



# Community Service Grant Requirements and Resources

September 9, 2020

Kate Arno

VP, CSG and Station Initiatives

Tim Bawcombe

Director, TV CSG Policy & Review

Andrew Charnik

Director, Radio CSG Policy & Administration

# Today's Objectives

- Understand General Provisions and Eligibility Criteria
- Learn how to access training and other resources
- Understand grantee accountability
- Improve reporting and compliance

# General Provisions & Eligibility Criteria

- Provide the terms and conditions of CSG awards

# CSG General Provisions

cpb.org

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 I want to... ▾



**Public Media Responds**  
**COVID-19**  
**Your Trusted Source**

Public Media Responds to Coronavirus Pandemic with Programming that Educates, Informs and Engages.

Jobline Stations Programs & Projects

## About CPB

 Corporation for Public Broadcasting

About CPB  
Steward of the U.S. government's investment in public media

 Subscribe to CPB  
Stay up-to-date on grants announcements, press releases and more

 Corporate Officers and Senior Staff  
Learn about the people on CPB's leadership team

## Resources

 Jobline  
Jobs in public broadcasting

 Community Service Grants  
CSG General Provisions, station guidelines and resources

 Open Grants and RFPs  
Prepare and submit an application, learn about terms and conditions

## Initiatives

# CSG General Provisions

## cpb.org/stations

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 ▾ I want to... ▾

Home / Grants / Community Service Grants

## 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 Card 2019 803KB PDF](#)
- **Compliance Alerts:**
  - [2018](#)
  - [2017](#)

## 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

# Communications Act

Grantees may not receive funding unless they comply with applicable provisions of the Communications Act.

## Non-compliance policy



Corporation  
for Public  
Broadcasting

### CSG Non-compliance Policy

January 2016

The Corporation for Public Broadcasting (CPB) has established this CSG Non-compliance Policy to encourage stations receiving a Community Service Grant (CSG) to comply with applicable provisions of the Communications Act of 1934, 47 U.S.C. §396, 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 non-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. § 396(k)(4));
- B. Open Financial Records (47 U.S.C. § 396(k)(5));
- C. Community Advisory Board (47 U.S.C. § 396(k)(8));
- D. Employment Statistical Report (47 U.S.C. § 396(k)(11)); and
- E. Donor Information (47 U.S.C. § 396(k)(12)).

- II. Compliance with the General Provisions

Failure to comply with requirements of the General Provisions which results in overpayment of 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

1. Open meetings
2. Closed meetings
3. Open financial records
4. Community advisory board
5. Employment statistical report
6. Donor information

# Communications Act

## cpb.org/stations

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 ▾ I want to... ▾

Home / Grants / Community Service Grants

## 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: \(202\) 878-9655](#)
- [Compliance Card 2019 803KB PDF](#)
- **Compliance Alerts:**
  - 2018
  - 2017

## 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](#).

# Communications Act

cpb.org/stations/certification

Home / Grants / Community Service Grants / Communications Act Compliance

Open Meetings

Closed Meetings

Open Financial Records

Community Advisory Board

CPB Employment Statistical Report

Donor Information

## Communications Act Compliance

This document explains important provisions of the Communications Act of 1934, 47 U.S.C. §396, et seq. (Communications Act or Act) that apply to public broadcasting stations receiving a Community Service Grant (CSG) from the Corporation for Public Broadcasting (CPB). It also references related requirements established by CPB's General Provisions and Eligibility Criteria (the General Provisions). It does not supersede other provisions of the Act, specific terms of CPB grants, or other laws and regulations applicable to grantees. CSG recipients should consult their legal counsel for guidance in complying with specific provisions of the Act and other legal requirements.

In their annual CSG Agreement and Certification of Eligibility, Grantees must certify that they comply with the Communications Act, the General Provisions, CPB's Financial Reporting Guidelines and the Application of Principles of Accounting and Financial Reporting Applicable to Public Telecommunications Entities. This annual certification must be signed by two individuals: the head of the grantee and the licensee official. The head of the grantee is the highest ranking representative of the station's management responsible for station operations, such as its president and chief executive officer. Licensee official means the chair of the stations licensee's governing board, or a designated senior level representative of the licensee who is not a member of the station's management and who has the authority to enter into binding contracts and agreements on behalf of the licensee.

