What is NFFS?
Introductions

Presenters

Tim Bawcombe, Director, Television CSG Policy & Review
Ken Goulet, Senior Financial Review Specialist
Imad Khalid, Senior Financial Review Specialist
Sarah Downs, Project Coordinator
For radio and TV CSG grantees:

• understand the definition of non-Federal financial support (NFFS)

• know the purpose and importance of reporting NFFS

• learn how to determine NFFS eligibility

• know where to find help

• meet your annual training requirement
Agenda

• Overview of Financial Reporting to CPB
• Overview of NFFS
• NFFS Exclusions
• NFFS Decision Charts
Audio issues?

• Ensure your computer has not gone into “sleep” mode.

• If audio problem continues:
  – Join by phone
    1-301-715-8592
  – Webinar ID: 840 6356 0160
  – Passcode: 01723754
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• Type question in field at bottom of screen.
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Additional questions and follow-up:
• csg@cpb.org
Agenda

• Overview of Financial Reporting to CPB
  – Financial reporting and compliance
  – Important documents
  – Where to find resources

• Overview of NFFS

• NFFS Exclusions

• NFFS Decision Charts
Financial Reporting

Why report?

• Communications Act requirement for CSG recipients

• The non-federal financial support (NFFS) you report is used to calculate your CSG.

• Required before CPB releases your second CSG payment.
What financial reports?

• AFR: Annual Financial Report or
• FSR: Financial Summary Report
• AFS: audited financial statement
  or unaudited financial statement, if allowed
AFR or FSR & AFS?

• All TV grantees are required to file AFR and submit AFS
• Radio grantees:

<table>
<thead>
<tr>
<th>Financial Form</th>
<th>Total Revenue</th>
<th>Financial Statements Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>FSR</td>
<td>&lt; $300,000</td>
<td>Audited or Unaudited</td>
</tr>
<tr>
<td>FSR</td>
<td>≥ $300,000</td>
<td>Audited</td>
</tr>
<tr>
<td>AFR</td>
<td>N/A</td>
<td>Audited</td>
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Where do you report?

- isis.cpb.org
When?

- Due 5 months after the end of your fiscal year
- Two extensions available:
  - 1\textsuperscript{st} extension is for 45 days
  - 2\textsuperscript{nd} extension is for 30 days
- Penalties apply for late filing.
Important Documents

Financial Reporting Guidelines

– Reporting requirements and independent accountant attestation, NFFS definition, line item instructions, updated annually

Principles of Accounting

– Guidance on CPB’s requirement to submit audited financial statements
Discrete Accounting

– Communications Act Requirement
– Included in the terms and conditions of your grant award for all CSG revenues and expenditures.

Discrete Accounting Defined

Grantees must use unique accounting codes for CSG revenues and expenses. Specifically, Grantee’s accounting systems must be able to generate a report showing CSG revenues and how they were expended, using unique accounting codes. These accounts may not include non-CSG revenues and expenses.
CSG Resources

cpb.org

Resource documents

Online webinars

Help Desk

Email: csg@cpb.org
Where to Find Resources
Website cpb.org
Where to Find Resources
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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. Applicants 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 and Bias Prevention Training Program
- CSG Non-Compliance Policy
- Communications Act Compliance
- Compliance Hotline: (202) 879-9655
- Compliance Checklist 2021 350KB PDF
- Compliance Alerts:
  - 2018
  - 2017
  - 2016
  - 2015

Reporting Requirements
- Financial Reporting Guidelines for CSG (AFR and FSR)
- Discrete Accounting Requirements
- Principles of Accounting and Financial Reporting
- In-Kind Donations
- Station Activity Survey (SAS)
- Station Activities Benchmarking Survey (SABS)
- Local Content and Service Report
- NFS Decision Charts PDF 110KB
- Source Criterion - Quick Reference Charts PDF 143KB

Additional Documents and Resources
- CPB’s responses to IG Audits
- FY 2024 Television CSG Calculations
- FY 2024 Radio CSG Calculations
- IAS Standard Method:
  - IAS Standard Method Instructions PDF 160KB
  - IAS Standard Method Excel Spreadsheet PDF 14KB
- Running SABS/SAS Survey Reports:
  - Running SABS Reports
  - Running SAS Reports
Where to Find Resources
Website cpb.org
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Community Service Grants

- Television CSG General Provisions
- Radio CSG General Provisions

Integrated Station Information System

The CSG legal forms as well as reporting tools (APR, PSR, SABS, and SAS) can be found on the Integrated Station Information System.

