Today’s Objectives

• Understand key components of the General Provisions and Eligibility Criteria.

• Learn how to access training and other resources to support compliance.
General Provisions & Eligibility Criteria

• Provide the terms and conditions of CSG awards.
CSG General Provisions

cpb.org
CSG General Provisions

cpb.org/stations

Community Service Grants

CPB distributes community service grants (CSGs) to noncommercial public television and radio stations that provide significant public service programming to their communities. CSGs help stations expand the quality and scope of their work, whether in educational, news, public affairs or other programming—all of which represent an immeasurable value to the American people. Applicant and current recipient stations must each year meet a variety of legal, managerial, staffing and operational criteria for CSG funding.

- Television CSG General Provisions
- Radio CSG General Provisions

Compliance

- Harassment Prevention Training Program
- CSG Non-Compliance Policy
- Communications Act Compliance
- Compliance Hotline: (202) 879-9655
- Compliance Checklist 2018 122KB PDF
- Compliance Card 2018 430KB PDF
- Compliance Quiz Answers 2018 430KB PDF
- Compliance Alerts:
  - 2018
  - 2017
  - 2016
  - 2015

Integrated Station Information System

The CSG legal forms as well as reporting tools (AFR, FSR, SABS, and SAS) can be found on the integrated station information system.

Training

CPB provides pre-recorded and live training sessions on financial reporting, completing forms and CSG compliance. To view or sign up for training, visit our training site.
CSG General Provisions

Eligibility Criteria
Communications Act Requirements
Recordkeeping Requirements
Reporting Requirements
Operational Requirements
Diversity Statement
Transparency
Donor Privacy
Training
Use of CSG Funds
Eligibility Criteria

Eligible:

• operate 1+ broadcast stations and
• at least one meets the CSG eligibility criteria.
• TV: full-power UHF or VHF station.
Eligibility Criteria

Ineligible:

• closed-circuit
• student
• training or
• licensed to political organizations.
Grantees may not receive funding unless they comply with applicable provisions of the Communications Act.

Non-compliance policy

The Corporation for Public Broadcasting (CPB) has established this CSG Non-compliance Policy to encourage grantees receiving a Community Service Grant (CSG) to comply with applicable provisions of the Communications Act of 1934, 47 U.S.C. §§ 300 et seq. (Communications Act or Act) and CPB’s General Provisions and Eligibility Criteria (General Provisions). This policy replaces and supersedes CPB’s 2013 Grantee Non-compliance Policy. The General Provisions require CSG recipients to certify annually that they comply with applicable provisions of the Communications Act and the General Provisions. Stations that certify their compliance but are subsequently found to be not-compliant will be subject to the following penalties, in addition to any repayment of CSG funds as required by the General Provisions.

I. Compliance with the Communications Act

Failure to comply with the following Communications Act requirements will subject the recipient to a penalty of $5,000 per infraction:

A. Open Meetings, including meetings of the recipient’s board, community advisory board, and their committees, documenting the reasons for closing those meetings, and making that documentation available to the public (47 U.S.C. § 390(i)(10);
C. Community Advisory Board (47 U.S.C. § 390(i)(8));
E. Donor Information (47 U.S.C. § 390(l)(12)).

II. Compliance with the General Provisions

Failure to comply with requirements of the General Provisions which results in overpayment to the recipient’s CSG will subject the recipient to a penalty of ten percent of the amount of the overpayment, in addition to refunding the overpayment. In such cases, CPB may require the recipient to review its records for the prior two years and
Communications Act

• Open meetings
• Closed meetings
• Open financial records
• Community advisory board
• Employment statistical report
• Donor information
Communications Act

cpb.org/stations

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Communications Act

- cpb.org/stations/certification
Recordkeeping

The Communications Act mandates recordkeeping and auditing and gives CPB access to all CSG records.

Grantees must keep records to facilitate an effective audit.

Discrete accounting required.
Reporting Requirements

- cpb.org/stations/frg/
Reporting Requirements

Reporting required:
AFR/FSR and financial statements within 5 months after close of grantee fiscal year; and submit by Feb. 15:
- Station Activities Survey (SAS)
- Local Content & Services Report (LCSR)
- Station Activities Benchmarking Survey (SABS)

Grant offers: Must be accepted by June 30.
Operational Requirements

- FCC operating requirements
- Operating power
- Broadcast schedule
- Staffing requirement
- Minimum NFFS
- Channel sharing agreement (TV)
- Audience service criteria (Radio)
Operational Requirements

FCC Requirements and Operating Power

- Comply with FCC requirements for a noncommercial educational TV or radio station
  - TV: operate at full-power
  - Radio
    - FM: 100 Watts
    - AM: 250 Watts
Operational Requirements

Broadcast Schedule:

CPB Qualified Programming

**TV**: 7 days/week, 52 weeks/year, at least 3,000 hours or 58 hours/week.

**Radio**: at least 18 consecutive hours/day, 7 days/week, for 52 weeks/year.
Operational Requirements

Staffing Requirement:

**TV**: an executive with primary responsibility to oversee operations

**Radio**: Varies by level
- Level A: Sole service
- Level B: 2 FT employees
- Level C & D: 4 FT employees
Minimum NFFS

**TV**: $800,000 3-year average

**Radio**: by level, requires minimum NFFS direct revenue.

<table>
<thead>
<tr>
<th>Level</th>
<th>NFFS</th>
<th>NFFS Direct Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>B &amp; C (Minority &amp; Rural)</td>
<td>$100,000</td>
<td>$50,000</td>
</tr>
<tr>
<td>B &amp; C</td>
<td>$300,000</td>
<td>$150,000</td>
</tr>
<tr>
<td>D</td>
<td>$500,000</td>
<td>$250,000</td>
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</tbody>
</table>
Operational Requirements

Channel Sharing Agreement

TV:
- Two grantees
- Grantee and commercial station
Operational Requirements

Audience Service Criteria (ASC)

Radio:

– Financial and listening goals
– Goals depend on
  • Coverage Area Population
  • Station format
  • Minority designation
– Removal path
Diversity Statement

To support service to diverse audiences

Diversity Statement
Annual review
Annual Initiative
Recruiting
To ensure transparency and public confidence in the use of CPB funds

### Website:
- Station Management
- Board of Directors
- CAB Members
- Financial Records

### Public Inspection:
- Diversity Statement
- Local Content and Service Report
Grantees must meet all applicable federal and state laws and regulations regarding donor privacy and data security.
Harassment Prevention Training

• Annual requirement for Grantee’s officers, employees, interns (paid and unpaid)

• Options for training
  ▪ Online NAVEX – licenses provided at no cost by CPB
  ▪ Training of Grantee’s choosing
Harassment Prevention Training

Topics must include:

• What constitutes acceptable and unacceptable workplace behavior;

• How to recognize harassment when it occurs; and

• How to report and respond to violations.

csg@cpb.org
Compliance Training

Annual
Grantees must complete at least one CSG compliance training provided by CPB
- In-person
- Live webinars
# Use of CSG Funds

<table>
<thead>
<tr>
<th>CSG Funds</th>
<th>Radio</th>
<th>TV</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unrestricted Funds</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>7 Spending Categories</td>
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<td></td>
</tr>
<tr>
<td>Restricted Funds</td>
<td>✓</td>
<td>N/A</td>
</tr>
<tr>
<td>For National Programming</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

N/A: Not applicable
Use of CSG Funds

**Spending period:** Funds must be used within 2-year spending period.

**Documenting expenses:** three years with some exceptions

**Return of funds:** conditions requiring grantees to return funds
CSG Resources

**CPB Office of Grants Administration**

Greg Schnirring, VP, CSG and Station Initiatives
Kate Arno, Director, TV CSG Policy and Review
Andrew Charnik, Director, Radio CSG Policy and Administration
Nadine M. Feaster, Director, Grants Administration
Sharon Simmons, Manager, Grants Administration
Biniam Debebe, Senior Financial Review Specialist
Ken Goulet, Senior Financial Review Specialist
Kortnei Morris, Project Coordinator,

**Help Desk**

Email: csg@cpb.org
Phone: (866) 635-4747
Fax: (202) 879-9700

cpb.org

CSG information page: [cpb.org/stations/](http://cpb.org/stations/)
Online webinars: [cpb.org/station-resource/csg-and-isis-training-opportunities](http://cpb.org/station-resource/csg-and-isis-training-opportunities)
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Reporting Requirements
CSG Training

cpb.org/station-resource/csg-and-isis-training-opportunities

CSG and ISIS Training Opportunities

We strongly encourage all station/licensee staff assigned to ISIS security groups to sign up for as many webinars and face-to-face workshops as needed to understand the use of ISIS, CSG compliance and certification, as well as how to complete CSG legal, financial, survey and other reporting forms. Inquiries related to SABS and SAS should be sent to SABS@cpb.org and SAS@cpb.org, respectively.

PDF Webinar Presentations

- Slide Deck: Community Service Grant Requirements and Resources: September 7, 2017
- Slide Deck: How to Compute Indirect Administrative Support to Report as NFFS: November 15, 2017
- Slide Deck: Intro to Financial Reporting: February 7, 2018
- Slide Deck: What is NFFS?: February 14, 2018
- Slide Deck: Completing the FSR: February 21, 2018

Pre-Recorded Web-Based Training

- Pre-Recorded Financial Reporting topics (for AFR and FSR filers)
- Pre-Recorded SABS topics
- Pre-Recorded SAS topics
- Pre-Recorded New Radio CSG Policies topics
- Pre-Recorded FY 2017 CSG Agreement and Certification of Eligibility Webinar
- Pre-Recorded Community Service Grant Requirements and Resources

Live Online Webinar

Financial Reporting

These webinars are for Grants Administrators, Head of Grants, and Independent Accountants and...
Q & A

Please type your questions now.
Community Service Grant Requirements and Resources

Kate Arno
Director, TV CSG Policy & Review

Andrew Charnik
Director, Radio CSG Policy & Administration