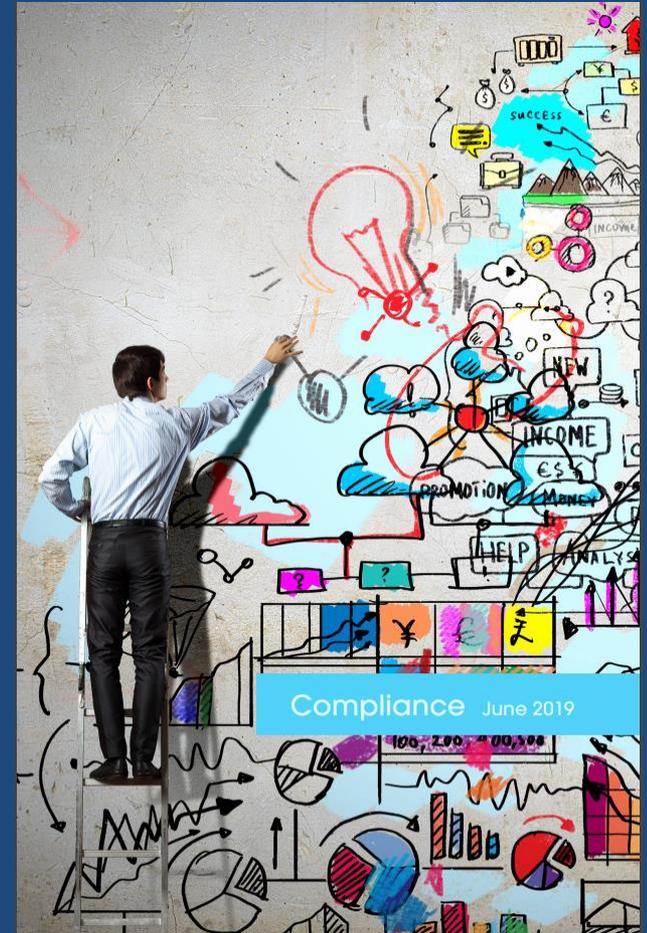
To ensure compliance, the Act enables CPB and its representatives, including the Inspector General, to audit grantees, including the right of access to their "books, documents, papers and records" (§396(l) (3) (D)). Stations may therefore find it helpful to develop procedures for documenting their compliance with each requirement. Such procedures would support consistency in a station's compliance, the accuracy of its annual certification to CPB, and evidence that may be useful to demonstrate compliance in the event of a station audit.

### Download the Requirements

Compliance 2019 1.9MB PDF

#### General Provisions

- Television
- Radio



Compliance June 2019

# 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**

# Discrete Accounting

- The use of unique accounting codes by CSG recipients to identify CSG funds – both revenues and expenses, restricted and unrestricted
- Not required to segregate CSG funds in separate bank accounts
- Cannot use the CSG accounting codes for non-CSG funds

# Reporting Requirements

[cpb.org/stations/frg/](http://cpb.org/stations/frg/)



The screenshot shows the top navigation bar of the CPB website with links for About CPB, About Public Media, Programs and Initiatives, Grants, Press Room, and COVID-19. Below the navigation is a breadcrumb trail: Home / Grants / Community Service Grants / Financial Reporting Guidelines. The main heading is "Financial Reporting Guidelines". The text below the heading states: "The Financial Reporting Guidelines have been updated. *Section XIV Amortizing Capital Assets and Gifts* has been renamed *Section XIV Allocating Capital Assets and Gifts* and features a policy change." It then explains that grantees awarded a Community Service Grant (CSG) by CPB must complete either an Annual Financial Report (AFR) or an annual Financial Summary Report (FSR), as detailed in the applicable year General Provisions and Eligibility Criteria. The Financial Reporting Guidelines (Guidelines) for fiscal year 2019 explain how to complete these reports. A bulleted list at the bottom provides links for 2019, 2018, and 2017 Financial Reporting Guidelines.