Training

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

Reporting Requirements

- Financial Reporting Guidelines for CSG (ARH and FSR)
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Questions & Answers

Q & A

Test Your Knowledge

(Please enter your answers using the Poll feature within Zoom)
Which of the following are reasons why financial reporting to CPB is required?

A. It is a Communications Act requirement.
B. The NFFS you report is used to calculate your CSG.
C. It is required for CPB to release your 2nd CSG payment.
D. All of the above
Question 1 - Answer

Which of the following is a reason why financial reporting to CPB is required?

A. It is a Communications Act requirement.
B. The NFFS you report is used to calculate your CSG.
C. It is required for CPB to release your 2nd CSG payment.
D. All of the above
Question 2

Which of the following items are found within the Financial Reporting Guidelines?

A. Audited Financial Statement Reporting Requirements
B. NFFS Definition and Criteria
C. AFR/FSR Line by Line Instructions
D. Recordkeeping Requirements
E. Discrete Accounting Requirements
Which of the following items are found within the Financial Reporting Guidelines?

A. Audited Financial Statement Reporting Requirements
B. NFFS Definition and Criteria
C. AFR/FSR Line by Line Instructions
D. Recordkeeping Requirements
E. Discrete Accounting Requirements
Question 3

Which of the following is correct regarding the AFR/FSR filing due date?

A. The AFR/FSR is due by May 31.
B. Late filing penalties do not apply.
C. 1st extension requires justification & approval by CPB.
D. 2nd extension requires justification & approval by CPB.
Which of the following is correct regarding the AFR/FSR filing due date?

A. The AFR/FSR is due by May 31.
B. Late filing penalties do not apply.
C. 1st extension requires justification & approval by CPB.
D. 2nd extension requires justification & approval by CPB.
Question 4

Which of the following can be found on the CPB website under the resources section for Community Service Grants?

A. Reporting Requirements
B. Compliance
C. Additional Documents and Resources
D. Training
E. All of the above
Question 4 - Answer

Which of the following can be found on the CPB website under the resources section for Community Service Grants?

A. Reporting Requirements
B. Compliance
C. Additional Documents and Resources
D. Training
E. All the above
Which of the following statements are incorrect concerning the Discrete Accounting requirement?

A. It is a Communications Act Requirement for CSG Grantees
B. Grantees must use unique accounting codes for CSG revenues and expenses.
C. Non-CSG revenues and expenses may be included within the CSG accounting codes.
D. None of the above
Question 5 - Answer

Which of the following statements are incorrect concerning the Discrete Accounting requirement?

A. It is a Communications Act Requirement for CSG Grantees
B. Grantees must use unique accounting codes for CSG revenues and expenses.
C. Non-CSG revenues and expenses may be included within the CSG accounting codes.
D. None of the above
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Agenda

• Overview of Financial Reporting to CPB
• Overview of NFFS
  – Definition and purpose of NFFS
  – NFFS Criteria
• NFFS Exclusions
• NFFS Decision Charts
NFFS is the total of direct revenue and the fair value of property and services received as either a **contribution** or a **payment**, which meets specific criteria as to: **recipient**, **form**, **source**, and **purpose**.
Purpose of NFFS

• Determine Grantee’s CSG program eligibility

• Factor in calculating incentive portion of CSG

• Part of the legal justification for CPB’s federal appropriation
NFFS Criteria

• Recipient
• Form
• Source
• Purpose
NFFS: The Recipient Criterion

- Public broadcasting entity, or an organization that receives the revenue on its behalf
- Same for both contributions and payments
NFFS: The Form Criterion

- **Contributions**
  - Grants
  - Gifts or donations of cash, property, or services
  - Bequests
  - Appropriations from licensee (institutional stations)

- **Payments**
  - Cash, property, or services in exchange for materials and services related to public broadcasting services
NFFS: The Source Criterion

• **Contributions** may be from any source *except*:
  – The federal government or
  – Public broadcasting entities.

