounts of money from public entities and individuals. The station's finances are audited yearly by an
independent professional accountant and the reports for the most recent year are made available to the public on the “Contact/About Us” section of the WJFF homepage once they are approved. They are also available for viewing along with WJFF’s Public File, during normal business hours at the WJFF’s Jeffersonville offices. WJFF also files an Annual Financial Report with the Corporation for Public Broadcasting. This report is available by arrangement with the station manager.

**Community Advisory Board (CAB)**
As a recipient of funding from the Corporation for Public Broadcasting, WJFF is required to maintain an active Community Advisory Board (CAB). CAB members are appointed by WJFF’s Board of Trustees each year following the board’s annual meeting. CAB members are selected to represent a diverse cross-section of the WJFF listening area. The CAB’s function is to advise the Board of Trustees (BoT) as to whether or not the station is successful in its mission and whether the station’s programming is meeting the needs of its audience as well as to review the programming goals and community service provided by the station. The CAB sets its own schedule and agenda.

**EEO**
WJFF complies with EEO (Equal Employment Opportunity) regulations. As a recipient of the CPB CSG (Community Service Grant), WJFF regularly submits proof of this to the CPB via an annual Station Activities Survey (SAS) which is available to the public by advance arrangement with the station manager.

**Donor Lists**
WJFF keeps a record of its donors for use in its own fundraising activities and historical research but does not sell, rent, lease or make publicly available this list to any entity for any reason. During on-air pledge drives, donors are asked specifically if it is acceptable to use their name on-air in thanking them, and are always provided with the choice to remain anonymous.