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 ▾

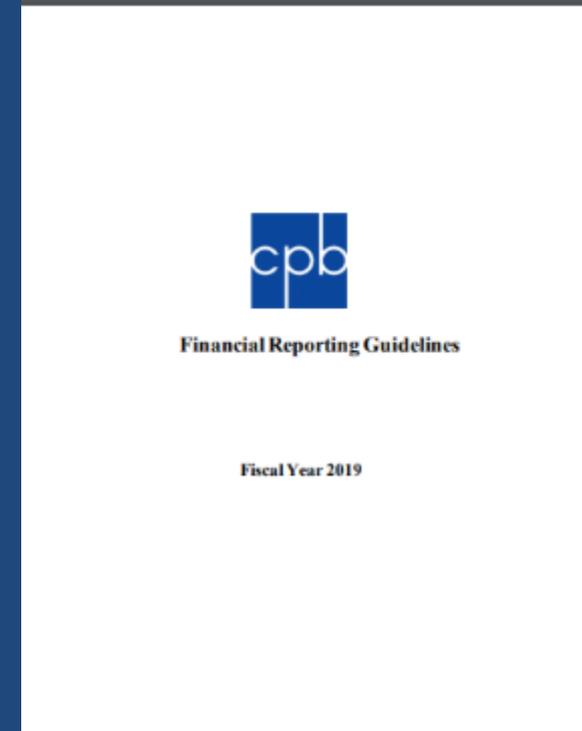
Home / Grants / Community Service Grants / Financial Reporting Guidelines

## Financial Reporting Guidelines

The Financial Reporting Guidelines have been updated. *Section XIV Amortizing Capital Assets and Gifts* has been renamed *Section XIV Allocating Capital Assets and Gifts* and features a policy change.

Grantees awarded a Community Service Grant (CSG) by CPB must complete either an Annual Financial Report (AFR) or an annual Financial Summary Report (FSR), as detailed in the applicable year General Provisions and Eligibility Criteria. The Financial Reporting Guidelines (Guidelines) for [fiscal year 2019](#) explain how to complete these reports.

- [2019 Financial Reporting Guidelines](#)
- [2018 Financial Reporting Guidelines](#)
- [2017 Financial Reporting Guidelines](#)



# 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
- Policy changes
- 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

# CSG Policy Changes

- Radio level reorganization
- Minimum NFFS
- Base and incentive grants

# Radio Organized by Coverage Area Population (CAP)

Level	A	B	C	D
Description	Sole Service	Smaller	Larger Rural	Larger

Category	CAP 1	CAP 2	CAP 3	CAP 4	CAP 5	CAP 6
CAP	0-20K	20-100K	100K-300K	300K-1M	1M-3M	3M+

# Operational Requirements

## Staffing Requirement:

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

**Radio:** Revised in 2021

Varies by category

- 1-3: 2 FT employees
- 4: 3 (min. 2 FT) employees
- 5-6: 4 (min. 2FT) employees

# Non-Federal Financial Support (NFFS)

Revenue raised from sources other than the federal government and public broadcasting entities

- Memberships
- State appropriations
- Foundation grants
- Underwriting
- Other

# Operational Requirements

## Minimum NFFS

**TV:** \$800,000

- Current NFFS or 3-year average
- Additional considerations

## Radio:

Categories	CAP 1 0-20K	CAP 2 20-100K	CAP 3 100K-300K	CAP 4 300K-1M	CAP 5 1M-3M	CAP 6 3M+
<b>NFFS Minimum</b>	<b>\$250,000</b>	<b>\$275,000</b>	<b>\$300,000</b>	<b>\$300,000</b>	<b>\$400,000</b>	<b>\$500,000</b>
NFFS Minimum (Minority or Rural)	\$250,000	\$250,000	\$275,000	\$275,000	\$300,000	\$400,000
NFFS Minimum (Minority + Rural)	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000

Sole Service grantees have no minimum NFFS requirement

# 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

# Transparency

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

# Donor Privacy

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.

# Compliance Training

## Annual

Grantees must complete at least one CSG compliance training provided by CPB

- In-person
- Live webinars

# Use of CSG Funds

CSG Funds	Radio	TV
<b>Unrestricted Funds</b> 7 Spending Categories	✓	✓
<b>Restricted Funds</b> For National Programming	✓	N/A

# 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

Questions?

# TV & Radio CSG Formulas

# CSG Grant Elements

**Base grant**

- Fixed amount

**Supplemental  
grant**

- Eligible grantees

**Incentive grant**

- Based on NFFS

# CSG Grant Elements

## FY 2021 TV CSG

### Base Grant

0.12% of total CPB appropriation

**\$534,000**

### Supplemental Grants

- Rural
- Distance service

### Incentive Grant

Based on a grantee's tiered NFFS

## FY 2021 Radio CSG

### Base Grant determined by category

1	0 – 20K	\$90,000
2	20K – 100k	\$85,000
3	100K – 300K	\$75,000
4	300K – 1M	\$60,000
5	1M – 3M	\$50,000
6	3M +	\$35,000

### Supplemental Grant

Rural Support Grant = \$23,643 in 2020  
Designations

Rural

Minority

(+ multipliers on NFFS, base grants, and RSG)