• **Payments** must be from:
  – State and local government agencies or
  – Educational institutions.
NFFS: The Source Criterion

**Contributions**

- **Ineligible**
  - Federal Government
  - Public Broadcasting Entities

- **Eligible**
  - State & Local Government Agencies
  - Not for profits & Foundations
  - For Profit Entities
  - Individuals
  - Public & Private Colleges & Universities
NFFS: The Source Criterion

Payments

Ineligible
- Federal Government
- Public Broadcasting Entities
- For Profit Entities
- Individuals
- Not for profits & foundations that are not educational inst

Eligible
- State & Local Government Agencies
- Educational Institutions
• **Paycheck Protections Program (PPP)** funds from Federal Government are excluded from NFFS

  – AFR filers report:
    • Funds recognized as revenue in Schedule A, Line 1F
    • Funds expended as “all non-CPB funds” in Schedule E

  – FSR Filers report:
    • Funds recognized as revenue in Part 1, Line 1
    • Funds expended as “all non-CPB funds” in Part 2 Expenses
Stabilization Grants for public media distributed by CPB from CARES Act and American Rescue Plan Act funding are excluded from NFFS

AFR filers report:

- Funds recognized as revenue in Schedule A, Line 2B
- Funds expended as “other CPB funds” in Schedule E

FSR filers report:

- Funds recognized as revenue in Part 1, Line 2
- Funds expended as “other CPB funds” in Part 2 Expenses
NFFS: Next Generation Warning System

- **Website:** [CPB.org/grants](http://CPB.org/grants)

- **Next Generation Warning System (NGWS) Grants** awarded by CPB are from FEMA funding and are excluded from NFFS

  - AFR filers report:
    - Funds recognized as revenue in Schedule A, Line 2B
    - Funds expended as “other CPB funds” in Schedule E

  - FSR filers report:
    - Funds recognized as revenue in Part 1, Line 2
    - Funds expended as “other CPB funds” in Part 2 Expenses
Contributions must be for:
- Construction or operation of a non-commercial, educational broadcast station, or
- Production, acquisition, distribution, or dissemination of educational television or radio programs and related activities.

Payments must be in exchange for:
- Cash, goods and/or services the CSG recipient received, in exchange for services or materials with respect to the provision, of educational or instructional television or radio programs.
### NFFS Criteria Summary

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<tr>
<td><strong>Form</strong></td>
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Q & A

Test Your Knowledge

(Please enter your answers using the Poll feature within Zoom)
Question 6

Which of the following statements are true?

A. All revenues in a station’s AFS qualify as NFFS.
B. The four NFFS criteria are Recipient, Form, Source and Purpose.
C. Revenue needs to meet only one NFFS criteria to be eligible as NFFS.
D. Contributions from individuals are NFFS eligible.
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D. Contributions from individuals are NFFS eligible.
A TV station received grants from CPB, Sesame Workshop, a for-profit entity and a university (licensee of another public broadcasting station) for production of an educational TV series for which underwriting credit was provided. The station also received a grant from the State for upgrades on the station’s facility/equipment. Which statements are correct?

A. All grants for the purpose of production and distribution of educational television are NFFS eligible.
B. Grants from CPB and Sesame Workshop are NFFS ineligible.
C. Grants from state gov’t agency, for-profit entity and university are NFFS eligible.
D. Both B and C
A TV station received grants from CPB, Sesame Workshop, a for-profit entity and a university (licensee of another public broadcasting station) for production of an educational TV series for which underwriting credit was provided. The station also received a grant from the State for upgrades on the station’s facility/equipment. Which statements are correct?

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D. Both B and C
A Radio station received payments from a local government and local business for studio space rental and audio production for private use. Which statements are correct?

A. Payment from the local government is NFFS eligible and private business is NFFS ineligible.
B. Payments from both sources are NFFS ineligible.
C. Payments from both sources are NFFS eligible.
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C. Payments from both sources are NFFS eligible.
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Additional questions and follow-up:

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Agenda

- Overview of Financial Reporting to CPB
- Overview of NFFS
- NFFS Exclusions
  - Direct Revenues Exclusions
  - In-Kind Contributions Exclusions
  - Source Criterion Exception
- NFFS Decision Charts
NFFS Exclusions: Direct Revenues

- Federal funds (e.g. CARES ACT, ARPA, PPP and NGWS funds)
- Funds from CPB (e.g. Stabilization funds) and other PBEs
- Quid Pro Quo contributions — high-end premiums
- Funds derived from subsidiary enterprises unrelated to public broadcasting
- Spectrum auction/FCC repack related revenues
- Presenting station fees
NFFS Exclusions: Direct Revenues

- Capital Funds (TV CSG grantees only)
- Gains from sale of property & equipment
- Realized & unrealized investment gains & losses
- Rental revenues
- Advertising
- Refunds and rebates
- Unrelated Business Income (UBI)
NFFS Eligibility: In-Kind Contributions

- To be eligible as NFFS, in-kind contributions must:
  - be reported as revenues in your financial statements
  - meet the 4 NFFS criteria
  - meet CPB’s valuation & documentation criteria
  - not be excluded by policy
• Certain *in-kind* contributions are NFFS-ineligible:
  
  – Third party production payments
  – Contributions in quid pro quo transactions
  – Non-professional donated services
  – Miscellaneous Electronic Items—prerecorded compact discs, records, tapes, cassettes, and film libraries
  – Fundraising related in-kind contributions
NFFS Exclusions: In-kind Contributions

- Certain in-kind contributions are NFFS-ineligible:
  - Promotional items
  - Local productions
  - Nationally distributed programs
  - Program supplements
  - ITV or educational radio outside the allowable scope of approved activities
  - TV CSG grantees only — in-kind contributions of capital assets
Valuation Criteria: In-Kind Contributions

- Generally Accepted Accounting Principles (GAAP) require recording all contributed support at FMV.
  - Donor determines value.
  - Do not base FMV on underwriting credits traded.
Documentation Criteria: In-Kind Contributions

- **Donor certification letter/invoice/appraisals or CPB’s template can be used.**
  - Descriptions & date(s) of in-kind donations
  - FMV of donation & method of valuation (e.g. lawyer’s hourly rate x hours worked) (per GAAP)
  - Intent to donate/trade the goods or services
  - Signature of the donor

- **Trade underwriting agreements are not acceptable.**
In-Kind Donations
Certification of Goods and Services Delivered

The donor identified below has provided the following goods and/or services as an in-kind donation to ______ (insert station name), on the date and as specified below.

Donor
Address:
City: State: Zip:
Telephone/Email:

1. Date of the donation:
   (If the donation is made in several installments, the donor may either provide a single certification after providing the last installment, or an individual certification with each installment.)

2. Please itemize the goods and/or services donated below:

3. Please identify the market value of the donation at the time of the donation:

4. Please identify the method used to calculate the market value of the donation.
   (Attach any documentation necessary to confirm the value of the donation. For example, if donating legal/professional services, identify the standard hourly rate, and number of hours worked.)

The donor represents and warrants that the above donation was delivered as described.

Donor Name:
Title:
Signature:
Date:
• In-kind contributions from your licensee are ineligible as NFFS.

• However, an institutional station can include as NFFS the following:
  – Direct revenues
    • Appropriations from your licensee
    • Expenses incurred or absorbed by your licensee specifically for your station
  – Indirect administrative support (IAS)
Questions & Answers

Q & A

Test Your Knowledge

(Please enter your answers using the Poll feature within Zoom)
Question 9

A TV station received the following direct revenues. Which revenue items are eligible as NFFS?

A. Underwriting from a department of University (Licensee of the station).
B. Funds from subsidiary enterprise unrelated to public broadcasting.
C. Interest and dividends on spectrum auction funds invested.
D. Funds received through capital campaign for facilities and equipment.
E. None of the above.
A TV station received the following direct revenues. Which revenue items are eligible as NFFS?

A. Underwriting from a department of University (Licensee of the station).
B. Funds from subsidiary enterprise unrelated to public broadcasting.
C. Interest and dividends on spectrum auction funds invested.
D. Funds received through capital campaign for facilities and equipment.
E. None of the above
Which of the following in-kind contributions received by Radio station are eligible as NFFS?