### Incentive Grant

Based on a grantee's tiered NFFS

# TV: Tiered NFFS for Incentive Grant

Tier	Apply CPB Match to:
1	100% of NFFS up to \$3 million
2	92.5% of NFFS over \$3M but less than \$20M
3	95% of NFFS \$20M and over

# Radio: Tiered NFFS for Incentive Grant

Tier	Apply CPB Match to:
1	90% of NFFS up to \$300 thousand
2	100% of NFFS from \$300K to less than \$15M
3	100% (2021); 90% (2022); 80% (2023) of NFFS \$15M and over

# Simplify the Calculation of IAS

- Allow one method
  - Derive a rate by dividing the licensee's indirect costs by its direct costs;
  - Apply the rate to a base amount consisting of the station's net direct expenses.

## *Estimating* FY 2021 TV CSGs

Base

- 0.12% of appropriation
- \$534,000
- MPM grantees share one

Incentive

- 12 cents\*
- Use 2019 tiered NFFS

USSG, IC  
& DSG

- Similar to 2020 CSG
- Transmitter changes affect DSG

# Estimating FY 2021 Radio CSGs

Base

- Varies by category
- If MASS =1.5 x

Incentive

- All categories
- 0.05 IRR\*
- Use tiered 2019 NFFS

RSG

- For Rural Audience Service Stations
- If MASS =1.5 x

Category	CAP Range	Base Grant
1	0 – 20K	\$90,000
2	20K – 100k	\$85,000
3	100K – 300K	\$75,000
4	300K – 1M	\$60,000
5	1M – 3M	\$50,000
6	3M +	\$35,000

Questions?

# CSG Resources

## CPB Office of Grants Administration

Kate Arno, VP, CSG and Station Initiatives

Tim Bawcombe, 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

## Help Desk

Email: [csg@cpb.org](mailto:csg@cpb.org)

Phone: (866) 635-4747

## cpb.org

CSG information page: [cpb.org/stations/](https://cpb.org/stations/)

Online webinars: [cpb.org/station-resource/csg-and-isis-training-opportunities](https://cpb.org/station-resource/csg-and-isis-training-opportunities)



# CSG General Provisions

cpb.org/stations

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room I want to... ▾

Home / Grants / Community Service Grants

## 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 Card 2019 803KB 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 Training

[cpb.org/station-resource/csg-and-isis-training-opportunities](https://cpb.org/station-resource/csg-and-isis-training-opportunities)

[About CPB](#) ▾ [About Public Media](#) ▾ [Programs and Initiatives](#) ▾ [Grants](#) ▾ [Press Room](#) [COVID-19](#) ▾ [I want to...](#) ▾

[Home](#) / [Grants](#) / [Community Service Grants](#) / [Communications Act Certification Requirements for Community Service Grant Recipients](#)  
/ [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](mailto:SABS@cpb.org) and [SAS@cpb.org](mailto:SAS@cpb.org), respectively.

## PDF Webinar Presentations

-  [Slide Deck: Indirect Administrative Support Method](#)
-  [Slide Deck: CPB ISIS 101: Learning How to Use the Integrated Station Information System](#)
-  [Slide Deck: How to Compute Indirect Administrative Support to Report as NFFS: November 15, 2017](#)
-  [Slide Deck: Completing the FSR: October 23, 2019](#)
-  [Slide Deck: CSG Requirements and Resources Webinar, September 13, 2018](#)
-  [Slide Deck: Intro to Financial Reporting: October 2019](#)
-  [Slide Deck: What is NFFS?: October 16, 2019](#)

## Pre-Recorded Web-Based Training

- [Pre-Recorded 2019 CPB ISIS 101: Learning How to Use the Integrated Station Information System](#)
- [Pre-Recorded Indirect Administrative Support: New Method, February 27, 2020](#)
- [Pre-Recorded Indirect Administrative Support: New Method, February 20, 2020](#)

## Next Live Online Webinars

- [CSG Requirements and Resources: Wednesday, September 9th 2:00pm-3:30pm ET](#)
- [Introduction to Financial Reporting: Wednesday, September 16th 2:00pm-3:30 ET](#)
- [Completing the FSR: Wednesday, September 23rd 2:00pm- 3:30pm ET](#)



# Community Service Grant Requirements and Resources

Kate Arno

VP, CSG and Station Initiatives

Tim Bawcombe

Director, TV CSG Policy & Review

Andrew Charnik

Director, Radio CSG Policy & Administration