A. Food and drinks from local restaurant for volunteers supporting fund drive
B. Accounting and audit services
C. Local advertising in exchange for production services
D. FMV of tickets received with local advertising from local sports team
E. Professional services for facility improvements
Which of the following in-kind contributions received by Radio station are eligible as NFFS?

A. Food and drinks from local restaurant for volunteers supporting fund drive
B. Accounting and audit services
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• NFFS Decision Charts
  – copies provided in folder
NFFS Revenue Decision

Revenue
Recipient: PBE or an organization that receives the revenue on its behalf

Contributions
Unconditional transfer of cash or other assets in a voluntary nonreciprocal transfer?

Payments?
Reciprocal transfer or exchange transaction of cash or other assets of approximately equal value?

Contributions
Form: Gifts, grants, bequests, donations, appropriations

Payments
Form: Appropriation or contract payment in exchange for specific materials or services related to public broadcasting

Other Income

NFFS?
Contributions Decision Chart

In-kind Contributions Excluded from NFFS
- Quid pro quo exchange transactions
- Non-professional volunteer services
- Pre-recorded compact discs, records, tapes and cassettes
- Fundraising related activities
- ITV or educational radio outside the allowable scope of approved activities
- Local Productions
- Program supplements
- Programs that are nationally distributed
- Promotional items
- Regional Organization allocations of program services
- TV Grantees - Direct and in-kind contributions of capital assets

Direct Revenues
- FMV of high-end premiums
Payments Excluded from NFFS
-Sales of premiums
-Sales of program guides
-Unrelated business income as reported on federal form 990T
-Revenue from ITV or educational radio outside the allowable scope of approved activities
-Spectrum auction revenues including interest & dividends earned and/or received
-Presenting Station fees
Other Income Criteria

- Passive Income
  - Royalties, Interest & Dividends, Pass-through copyright royalties (PBS or NPR, NOT Datacast)?
    - NFFS
    - Not NFFS

- Sale of Property & Equipment
  - Gains from sale or exchange of property/equipment used in operations?
    - Not NFFS

- Gains & Losses on Investments
  - Realized, unrealized, & actuarial gains/losses?
    - Not NFFS

- Other
  - Refunds, rebates, reimbursements, insurance proceeds? Income from for-profit subsidiary engaged in non-broadcast activities?
    - Not NFFS
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Question 11

Which of the following statements are incorrect?

A. In-kind local/national advertising is always eligible as NFFS.
B. Insurance reimbursement is NFFS eligible if it was for replacement of damaged equipment.
C. Revenue from sale of various station logo products are NFFS eligible.
D. All in-kind is NFFS eligible if proper documentation is obtained.
E. All of the above
Which of the following statements are incorrect?

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E. All of the above
A TV station received the following revenue:

- CPB Next Generation Warning System grant of $25,000
- In-kind contribution from station’s institutional licensee of $35,000
- Appropriation from Licensee:
  - Pass-through of Federal funds of $50,000
  - Expenses incurred on station’s behalf of $40,000
- Gifts for facilities and equipment of $150,000
- Local advertising in-kind contribution of $25,000 from local sports team which includes tickets with FMV of $2,000.

What is the correct total NFFS?

A. $98,000
B. $63,000
C. $215,000
D. $250,000
Question 12 - Answer

Answer (B) – Total NFFS is $63,000.

NFFS Eligible:
- Appropriation from licensee for expenses incurred on station’s behalf of $40,000
- Local advertising in-kind of $23,000

NFFS Ineligible:
- CPB Next Generation Warning System grant of $25,000
- In-kind contribution from station’s institutional licensee of $35,000
- Appropriation of Pass-through of Federal funds of $50,000
- Gift for facilities and equipment of $150,000
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- Source Criterion - Quick Reference Charts PDF 143KB

Additional Documents and Resources
- CPB’s responses to IG Audits
- FY 2024 Television CSG Calculations
- FY 2024 Radio CSG Calculations
- IAS Standard Method:
  - IAS Standard Method Instructions PDF 160KB
  - IAS Standard Method Excel Spreadsheet PDF 14KB
- Running SABS/SAS Survey Reports:
  - Running SABS Reports
  - Running SAS Reports
Corporation for Public Broadcasting

What is NFFS?

Live Webinar Training
January 30, 2024